

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

<p>GMO FREE USA d/b/a TOXIN FREE USA, P.O. Box 458, Unionville, CT 06085,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ALDI INC., 1200 N. Kirk Rd., Batavia, IL 60510,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. <u>2021 CA 001694 B</u></p> <p>COMPLAINT</p> <p><u>DEMAND FOR JURY TRIAL</u></p>
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Plaintiff GMO Free USA d/b/a Toxin Free USA (“Toxin Free USA”) brings this action against Defendant ALDI INC. (“ALDI”) regarding the false and deceptive marketing and sale of its fresh Atlantic salmon products labeled with the phrase “Simple. Sustainable. Seafood.” The products are not sustainable but instead are made from salmon industrially farmed using unsustainable practices that are environmentally destructive and inhumane. Toxin Free USA alleges the following based upon personal knowledge, information, and belief. This Complaint is on behalf of the general public of the District of Columbia, in the interest of consumers.

INTRODUCTION

1. This is a consumer-protection case concerning deceptive marketing representations about ALDI’s salmon products. The case is brought by Toxin Free USA, a nonprofit, public-interest organization dedicated to consumer protection and education. Toxin Free USA seeks no monetary damages, only an end to the deceptive marketing and advertising at issue. Toxin Free USA acts on behalf of the general public of the District of Columbia.

2. With over 2,000 stores across the country, ALDI is one of the largest food retailers in the United States.¹

3. As part of its seafood offerings, ALDI sells products, including Atlantic Salmon products,² that are labeled with the claim “Simple. Sustainable. Seafood.” (“Sustainable Representations”³) despite not being produced sustainably (the “Products”⁴). Examples of these representations are seen in the images below:



¹ ALDI, *ALDI History*, <https://corporate.aldi.us/en/aldi-history/> (last visited Feb. 18, 2021); Food Industry, *Who are the top 10 grocers in the United States?* (Nov. 2020), <https://www.foodindustry.com/articles/a-list-of-the-top-ten-grocery-chains-in-the-united-states/>.

² ALDI, *Fresh Atlantic Salmon*, <https://www.aldi.us/en/products/fresh-meat-seafood/fresh-seafood/detail/ps/p/fresh-atlantic-salmon/> (last visited Feb. 18, 2021); ALDI, *Fresh Atlantic Salmon Side*, <https://www.aldi.us/en/products/fresh-meat-seafood/fresh-seafood/detail/ps/p/fresh-atlantic-salmon-side/> (last visited Feb. 18, 2021).

³ Discovery may reveal that additional ALDI representations should be included within the scope of the allegations in this Complaint, and Toxin Free USA reserves the right to add such representations.

⁴ The Products include, but are not limited to, ALDI’s Atlantic Salmon products. The Products also include any additional ALDI products that fall within this definition, as revealed through discovery.

4. ALDI's Sustainable Representations lead D.C. consumers to believe that the Products are "Simple. Sustainable. Seafood." Consumer research demonstrates that ALDI's Sustainable Representations suggest to consumers that the Products are made from salmon sustainably sourced in accordance with high environmental and animal welfare standards.

5. In reality, the Products are made from salmon industrially farmed using unsustainable practices that are environmentally destructive and inhumane.

6. Thus, ALDI's marketing—which suggests that the Products are sustainable—is false and misleading to D.C. consumers.

STATUTORY FRAMEWORK

7. This action is brought under the District of Columbia Consumer Protection Procedures Act ("CPPA"), D.C. Code § 28-3901, *et seq.*

8. The CPPA makes it a violation for "any person" to, *inter alia*:

Represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have;

Represent that goods or services are of a particular standard, quality, grade, style, or model, if in fact they are of another;

Misrepresent as to a material fact which has a tendency to mislead;

Fail to state a material fact if such failure tends to mislead;

Use innuendo or ambiguity as to a material fact, which has a tendency to mislead;

Advertise or offer goods or services without the intent to sell them or without the intent to sell them as advertised or offered; or

Use deceptive representations or designations of geographic origin in connection with goods or services.

D.C. Code § 28-3904(a), (d), (e), (f), (f-1), (h), (t).

9. A violation of the CPPA may occur regardless of “whether or not any consumer is in fact misled, deceived or damaged thereby.” *Id.* § 28-3904.

10. The CPPA “establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia.” *Id.* § 28-3901(c). The statute “shall be construed and applied liberally to promote its purpose.” *Id.*

11. Because Toxin Free USA is a public-interest organization, it may act on behalf of the general public and bring any action that an individual consumer would be entitled to bring:

[A] public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice.

Id. § 28-3905(k)(1)(D)(i). Subparagraph (A) provides: “A consumer may bring an action seeking relief from the use of a trade practice in violation of a law of the District.”

12. A public-interest organization may act on behalf of consumers, *i.e.*, the general public of the District of Columbia, so long as the organization has a “sufficient nexus to the interests involved of the consumer or class to adequately represent those interests.” *Id.* § 28-3905(k)(1)(D)(ii). As set forth in this Complaint, *see infra* ¶¶ 55-59, Plaintiff Toxin Free USA’s mission is to advocate for and educate consumers on healthy food and ecological systems, which it has long done within the District of Columbia, and Toxin Free USA has previously represented D.C. consumers in similar actions under the CPPA. Toxin Free USA thus has a sufficient nexus to D.C. consumers to adequately represent their interests.

13. This is not a class action, or an action brought on behalf of a specific consumer, but an action brought by Toxin Free USA on behalf of the general public, *i.e.*, D.C. consumers generally. No class certification will be requested.

14. This action does not seek damages. Instead, Toxin Free USA seeks to end the unlawful conduct directed at D.C. consumers. Remedies available under the CPPA include “[a]n injunction against the use of the unlawful trade practice” and “[a]ny other relief which the court determines proper.” *Id.* § 28-3905(k)(2)(D), (F).

FACT ALLEGATIONS

15. ALDI markets the Products throughout the District of Columbia via both its in-store and online marketing.

16. ALDI operates a retail store within the District of Columbia and over a dozen other stores within a short driving radius.⁵ ALDI also allows consumers to view and purchase the Products online through its company website.⁶

17. Through the Products’ packaging, labeling, and online descriptions, ALDI markets the Products with Sustainable Representations (e.g., “Simple. Sustainable. Seafood.”).

18. As described below, consumer research shows that ALDI’s Sustainable Representations lead consumers to believe that its Products are sustainably sourced in accordance with high environmental and animal welfare standards. This representation is false and misleading.

⁵ ALDI, *Store Locator*, <https://www.aldi.us/stores/en-us/Search?SingleSlotGeo=Washington%20D.C.%2C%20DC%2C%20USA&Mode=None> (last visited Feb. 18, 2021).

⁶ ALDI, *Grocery Delivery*, <https://www.aldi.us/en/pickup-delivery/grocery-delivery/> (last visited Feb. 18, 2021).

I. ALDI’s Sustainable Representations Suggest to Consumers That the Products Are Made From Salmon Sustainably Sourced in Accordance with High Environmental and Animal Welfare Standards.

19. The retail packaging of the Products features the claim that the Products are “Simple. Sustainable. Seafood.”

20. ALDI makes identical representations through its website, claiming again that the Products are “Simple. Sustainable. Seafood.” on the Products’ webpages.⁷

21. ALDI also makes more general Sustainable Representations regarding its seafood offerings, including the Products, through its company website.

22. For example, ALDI claims to be “committed to the principles of responsibility and sustainability in the sourcing of our ALDI exclusive-brand seafood” and claims that it sources “from responsibly managed fisheries and farms that have minimal impacts on the wider marine environment”⁸

23. Federal guidance and consumer research show that ALDI’s Sustainable Representations suggest to consumers that the Products are made from salmon sustainably sourced in accordance with high environmental and animal welfare standards.

24. The Federal Trade Commission (“FTC”) has determined that unqualified general environmental benefit claims such as “sustainable”⁹ “likely convey that the product . . . has specific and far-reaching environmental benefits and may convey that the item . . . has no negative environmental impact.”¹⁰ For that reason, the FTC has admonished companies not to use

⁷ See *supra*, note 2.

⁸ ALDI, *Corporate Responsibility: Seafood*, <https://corporate.aldi.us/en/corporate-responsibility/supply-chain/seafood/> (last visited Feb. 18, 2021).

⁹ *FTC Sends Warning Letters to Companies Regarding Diamond Ad Disclosures*, Federal Trade Commission (Apr. 2, 2019), <https://www.ftc.gov/news-events/press-releases/2019/03/ftc-sends-warning-letters-companies-regarding-diamond-ad>.

¹⁰ FTC Green Guides, 16 C.F.R. § 260.4(b) (2014).

unqualified claims such as “sustainable” due to its determination that “it is highly unlikely that marketers can substantiate all reasonable interpretations of these claims.”¹¹

25. Research demonstrates that claims related to sustainability are perceived by many consumers to mean “produced according to higher animal welfare standards.”¹²

26. Consumers have ranked the “minimal use of hormones and drugs,” “no pollution to the environment,” and “respect of fish welfare” as three of the four most important elements of sustainable aquaculture.¹³

27. A study on consumer perception of the phrase “ecologically sustainable” found that a majority of consumers “expect eco-labelled seafood to be harvested in a way that reduced impact on the fish population or the marine environment.”¹⁴ And, out of 235 responses, only four percent “expressed skepticism about the term [‘ecologically sustainable’]” and felt that “it was primarily a marketing term without real meaning.”¹⁵

II. Contrary to ALDI’s Sustainable Representations, The Products Are Sourced from Salmon Industrially Farmed Using Unsustainable Practices That Are Environmentally Destructive and Inhumane.

28. ALDI’s Sustainable Representations suggest to consumers that the Products are sustainably sourced in accordance with high environmental and animal welfare standards, but in reality, the Products are sourced from salmon industrially farmed using unsustainable practices that are environmentally destructive and inhumane.

¹¹ *Id.*

¹² Katrin Zander et al., *Consumers’ Willingness to Pay for Sustainable Seafood Made in Europe*, 30 J. Int’l Food & Agribusiness Mktg. 251 (Dec. 22, 2017).

¹³ *Id.*

¹⁴ Loren McClenachan et al., *Fair Trade Fish: Consumer Support for Broader Seafood Sustainability*, 17 Fish & Fisheries 825 (Sept. 2016).

¹⁵ *Id.*

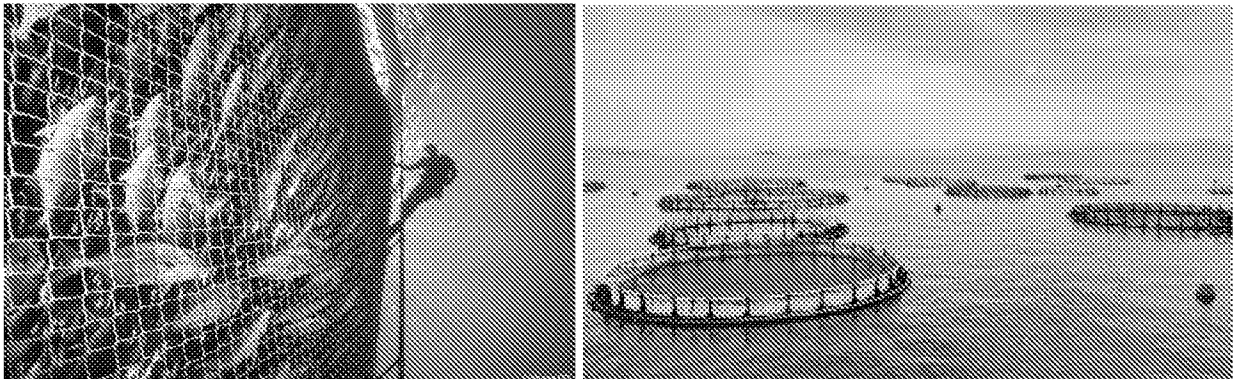
29. The Products are made from Atlantic Salmon sourced, at least in part, from Chile. Atlantic Salmon are not native to Chile—instead, these salmon are raised in, and sourced from, large industrial fish farms known for their unsustainable production methods.¹⁶

30. The Monterey Bay Aquarium Seafood Watch (“Seafood Watch”) specifically warns consumers to avoid Atlantic Salmon farmed in Chile due to sustainability concerns.¹⁷

31. These concerns arise in part because of the manner in which the salmon used for the Products are raised and sourced.

A. Environmental Harm

32. Salmon farms in Chile use an ecologically dangerous method of salmon production known as net pen aquaculture, where thousands of fish are crowded into cages or “pens” in natural waterways. Examples of this type of farming are seen in the images below.



33. Net pen aquaculture is considered to be a “high risk” form of fish farming because, among other problems, this method “allow[s] free exchange of waste, chemicals, parasites and

¹⁶ Peter Bridson, *Atlantic Salmon, Coho Salmon, Chile: Net pens*, Monterey Bay Aquarium Seafood Watch (Mar. 31, 2014), <https://seafood.ocean.org/wp-content/uploads/2016/10/Salmon-Atlantic-Coho-Salmon-Chile.pdf> (“Chile is somewhat infamous for the collapse in [salmon] production due to a parasite and disease outbreak”).

¹⁷ *Id.*

disease. . . .” between the pens and the surrounding environment.¹⁸ This form of farming has been banned in numerous jurisdictions due to concerns over environmental risks.¹⁹

34. Because net pens are directly connected to the broader marine environment experts have concluded that diseases and escaped salmon may spread from the farms into the environment and that “risks of damage to wild salmon populations, ecosystems, and society are large.”²⁰

35. To enable the salmon to survive in these stressful, crowded, and unsanitary conditions, a large amount of toxins and pesticides are used. As Seafood Watch explains: “The high volume of antibiotics and pesticides that are used to control diseases and sea lice parasites is a critical concern.”²¹

36. Indeed, “[h]igh chemical use has been a defining characteristic of the Chilean salmon farming industry since its inception.”²²

37. Testing of ALDI’s Products has revealed the presence of at least one such toxin, ethoxyquin, which is routinely used as a preservative in industrial fish feed.

¹⁸ SeaChoice, *Aquaculture Methods*, <https://www.seachoice.org/info-centre/aquaculture/aquaculture-methods/> (last visited Feb. 18, 2021).

¹⁹ See Craig Medred, *The Failed Ban*, Craig Medred (Oct. 13, 2019), <https://craigmedred.news/2019/10/13/the-failed-ban/>; Ben Fisher, *Washington Governor Jay Inslee Signs Bill Banning Atlantic Salmon Farming*, SeafoodSource (Mar. 23, 2018), <https://www.seafoodsource.com/news/aquaculture/washington-governor-jay-inslee-signs-bill-banning-atlantic-salmon-farming/>; Lynda V. Mapes, *Fish Farm Caused Atlantic Salmon Spill Near San Juans, Then Tried to Hide How Bad It Was, State Says*, Seattle Times (Feb. 2, 2018, 11:23 PM), <https://www.seattletimes.com/seattle-news/fish-farm-caused-atlantic-salmon-spill-state-says-then-tried-to-hide-how-bad-it-was/>; Lynda V. Mapes, *Fish Farm Objects, But Washington State Says It’s Over for Atlantic Salmon Pens at Port Angeles*, Seattle Times (Dec. 19, 2017, 5:29 PM), https://www.seattletimes.com/seattle-news/environment/state-says-decision-to-terminate-port-angeles-atlantic-salmon-farm-is-final (“Atlantic salmon farming in open-water net pens is banned in California and Alaska and not practiced in Oregon.”).

²⁰ Rosamond Naylor et al., *Fugitive Salmon: Assessing the Risks of Escaped Fish from Net-Pen Aquaculture*, 55 *BioScience* 427 (May 2005), <https://academic.oup.com/bioscience/article/55/5/427/226100>.

²¹ See *Salmon Recommendations*, *supra* note 16.

²² See Bridson, *supra* note 16.

38. Ethoxyquin has been banned from use in animal feed in the European Union because “it has not been established that the additive does not have an adverse effect on animal health, human health or the environment when used under the proposed conditions.”²³

39. Research has specifically shown that the use of ethoxyquin as a feed additive “poses a risk for aquatic life.”²⁴

40. The salmon feed ingredients used by ALDI’s suppliers pose other severe environmental risks. In particular, ALDI’s suppliers’ use of wild-caught fish in salmon feed contributes to the collapse of wild fish stock and the aquatic ecosystem, compounding the environmental consequences of ALDI’s salmon products.²⁵

B. Poor Animal Welfare

41. In addition to their negative impacts on the surrounding environment, the conditions under which ALDI’s salmon are raised inflict unnecessary suffering on the fish used in the Products, contrary to what consumers believe the Sustainable Representations to mean, as research has shown.

42. The extremely crowded and unsanitary environments of net pens are nothing like the natural environment in which the salmon would be raised in the wild. Scientists characterize these crowded production methods as “stressful high-density conditions” that far exceed what salmon would experience in their natural habitats.²⁶ Salmon in these crowded environments

²³ Eur. Comm’n Implementing EU Reg. 2017/ 962 *Suspending the Authorisation of Ethoxyquin as a Feed Additive for All Animal Species and Categories*, 2017 O.J. (L 145) 13, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0962&from=EN>.

²⁴ Sophia Egloff & Constanze Pietsch, *Ethoxyquin: a feed additive poses a risk for aquatic life*, 131 *Diseases of Aquatic Organisms* 39 (Oct. 16, 2018).

²⁵ *Caught Out: How UK Retailers are Tackling the Use of Wild Fish in their Aquaculture Supply Chains*, Changing Markets Foundation, https://mk0fishingthefek0vho.kinstacdn.com/wp-content/uploads/2020/03/Caught_Out_Report_FINAL.pdf.

²⁶ Alison C. Harvey, *Does Density Influence Relative Growth Performance of Farm, Wild and F1 Hybrid Atlantic Salmon in Semi-Natural and Hatchery Common Garden Conditions?*, 3 *Royal Soc. Open Sci.* 1 (July 2016), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4968464/>.

become highly aggressive and cause harm to each other as a result.²⁷ These crowded conditions inevitably lead to rampant sea lice infestations, which results in poor animal welfare.

43. Research suggests that fish raised on farms without such enrichments experience significantly higher stress levels and are subjected to more violent aggression from other fish.²⁸

44. The net pens are also devoid of the environmental variety salmon would experience in the wild. As a result, there are no opportunities for the fish to seek shelter from each other. Research suggests that fish raised on farms without such enrichments experience significantly higher stress levels and are subjected to more violent aggression from other fish.²⁹

45. The stocking density issues on Chilean salmon farms are consistent with ALDI's sourcing practices of Scottish salmon for its stores in the United Kingdom. There, the company sourced salmon from farms that exceeded density limits set by the Scottish Environmental Protection Agency six times in 2017, sometimes by up to 50%.³⁰

46. Due to high stocking density, ALDI's salmon suppliers in the United Kingdom have also struggled with the proliferation of sea lice, a parasitic species that can inflict immense suffering and stress by consuming the flesh around the head and neck areas of salmon.³¹

47. ALDI in the United Kingdom has sourced from salmon farms that utilize painful and stressful high pressure and/or high temperature de-lousing practices that have killed over

²⁷ Joacim Näslund et al., *Hatchery Tank Enrichment Affects Cortisol Levels and Shelter-Seeking in Atlantic Salmon (*Salmo salar*)*, 70 *Can. J. Fisheries & Aquatic Sci.* 585 (Feb. 2013), https://www.researchgate.net/publication/236155282_Hatchery_tank_enrichment_affects_cortisol_levels_and_shelter-seeking_in_Atlantic_salmon_Salmo_salar.

²⁸ *Id.*

²⁹ *Id.*

³⁰ Billy Briggs, *Supermarkets selling salmon from 'poor' welfare firms*, *The Ferret* (January 2021), <https://theferret.scot/supermarkets-salmon-companies-animal-welfare>.

³¹ *Breaking: Scottish Salmon Investigation*, *Viva!* (Nov. 23, 2020), <https://viva.org.uk/media-centre/media-release-theres-something-fishy-about-co-op-sainsburys-lidl-aldi-morrisons-and-ms-scottish-farmed-salmontheyre-infested-with-sea-lice>.

447,00 salmon from 2016-2019.³² Due to animal welfare concerns, veterinary and marine science groups in Scotland are urging the government to ban these techniques.³³

48. Thus, ALDI's marketing of the Products—which suggests to consumers that the Products are made from salmon sustainably sourced in accordance with high environmental and animal welfare standards—is false and misleading.

III. ALDI's Sustainable Representations Are Material to D.C. Consumers.

49. The FTC has specifically acknowledged that “sustainable” claims are material to consumers.³⁴

50. Researchers have found that consumers seek out and are willing to pay significantly more for products labeled as “ecologically sustainable.”³⁵

51. This finding is consistent with other research that has found that “consumers are willing to pay to improve animal welfare and reduce undesirable environmental effects from fish farming.”³⁶

PARTIES

52. Defendant ALDI Inc. is an Illinois corporation headquartered in Batavia, Illinois.

53. ALDI Inc. is a grocery store company with over 2,000 stores in the United States across 36 states and in the District of Columbia.

³² Fergus Ewing, *Motions, Questions and Answers Search*, Parliamentary Business: Scottish Parliament (Mar. 2020), <https://www.parliament.scot/parliamentarybusiness/28877.aspx?SearchType=Advance&ReferenceNumbers=S5 W-27713&ResultsPerPage=10>.

³³ Moira Kerr, *Scottish Government is urged to ban 'painful' salmon delicing tech*, The Herald Scotland (2019), <https://www.heraldscotland.com/news/17966373.scottish-government-urged-ban-painful-salmon-delicing-tech>.

³⁴ See FTC Green Guides *supra*, note 10.

³⁵ McClenachan et al., *supra* note 14.

³⁶ Ingrid Olesen et al., *Eliciting Consumers' Willingness to Pay for Organic and Welfare-Labelled Salmon in a Non-Hypothetical Choice Experiment*, 127 *Livestock Sci.* 218 (Feb. 2010), <https://pubag.nal.usda.gov/catalog/775401>.

54. ALDI markets and distributes the Products in its own retail outlets and through its website both in the District of Columbia and throughout the United States.

55. Plaintiff, Toxin Free USA (previously known as GMO Free USA) is a 501(c)(3) non-profit, public interest organization, whose mission is to harness independent science and agroecology concepts to advocate for clean and healthy food and ecological systems. Toxin Free USA educates consumers about potential hazards of synthetic chemicals, including pesticides and biocides, and genetically engineered organisms.

56. Toxin Free USA performs its work throughout the United States, including in the District of Columbia.

57. Toxin Free USA was formed in 2012 with the intent of organizing national boycotts of food companies that use genetically modified ingredients and related synthetic herbicides and pesticides in their products and pressuring companies to remove those ingredients or contaminants.

58. Consequently, Toxin Free USA strives to advance transparency in the food industry. The organization diligently works to promote food and ecological systems that are clean, accessible, and free of contamination.

59. Toxin Free USA's website, publications, public education, research, network building, and mobilization activities provide an important service to consumers and community activists every month.

JURISDICTION

60. This Court has personal jurisdiction over the parties in this case. Toxin Free USA has a presence in the District and consents to this Court having personal jurisdiction over the organization.

61. This Court has personal jurisdiction over ALDI because ALDI has purposefully directed its conduct to the District and has availed itself of the benefits and protections of District of Columbia law. ALDI operates a retail store within the District and its internet advertising is accessible in the District. ALDI's Products can be, and are, purchased in the District by District consumers.

62. This Court has subject-matter jurisdiction over this action under the CPPA, D.C. Code § 28-3901, *et seq.*

CAUSE OF ACTION

Violations of the District of Columbia Consumer Protection Procedures Act

63. Toxin Free USA incorporates by reference all the allegations of the preceding paragraphs of this Complaint.

64. Toxin Free USA is a nonprofit, public-interest organization that brings these claims on behalf of the general public of D.C. consumers. *See* D.C. Code § 28-3905(k)(1)(D)(i).

65. Through § 28-3905(k)(1)(D)(i), the CPPA explicitly allows a public-interest organization to stand in the shoes of a consumer to seek relief from any violation of the CPPA.

66. ALDI is a “person” and a merchant that provides “goods” within the meaning of the CPPA. *See id.* § 28-3901(a)(1), (3), (7).

67. As set forth *supra* in Section I, ALDI has advertised and marketed the Products with Sustainable Representations when, in fact, the Products are sourced from salmon industrially farmed using unsustainable and environmentally destructive practices. Thus, ALDI has violated the CPPA by “represent[ing] that goods . . . have a source, . . . characteristics, . . . [or] benefits . . . that they do not have”; “represent[ing] that goods . . . are of a particular standard [or] quality . . . if in fact they are of another”; “misrepresent[ing] as to a material fact which has a tendency to

mislead”; “fail[ing] to state a material fact if such failure tends to mislead”; “us[ing] innuendo or ambiguity as to a material fact, which has a tendency to mislead”; and “advertis[ing] or offer[ing] goods . . . without the intent to sell them as advertised or offered.” *Id.* § 28-3904(a), (d), (e), (f), (f-1), (h).

JURY TRIAL DEMAND

68. Plaintiff Toxin Free USA hereby demands a trial by jury.

PRAYER FOR RELIEF

Wherefore, Plaintiff Toxin Free USA prays for judgment against ALDI and requests the following relief:

- a. A declaration that ALDI’s conduct is in violation of the CPPA;
- b. An order enjoining ALDI’s conduct found to be in violation of the CPPA; and
- c. An order granting Plaintiff costs and disbursements, including reasonable attorneys’ fees and expert fees, and prejudgment interest at the maximum rate allowable by law.

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