

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

<b>In the Matter of:</b>	)	
	)	
<b>Taotao USA, Inc.,</b>	)	<b>Docket No. CAA-HQ-2015-8065</b>
<b>Taotao Group Co., Ltd., and</b>	)	
<b>Jinyun County Xiangyuan Industry Co., Ltd.</b>	)	
	)	
<b>Respondents.</b>	)	

**BUSINESS CONFIDENTIALITY ASSERTED**

Attachments B and C submitted with Complainant’s Sixth Motion to Supplement the Prehearing Exchange contains material that may be claimed to be confidential business information (“CBI”) pursuant to 40 C.F.R. § 2.203(b). The attachments consist of certified deposition transcripts that have not yet been signed by the deponents, in which the deponents describe and discuss documents and business practices claimed as CBI. These Attachments are therefore filed under seal pursuant to 40 C.F.R. § 22.5(d).

A complete filing in which the exhibit containing CBI is included has been filed with the Hearing Clerk. If you have any questions, please contact Robert Klepp, at [klepp.robert@epa.gov](mailto:klepp.robert@epa.gov), or at (202) 564-5805.

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

<b>In the Matter of:</b>	)	
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<b>Taotao USA, Inc.,</b>	)	<b>Docket No. CAA-HQ-2015-8065</b>
<b>Taotao Group Co., Ltd., and</b>	)	
<b>Jinyun County Xiangyuan Industry Co., Ltd.</b>	)	
	)	
<b>Respondents.</b>	)	

**MOTION FOR ADDITIONAL DISCOVERY  
ON ABILITY TO PAY THROUGH REQUESTS FOR PRODUCTION**

The Director of the Air Enforcement Division of the U.S. Environmental Protection Agency's Office of Civil Enforcement ("Complainant") files this Motion for Additional Discovery on Ability to Pay Through Requests for Production ("Motion"). Complainant seeks documents from the respondents in this proceeding, Taotao USA, Inc. ("Taotao USA"), Taotao Group Co., Ltd. ("Taotao Group"), and Jinyun County Xiangyuan Industry Co., Ltd. ("JCXI") (collectively "Respondents") regarding the financial condition of Taotao USA, Inc., and entities related to Taotao USA, Inc. through non-arm's length transactions or common ownership or control. Complainant's counsel attempted to confer with Respondents' counsel to see if Respondents intend to oppose this Motion, but were unable to contact them prior to filing. Respondents have previously indicated they intend to oppose Complainant's request for additional information regarding Respondents' ability to pay.

I. Applicable Authority

The Consolidated Rules of Practice provide that after the prehearing exchange of information, a party may move for additional discovery. 40 C.F.R. § 22.19(e)(1). The motion for discovery shall specify the method of discovery sought, provide the proposed discovery instruments, and describe in detail the nature of the information and/or documents sought. *Id.* The Presiding Officer may order additional discovery if it:

- (i) Will neither unreasonably delay the proceeding nor unreasonably burden the non-moving party;
- (ii) Seeks information that is most reasonably obtained from the non-moving party, and which the non-moving party has refused to provide voluntarily; and



- (iii) Seeks information that has significant probative value on a disputed issue of material fact relevant to liability or the relief sought.

*Id.*

## II. Grounds for Motion

Complainant is requesting an order compelling production of documents relevant to Respondents' claim that they are unable to pay a penalty in this matter without experiencing undue financial hardship. *See* Respondents' Joint Prehearing Exchange at 8–9. The Clean Air Act requires the EPA to consider the effect of a penalty on the violator's ability to continue in business when determining the amount of a civil penalty. 42 U.S.C. § 7524(c)(2). Information obtained during and subsequent to the depositions of Taotao USA's owner, Matao Cao, and Respondents' proposed witness, David Garibyan, on September 6 and 8, 2017, has revealed the existence of information having significant probative value regarding Respondents' ability to pay.

Complainant has learned that in December 2015, one month after Complainant filed the Complaint in this matter, Taotao USA, acting in concert with 2201 Luna Road, LLC and Daction Trading, Inc. ("Daction"), was involved in a series of transactions in which the entities obtained loans totaling in excess of \$11 million through the U.S. Small Business Administration's ("SBA") 504 program and purchased real property at 2201 Luna Rd., Carrollton, Texas. CX206 at EPA-002653–56, EPA-002686–87, EPA-002706. The 2201 Luna Rd. address is listed as the address of record for Taotao USA, LLC in this case. Respondent Taotao USA, Inc.'s Amended Answer and Request for Hearing ¶ 4. Documents show that an SBA loan in the amount of \$6,470,500 ("Note 1") was made by the East West Bank and North Texas Certified Development Corporation ("CDC") to 2201 Luna Road, LLC, Taotao USA, Inc., and Daction, through the U.S. Small Business Administration's ("SBA") 504 program. *Id.* at EPA-002706. The Third Party Lender Agreement dated December 18, 2015, identifies the loan as "SBA Loan Name: Taotao USA, Inc.," the Borrower as "2201 Luna Road, LLC," and the Operating Company as "Taotao USA, Inc. and Daction Trading, Inc.," and further specifies that the loan is being provided "to the Borrower and Operating Company." *Id.* An Assignment of Rents securing Note 1 is signed on behalf of 2201 Luna Road, LLC by Matao Cao in his capacity as the "Member/Manager of 2201 Luna Road, LLC." *Id.* at EPA-002662–66.

Documents also show that another SBA loan in the amount of \$5 million, consisting of a prior \$4,891,000 loan ("Note 2") and a cash advance of \$109,000, was made by the CDC to 2201 Luna Road LLC, secured in part through a Deed of Trust and an Assignment and Subordination of Leases. *Id.* at EPA-002686–87, EPA-002702, EPA002719. The Deed of Trust is signed on behalf of 2201 Luna Road LLC by Matao Cao in his capacity as "sole Manager." *Id.* at EPA-002703. The Assignment and Subordination of Leases identifies 2201 Luna Road, LLC as the "Eligible Passive Company," and Taotao USA and Daction as the "Operating Company." *Id.* at EPA-002719. It is signed on behalf of 2201 Luna Road, LLC by Matao Cao as "sole Manager," on behalf of Taotao USA by Matao Cao as "President," and on behalf of Daction by Qiong Li as "President." *Id.* at EPA-002722. In February or March 2016, the Deed of Trust and Assignment



of Rents securing Note 2, and the liens in the Special Warranty Deed recorded as 201500328282, were released, suggesting that the loan associated with Note 2 was fully paid and satisfied. *Id.* at EPA-002655–57, EPA-002669–78, EPA-002679–83, EPA-002728–35.

These transactions indicate that Respondent Taotao USA, acting as an economic unit with 2201 Luna Road, LLC and Daction, was able to qualify for and obtain loans totaling \$11,470,500, at the same time Respondents were filing Answers with this Tribunal putting their ability to pay a penalty at issue. *See* Respondent Taotao USA Inc.’s Original Answer and Request for Hearing at 13 (protesting effect of penalty on Respondent’s ability to continue in business). Information pertaining to the loans and the real property purchase, including but not limited to the SBA loan application materials prepared by Taotao USA and its principal Matao Cao, is probative of Respondents’ claimed inability to pay a penalty.

The transactions also illustrate that Respondents are closely entwined with other entities through common control or close business dealings. Taotao USA worked in concert with 2201 Luna Road, LLC, a company owned or controlled by Matao Cao, and Daction, to jointly obtain loans through the SBA. The interconnected nature of Respondents’ business is further supported by the deposition testimony of Matao Cao and David Garibyan, certified transcripts of which are provided as Attachments B and C to this Motion,<sup>1</sup> and by other documents provided in the record. Where a respondent claims to be unable to pay a penalty without suffering severe financial hardship, it is appropriate to look to the finances of closely-related entities when evaluating the claim. *In re New Waterbury, Ltd.*, 5 E.A.D. 529, 547–50 & n.33 (EAB 1994); CX025 at EPA-000527.

2201 Luna Road, LLC, was formed on September 14, 2015, shortly before the Complaint in this matter was filed, with Matao Cao named as the initial registered agent and manager. CX205. As described previously, 2201 Luna Road, LLC, under the control of Matao Cao, worked closely with Taotao USA and Daction, to obtain financing and purchase warehouse property at 2201 Luna Rd., Carrollton, Texas. CX206. Taotao USA is owned by Matao Cao, and is located at 2201 Luna Rd., Carrollton, Texas. Respondent Taotao USA, Inc.’s Amended Answer and Request for Hearing ¶ 4; CX171 at EPA-002294; CX191 at EPA-002522. This suggests that Respondent Taotao USA, a company under the ownership and control of Matao Cao, is leasing its office space from another company also under the ownership or control of Matao Cao. Information about the financial condition of 2201 Luna Road, LLC, and financial

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<sup>1</sup> A certified copy of the transcript signed by the court reporter for the deposition of Matao Cao was delivered by the court reporter on September 18, 2017, and a certified copy of the transcript signed by the court reporter for the deposition of David Garibyan was delivered on September 19, 2017. Mr. Cao and Mr. Garibyan each have thirty days to review the transcript of their deposition and submit an errata sheet. In light of the September 22, 2017 deadline for filing non-dispositive prehearing motions established by the Tribunal’s Order on Respondents’ Motion for Continuance of the Hearing, and the proximity of the hearing scheduled to begin Tuesday, October 17, 2017, Complainant is providing copies of the certified deposition transcripts without the deponents’ signatures as attachments to this Motion with the understanding that they are subject to errata revisions identified by the deponent.



transactions between that company and Taotao USA, is presumably within the custody or control of Taotao USA's principal, Mr. Cao, and is relevant to Taotao USA's ability to pay a penalty in this matter.

Tao Motor Inc. was formed on January 6, 2016, with Matao Cao named as the registered agent, sole director, and organizer of the company, with an address of 2201 Luna Rd., Carrollton, Texas. CX207. Tao Motor Inc. is owned by a Chinese manufacturing company, Zhejiang Taotao Vehicles Co., Ltd., which is 90% owned by Matao Cao. CX191 at EPA-002523; Attach. B at 25, 86–87. Both Tao Motor, Inc., and Respondent Taotao USA, are directly or indirectly owned and controlled by Matao Cao, and both are located at 2201 Luna Rd., in a warehouse indirectly owned and controlled by Matao Cao through 2201 Luna Road, LLC. Further, after Tao Motor Inc. was incorporated in 2016, all of the employees in Taotao USA's branch office in California became Tao Motor employees, except for one individual who left the company. Attach. C at 38–41. Both Taotao USA and Tao Motor are in the business of selling on-road and nonroad vehicles. Attach. B at 108; Attach. C at 8, 19. Both companies sell parts through EagleATVParts.com, a division of Taotao USA. Attach. B at 111–12; Attach. C at 33–34. The internet domain name "eagleatvparts.com" is registered to Matao Cao, of Taotao USA, under e-mail address janelee217@gmail.com. CX211.

Respondents Taotao Group and JCXI, who manufacture vehicles for Taotao USA, are owned by Matao Cao's father, while Zhejiang Taotao Vehicles Co., Ltd., who manufactures vehicles for Tao Motor, is owned by Matao Cao. Attach. B at 25, 86–87, 105. Taotao Group and JCXI rent production lines in a factory owned by Zhejiang Taotao Vehicles Co., Ltd., and the companies are not competitors. Attach. B. at 93–95, 106; Attach. C at 59. Tao Motor occasionally purchases vehicles from Taotao USA, and the companies do not compete with one another. Attach. B at 61–63, 86–87, 107–108; Attach. C at 19–20, 33–34. A Tao Motor official monitors compliance with EPA requirements for both Tao Motor and Taotao USA. Attach. C at 62. The foregoing suggests that Tao Motor and Respondent Taotao USA are closely intertwined entities under common control who are engaged in non-arm's length business transactions. Information about the financial transactions between Taotao USA and Tao Motor, and about Tao Motor's financial condition, may be is relevant to Respondents' ability to pay a penalty. That information is presumably within the custody or control of Mr. Cao.

Daction was created in 2009 and is owned by Qiong Li. CX204. Daction does or has done business as BudgetATVs. CX203 at EPA-002641. The internet domain name "budgetatvs.com" is registered to Matao Cao's wife, Yaoyao Lu, mailing address 2201 Luna Rd., Carrollton, Texas, under e-mail address janelee217@gmail.com.<sup>2</sup> See CX209 at EPA-002766 (identifying Yaoyao Lu as Matao Cao's wife); CX210 (registration record for budgetatvs.com). The registration record for "budgetatvs.com" was last updated May 17, 2016. CX210; see

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<sup>2</sup> The e-mail address "janelee217@gmail.com" was also used to register the domain "eagleatvparts.com," and is associated with Qiong Li in e-mail correspondence between Respondents and the EPA. See CX073 at EPA-000877 (e-mail from Matao Cao to EPA attorney Christopher Thompson copied to Qiong Li at janelee217@gmail.com); CX211 (registration record for eagleatvparts.com showing Matao Cao registered the domain name using e-mail address janelee217@gmail.com).

Attach. B at 110 (discussing BudgetATVs.com and stating that Daction closed the website in 2009 or 2010). Respondents previously provided tax returns and other financial information for Daction to Complainant, though the relationship between Respondents and Daction was not clear at the time. During his deposition, Mr. Cao explained that Taotao USA would transfer sales to Daction, and that Taotao USA and Daction share an office or warehouse. Attach. B at 109. As previously described, Taotao USA, Daction, and 2201 Luna Road LLC worked together in 2015 and 2016 to obtain financing and purchase property at 2201 Luna Road, Carrollton, Texas. The foregoing suggests that Taotao USA and Daction, though not under common ownership, are closely intertwined such that Daction's financial information is relevant to the issue of how a penalty in this matter will impact Respondents' ability to continue in business. Respondents have previously provided Daction's financial information, indicating that such information is within their possession, custody, or control.

Complainant has previously requested information about the relationship between Respondents, Daction, Tao Motor Inc., 2201 Luna Road, LLC, and other entities, and about those entities' finances. CX169; CX196. Respondents have refused to provide this information voluntarily.<sup>3</sup> CX170. This information has significant probative value regarding Respondents' claim of inability to pay, and is most reasonably obtained from Respondents in this matter. Requiring Respondents to produce the information, or certify they have exercised their best efforts to do so, will not cause undue delay or burden, because the information should be within the possession, custody, or control of Respondents or their principals, and because the burden is outweighed by the value of the information to assessing the merit of Respondents' claim. Therefore, Complainant requests that the Presiding Officer order Respondents to respond to the Requests for the Production of Documents filed and served as Attachment A to this Motion, or for documents not in the possession, custody, or control of Respondents or their principals, certify that they have exercised their best efforts to obtain and produce the requested documents.

Respectfully Submitted,

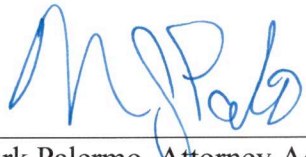
9/21/17  
Date

  
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Office of Civil Enforcement  
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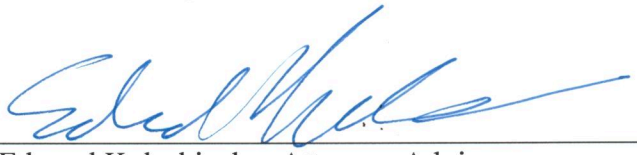
<sup>3</sup> On September 13, 2017, counsel for Respondents indicated they would oppose the request for information contained in the letter dated September 12, 2017, included in Complainant's Prehearing Exchange as CX196.



9/21/17  
Date

  
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<b>Taotao USA, Inc.,</b>	)	<b>Docket No. CAA-HQ-2015-8065</b>
<b>Taotao Group Co., Ltd., and</b>	)	
<b>Jinyun County Xiangyuan Industry Co., Ltd.</b>	)	
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<b>Respondents.</b>	)	

**MOTION FOR ADDITIONAL DISCOVERY**  
**ON ABILITY TO PAY THROUGH REQUESTS FOR PRODUCTION**  
**ATTACHMENT A**

Pursuant to 40 C.F.R. § 22.19(e) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, Complainant hereby propounds these Interrogatories and Requests for Production of Documents to respondents Taotao USA, Inc. (“Taotao USA”), Taotao Group Co., Ltd. (“Taotao Group”), and Jinyun County Xiangyuan Industry Co., Ltd. (“JCXI”) (collectively “Respondents”). Complainant requests that the following documents be served on Complainant’s counsel in accordance with the order of the U.S. Environmental Protection Agency’s Office of Administrative Law Judges. As used in this Request for Discovery, the terms “Document” and “Documents” are defined to be synonymous in meaning and equal in scope to the usage of the term “Documents” in Fed. R. Civ. P. 34(a) and include(s) the term “writing” and electronically stored information (“ESI”).

1. For Taotao USA, Inc.:
  - a. Complete 2016 Federal Income Tax Returns, together with all schedules and attachments;
  - b. All Financial Statements prepared by an outside accountant or internally within the company, including all balance sheets, statements of operations, statements of retained earnings, statements of cash flows, analysis of performance relative to budget or forecast and all notes to each financial statement (hereinafter “Financial Statements”) for 2015 and 2016;
  - c. Year-to-Date Financial Statements for 2017;
  - d. All documents, including written and electronic correspondence, relating to contracts, agreements, promises, or other arrangements between Taotao USA, Inc., and 2201 Luna Road, LLC, Daction Trading, Inc., or Tao Motor, Inc., including but not limited to any agreement to lease, rent, use, or occupy any real property or for the payment of rent or other value;



- e. All documents, including written and electronic correspondence, between Taotao USA, Inc., its representatives, principals, or agents, including but not limited to Matao Cao, and the North Texas Certified Development Corporation;
- f. All documents, including written and electronic correspondence, between Taotao USA, Inc., its representatives, principals, or agents, including but not limited to Matao Cao, and East West Bank, related to the financing and purchase of real property at 2201 Luna Rd., Carrollton, Texas;
- g. All documents, including written and electronic correspondence, provided or received by Taotao USA, Inc., its representatives, principals, or agents, including but not limited to Matao Cao, to or from the North Texas Certified Development Corporation, East West Bank, the U.S. Small Business Administration, Daction Trading, Inc., or 2201 Luna Road, LLC, from January 1, 2015 to present, including but not limited to any:
  - i. Loan Application;
  - ii. SBA 504 Application;
  - iii. Statement of Personal History;
  - iv. Personal Information Statement;
  - v. SBA Form 413 or other Personal Financial Statement for Matao Cao or any other owner;
  - vi. Individual Tax Returns with Schedules for Matao Cao or any other owner;
  - vii. Financial Statement, Profit and Loss Statement, or Balance Sheet;
  - viii. Business Debt Schedule;
  - ix. Government Financing Schedule;
  - x. Personal Cash Flow Statement;
  - xi. Assistance Agreement;
  - xii. Disclosure Statement;
  - xiii. Appraisal;
  - xiv. Business Plan;
  - xv. Lease Agreement;
  - xvi. Certificate of Occupancy;
  - xvii. Closing Statements;
  - xviii. Closing Documents;
  - xix. Insurance Certificate or Policy Documents;
  - xx. Interim or Permanent Loan Documents with any modifications or extensions;
  - xxi. Proof of Equity Injection;
  - xxii. Promissory Note and Related Loan Amortization Schedule;
  - xxiii. Authorization and Debenture Guaranty;
- h. All documents, including written or electronic correspondence, relating to the Release of Lien electronically recorded under Clerk's File No. 201600047390 on February 23, 2016, including but not limited to documents or other information relating to the payment or satisfaction of the debt secured by the liens, security interests, assignments, and/or rights released;
- i. All documents, including written or electronic correspondence, relating to the Release of Lien/Certificate of Satisfaction recorded under Clerk's File No. 201600069586, including but not limited to documents or other information

relating to the payment or satisfaction of Loan No. 32300014, and/or the debt secured by the Deed of Trust recorded as Instrument No. 201500328285.

2. For Tao Motor, Inc.:
  - a. Complete 2016 Federal Income Tax Returns, together with all schedules and attachments;
  - b. All Financial Statements prepared by an outside accountant or internally within the company for 2016;
  - c. Year-to-Date Financial Statements for 2017.
  
3. For 2201 Luna Rd. LLC:
  - a. Complete 2015 and 2016 Federal Income Tax Returns, together with all schedules and attachments;
  - b. All Financial Statements prepared by an outside accountant or internally within the company for 2015 and 2016;
  - c. Year-to-Date Financial Statements for 2017;
  - d. All documents, including written or electronic correspondence, relating to contracts, agreements, promises, or other arrangements between 2201 Luna Road, LLC, and Daction Trading, Inc., or Tao Motor, Inc., including but not limited to any agreement to lease, rent, use, or occupy any real property or for the payment of rent or other value;
  - e. All documents, including written or electronic correspondence, provided or received by 2201 Luna Road, LLC, its representatives, principals, or agents, including but not limited to Matao Cao, to or from the North Texas Certified Development Corporation, East West Bank, the U.S. Small Business Administration, or Daction Trading, Inc., from January 1, 2015 to present,
  - f. All documents, including written or electronic correspondence, relating to the Release of Lien electronically recorded under Clerk's File No. 201600047390 on February 23, 2016, including but not limited to documents or other information relating to the payment or satisfaction of the debt secured by the liens, security interests, assignments, and/or rights released;
  - g. All documents, including written or electronic correspondence, relating to the Release of Lien/Certificate of Satisfaction recorded under Clerk's File No. 201600069586, including but not limited to documents or other information relating to the payment or satisfaction of Loan No. 32300014, and/or the debt secured by the Deed of Trust recorded as Instrument No. 201500328285.
  
4. For Daction Trading, Inc., or its successor in interest:
  - a. Complete 2015 and 2016 Federal Income Tax Returns, together with all schedules and attachments;
  - b. All Financial Statements prepared by an outside accountant or internally within the company for 2015 and 2016;
  - c. Year-to-Date Financial Statements for 2017
  - d. All documents, including written or electronic correspondence, provided or received by Daction Trading, Inc., its representatives, principals, or agents, to or from the North Texas Certified Development Corporation, East West Bank, or the U.S. Small Business Administration, from January 1, 2015 to present.



5. For the company doing business as EagleATVParts.com:
  - a. Complete 2013, 2014, 2015, and 2016 Federal Income Tax Returns, if not already provided;
  - b. All Financial Statements prepared by an outside accountant or internally within the company for 2013, 2014, 2015, and 2016, if not already provided;
  - c. Year-to-Date Financial Statements for 2017, if not already provided.
  
6. If the 2016 Federal Income Tax returns are not available for any entity named in requests 1 through 5, then preliminary financial statements for the year ending December 31, 2016, for the entity whose 2016 Federal Income Tax return is not available.

Respectfully Submitted,

9/21/17  
Date



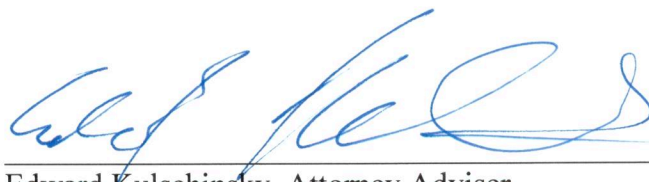
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9/21/2017  
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**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
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**Taotao USA, Inc.,** ) **Docket No. CAA-HQ-2015-8065**  
**Taotao Group Co., Ltd., and** )  
**Jinyun County Xiangyuan Industry Co., Ltd.** )  
 )  
**Respondents.** )

**MOTION FOR ADDITIONAL DISCOVERY**  
**ON ABILITY TO PAY THROUGH REQUESTS FOR PRODUCTION**  
**ATTACHMENT B**

**Oral Deposition of Matao Cao**

**September 6, 2017**

**Certified Transcript Subject to Errata Sheet Submission**

**Claimed as Confidential Business Information  
and filed under seal pursuant to 40 C.F.R. § 22.5(d)**

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
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<b>Jinyun County Xiangyuan Industry Co., Ltd.</b>	)	
	)	
<b>Respondents.</b>	)	

**MOTION FOR ADDITIONAL DISCOVERY  
ON ABILITY TO PAY THROUGH REQUESTS FOR PRODUCTION  
ATTACHMENT C**

**Oral Deposition of David Garibyan**

**September 8, 2017**

**Certified Transcript Subject to Errata Sheet Submission**

**Claimed as Confidential Business Information  
and filed under seal pursuant to 40 C.F.R. § 22.5(d)**



**CERTIFICATE OF SERVICE**

I certify that the foregoing Motion for Additional Discovery on Ability to Pay through Requests for Production (“Motion”) in the Matter of Taotao USA, Inc., et al., Docket No. CAA-HQ-2015-8065, with CBI omitted, was filed this day electronically using the EPA Office of Administrative Law Judges’ E-Filing System. In addition, three copies of Attachments B and C were filed this day by hand delivery to the Headquarters Hearing Clerk in the EPA’s Office of the Headquarters Hearing Clerk at the address listed below:

U.S. Environmental Protection Agency  
Office of the Headquarters Hearing Clerk  
1300 Pennsylvania Ave., NW, MC-1900R  
Ronald Reagan Building, Room M1200  
Washington, DC 20004

I certify that an electronic copy of Complainant’s Sixth Motion to Supplement the Prehearing Exchange, with CBI protected by password, was sent this day for service by electronic mail to Respondents’ counsel: William Chu at [wmchulaw@aol.com](mailto:wmchulaw@aol.com); Salina Tariq at [stariq.wmchulaw@gmail.com](mailto:stariq.wmchulaw@gmail.com); and David Paulson at [dpaulson@gmail.com](mailto:dpaulson@gmail.com).

9/21/2017  
Date

  
\_\_\_\_\_  
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