

APPENDIX

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DECLARATION OF DEBORAH LAUFER

1. My name is Deborah Laufer. I am a resident of Pasco County, Florida. More than a decade ago, I was diagnosed with multiple sclerosis. I am visually impaired, I have limited use of my hands, and I must use a wheelchair or cane to move around.

2. After my diagnosis with multiple sclerosis, I became unable to continue in my career providing private security as an executive protection specialist. My career was important to me because I value being able to help people, and I fell into a depression when I thought I had lost the ability to do that.

3. Once I needed a wheelchair to move around, I became extremely frustrated at how difficult it was to reserve an accessible room at a hotel when I would travel. I could not get information about accessible rooms, or I would book a room that claimed to be accessible, but it ended up not being accessible or available when I arrived. I sometimes ended up sleeping in my car because I could not get an accessible room at a hotel.

4. In 2018, my daughter was in a romantic relationship with Daniel Pezza. I learned from him that he worked as an investigator for attorney Thomas Bacon, who brought lawsuits to enforce the ADA. I told him that I was interested in getting involved in their work, so Mr. Pezza introduced me to Mr. Bacon, who became my attorney in or around May 2018.

5. I saw this as an opportunity to help myself and other people with disabilities who want to visit their

families and to travel. Serving as an ADA plaintiff helped get me out of my depression because it allowed me to help myself and other people.

6. My daughter and Mr. Pezza had a child in January 2019. They ended their relationship later that year. My daughter has full custody of their child. She also has an older daughter who has a different father.

7. After my daughter and Mr. Pezza split up, I continued to work with Mr. Pezza. I did not let Mr. Pezza's relationship with my daughter affect my desire to continue to advocate on behalf of myself and other disabled people.

8. When I was looking at hotel websites (often because I was considering making travel plans) and found an online reservations system that did not appear to have the accessibility information required by the ADA, I would refer it to Mr. Pezza and he would look into it further. If Mr. Pezza's investigation determined that the reservation system clearly and substantially violated the ADA, and Mr. Bacon and I agreed that a lawsuit should be brought, then Mr. Bacon, or another attorney working with Mr. Bacon, would file a case on my behalf. It is my understanding that the attorneys paid Mr. Pezza for this work, but I had no involvement in that arrangement.

9. I understand that Title III of the ADA does not allow plaintiffs to get monetary damages, and I did not expect to receive any money. I have never received any payments for my federal ADA claims. I have received monetary damages a few times in lawsuits brought under state law.

10. It was recently brought to my attention that an

order disciplining an attorney who represented me in cases in the District of Maryland raised questions about my “familial relationship” with Mr. Pezza. I understand that the order suggests that there may have been improprieties about Mr. Bacon and the other attorneys who have represented me paying Mr. Pezza for his work because of this relationship.

11. Mr. Pezza has never given me money or anything else of material value.

12. I live with my daughter and her two children, who moved in with me after Mr. Pezza and my daughter broke up. My daughter and I keep separate finances and split shared household costs. I do not know the details of whether Mr. Pezza pays child support to my daughter or how much, and I generally do not know the details of their relationship (if any) after they split up in 2019. Based on a recent conversation with my daughter, it is my understanding that Mr. Pezza has never paid a meaningful amount of child support.

13. It is also my understanding that the disciplinary order talks about testimony I gave at an evidentiary hearing in 2020 in one of my cases in Maryland about a cross-country trip I had planned. I understand that the judge in that case did not believe that I would take as extensive a trip as I said I would.

14. In my testimony in 2020, I said that I planned to take the trip with my daughter, her boyfriend, and my granddaughter. This boyfriend was not Mr. Pezza; my daughter and he had broken up by that time. The granddaughter was my daughter’s older daughter, who is not Mr. Pezza’s child.

15. In the summer of 2021, I took the cross-country road trip I had planned. I ended up traveling with my sister (instead of my daughter) and my older granddaughter (who I had originally planned to travel with, and who is not Mr. Pezza's daughter). My road trip started in Florida, and we then traveled through a number of states, including but not limited to Louisiana, Texas, Colorado, Illinois, Pennsylvania, New York, and Virginia, and then back home to Florida.

16. In the course of the disciplinary investigation into my attorney in Maryland, I provided the investigator with receipts, photos, and videos documenting my trip.

17. I have always wanted my cases to focus solely on enforcing the ADA so that I and people like me can enjoy the rights the ADA provides us. I have decided to dismiss this and my other lawsuits because I do not want any allegations of misconduct committed by my attorney in Maryland to distract from these important issues.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

 /s Deborah Laufer
Deborah Laufer

Executed on: July 23, 2023