

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. _____

DIEGO TRINIDAD individually and
on behalf of all others similarly situated,

Plaintiff,

v.

TRIVAGO GmbH, a German limited
liability company, BOOKING.COM B.V., a
Dutch limited liability company, GRUPO
HOTELERO GRAN CARIBE,
CORPORACIÓN DE COMERCIO Y
TURISMO INTERNACIONAL
CUBANACÁN S.A., GRUPO DE
TURISMO GAVIOTA S.A., RAÚL DOE 1-
5, MARIELA ROE 1-5,

Defendants.

_____/

CLASS ACTION COMPLAINT FOR DAMAGES

In the late 1950's, Diego Cosme Trinidad Valdes and his wife Estela Esperanza García, a couple of the original homeowners of Varadero, Matanzas province Cuba, built a beachfront home (the "Property"), which upon their passing, was inherited by their son Diego Trinidad.¹ The property faced the ocean and was located just a couple hundred meters from the hotel now known as the Meliá Internacional.

When Fidel Castro seized power, the Trinidad home was confiscated, and the family was forced to flee their native country for the United States. The communist Cuban government ultimately demolished the home, along with several other nearby properties, and together with the Barceló Hotel Group (the "Barceló Group"),² built the Barceló Solymar (the "Resort").

The Resort is offered directly through the Barceló Group's own website, to visitors including Florida and other U.S. residents. But travelers, including Florida and other U.S. residents, are also able to book stays at the Resort through online booking providers like Trivago, a subsidiary of Expedia, Inc., as well as Booking.com.³

Together, the Cuban government, the Barceló Group, Expedia Entities, and the Booking Entities have exploited and benefitted from Diego Trinidad's property for decades without paying him—the rightful owner—any compensation whatever. Diego Trinidad now sues to right

¹ Plaintiff Diego Trinidad is the current heir to the Property, and thus is entitled to bring this action.

² In accordance with 22 U.S.C. § 6082(a)(3), Diego Trinidad has, contemporaneously with this filing, given notice to the Barceló Hotel Group ("Barceló Group") of his intent to add the Barceló Group as a defendant to this lawsuit if they do not promptly compensate Diego Trinidad and the class for the unlawful trafficking of their property.

³ In accordance with 22 U.S.C. § 6082(a)(3), Diego Trinidad has given notice to Expedia, Inc., together with its affiliates Hotels.com L.P., Hotels.com GP, LLC, Orbitz, LLC, Travelocity.com, LP (collectively, including defendant Trivago, the "Expedia Entities"), as well as Booking Holdings Inc. (together with defendant Booking.com B.V., the "Booking.com Entities"), of their intent to add them as defendants to this lawsuit if they do not promptly compensate Diego Trinidad and the class for the unlawful trafficking of their property.

the defendants' unlawful trafficking in his property and for just compensation for himself and persons who are in a similar situation.

THE ACTION

1. Diego Trinidad, on behalf of himself and a class of similarly-situated persons, sues defendants Grupo Hotelero Gran Caribe ("Gran Caribe"), Corporación de Comercio y Turismo Internacional Cubanacán S.A. ("Cubanacán"), Grupo de Turismo Gaviota S.A. ("Gaviota"), Raúl Does 1-5, Mariela Roes 1-5, Trivago GmbH ("Trivago"), and Booking.com B.V. ("Booking.com") under the Cuban Liberty and Democratic Solidarity Act, 22 U.S.C. § 6021, *et seq.* (the "LIBERTAD Act"), for unlawful trafficking in their confiscated property in Cuba.

THE PARTIES

2. Diego Trinidad is a United States citizen and a natural person who resides in Miami, Florida.

3. Defendant Gran Caribe is a "Sociedad Anónima" incorporated in Cuba, with its principal place of business at 7ma. Avenida No. 4210 entre 42 y 44, Miramar, Playa, La Habana, Cuba. Gran Caribe is an agency or instrumentality of the government of Cuba.

4. Defendant Cubanacán is a "Sociedad Anónima" incorporated in Cuba, with its principal place of business at Calle 23 No. 156 entre N y O, Vedado, Plaza de la Revolución, La Habana, Cuba. Cubanacán is an agency or instrumentality of the government of Cuba.

5. Defendant Gaviota is a "Sociedad Anónima" incorporated in Cuba, with its principal place of business at Edificio La Marina, 3er. Piso. Ave del Puerto No. 102 entre Justiz y Obrapía, La Habana, Cuba. Gaviota is an agency or instrumentality of the government of Cuba.

6. Raúl Does 1-5 and Mariela Roes 1-5 are as-yet-unknown members of the Cuban government who, on information and belief, are associated with, and benefit from, the trafficking of confiscated property belonging to Diego Trinidad and to the class members.

7. Defendant Trivago GmbH, an affiliate of Expedia, Inc., is a German limited liability company headquartered in Düsseldorf, Germany, with offices in New York, New York.

8. Defendant Booking.com B.V. is a Dutch limited liability company based in Amsterdam, the Netherlands, with its principal place of business in Amsterdam. Booking.com B.V. owns and operates Booking.com.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction of this action under 28 U.S.C. § 1331 because this action arises under the LIBERTAD Act (22 U.S.C. § 6082) and the amount in controversy exceeds \$50,000, excluding interest, costs, and attorneys' fees.

10. This Court has personal jurisdiction over defendants Gran Caribe, Cubanacán, and Gaviota under 28 U.S.C. § 1330 once service is made under 28 U.S.C. § 1608 because Gran Caribe, Cubanacán, and Gaviota are a foreign state as defined by 28 U.S.C. § 1603.

11. The Court has personal jurisdiction over Raúl Does 1-5 and Mariela Roes 1-5 under Fed. R. Civ. P. 4(k).

12. The Court has personal jurisdiction over Trivago and Booking.com under Fla. Stat. §§ 48.193(1)(a)(1) and (6)

13. Venue is proper in this District under 28 U.S.C. § 1391(c)(3) because Gran Caribe, Cubanacán, Gaviota, Raúl Does 1-5 and Mariela Roes 1-5 are not United States residents and because Trivago and Booking.com are deemed to be residents of Florida under 28 U.S.C. §§ 1391(c)(2) and (d).

THE LIBERTAD ACT

14. In 1996, in response to the communist Cuban government's murder of four civilian pilots performing humanitarian work with the Cuban-American group Brothers to the Rescue, Congress enacted the LIBERTAD Act to strengthen sanctions against the communist Cuban government and deter the exploitation of wrongfully confiscated property in Cuba belonging to U.S. nationals.

15. Title III of the LIBERTAD Act provides U.S. nationals whose property in Cuba had been confiscated by the communist Cuban government with a right of action against those who traffic in that property. 22 U.S.C. §§ 6081-6085.

16. Since the LIBERTAD Act's enactment more than twenty years ago, successive Presidents of the United States suspended the right of action provided by Title III. As of May 2, 2019, the suspension was not renewed. Diego Trinidad and the class members are now permitted to file suit under the LIBERTAD Act.

FACTUAL ALLEGATIONS

A. The Property

17. In the early 1950's, Diego Cosme Trinidad Valdes, and his wife, Estela Esperanza García, built a beachfront estate in a prime location in Varadero approximately 300 meters west of the hotel now known as the Melia Internacional.

18. On January 1, 1959, Fidel Castro took power in Cuba and instituted a communist regime. Shortly thereafter, in the early 1960's, the Cuban government confiscated the Property from the Trinidad Family, as it did with ultimately all privately-owned property on the island.

19. In 1960, Diego Cosme Trinidad Valdez, his wife, and their son, Diego Trinidad, fled their native country to the United States, where they lived ever since.

20. Upon the passing of Diego Cosme Trinidad Valdez, and his wife, the property which is the subject of this action was inherited by their son, Diego Trinidad.

21. Throughout the decades following the confiscation of the Property, Gran Caribe, together with the Barceló Group, developed the Resort. Vacation packages at the Resort can be reserved either directly from the Barceló Group through its website, or through Trivago, securing those reservations with a credit card. The booking of reservations online through either the Barceló Group or through Trivago is available to U.S. residents, including Florida residents.

B. Succession Rights to the Properties

22. As of the time of filing this lawsuit, Diego Trinidad is the rightful owner of the Property, which is being trafficked by Gran Caribe, the Barceló Group, and the Expedia and Booking.com Entities.

C. Defendants and the Expedia and Booking.com Entities Have Trafficked the Property Without Compensating Diego Trinidad

23. Neither the communist Cuban government, nor any of the defendants and their accessories, the Expedia and Booking.com Entities, has ever paid—and Diego Trinidad has never received—any compensation whatsoever for the trafficking of his Property.

24. Diego Trinidad was not eligible to file a claim with the Foreign Claims Settlement Commission under Title V of the International Claims Settlement Act of 1949 (22 U.S.C. § 1643 *et seq.*) because he was not a U.S. citizen at the time the Property was confiscated.

25. The Property has not been the subject of a certified claim under Title V of the International Claims Settlement Act of 1949 (22 U.S.C. § 1643 *et seq.*).

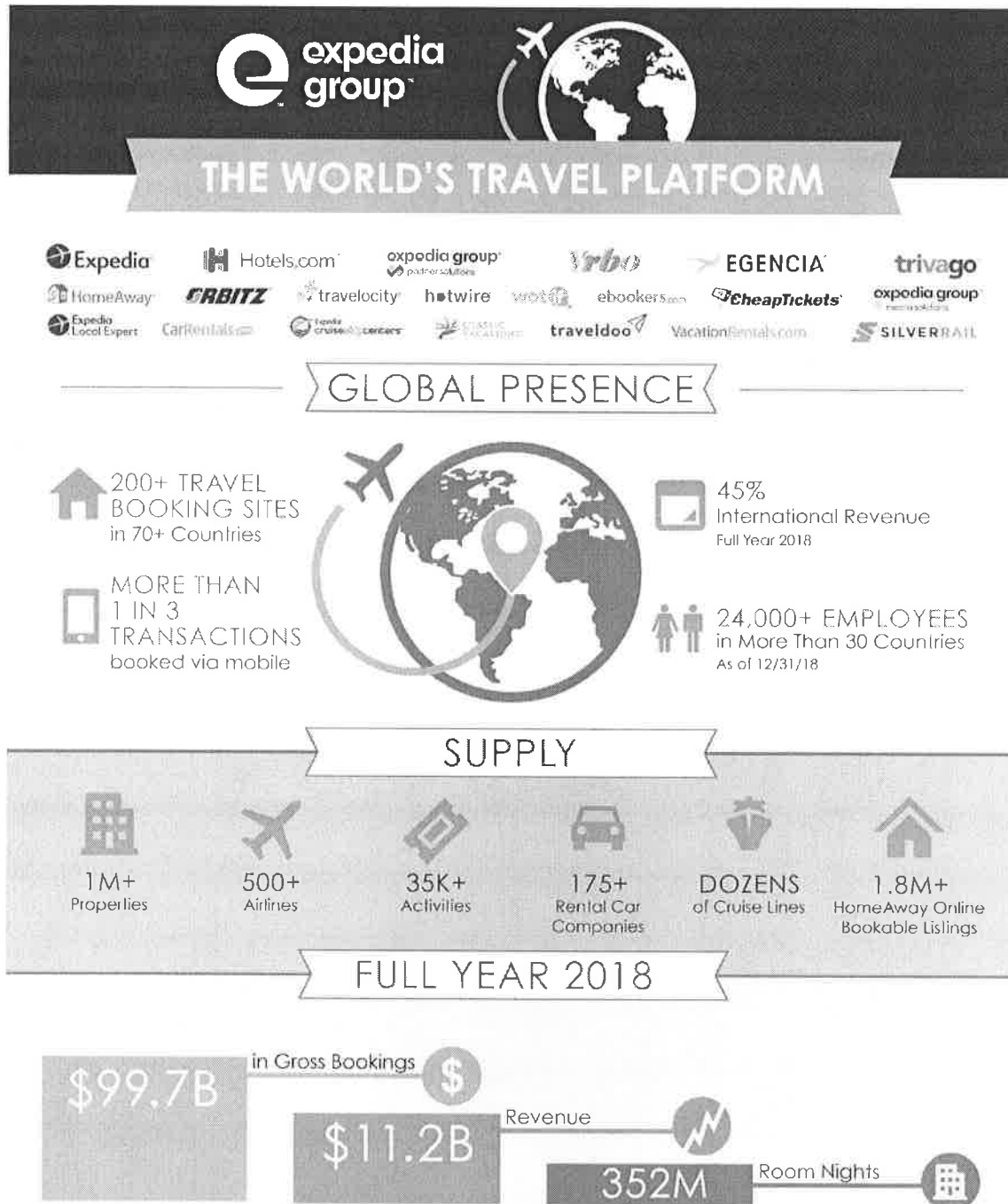
D. The Joint Venture

26. Gran Caribe and the Barceló Group operate in a joint venture by which they receive, possess, obtain control of, manage, use, or otherwise acquire or hold an interest in

confiscated property and engage in commercial activity involving the use of or otherwise benefitting from confiscated property. One of these properties is the Resort, a portion of which sits upon the Property.

E. The Expedia Entities

27. Expedia, Inc. is the corporate parent company for a number of brands, including Trivago. In fact, Expedia, Inc. lists a total of 21 subsidiaries or affiliates, through which it maintains more than 200 travel booking sites across more than 70 countries, and through which it offers more than 1 million properties for rent.



Expedia Group is a public traded company listed under the ticker symbol EXPE on the NASDAQ Global Market. All information as of December 31, 2018, unless otherwise specified. ©2019 by Expedia, Inc.

<https://www.expediagroup.com/about/>

28. According to Expedia, Inc.'s most recent 10-K filing, the Expedia Entities "make travel products and services available both on a stand-alone and package basis, primarily through

the following business models: the merchant model, the agency model and the advertising model.” Expedia, Inc., Annual Report (Form 10-K) (Feb. 14, 2018) at 5.

Under the merchant model, we facilitate the booking of hotel rooms, airline seats, car rentals and destination services from our travel suppliers and we are the merchant of record for such bookings. The majority of our merchant transactions relate to hotel bookings. Under the agency model, we facilitate travel bookings and act as the agent in the transaction, passing reservations booked by the traveler to the relevant travel provider. We receive commissions or ticketing fees from the travel supplier and/or traveler.

* * *

Under the advertising model, we offer travel and non-travel advertisers access to a potential source of incremental traffic and transactions through our various media and advertising offerings on trivago and our transaction-based websites.

Id. at 5-6.

29. When the Expedia Entities operate under the merchant model, customers “pay [the Expedia Defendants] for merchant hotel transactions prior to departing on their trip, generally when they book the reservation.” *Id.* at F-10. As to how the Expedia Entities profit from this model, they “generally contract in advance with lodging providers to obtain access to rooms at negotiated rates” then re-sell the rooms to its customers at a profit. *Id.* at F-11.

30. When the Expedia Entities operate under the agency model, the Expedia Entities “act as the agent in the transaction, passing reservations booked by the traveler to the relevant travel provider” and “receive commissions or ticketing fees from the travel supplier and/or traveler.” *Id.* at F-10.

31. The Expedia Entities all provide online booking services for hotels in Cuba, including those operated by Meliá, Blue Diamond, Iberostar, Be Live, Barceló, and others. For example, Expedia.com lists a total of 3,711 properties available for rent throughout Cuba, including 15 Blue Diamond properties, 3 Iberostar properties, 23 Meliá properties, 3 Be Live

properties, and 3 Barceló properties. One of these properties is the Resort, a portion of which sits upon the Property.

F. The Booking.com Entities

32. Like Expedia Inc., Booking Holdings is the corporate parent company for a number of brands, including Booking.com, Kayak, Priceline, Agoda, Rentalcars.com, and OpenTable. Booking Holdings, Inc., Annual Report (Form 10-K) (Feb. 27, 2019) at 1.

33. According to Booking Holdings, its “business is driving primarily by international results, which consist of the results of Booking.com, agoda, and Rentalcars.com and the international business of KAYAK and OpenTable.” *Id.* Booking Holdings clarifies, however, that its characterization of the majority of its business as “international” is “independent of where the consumer resides, where the consumer is physically located while using our services or the location of the travel service provider or restaurant. For example, a reservation made through Booking.com at a hotel in New York for a consumer in the United States is part of our international results.” *Id.*

34. The “substantial majority,” or 89%, of Booking Holdings’ “international”—by Booking Holdings’ definition of “international”—business is generated by defendant Booking.com. *Id.*

35. The Booking.com Entities operate under both an agency model and a merchant model:

- Agency revenues are derived from travel-related transactions where we do not receive payments from travelers for the services provided. We invoice the travel service providers for our commissions after travel is completed. Agency revenues consist almost entirely of travel reservation commissions, as well as certain GDS reservation booking fees and certain travel insurance fees.
- Merchant revenues are derived from travel-related transactions where we receive payments from travelers for the service provided, generally at the

time of booking. Merchant revenues include travel reservation commissions and transaction net revenues (i.e., the amount charged to travelers less the amount owed to travel service providers) in connection with our merchant reservation services; ancillary fees, including travel insurance-related revenues and certain GDS reservation booking fees; and credit card processing rebates and customer processing fees. Substantially all merchant revenues are for merchant services derived from transactions where travelers book accommodation reservations or rental car reservations from travel service providers.

Id. at 2. Under these models, along with advertising through KAYAK, Booking Holdings had revenues of \$14.5 billion. *Id.*

36. “Booking.com is the world’s leading brand for booking online accommodation reservations, based on room nights booked, with operations worldwide and headquarters in the Netherlands.” *Id.* at 4.

37. Defendant Booking.com provides online booking services for hotels in Cuba, including those operated by Meliá, Blue Diamond, Iberostar, Be Live, Barceló, and others. For example, Booking.com lists a total of 6,500 properties available for rent across Cuba, including 9 Iberostar properties, 19 Meliá properties, 5 Blue Diamond properties, 3 Be Live properties, and 3 Barceló properties. One of these properties is the Resort, a portion of which sits upon the Property.

CLASS REPRESENTATION ALLEGATIONS

38. Under Fed. R. Civ. P. 23, Diego Trinidad brings this suit and seeks class certification of the claim alleged here and a damages judgment against defendants for themselves and on behalf of the class.

39. The class is defined as follows and consists of:

All U.S. nationals (as defined at 22 U.S.C. § 6023(15)) who own property (as defined at 22 U.S.C. § 6023(12)) in Cuba that was expropriated by the government of Cuba prior to March 12, 1996, and has been trafficked by an agency or instrumentality of Cuba together with the Barceló Group, in many instances with the assistance of the Expedia or Booking.com Entities, without prior authorization of, or absent compensation to, such

U.S. nationals, where such U.S. national was not eligible to file a claim with the Foreign Claims Settlement Commission under Title V of the International Claims Settlement Act of 1949 (22 U.S.C. § 1643 et seq.), and no certified claim to the property exists.

This class definition excludes (a) the defendants, their officers, directors, management, employees, subsidiaries, and affiliates; and (b) any judges or justices involved in this action and any members of their immediate families.

A. *Federal Rule of Civil Procedure 23(a)*

40. Fed. R. Civ. P. 23(a) provides for class certification where the representative plaintiffs demonstrate that:

1. the class is so numerous that joinder of all members is impracticable;
2. there are questions of law or fact common to the class;
3. their representative claims or defenses are typical of the claims or defenses of the class; and
4. they will fairly and adequately protect the interests of the class.

(1) Numerosity

41. On information and belief, the class consists of hundreds of persons. The Barceló Group operates at least 3 hotels, resorts, and other tourist attractions in several locations throughout Cuba, rendering individual joinder of each class member impracticable.

(2) Commonality

42. Diego Trinidad and the class have claims that raise common questions of law or fact.

43. This is an action in which Diego Trinidad and the class members assert claims alleging the same theory of recovery, namely, that they are entitled to damages from the defendant for its wrongful trafficking of their property.

44. Diego Trinidad's and class members' claims arise from the same practice or course of conduct: defendant's trafficking of confiscated properties used in the hospitality and tourism industry for its own economic gain.

45. Diego Trinidad's and class members' damages were caused by the same practice or course of conduct: defendants' unlawful trafficking in their property without prior authorization or compensation to the rightful owners.

46. Diego Trinidad's and class members' claims raise common questions of law or fact, including, but not limited to, whether:

- a.* The communist Cuban government nationalized, expropriated, or seized property without providing the owners with adequate or effective compensation;
- b.* The confiscation of property occurred before March 12, 1996;
- c.* Defendants trafficked in that confiscated property; and
- d.* Defendants knew or had reason to know that the trafficked property had been confiscated.

(3) Typicality

47. Diego Trinidad's claims are typical of class member claims because they are based on the same legal theory, arise from a similar core set of facts, and are not subject to any unique defenses. Members of the class have sustained, and will continue to sustain, damages in the same manner as Diego Trinidad as a result of defendants' conduct.

(4) Adequacy of Representation

48. Diego Trinidad and his counsel will fairly and adequately protect and represent the interest of the class members.

49. Diego Trinidad is a member of the class defined above. As representative plaintiff, he is committed to the active and vigorous prosecution of this action and has engaged

competent counsel experienced in litigation of this nature, who possess the resources and commitment to vigorously prosecute this case to a successful resolution.

50. There is no hostility of interests between Diego Trinidad and other class members. Diego Trinidad has no claims that are antagonistic to the claims of other class members, and reasonably anticipates no difficulty in the management of this litigation as a class action.

B. Federal Rule of Civil Procedure 23(b)

51. This class action is maintainable under Rule 23(b)(3).

(1) Predominance

52. In this case, common liability issues of law and fact predominate over any hypothetical or potential individualized issues, because Diego Trinidad's and class members' claims arise from a common nucleus of operative fact and share, among other things, the common issues of law and fact set forth above. The predominant common issue in this action is whether defendants knew, or had reason to know, that they trafficked in confiscated property.

(2) Superiority

53. A class action is superior to other available methods for the fair and efficient adjudication of this litigation because it is the most manageable and efficient way to resolve the individual claims of each class member.

54. Specifically, a class action will provide class members with what may be their only economically viable remedy. Moreover, there are no known class members who are interested in individually controlling the prosecution of separate actions. In addition, a class action will concentrate all litigation in one forum, which will conserve judicial and party resources with no unusual manageability problems.

C. National Issues Class under Fed. R. Civ. P. 23(c)(4)

55. In the alternative, Diego Trinidad seeks to bring and maintain a national issues class under Fed. R. Civ. P. 23(c)(4).

56. Rule 23(c)(4) provides that an action may be brought or maintained as a class action with respect to particular issues when doing so would materially advance the litigation as a whole.

57. In order to materially advance this litigation, Diego Trinidad brings this action on behalf of himself and the Class Members to resolve several critical, class-wide issues, including whether:

- a. defendants entered into a joint venture or other contractual arrangement that arranged for the use of confiscated property;
- b. defendants engaged in a commercial activity using or otherwise benefitting from the use of confiscated property;
- c. defendants sold, transferred, managed, used, or acquired an interest in confiscated property; and
- d. defendants knew or had reason to know that the property they used or benefitted from was confiscated.

58. The Issues Class is properly brought and should be maintained as a class action under Rule 23(a), satisfying the class action prerequisites of numerosity, commonality, typicality, and adequacy because:

- a. Numerosity: Individual joinder of the Issues class members would be wholly impracticable. There are hundreds of persons throughout the United States whose property was confiscated by the communist Cuban government and in which defendants traffic. Thus, the numerosity element for class certification is satisfied;
- b. Commonality: Questions of law and fact are common to the Issues class members' claims. As this is an issues class under Rule 23(c)(4), there are, by definition, common questions of law applicable to all class members' claims;
- c. Typicality: Diego Trinidad's claims are typical of Issues class members' claims because all the claims arise from the same course of conduct by

defendants, i.e., defendants' trafficking in confiscated property. Therefore, Diego Trinidad's claims are typical of the issues class members' claims;

- d. Adequacy: Diego Trinidad will fairly and adequately represent and protect the interests of the Issues class members. Diego Trinidad's interest in vindicating his claims is shared with all Issues class members, and there are no conflicts between the named plaintiff and putative Issues class members. Further, Diego Trinidad is represented by counsel who are competent and experienced in class action litigation and have no conflicts.

59. This Issues class also is maintainable under Rule 23(b)(3) because common liability issues of law and fact predominate over any hypothetical or potential individualized issues. Diego Trinidad's and issues class members' claims arise from a common nucleus of operative fact and share, among other things, the common issues of law and fact set forth above. The predominant common issue in this action is whether defendants knew, or had reason to know, that they trafficked in confiscated property. A class action is superior to other available methods for the fair and efficient adjudication of this overarching issue, and this litigation, because class treatment affords the most manageable and efficient way to resolve the individual claims of each Issues class member. Class treatment will provide Issues class members with what may be their only economically viable remedy. Moreover, there are no known Issues class members who are interested in individually controlling the prosecution of separate actions. In addition, a class action will concentrate all litigation in one forum, which will conserve judicial and party resources with no unusual manageability problems.

CAUSE OF ACTION

COUNT I

Private Right of Action Under 22 U.S.C. § 6082(a)(1) **Against All Defendants**

60. Diego Trinidad incorporates by reference paragraphs 1 to 59 as if fully set forth here.

61. This claim is brought under Title III of the LIBERTAD Act, 22 U.S.C. § 6082.

62. Defendants are “persons” as defined by 22 U.S.C. § 6023(11).

63. Diego Trinidad and the class members had their property confiscated by the communist Cuban government.

64. Defendants Gran Caribe, Cubanacán, and Gaviota, together with the Barceló Group, entered into joint ventures for the purpose of trafficking in confiscated properties for use as hotel or other hospitality venues, including the Resort, which trafficking continues to this day, in violation of Title III of the LIBERTAD ACT.

65. Defendants Trivago and Booking.com, together with the Expedia and Booking.com Entities also have used or benefitted from the confiscated properties by offering, for economic benefit, reservations at the Resort, which trafficking continues to this day, in violation of Title III of the LIBERTAD ACT.

66. On information and belief, officials of the Cuban government and its defendant instrumentalities, including Raúl Does 1-5 and Mariela Roes 1-5 have, throughout the years, also participated in and profited from trafficking in confiscated properties, including Diego Trinidad’s property.

67. Defendants Gran Caribe, Cubanacán, Gaviota, Raúl Does 1-5, Mariela Roes 1-5, Trivago, and Booking.com together with the Barceló Group and the Expedia and Booking.com Entities, have conducted this trafficking “without the authorization of any United States national who holds a claim to the property” (22 U.S.C. § 6023(13)) in violation of Title III of the LIBERTAD Act.

68. Accordingly, Diego Trinidad and the class members are entitled to damages to be determined under 22 U.S.C. § 6082(a)(1)(A)(i), along with attorneys’ fees and costs under 22 U.S.C. § 6082(a)(1)(A)(ii).

PRAYER FOR RELIEF

WHEREFORE, Diego Trinidad, individually and on behalf of the class members,
demands the following relief:

- (a) A finding that this action satisfies the prerequisites for maintenance of a class action under Federal Rule of Civil Procedure 23(a) and (b)(3), and a certification of class;
- (b) Designation of Diego Trinidad as representative for the class and his undersigned counsel as class counsel for the class; and
- (c) A judgment against defendants that:
 - i. Awards actual damages in an amount to be determined under 22 U.S.C. § 6082(a)(1)(A)(i);
 - ii. Awards reasonable attorneys' fees and costs incurred in this action under 22 U.S.C. § 6082(a)(1)(A)(ii);
 - iii. Awards appropriate post-judgment interest; and
 - iv. Grants all other relief that the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand trial by jury on all issues so triable.

Dated: June 24, 2019

Respectfully submitted,

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