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U.S. Tech Workers, et al.  
v.  
Chicago H-1B Connect, et al.

U.S. Department of Justice  
Civil Rights Division Revised  
Immigrant and Employee Rights  
Section

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**Charge of Immigration Related Employment Discrimination**

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1. U.S. Tech Workers is an organization dedicated to promoting U.S. workers and to end the direct displacement of Americans through H-1B and other guestworker programs. U.S. Tech workers and its members bring this charge.

*Parties*

Complainants:

2. U.S. Tech Workers (<https://instituteforsoundpublicpolicy.org/ustechworkers/>) is an advocacy organization that promotes the interests of American technology workers. Founded in 2018, U.S. Tech Workers provides inspiration, leadership and resources to displaced tech workers every single day. Its goal is to combat the impacts of outsourcing American jobs. It is located at 1701 Pennsylvania Ave. NW, Washington DC 20006, (202) 543-5325.
3. The individual complainants are all U.S. Citizens.
4. J. \_\_\_\_\_e is a senior data analyst, currently located in Round Rock TX. He has a BS degree in business administration.
5. J. L\_\_\_\_\_n is a computer programmer, currently located in Norwalk CT. He has a BA degree in English and a certificate in computer programming. He also teaches programming-related courses at a community college.
6. J. D \_\_\_\_\_t is a software developer, currently located in Oakland CA. Mr. Donaldson has a BA degree in Computer Science.
7. J. T\_\_\_\_\_t is a software developer, currently located in Spearfish SD. Mr. Dale has BA in Philosophy with a minor in Computer Science and has a Masters degree in MIS.
8. S. W\_\_\_\_\_d is a software engineering. He currently resides in Michigan but works in Washington DC. He has a BS degree in computer science and an MS degree in Business Informatics and Operations
9. R. E\_\_\_\_\_d is a software engineer. He currently resides in Pendleton OR. He has a BS in software engineering.
10. Jeff Odgis is a technology consultant He currently resides in Ft. Lauderdale FL. He received his technology training at a trade school.

11. X. O\_\_\_\_\_r is a software development engineer. She has a PhD in computer science. She resides in Mercer Island WA.
12. N. A\_\_\_\_\_y resides is a software engineering. He has an associates degree in computer programming. He resides in Morrow OH.
13. Respondents collectively identify themselves as “Chicago H-1B Connect.” The individual respondents are:

P33 (Chicago)  
p33chicago.com  
1234 W Fulton Market  
Chicago IL 60607

World Chicago Business  
worldbusinesschicago.com  
180 N LaSalle, Suite 2505  
Chicago IL 60601  
(312) 553-0500

Commercial Club Chicago  
commercialclubchicago.org  
21 South Clark Street Suite 4301  
Chicago IL 60603  
(312) 853-1200

Executive’s Club Chicago (EXEC Chicago)  
executivesclub.org  
425 S Financial Pl, Suite 908  
Chicago IL 60605  
(312) 263-3500

1871  
1871.com  
222 W Merchandise Mart Plaza #1212  
Chicago IL 60654  
(312) 210-0695

Chicagoland Chamber of Commerce  
www.chicagolandchamber.org  
Wrigley Building  
410 North Michigan Avenue, Ste 900  
Chicago IL 60611  
(312) 494 6700

Corporate Coalition of Chicago  
www.corpcoalition.org  
info@corpcoalition.org

Matter  
matter.health  
222 W Merchandise Mart Plaza #1230  
Chicago IL 60654  
(312) 374-8243

Illinois Manufacturing Association  
ima-net.org  
220 E. Adams St.  
Springfield, Illinois 62701  
(217) 522-1240  
(800) 875-4462

Avant  
www.avant.com  
222 W Merchandise Mart Plaza Suite 900  
Chicago IL 60654  
(800) 712-5407

BCG (Boston Consulting Group)  
BCG.com  
200 Pier 4 Boulevard  
Boston MA 02210  
(617) 973-1200

BMO Bank  
Bmo.com  
320 S. Canal Street  
Chicago, IL 60606  
(872) 289-2300

Calamos Investments  
calamos.com  
2020 Calamos Court  
Naperville, IL 60563-2787  
630-245-7200

Cast21  
Cast21.com  
965 W Chicago Ave.  
Chicago, IL 60642  
(847) 772-8547

Caterpillar  
www.caterpillar.com  
5205 N O'Connor Blvd Ste. 100  
Irving TX 75039  
(309) 675-1000

Chime  
Chime.com  
77 Maiden Ln  
San Francisco CA 94108  
(844) 244-6363

Cohesion  
cohesionib.com  
20 N Upper Wacker Dr #2420  
Chicago IL 60606  
(833) 796-5500

DPI Discovery Partners Institute/University of Illinois  
dpi.uillinois.edu  
200 S. Wacker Dr Fourth Floor  
Chicago IL 60606  
(217) 300-1645

Discover Financial Services  
Discover.com  
2500 Lake Cook Rd  
Riverwoods IL 60015  
(224) 405-0900

Edelman  
www.edelman.com  
111 N. Canal St.  
Suite 1100  
Chicago IL 60606  
(312) 240-3000

Fifth Third Bank  
53.com  
Fifth Third Center  
38 Fountain Square Plaza  
Cincinnati OH 45263  
(513) 579-5353

G2  
www.g2.com  
100 S Wacker Dr #600  
Chicago, IL 60606  
(847) 748-7559

Gensler  
www.gensler.com  
11 E Madison St  
Chicago IL 60602  
(312) 456-0123

Grainger (W.W. Grainger)  
www.grainger.com  
222 W Merchandise Mart Plaza  
Chicago IL 60654  
(847) 535-1000

Illinois Tech (Illinois Institute of Technology)  
www.iit.edu  
Illinois Institute of Technology  
10 West 35th Street  
Chicago IL 60616-3793  
(312) 567.-3000

IODatasphere  
iodatasphere.com  
PO Box 1444  
Warrenville, IL 60555  
(630) 520-0260

ITW (Illinois Tool Works)  
Itw.com  
155 Harlem Avenue  
Glenview IL 60025  
224-661-8870

John Deere  
www.deere.com  
One John Deere Place  
Moline IL 61265  
(309) 765-8000

M1  
m1.com  
200 N LaSalle St., Ste. 800  
Chicago IL 60601  
(312) 600-2883

Merirow  
mesirow.com  
353 N Clark St  
Chicago IL 60654  
(312) 595-6000

Morningstar  
www.morningstar.com  
22 W Washington St #7  
Chicago IL 60602  
(312) 696-6000

MycoCycle  
mycocycle.com  
503 S Weber Rd #309  
Bolingbrook IL 60490  
(630) 235-1526

Northern Trust  
www.northerntrust.com  
50 S La Salle St  
Chicago IL 60603-1003  
(312) 630-6000

Northwestern Medicine  
Nm.org  
211 East Ontario Street  
Suite 1600  
Chicago, Illinois 60611  
(312) 694-7973

Oak St. Heath  
oakstreethealth.com  
30 W Monroe St Ste 1200  
Chicago IL 60603  
(888) 898-6762

Paylocity  
www.paylocity.com  
1400 American Ln, Schaumburg, IL 60173  
(800) 520 2687

Relativity  
relativity.com  
231 South LaSalle Street, 8th Floor  
Chicago, IL 60604  
(312) 263-1177

Reveal  
www.revealdata.com  
145 S Wells St Ste 500  
Chicago IL 60606  
(872) 310-0001

Rheaply  
rheaply.com  
227 W Monroe St #2100  
Chicago IL 60606  
(312) 561-9977

SSG (Sharma Strategy Group)  
www.sharmastrategygroup.com  
4327 Bluffview Blvd.  
Dallas TX 75209  
(214) 641-0307



Slalom Consulting  
slalom.com  
200 E Randolph St #3700  
Chicago IL 60601  
(312) 329-0401

Telynx  
telnyx.com  
515 N State St.  
Chicago IL 60654  
(312) 945-7420

Transunion  
transunion.com  
555 W Adams St.  
Chicago IL 60661  
(855) 681-3196

UL Solutions  
UL.COM  
333 Pfingsten Road  
Northbrook IL 60062  
(847) 272 8800

Ulta Beauty  
www.ulta.com  
1000 Remington Boulevard  
Suite 120  
Bolingbrook IL 60440  
(630) 410-4800

The University of Chicago  
Uchicago.edu  
5801 S Ellis Ave  
Chicago, IL 60637  
(773) 702-1234

Valkyrie Trading  
valkyrietrading.com  
425 South Financial Place  
Suite 3200  
Chicago IL 60605  
(312) 379-0200

Vividseats  
www.vividseats.com  
24 E Washington St  
Chicago IL 60602  
(866) 848-8499

Walgreens (Walgreen. Co.)  
walgreens.com  
200 Wilmot Rd.  
Deerfield IL 60015  
(800) 925 4733

Water Saver Faucet  
wsflab.com  
701 W Erie St.  
Chicago IL 60654  
(312) 666-5500

Zebra  
www.zebra.com  
3 Overlook Point  
Lincolnshire IL 60069  
(847) 634-6700

14. On or about January 21, 2023, Respondents began engaging in an unlawful scheme of recruitment based upon immigration status collectively operating under the name “Chicago H-1B Connect.”
15. Respondents targeted their recruitment efforts towards those in H-1B visa status in violation of 8 U.S.C. § 1324a.
16. Respondents promoted their efforts to target workers in H-1B status on their web site. <https://gotechchicago.com/h1b/>
17. Respondents promoted their effort to target workers in H-1B status on Twitter under the tag, #ChicagoH1BConnect.  
<https://twitter.com/P33Chicago/status/1618282170220707841>
18. Respondents promoted their efforts to target workers in H-1B status for recruitment in a press releases.

“P33 and World Business Chicago Form Coalition to Help Laid-Off Tech Workers with H-1B Visas Find New Jobs in Chicago”

<https://www.prnewswire.com/news-releases/p33-and-world-business-chicago-form-coalition-to-help-laid-off-tech-workers-with-h-1b-visas-find-new-jobs-in-chicago-301730776.html>

“Mycocycle, Inc., a leader in using mycoremediation to process toxins out of waste, announced that it has joined Chicago H1-B Connect, a coalition of Chicagoland companies who are willing to sponsor the H1-B visas for technology workers who have been displaced in the nationwide technology industry layoffs.”

[https://www.prweb.com/releases/mycocycle\\_joins\\_chicago\\_h1\\_b\\_connect\\_to\\_support\\_displaced\\_tech\\_workers/prweb19141147.htm](https://www.prweb.com/releases/mycocycle_joins_chicago_h1_b_connect_to_support_displaced_tech_workers/prweb19141147.htm)

19. Respondents promoted their efforts to target the recruitment of nonimmigrant workers in H-1B status in interviews with the news media.

Iris Almeida, *Laid-Off Foreign Tech Workers Are Set to Find New Jobs in Chicago*, Bloomberg, Jan 25, 2023

<https://www.bloomberg.com/news/articles/2023-01-25/chicago-seeks-to-lure-foreign-workers-laid-off-by-tech-giants>

*Chicago Seeks to Lure Laid Off Foreign Tech Workers*, Bloomberg TV

<https://www.youtube.com/watch?v=DsNA0arSgIo>

*Tech layoffs put extra strain on H-1B visa holders*, All Things Considered, NPR, Feb. 18, 2020

<https://www.npr.org/2023/02/18/1158169208/tech-layoffs-put-extra-strain-on-h-1b-visa-holders>

Reset with Sasha-Ann Simons, *Chicago Woos Laid-Off Foreign Tech Workers*

<https://podcasts.apple.com/us/podcast/chicago-woos-laid-off-foreign-tech-workers/id1108147135?i=1000597260712>

Daniel Tucker, *New coalition will help laid-off foreign tech workers find jobs in Chicago*, WBEZ, Jan 26, 2023

<https://www.wbez.org/stories/new-coalition-will-help-laid-off-foreign-tech-workers-find-jobs-in-chicago/3a4e43ca-4636-43df-9cb9-2bc9c0172b88>

Alex Zorn, Chicago makes play to support and attract laid-off foreign-born tech workers, Chicago Business Journal, Jan 25, 2023

<https://www.bizjournals.com/chicago/news/2023/01/25/chicago-foreign-born-laid-off-tech-workers.html>

20. On or about Feb. 16, 2023, Complainant J. \_\_\_\_\_e applied for a Data Analyst job at Respondent University of Chicago. He was rejected on or about Mar. 20, 2023.
21. On or about Feb. 16, 2023, Complainant J. \_\_\_\_\_e applied for a Data Analyst job at Respondent Rheaply. He was rejected on or about Feb. 24, 2023.
22. On or about March 9, Complainant J. \_\_\_\_\_e applied for a Senior People Analytics Analyst job at Respondent Adyen. He was rejected on or about April 6.
23. On or about March 22, Complainant J. \_\_\_\_\_e applied for an analyst job at Respondent ITW. He has received no response.
24. On or about March 5, Complainant S. W\_\_\_\_\_d applied for a Java Software Engineer job at Respondent Walgreens. He was rejected the next day.
25. On or about March 5, Complainant S. W\_\_\_\_\_d applied for a Mobile Applications Java Software Engineer job at Respondent Walgreens. He was rejected the next day.
26. On or about Feb. 21, 2023, Complainant S. W\_\_\_\_\_d applied for a Junior Quantitative Analyst job at Respondent Calamos Investments. He has received no response from the company.
27. On or about Mar. 6, 2023, Complainant S. W\_\_\_\_\_d applied for a Business Operations Analyst job at Respondent University of Chicago. The same day he received an acknowledgement from the employer that he had made the application but has heard nothing from the employer since.
28. On or about Feb. 21, 2023, Complainant S. W\_\_\_\_\_d applied for a Platinion Core Technology IT Consultant job at Respondent BCG. He received a rejection on from the employer on or about Mar. 10, 2023.
29. On or about Mar. 6, 2023, Complainant S. W\_\_\_\_\_d applied for a Forward-Deployed Data Engineer job at Respondent BCG. He received a rejection from the employer on or about Mar. 17, 2023.
30. On or about Mar. 6, 2023, Complainant S. W\_\_\_\_\_d applied for an Enterprise BI Sr. Analyst job at Respondent Avant. He received an acknowledgement from the employer the same day but has not heard from the employer since then.

31. On or about Mar. 6, 2023, Complainant S. W\_\_\_\_\_d applied for a Workday Analyst job at Respondent Avant. He has not heard from the employer about this application.
32. On or about Feb. 2, 2023, Complainant S. W\_\_\_\_\_d applied for a Business Analyst job at Respondent Grainger. He was rejected on or about Mar. 10, 2023.
33. On or about Feb. 2, 2023, Complainant S. W\_\_\_\_\_d applied for a Scientific Computing Platform Engineer job at Respondent Transunion. He was rejected on or about Feb. 23, 2023.
34. On or about Mar. 23, 2023, Complainant S. W\_\_\_\_\_d applied for an Application Engineer job at Respondent Discover. He was rejected on or about Mar. 31, 2023.
35. On or about April. 6, 2023, Complainant S. W\_\_\_\_\_d applied for a Full Stack Developer job at Respondent University of Chicago. He received an acknowledgement of his application the same day and an interview on or about April 13, 2023. He received a rejection on or about April 20, 2023.
36. On or about Mar. 23, 2023, Complainant S. W\_\_\_\_\_d applied for an IT Engineer job at Respondent Walgreens. He received an acknowledgement of his application the same day but has not heard from the employer since then.
37. On or about Apr. 4, 2023, Complainant S. W\_\_\_\_\_d applied for an Application Engineer job at Respondent Discover. He received an acknowledgement of his application the same day but has not heard from the employer since then.
38. On or about Apr. 4, 2023, Complainant S. W\_\_\_\_\_d applied for an Application Engineer job (Full Stack) at Respondent Discover. He received a rejection on or about April 5, 2023.
39. On or about Apr. 4, 2023, Complainant S. W\_\_\_\_\_d applied for an Application Engineer (SRE) job at Respondent Discover. He received a rejection on or about April 5, 2023.
40. On or about Apr. 4, 2023, Complainant Jeff Odgis applied for a Systems Support Specialist job at Respondent Calamos. He received no response or acknowledgement from the employer.

41. On or about Feb. 21, 2023, Complainant J. T\_\_\_\_\_t applied for a Cyber Security Engineer job at Respondent Walgreens. He was rejected on or about Feb. 23, 2023.
42. On or about Feb. 17, 2023, Complainant J. T\_\_\_\_\_t applied for an IT Product Development Manager at Respondent Ulta Beauty. He was rejected on or about Mar. 2, 2023.
43. On or about Feb. 3, 2023, Complainant J. D \_\_\_\_\_t applied for a Support Specialist job at Respondent University of Chicago. He was rejected on or about Feb. 15, 2023.
44. On or about Apr. 6 2023, Complainant J. D \_\_\_\_\_t submitted his resume with the named changed to Prashanth Patel to a Support Specialist Job at University of Chicago. On or about April 10, 2023, the University of Chicago responded to the “Patel” application, asking if he would relocate for the job.
45. On or about Feb. 3, 2023, Complainant J. D \_\_\_\_\_t applied for an IT Project Manager job at Respondent University of Chicago. He has not received any response.
46. On or about Feb. 3, 2023, Complainant J. D \_\_\_\_\_t applied for a Software Engineer Mobile App. Testing job at Respondent Walgreens. He has not received a response.
47. On or about Feb. 3, 2023, Complainant J. D \_\_\_\_\_t applied for a Java Software Engineer Mobile App. job at Respondent Walgreens. On or about Feb. 24, 2023, Walgreens conducted a scripted telephone interview with someone in Mexico. He has not been contacted since then.
48. On or about Feb. 27, 2023, Complainant R. E\_\_\_\_\_d applied for an Application Engineer job at Respondent Discover. On or about Mar. 4, 2023 he was rejected.
49. On or about Feb. 27, 2023, Complainant R. E\_\_\_\_\_d applied for a Firmware Software Engineer job at Respondent Zebra Technologies. On or about Mar. 15, 2023 he was rejected.

50. On or about Feb. 27, 2023, Complainant R. E\_\_\_\_\_d applied for a Software Engineer job at Respondent John Deere. He has received an acknowledgement of the application but no other response from the employer.
51. On or about Feb. 27, 2023, Complainant R. E\_\_\_\_\_d applied for a Software Engineer job at Respondent University of Chicago. He has received an acknowledgement of the application but no other response from the employer.
52. On or about Feb. 27, 2023, Complainant R. E\_\_\_\_\_d applied for a Software Engineer job at Respondent Walgreens. He has received an acknowledgement of the application but no other response from the employer.
53. On or about Mar. 1, 2023, Complainant R. E\_\_\_\_\_d applied for a Software Engineer job at Respondent Caterpillar. On or about Mar. 7, 2023 he was rejected.
54. On or about Jan. 31, 2023, Complainant J. L\_\_\_\_\_n applied for a Software Engineer, Mobile Apps. Job at Respondent Walgreens. He was interviewed on or about Feb. 15, 2023 and rejected on or about Feb. 18, 2023.
55. On or about Jan. 31, 2023, Complainant J. L\_\_\_\_\_n applied for a TDA/Platinion Core Technology Senior IT Consultant at Respondent BCG. He was interviewed on or about Feb. 15, 2023 and rejected on or about Feb. 10, 2023.
56. On or about Feb. 19, 2023, Complainant J. L\_\_\_\_\_n applied for a Software Development Engineer job at Respondent 5th 3d Bank. He received an acknowledgement the same day and a rejection on or about Mar. 9, 2023.
57. On or about Feb. 19, 2023, Complainant J. L\_\_\_\_\_n applied for a Data Science Analyst job at Respondent University of Chicago. He received an acknowledgement the same day but has had no response since.
58. On or about Feb. 19, 2023, Complainant J. L\_\_\_\_\_n applied for a DevOps Engineer job at Respondent Transunion. He was rejected on or about Mar. 29, 2023.
59. On or about Feb. 26, 2023, Complainant J. L\_\_\_\_\_n applied for a Data Science Analyst job at Respondent Discover. He was rejected on or about Mar. 4, 2023.

60. On or about Feb. 19, 2023, Complainant J. L\_\_\_\_\_n applied for a Data Analyst job at Respondent Rheaply. He has received no response.
61. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Sr. Software Engineer Job at Respondent Walgreens. She received an acknowledgement of her application but no other response.
62. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Sr. Software Engineer Job at Respondent Reveal. She received a rejection on or about Mar. 3, 2023.
63. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Java Software Engineer Job at Respondent UL Solutions. She received an acknowledgement of her application but no other response.
64. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Senior Software Engineer Job at Respondent Morningstar. She received an acknowledgement of her application but no other response.
65. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Senior Software Engineer Job at Respondent M1. She received an acknowledgement of her application but no other response.
66. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Software Engineer Job at Respondent John Deere. She received an acknowledgement of her application but no other response.
67. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Software Engineer Job at Respondent Grainger. She received an acknowledgement of her application and a rejection on or about Mar. 30, 2023.
68. On or about Feb. 26, 2023, Complainant X. O\_\_\_\_\_r applied for a Senior Full-Stack Developer Job at Respondent Mesirov. She received an acknowledgement of her application and a rejection on or about Mar. 10, 2023.
69. On or about Mar. 23, 2023, Complainant N. A\_\_\_\_\_y applied for a Principal Platform Engineer Job at Fifth Third Bank. He received an acknowledgement of his application the same day but no further response.



Dated: June 7, 2023

Respectfully submitted,

/s/ John Miano

Attorney for the Complainants

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Summit NJ 07901

(908) 273-9207

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