

Case No. \_\_\_\_\_

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
STATESBORO DIVISION**

<b>BRUCE A. McCARTNEY, SFC, USA (Ret),</b>	)	
<b>and CATHY LYONS,</b>	)	
Plaintiffs,	)	
	)	Civil Action No. _____
v.	)	
	)	
<b>DEPARTMENT OF VETERANS AFFAIRS,</b>	)	
Defendant.	)	
_____)		

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

(Administrative Procedure Act, 5 U.S.C. §§ 702, 706;  
Mandamus, 28 U.S.C. § 1361)

**PRELIMINARY STATEMENT**

1. Plaintiffs Bruce A. McCartney and Cathy Lyons, proceeding *pro se*, bring this action against the Department of Veterans Affairs (“Defendant” or “VA”) seeking declaratory and injunctive relief to compel compliance with **Public Law 118-61** (138 Stat. 1021), signed by the President of the United States on May 13, 2024, which renamed the Department of Veterans Affairs community-based outpatient clinic in Hinesville, Georgia as the “John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic” in honor of four Liberty County, Georgia Vietnam War heroes who gave their lives in service to this Nation.

2. Despite this clear and unambiguous Congressional mandate, the leadership of the Ralph H. Johnson VA Health Care System in Charleston, South Carolina—acting through the

Case No. \_\_\_\_\_

VA Southeast Network (VISN 7)—has systematically undermined, resisted, and failed to properly implement the law. Specifically, the Charleston VA leadership placed large, dominant “Ralph H. Johnson Healthcare System” signage on the Hinesville clinic *before* and *after* the signing of Public Law 118-61, spent over \$228,000 in taxpayer funds on unauthorized signage modifications, provided false and misleading statements to federal oversight bodies, and relegated the four heroes’ names to inferior signage—all in violation of federal law, VA directives, and VA signage design requirements.

3. Plaintiff McCartney has exhausted all available administrative remedies, including direct communications with local VA leadership, the VA Office of General Counsel, the VA Office of Accountability and Whistleblower Protection (“OAWP”), the VA Southeast Network (VISN 7), the Government Accountability Office (“GAO”), and the VA Inspector General. All administrative channels have been closed without resolution. The VISN 7 Network Director issued a “final response” on September 23, 2025, finding no wrongdoing.

4. Plaintiffs now seek judicial review of the VA’s final agency action under the Administrative Procedure Act, 5 U.S.C. §§ 702 and 706, and a writ of mandamus under 28 U.S.C. § 1361 to compel the VA to fully comply with Public Law 118-61.

### **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 (federal question) because this action arises under the laws of the United States, specifically 38 U.S.C. § 531, Public Law 118-61, and the Administrative Procedure Act, 5 U.S.C. §§ 701–706.

Case No. \_\_\_\_\_

6. This Court has jurisdiction to review final agency action under the Administrative Procedure Act, 5 U.S.C. § 702, which waives sovereign immunity for claims seeking relief other than money damages against the United States.

7. This Court has jurisdiction to issue writs of mandamus to compel a federal agency to perform a duty owed to the Plaintiffs under 28 U.S.C. § 1361.

7A. This action does not arise under, and is not barred by, 38 U.S.C. § 511. Section 511(a) channels into an exclusive administrative and appellate-review scheme only those decisions of the Secretary made “under a law that affects the provision of benefits” to veterans. Plaintiffs do not challenge any decision concerning veterans’ benefits, eligibility, or medical care. Plaintiffs challenge the VA’s failure to comply with a facility-naming statute, Public Law 118-61, the VA’s unauthorized expenditure of appropriated funds on noncompliant signage, and the related final agency action described below—none of which is a benefits determination or otherwise within the exclusive jurisdiction of the Court of Appeals for Veterans Claims. Subject-matter jurisdiction therefore lies in this Court under 28 U.S.C. § 1331, and sovereign immunity is waived by 5 U.S.C. § 702.

8. Venue is proper in this District under 28 U.S.C. § 1391(e)(1) because a substantial part of the events or omissions giving rise to this claim occurred within the Southern District of Georgia. The John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic is located at 500 East Oglethorpe Highway, Hinesville, Georgia 31313, within this District. Plaintiff McCartney resides in Midway, Georgia, within this District.

### **PARTIES**

Case No. \_\_\_\_\_

9. **Plaintiff Bruce A. McCartney** is a citizen of the United States residing in Midway, Liberty County, Georgia. Plaintiff is a retired United States Army Sergeant First Class (SFC), having served on active duty from 1968 to 1972, including service in the Republic of Vietnam (RVN 7/68–7/72) as a DUSTOFF Medic and Combat Medic. Plaintiff was medically retired under Chapter 61 and is rated as a 100% disabled veteran by the Department of Veterans Affairs. Plaintiff is eligible to receive, and does receive, health care services through the VA, including at the Hinesville clinic at issue in this action. Plaintiff led the multi-year effort to honor the four Liberty County Vietnam War heroes through the Congressional renaming of the clinic.

9A. **Plaintiff Cathy Lyons** is a citizen of the United States and the surviving sister of Specialist Four William E. (Billy) Sapp, United States Army, who was killed in action in the Republic of Vietnam on June 7, 1968, and who is one of the four Liberty County, Georgia heroes for whom Congress renamed the Hinesville clinic in Public Law 118-61. Plaintiff Lyons resides in [CITY], [STATE] [ZIP]. As the surviving sister of a fallen service member whom Congress expressly chose to honor, Plaintiff Lyons has a direct, concrete, and personal interest in ensuring that the VA designates and identifies the clinic as Congress commanded. Plaintiff Lyons attended the December 2, 2024 renaming ceremony and personally experienced the VA's relegation of the four heroes' names to inferior, poorly sited signage while the unauthorized "Ralph H. Johnson Healthcare System" name remained dominant, as described in her written statement dated February 13, 2025. Plaintiff Lyons falls squarely within the zone of interests protected by Public Law 118-61 and is adversely affected and aggrieved by the VA's failure to comply with that law within the meaning of 5 U.S.C. § 702.

10. **Defendant Department of Veterans Affairs** is a department of the executive branch of the United States Government, headquartered at 810 Vermont Avenue, NW, Washington,

Case No. \_\_\_\_\_

D.C. 20420. The VA operates the Ralph H. Johnson VA Health Care System in Charleston, South Carolina, and the VA Southeast Network (VISN 7) based in Duluth, Georgia, through which the Hinesville clinic is administered.

## **STATUTORY AND REGULATORY BACKGROUND**

### **A. Public Law 101-488 (October 31, 1990)**

11. On October 31, 1990, Congress enacted Public Law 101-488 (104 Stat. 1178), designating “the Department of Veterans Affairs Medical Center located in Charleston, South Carolina” as the “Ralph H. Johnson Department of Veterans Affairs Medical Center.”

12. The text of Public Law 101-488 is limited and specific. It names *only* “the Department of Veterans Affairs Medical Center located in Charleston, South Carolina.” The law contains **no language whatsoever** extending the Ralph H. Johnson designation to associated clinics, community-based outpatient clinics (“CBOCs”), leases, or any other facilities. The Hinesville, Georgia CBOC is a separate facility located in a different city, county, and state from the Charleston Medical Center.

### **B. 38 U.S.C. § 531 (November 11, 1998)**

13. 38 U.S.C. § 531(a) provides: “Except as expressly provided by law or as authorized under subsection (b), a facility, structure, or real property of the Department . . . may be named only for the geographic area in which the facility, structure, or real property is located.” The sole exception, subsection (b), permits the Secretary only to transfer an existing, congressionally conferred name to a replacement facility in the same locality under enumerated conditions; it does not authorize the VA to apply a name to a facility for which Congress has not provided that

Case No. \_\_\_\_\_

name. Accordingly, absent express statutory authorization, VA facilities may be named only for their geographic location.

### **C. Public Law 118-61 (May 13, 2024)**

14. On May 13, 2024, the President of the United States signed into law Public Law 118-61 (138 Stat. 1021), which states: “The Department of Veterans Affairs community-based outpatient clinic in Hinesville, Georgia, **shall** after the date of the enactment of this Act be known and designated as the ‘John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic.’” The use of the word “shall” imposes a mandatory, non-discretionary duty upon the VA.

15. The legislative history of Public Law 118-61 (H.R. 593, 118th Congress) shows that the bill was considered and passed by the House of Representatives on November 13, 2023 (Vol. 169, Congressional Record) and considered and passed by the Senate on May 2, 2024 (Vol. 170, Congressional Record).

### **D. VA Signage Design Requirements**

16. The VA Signage PG 18-10 Design Manual (May 16, 2023) establishes mandatory compliance requirements for all VA facility signage. Section 3 states that the Design Manual is “mandatory.” Section 2.5.3 requires that facilities “always” comply with signage standards. Page 2, Section 1 requires that a “variance” be approved before any variations to standard signage are implemented. The Center for Facilities Management (“CFM”) in Washington, D.C. must be consulted before any variance is considered.

17. VA Directive 0023 establishes the VA’s unified corporate image requirements and provides that signage should be updated “only when it is appropriate for new signage to be

Case No. \_\_\_\_\_

created, from a maintenance perspective”—meaning existing signage should not be changed absent a legitimate need.

18. VHA Directive 1229, Section 6(f)(1), addresses geographic location naming requirements for VA health care facilities.

19. The VA Signage PG 18-10 Design Manual, Section 4.1.3, at page 807, provides that the VA Seal is “NOT to be used” on signage.

## **STATEMENT OF FACTS**

### **A. Background and the Renaming Effort**

20. The Hinesville CBOC was established circa 2014 as part of the Ralph H. Johnson VA Health Care System. There was no Congressional act designating the Hinesville clinic under the Ralph H. Johnson name. The Charleston VA leadership applied the name administratively, without Congressional authorization and without legal authority under Public Law 101-488, which covers only the Medical Center in Charleston, South Carolina.

21. In 2022, Plaintiff began an effort to rename the Hinesville clinic in honor of four Liberty County, Georgia Vietnam War heroes: PFC John Gibson (USMC), PFC Dan James (USA), Spec 4 William Sapp (USA), and LCpl Frankie Smiley (USMC)—all of whom made the ultimate sacrifice in service to the United States. The effort included a resolution from the City of Midway and support from Liberty County, Georgia.

22. On October 7, 2022, Plaintiff contacted H. Wayne Capps, Chief of Stakeholder Relations, Public Affairs and Congressional Relations for the Ralph H. Johnson VA Health Care System. Mr. Capps indicated that the clinic “is already named after a Vietnam Veteran, Ralph H. Johnson” and stated he would contact Congressman Buddy Carter’s office regarding the matter.

Case No. \_\_\_\_\_

23. From 2022 through 2024, Congressman Buddy Carter (GA-1) championed H.R. 593 through Congress, with the bill passing the House on November 13, 2023 and the Senate on May 2, 2024. President Biden signed it into law on May 13, 2024 as Public Law 118-61.

### **B. Charleston VA's Unauthorized Signage Modifications**

24. Beginning in June 2023, the Charleston VA leadership initiated unauthorized signage modifications at the Hinesville clinic. A building permit (No. S-2300870) was paid on June 5, 2023, and the installation of large “Ralph H. Johnson Healthcare System” signage—including on the portico (main entrance) and on a monument sign at the road—was completed on October 10, 2023, at a documented cost of \$87,399.55. This signage was installed *before* H.R. 593 had even passed the House of Representatives on November 13, 2023, and well *before* it was signed into law on May 13, 2024. The Charleston VA leadership was aware that the renaming legislation was pending, yet proceeded to invest \$87,399.55 in taxpayer funds to place the unauthorized Ralph H. Johnson branding on the clinic.

25. This signage modification was done **without** submitting a variance request to the Center for Facilities Management (CFM) in Washington, D.C., as required by the VA Signage PG 18-10 Design Manual. The VA’s own FOIA response (FOIA No. 25-28059-F) admits that **“no variances were submitted”** for the exterior signage modifications.

26. The unauthorized signage installed by Charleston VA exhibits multiple specific violations of VA mandatory standards: (a) the signage incorporates the VA Seal, in violation of the VA Signage PG 18-10 Design Manual, Section 4.1.3, page 807, which states the seal is “NOT to be used” on signage; (b) the signage displays “Ralph H. Johnson Healthcare System” rather than the geographic designation required by 38 U.S.C. § 531; (c) the signage was installed without the mandatory variance approval from the Center for Facilities Management (CFM) in

Case No. \_\_\_\_\_

Washington, D.C., as required by the Design Manual, Section 1; and (d) the signage modifications were initiated without any documented compliance review against existing naming statutes, including Public Law 101-488 or 38 U.S.C. § 531.

27. After the signing of Public Law 118-61 on May 13, 2024, a second modification was made to the monument sign between July and September 2024 to add the Congressional naming (the four heroes' names). However, the large "Ralph H. Johnson Healthcare System" signage on the portico remained, effectively relegating the Congressionally mandated name to a secondary position.

27A. The VA's addition of the four heroes' names to a secondary monument sign does not constitute compliance with Public Law 118-61. The statute provides that the clinic "shall ... be known and designated" by the Congressionally mandated name. The Hinesville clinic's primary exterior identification—the large portico signage visible to all who enter—continues to display "Ralph H. Johnson Healthcare System," a name that was never authorized by Congress for this facility. Partial or subordinate display of the lawful name, while maintaining dominant display of an unauthorized name, is not compliance with the mandatory "shall be known and designated" language. Of the 1,294 VA facilities nationwide, the Hinesville clinic is the only facility whose primary exterior signage does not reflect its Congressionally or statutorily designated name.

27B. Email correspondence dated June 25, 2023, from H. Wayne Capps, Chief of Stakeholder Relations for the Charleston VA, reveals that "the sign design was approved by Congressman Carter." However, a member of Congress approving a sign design does not constitute statutory authority to name a federal facility. Congressional naming authority is exercised exclusively through legislation, and no legislation authorizes the Ralph H. Johnson

Case No. \_\_\_\_\_

name on the Hinesville clinic. The VA's reliance on informal Congressional design approval as a substitute for statutory compliance is legally insufficient.

### **C. The December 2, 2024 Renaming Ceremony**

28. On December 2, 2024, the Charleston VA conducted a ceremony ostensibly to honor the renaming. Plaintiff Cathy Lyons, a Gold Star family member and the sister of Spec 4 William E. (Billy) Sapp (killed in action in Vietnam on June 7, 1968), attended the ceremony. Plaintiff Lyons described the experience in a written statement dated February 13, 2025, noting that the heroes' names appeared only on a small sign placed in a disrespectful location with ditches, holes, and low-hanging tree limbs, while the large Ralph H. Johnson signs dominated the facility. Plaintiff Lyons stated she felt the Gold Star families were treated as if they were "not truly belonging, or perhaps being thrown to the side." The VA's relegation of the four heroes' names, and its treatment of the Gold Star families who came to honor them, is a direct and personal injury to Plaintiff Lyons.

### **D. Director Isaacks' Misrepresentation of Public Law 101-488**

29. On March 15, 2024, Scott R. Isaacks, Director and Chief Executive Officer of the Ralph H. Johnson VA Health Care System, wrote to Plaintiff citing Public Law 101-488 and claiming the Ralph H. Johnson name covers "all associated clinics and leases." This statement is a material misrepresentation of the law. Public Law 101-488 designates only "the Department of Veterans Affairs Medical Center located in Charleston, South Carolina." It contains no language whatsoever extending the name to associated clinics, CBOCs, leases, or facilities in other states. The Hinesville clinic is located in Hinesville, Georgia—a different city, county, and state from the Charleston Medical Center.

**E. False Statements and Contradictions by VA Officials**

30. The Charleston VA leadership provided false and misleading statements regarding compliance with VA policies and federal law. Specifically:

(a) Charleston VA officials initially claimed that presidential portrait display protocol “does not prohibit additional displays near national leadership portraits.” This was contradicted by the official policy from Gary C. Tallman, Acting Assistant Secretary, Office of Public and Intergovernmental Affairs (OPIA), who provided the actual VA protocol on February 7, 2024. After the OPIA intervention, Charleston corrected the portrait display but characterized the correction as “a favor, not to be in compliance.”

(b) The VA Southeast Network (VISN 7) Network Director David M. Walker repeatedly stated that the health care system “followed applicable policies and procedures for the clinic renaming, signage placement and permitting, and display protocols” and found “no evidence of wrongdoing or policy violations.” These statements are contradicted by the VA’s own FOIA response admitting no variances were submitted, the documented violations of the VA Signage Design Manual, and the use of the VA Seal on signage in violation of the Design Manual.

(c) The VA Office of General Counsel, through Deputy General Counsel Michael R. Hogan, declined to provide the promised Real Property Law Group review. On July 16, 2024, Mr. Hogan stated only that the Real Property Law Group “advised on the letter you received from the facility” and “will not be responding separately.” The OGC never addressed whether the signage modifications violated 38 U.S.C. § 531.

**F. Total Cost of Unauthorized Modifications**

Case No. \_\_\_\_\_

31. The total documented cost of unauthorized signage modifications across the Ralph H. Johnson VA Health Care System approaches \$230,000 in taxpayer funds. The documented expenditures include: (a) the initial Hinesville clinic exterior signage modification, \$87,399.55 (Building Permit No. S-2300870, paid June 5, 2023, completed October 10, 2023); (b) a subsequent modification to the Hinesville monument sign to add the Congressionally mandated name following passage of Public Law 118-61, approximately \$20,000; (c) similar unauthorized Ralph H. Johnson Healthcare System signage at the Savannah VA clinic, approximately \$20,000; and (d) additional signage modifications at other facilities under Charleston VA's control, approximately \$14,000. Upon information and belief, the Brunswick, Georgia clinic was also subjected to similar unauthorized signage modifications, the cost of which is not yet fully documented. All of these expenditures were made without the required CFM variance approval, for signage that violates federal statute and VA mandatory design requirements.

#### **G. Exhaustion of Administrative Remedies**

32. Plaintiff McCartney has exhausted all available administrative remedies, including:

(a) Direct communications with Charleston VA leadership (H. Wayne Capps, Scott R. Isaacks), 2022–2024;

(b) Engagement with VA Central Office, including OPIA Acting Assistant Secretary Gary C. Tallman, February 2024;

(c) Correspondence with the VA Office of General Counsel (Deputy General Counsel Michael R. Hogan; Richard Hipolit; Robert L. Davenport; Jessica Gaudette-Reed; Tyler O. Prout), June–July 2024;

Case No. \_\_\_\_\_

(d) Formal complaint to the VA Office of Accountability and Whistleblower Protection (OAWP Case No. 25-HinesvilleGA-28325), filed May 7, 2025, closed May 23, 2025 without finding of senior leader misconduct;

(e) Communications with the VA Southeast Network (VISN 7) Network Director David M. Walker, who issued a “final response” on September 23, 2025 finding no wrongdoing;

(f) Referral to the Government Accountability Office (GAO), which forwarded the complaint to the VA Office of Inspector General (OIG); no response was received;

(g) Multiple FOIA requests (Nos. 24-04945-F, 24-18345-F, 25-14848-F, 25-28059-F) and appeals/rebuttals of FOIA responses.

33. The OAWP closure on May 23, 2025, and the VISN 7 “final response” on September 23, 2025, constitute final agency action for purposes of judicial review under the APA.

### **COUNT I**

#### **VIOLATION OF THE ADMINISTRATIVE PROCEDURE ACT**

(5 U.S.C. §§ 702, 706(1) and 706(2))

34. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.

35. The Administrative Procedure Act, 5 U.S.C. § 706(2), provides that a reviewing court shall set aside agency action found to be: (A) arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; (C) in excess of statutory jurisdiction, authority, or limitations, or short of statutory right; or (D) without observance of procedure required by law.

35A. The Administrative Procedure Act separately provides, in 5 U.S.C. § 706(1), that a reviewing court shall “compel agency action unlawfully withheld or unreasonably delayed.”

Public Law 118-61 imposes on the VA a discrete and legally required duty: to designate and

Case No. \_\_\_\_\_

identify the Hinesville clinic by the name Congress assigned it. That duty is mandatory and is not committed to agency discretion. The VA has unlawfully withheld this discrete, nondiscretionary action by continuing, since the statute's enactment on May 13, 2024 and to the present day, to maintain the unauthorized "Ralph H. Johnson Healthcare System" name as the primary exterior identification of the clinic. Although the particular means by which the VA brings the clinic's signage into compliance may rest within the agency's reasonable discretion, the duty to designate and identify the facility by its statutory name is not.

36. The VA's actions with respect to the Hinesville clinic are "not in accordance with law" because: (a) the continued prominence of "Ralph H. Johnson Healthcare System" signage at a facility that Congress has renamed under Public Law 118-61 violates the mandatory "shall be known and designated" language of that law; (b) the original placement of Ralph H. Johnson signage on the Hinesville clinic was unauthorized by Public Law 101-488, which covers only the Medical Center in Charleston, South Carolina; and (c) the signage modifications violate 38 U.S.C. § 531.

37. The VA's actions are "arbitrary and capricious" because: (a) the VA spent over \$228,000 in taxpayer funds on signage that violates federal law; (b) the VA failed to submit required variance requests to CFM as mandated by its own Signage Design Manual; (c) the VA used the VA Seal on signage in violation of its own Design Manual; (d) VA officials made false and misleading statements regarding compliance with VA policies; and (e) the VA's "final response" finding "no wrongdoing" is contradicted by the VA's own FOIA responses and documented evidence.

Case No. \_\_\_\_\_

38. The VA's actions are "in excess of statutory jurisdiction" because the Charleston VA leadership applied the Ralph H. Johnson name to the Hinesville clinic without Congressional authorization, exceeding the scope of Public Law 101-488.

39. The VA's actions are "without observance of procedure required by law" because the signage modifications were made without the variance approval required by the VA Signage PG 18-10 Design Manual.

## **COUNT II**

### **MANDAMUS**

(28 U.S.C. § 1361)

40. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.

41. Public Law 118-61 imposes a clear, non-discretionary duty upon the VA. The statute provides that the Hinesville clinic "shall . . . be known and designated" as the John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic. The word "shall" is mandatory and leaves no room for discretion.

42. The VA owes this duty to the Plaintiffs. Plaintiff McCartney is a veteran receiving health care through the VA system, a resident of the community served by the Hinesville clinic, and the individual who led the renaming effort that Congress enacted into law. Plaintiff Lyons is the surviving sister of Spec 4 William Sapp, one of the four heroes for whom Congress renamed the clinic, and is among the very persons Public Law 118-61 was enacted to honor.

43. No other adequate remedy is available. All administrative remedies have been exhausted without resolution. The OAWP closed Plaintiff McCartney's complaint, the VISN 7 Network Director issued a "final response" finding no wrongdoing, the OGC declined to address the statutory violations, and the OIG has not responded to the GAO referral.

Case No. \_\_\_\_\_

44. Plaintiffs are entitled to a writ of mandamus compelling the VA to fully implement Public Law 118-61 by: (a) removing all “Ralph H. Johnson Healthcare System” signage from the Hinesville clinic that was not authorized by Congress; (b) ensuring that the John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic name is the primary and dominant identification of the facility; and (c) ensuring compliance with VA signage design requirements.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court:

A. Declare that the VA’s actions regarding the signage at the John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic in Hinesville, Georgia violate Public Law 118-61, 38 U.S.C. § 531, and the Administrative Procedure Act;

B. Declare that Public Law 101-488 does not extend the Ralph H. Johnson designation to the Hinesville, Georgia community-based outpatient clinic;

C. Declare that the VA’s FOIA-admitted failure to submit required variance requests for signage modifications constitutes a violation of VA mandatory signage design requirements;

D. Issue a writ of mandamus or injunctive relief compelling the VA to remove all unauthorized “Ralph H. Johnson Healthcare System” signage from the Hinesville clinic;

E. Issue an order compelling the VA to implement Public Law 118-61 such that the John Gibson, Dan James, William Sapp, and Frankie Smiley VA Clinic name is the primary and dominant identification of the facility in compliance with the law;

F. Order that the VA submit photographic documentation of full compliance within thirty (30) days of any order compelling corrective action; G. Award Plaintiffs their reasonable costs and expenses incurred in prosecuting this action; and

Case No. \_\_\_\_\_

H. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

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**Bruce A. McCartney, SFC, USA (Ret – Ch 61)**

*Pro Se Plaintiff*

3931 Islands Highway

Midway, Georgia 31320

Email: popz@coastalnow.net

Telephone: \_\_\_\_\_

Dated: \_\_\_\_\_, 2026

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**Cathy Lyons**

*Pro Se Plaintiff*

[Street Address]

[City, State ZIP]

Telephone: \_\_\_\_\_

Dated: \_\_\_\_\_, 2026

Case No. \_\_\_\_\_

**VERIFICATION**

I, Bruce A. McCartney, am the Plaintiff in the above-captioned action. I hereby verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the factual statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

\_\_\_\_\_  
Bruce A. McCartney

Date: \_\_\_\_\_

**VERIFICATION**

I, Cathy Lyons, am a Plaintiff in the above-captioned action. I hereby verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the factual statements made in the foregoing Complaint concerning me and within my personal knowledge are true and correct to the best of my knowledge, information, and belief.

\_\_\_\_\_  
Cathy Lyons

Date: \_\_\_\_\_

Case No. \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on \_\_\_\_\_, 2026, I caused a copy of the foregoing Complaint, together with the Summons, to be served upon the following:

**1. United States Attorney for the Southern District of Georgia**

P.O. Box 8970

Savannah, Georgia 31412

**2. Attorney General of the United States**

U.S. Department of Justice

950 Pennsylvania Avenue, NW

Washington, D.C. 20530

**3. Department of Veterans Affairs**

Office of the General Counsel

810 Vermont Avenue, NW

Washington, D.C. 20420

\_\_\_\_\_  
Bruce A. McCartney, *Pro Se*

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Case No. \_\_\_\_\_

Cathy Lyons, *Pro Se*