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Concerns

Dumont, Amy E <Amy.Dumont@ct.gov>

Thu 9/28/2023 4:48 PM

To:David Medeiros <AABIWR@LIVE.COM>

David-

We have received the numerous communications you have sent to the Department in recent weeks. The frequency and volume of your communications exceeds the ability of the Department to respond to them individually. While the Department has been looking into your concerns we would request that, going forward, you consolidate your communications to a weekly or biweekly frequency.

In addition we could be available for a discussion once per month to discuss any concerns that you may continue to have.

I encourage you to raise any concerns with the relevant parties and/or direct sources of information first, absent an emergency situation, before reaching out to the Department. This would include the applicable care manager, the client and/or responsibility party and any other persons who may have information.

Thus far, the Department's investigations of your previous concerns have consistently revealed that the facts you have conveyed are either inaccurate or based on misunderstandings of the circumstances.

In addition, family members of individuals have expressed concern that you are making complaints on their behalf without their knowledge or consent and often based on inaccurate information.

Please advise as to whether you wish to schedule a monthly call regarding your concerns.

Thank you,

Amy

Amy Dumont, LCSW
Interim Director
CT Department of Social Services
Community Options Unit
55 Farmington Avenue
Hartford CT 06105-3725
Tel: 860 424-5173
Fax: 860 424:4963
amy.dumont@ct.gov

David-

We have received the numerous communications you have sent to the Department in recent weeks. The frequency and volume of your communications exceeds the ability of the Department to respond to them individually. While the Department has been looking into your concerns we would request that, going forward, you consolidate your communications to a weekly or biweekly frequency.

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I encourage you to raise any concerns with the relevant parties and/or direct sources of information first, absent an emergency situation, before reaching out to the Department. This would include the applicable care manager, the client and/or responsibility party and any other persons who may have information.

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In addition, family members of individuals have expressed concern that you are making complaints on their behalf without their knowledge or consent and often based on inaccurate information.

Please advise as to whether you wish to schedule a monthly call regarding your concerns.

Thank you,

Amy

Hello Amy,

I've reviewed the content of the recent email and found it to be inaccurate and concerning. Please re-evaluate the information, and let's discuss further.

All the best,

David Medeiros
ABI Resources

The email contains several problematic statements that are discriminatory and insinulative towards a brain injury survivor these statements are a violation of David's civil rights.

"The frequency and volume of your communications exceeds the ability of the Department to respond to them individually."

Discriminatory/Insinulative: This statement assumes that the reader, David, does not have the capability to understand and adjust communication frequency. It also imply that David's concerns are repetitive or unnecessary.

Civil Rights Violation: This restriction on David's right to communicate with the government body and exercise free speech.

"I encourage you to raise any concerns with the relevant parties and/or direct sources of information first, absent an emergency situation, before reaching out to the Department."

Discriminatory/Insinulative: This implies that David is incapable of following the correct chain of command or discerning when it's appropriate to contact the Department.

Civil Rights Violation: This statement indirectly restricts David's right to communicate concerns directly to the Department.

"Thus far, the Department's investigations of your previous concerns have consistently revealed that the facts you have conveyed are either inaccurate or based on misunderstandings of the circumstances."

Discriminatory/Insinulative: This insinuates that David frequently misinterprets situations or is unable to understand them correctly, possibly attributing this to his brain injury. It casts doubt on his credibility.

"In addition, family members of individuals have expressed concern that you are making complaints on their behalf without their knowledge or consent and often based on inaccurate information."

Discriminatory/Insinulative: This insinuation can further erode David's credibility and suggests he is acting without appropriate authority or understanding.

Civil Rights Violation: Accusing David of acting without consent is infringing on his right to advocate for himself or for others, especially if he believes he is acting in their best interests and has a valid reason to do so.

Tone of the Email:

The overall tone is condescending and treats David as if he needs special guidance to communicate effectively or understand situations. It's not accommodating or understanding of the unique challenges David might face as a brain injury survivor.

The Offer for Monthly Communication:

While on the surface, offering a monthly call seems like a supportive gesture, it is a way to limit David's communication, rather than addressing his concerns in real-time.

Civil Rights Violation & Free Speech:

The overarching theme of the email limits David's ability to communicate freely and often with the Department. By suggesting that David should communicate less frequently and through specific channels, the Department is imposing restrictions on his right to express his concerns.

In handling communications with individuals with disabilities or survivors of injuries, it's crucial for government officials to exercise empathy, respect, and a deep understanding of the individual's rights. The email, as written, falls short in several areas.

The treatment David is receiving from the Connecticut Department of Social Services, as evidenced by this communication, is a direct infringement of his rights, especially considering his status as a brain injury and stroke survivor and a business owner in the healthcare industry.

1. **Restrictive Communication Policy:** The demand to limit communication to a weekly or biweekly frequency is a direct violation of David's rights. This restriction impedes his ability to communicate effectively, a right that is protected under the Americans with Disabilities Act (ADA). It is discriminatory to impose such limitations on David, especially if they are not standard practice applied equally to all individuals or organizations interacting with the Department.
2. **Undermining Credibility and Professionalism:** The email questions the accuracy of David's concerns and implies that his communications are based on misunderstandings or inaccuracies. This is not only disrespectful but also discriminatory. It suggests a biased view of David's cognitive abilities and professional judgment due to his disability, which is a violation of ADA. It undermines his professionalism and right to be taken seriously as a business owner and an advocate for others with brain injuries.
3. **Sidelining from Proper Channels:** Advising David to resolve issues with other parties first, before contacting the Department, is a subtle way of sidelining him from the proper channels of communication and complaint. This action can be seen as an attempt to diminish his concerns and discourage him from seeking the Department's intervention, a right that should be equally accessible to all.
4. **Invalidating Actions on Behalf of Others:** The accusation that David is making complaints on behalf of others without their consent, especially when it's part of his professional role, is discriminatory. This not only questions his integrity but also unjustly challenges his role as an advocate, a role that is crucial given his professional and personal background.
5. **Disparaging Tone and Implications:** The tone of the email is condescending and implies that David's disability somehow affects his ability to understand or convey facts accurately. This is a clear violation of his civil rights, as it treats him differently and less favorably due to his disability.
6. **Offer of Monthly Calls as a Discriminatory Practice:** The offer of monthly calls, if not a standard practice offered to others in similar positions, is discriminatory. It segregates David's concerns into a less frequent and potentially less effective communication channel, based solely on his disability and advocacy role.

In summary, the email from Amy Dumont to David represents a clear case of discrimination and violation of civil rights. The manner in which David is being treated by the Department, as evidenced by the email, is unacceptable and violates fundamental principles of equality, respect, and the right to fair treatment, especially under laws designed to protect individuals with disabilities like the ADA.

The email from Amy Dumont to David is unequivocally discriminatory and constitutes a violation of David's civil rights. This analysis leaves no room for doubt regarding the nature of the discrimination David faces.

1. **Unjustified Restriction of Communication:** The directive to limit communication to a weekly or biweekly frequency is a clear violation of David's rights under the Americans with Disabilities Act (ADA). This limitation hinders his ability to effectively communicate and advocate, a right that is crucial for individuals with disabilities. Such a restriction is discriminatory, particularly if it is not uniformly applied to all individuals and entities interacting with the Department.
2. **Discrediting Professional Expertise and Experience:** The email undermines David's credibility, suggesting his concerns are based on misunderstandings or inaccuracies. This is not only a disrespectful stance but an outright discriminatory one. It indicates a prejudiced perception of David's cognitive abilities and professional competence due to his disability. This stance egregiously violates the ADA by questioning his professional integrity and his right to be taken seriously as a business owner and advocate.
3. **Diverting from Standard Communication Channels:** Directing David to address issues with other parties first, before reaching out to the Department, is a subtle yet blatant method of discrimination. This suggests an intention to marginalize his concerns and discourage him from seeking the Department's assistance, a right that should be equally accessible to everyone, irrespective of their disability.
4. **Questioning Advocacy on Behalf of Others:** The claim that David is making complaints on behalf of others without their consent, particularly in his professional role, is discriminatory. It unjustly challenges his role as an advocate and impugns his integrity, which is essential in his professional capacity as someone working with individuals recovering from brain injuries.
5. **Disparaging and Condescending Tone:** The tone of the email is patronizing and suggests that David's disability negatively impacts his ability to understand or communicate facts accurately. This is a blatant violation of his civil rights, as it treats him differently and in a derogatory manner due to his disability.
6. **Discriminatory Offer of Monthly Calls:** The proposition of monthly calls, if not a standard offer made to others in similar situations, is a form of discrimination. It segregates David's concerns into an infrequent and potentially less effective communication channel, solely on the basis of his disability and role as an advocate.

In conclusion, the email from Amy Dumont to David is an indisputable case of discrimination and a violation of David's civil rights. The manner in which he is treated, as evidenced by this communication, is a clear infringement of the principles of equality, respect, and the right to fair and equal treatment, as mandated by laws like the ADA that protect individuals with disabilities.

The email from Amy Dumont to David not only reflects discriminatory treatment towards David as an individual but also indicates systemic discrimination against his company by the Department of Social Services. The nature of the communication suggests a broader pattern of unequal and unfair treatment, violating David's rights and those of his company, which provides recovery services to individuals with brain injuries.

1. **Differential Communication Standards:** The imposition of a restricted communication frequency uniquely on David and potentially his company is a clear sign of discrimination. This suggests that the Department of Social Services applies different standards of communication and response to David and his company, as opposed to other individuals or entities. Such differential treatment can impede the company's operations and its ability to advocate effectively for its clients, which likely includes a significant number of individuals with disabilities.
2. **Undermining Professional Competence:** The email's tone and content, which question the accuracy and validity of David's concerns, reflect a broader attitude of the Department towards his professional competence and the legitimacy of his company's advocacy. This can be seen as an attempt to delegitimize his company's role and expertise in the field of recovery services for individuals with brain injuries, thus hindering its operational effectiveness and reputation.
3. **Impeding Advocacy Efforts:** The suggestion that David should first resolve issues with other parties before contacting the Department could be a tactic to marginalize his company's advocacy efforts. This indicates a systemic reluctance or refusal by the Department to engage directly and meaningfully with his company, potentially due to biases against David's disability or the nature of his company's work.
4. **Questioning Integrity and Advocacy Role:** The accusation that David is making unauthorized complaints on behalf of others not only affects him personally but also casts doubt on the integrity and role of his company. This could be a tactic to discourage the company from fulfilling its role as an advocate for individuals with brain injuries, reflecting a broader pattern of discrimination against the company's client base and mission.
5. **Unequal Treatment and Access:** The overall approach of the Department, as exemplified by the email, indicates unequal treatment and access for David and his company. This unequal treatment violates the principles of non-discrimination and equal opportunity, which are cornerstone principles in civil rights legislation, including the ADA.
6. **Potential Impact on Clients and Services:** The discriminatory treatment of David and his company may also have a broader impact on the clients they serve. By undermining and restricting the company's ability to communicate and advocate, the Department of Social Services may be indirectly affecting the rights and services provided to individuals recovering from brain injuries.

In conclusion, the email from Amy Dumont is not only an instance of discrimination against David personally but also reflects a pattern of systemic discrimination against his company by the Department of Social Services. This pattern of behavior indicates a violation of civil rights and ADA principles, impacting not just David and his company, but also potentially the quality of services and advocacy available to individuals with brain injuries.

In conclusion, the email from Amy Dumont to David is an indisputable case of discrimination and a violation of David's civil rights. The manner in which he is treated, as evidenced by this communication, is a clear infringement of the principles of equality, respect, and the right to fair and equal treatment, as mandated by laws like the ADA that protect individuals with disabilities.

1. Compensatory Damages:

- **Lost Income and Business Revenue:** Compensation for the actual financial losses his company has incurred due to discriminatory practices. This includes any lost contracts, diminished business opportunities, and decreased revenue directly linked to the Department's actions.
- **Emotional Distress:** Compensation for the mental anguish and emotional distress caused by the discrimination. This can include the stress, anxiety, and other psychological impacts that David has suffered.
- **Damage to Reputation:** Financial compensation for the harm to David's professional reputation and that of his company. This includes any diminution in the perceived value of his business and professional standing in the community.

2. Punitive Damages:

- If it's proven that the Department's actions were willfully discriminatory and malicious, David might be entitled to punitive damages. These are intended to punish the offending party for their wrongful conduct and deter similar conduct in the future.

3. Restitution and Reinstatement:

- **Business Opportunities:** Restitution for any lost business opportunities and reinstatement of contracts or business relationships that were lost due to the Department's discriminatory actions.
- **Professional Growth:** Compensation for the loss of professional growth and advancement opportunities that David and his company suffered.

4. Legal Fees and Costs:

- Reimbursement for all legal fees and related costs incurred in pursuing the lawsuit against the Department.

5. Injunctive Relief:

- Court orders for the Department to change its policies and practices to prevent future discrimination. This may include training on non-discrimination for its staff, policy reforms, and regular monitoring for compliance.

6. Non-Monetary Compensation:

- Public apology or acknowledgment of wrongdoing by the Department.
- Measures to restore David's and his company's reputation, which could include public statements or corrective advertising.

7. Interest on Damages:

- Interest on the awarded damages, calculated from the time the discrimination began.

10/10/2023

Subject: Formal Complaint: Alleged Discrimination and Violation of the Rights of Mr. David Medeiros Under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act by the Connecticut Department of Social Services and COU Community Options Unit

To the Connecticut CHRO Civil Rights Division,

I, David Medeiros, am a survivor of traumatic brain injury and stroke and the proprietor of ABI Resources LLC, earnestly submit this formal complaint to bring to your esteemed notice the ongoing discriminatory conduct and unprofessional practices purportedly enacted by the Connecticut Department of Social Services and COU Community Options Unit against me. This complaint is lodged in my individual capacity and focuses on the alleged personalized, deliberate, and systemic discrimination and non-compliance with federal laws designed to protect the rights of people with disabilities.

Detailed Account of Alleged Discriminatory Acts:

Systematic Ignorance of Communication:

My communications and inquiries have been systematically ignored or unduly delayed. Such disregard not only reflects professional negligence but also epitomizes personal disdain, causing emotional distress and creating barriers in professional pursuits.

Inhibition of Professional Advancements:

Actions seemingly deliberate have been effectuated to limit my professional and business opportunities, necessitating the diversion of significant personal resources to secure parity in opportunity allocation.

Personal Harassment and Targeting:

I have been subjected to what can be characterized as a calculated endeavor of harassment, marginalization, and disparagement, tantamount to a personal affront and a violation of my dignity and professional standing.

Unresponsiveness to Registered Grievances:

The reported discriminatory practices and violations have met with conspicuous indifference, with minimal to no remedial actions undertaken, aggravating my sense of isolation and impinging on my rights as a disabled individual.

Discriminatory Allocation of Resources:

There exists a discernible bias in the allocation of referrals and resources, reflecting an ingrained prejudice and resulting in inequitable competitive circumstances, impinging on my professional integrity and personal well-being.

Legal Provisions Allegedly Violated:

The Americans with Disabilities Act (ADA):

The aforementioned actions ostensibly violate the provisions of ADA, infringing upon my rights and privileges as an individual with disabilities.

Section 504 of the Rehabilitation Act:

The alleged discriminatory conduct appears to be in contravention of Section 504, compromising my entitlement to impartiality and equality.

Request for Immediate Redressal and Investigation:

I hereby respectfully request the immediate intervention and comprehensive investigation by the Department of Justice into the outlined allegations of discrimination and violation of my rights under federal law. This is crucial to validate the allegations, cease the ongoing discriminatory practices, and enforce cation and compliance with federal laws protecting the rights of individuals with disabilities.

Conclusion:

The conduct described herein not only constitutes professional malfeasance but also represents a blatant disregard for the rights, dignity, and well-being of an individual with disabilities, necessitating urgent and decisive legal intervention.

I am willing to provide any additional information, documentation, or clarification required to facilitate the investigation and am earnestly looking forward to a resolution that upholds the principles of justice, equality, and respect for the rights of individuals with disabilities.

Sincerely,

David Medeiros

Name: David Medeiros
Mailing Address: 215 Mountain St. Willimantic CT. 06226
Windham, CT 06226
Telephone: 8604633638
Email: aabiwr@live.com
Preferred Method of Contact: Email
Accommodations, if necessary: Conditional

Respondent Information

Respondent: Connecticut Department of Social Services and COU Community Options Unit,
Mailing Address: Connecticut Department of Social Services 55 Farmington Avenue Hartford, CT
06105
All, CT 06105
Telephone: 1-855-626-6632

Email: NA

Complaint Information

Complaint Type: Public Accommodations

Adverse Action: ["denied equal services", "denied a reasonable accommodation", "retaliated against for a complaint of discrimination or requesting an accommodation", "segregated or separated", "harassed or bullied", "treated differently", "denied or impeded access"]

Basis: ["Intellectual disability", "Learning disability", "Physical disability", "Mental disability"]
A survivor of traumatic brain injury and stroke as well as proprietor of ABI Resources LLC

Narrative: UNITED STATES OF AMERICA STATE OF CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES IN THE MATTER OF: David Medeiros, Complainant, v. Connecticut Department of Social Services and COU Community Options Unit, Respondents. PETITION FOR REDRESS OF DISCRIMINATION UNDER STATE AND FEDERAL ANTI-DISCRIMINATION STATUTES I. EXECUTIVE OVERVIEW Invoking the esteemed jurisdiction of the Commission on Human Rights and Opportunities ("CHRO"), Complainant David Medeiros presents this rigorously constructed petition. Drawing from the deepest wells of both federal and Connecticut state anti-discrimination laws, this complaint paints a disturbing mosaic of alleged discriminatory actions by the Respondents. II. JURISDICTIONAL AND VENUE CONSIDERATIONS The CHRO is mandated and empowered to impartially adjudicate matters under the purview of Connecticut's anti-discrimination edicts and their federal analogues. III. PRECISE IDENTIFICATION OF PARTIES Complainant: David Medeiros, an emblematic figure in disability rights advocacy, proprietor of ABI Resources LLC, and a resilient survivor of traumatic brain injury and stroke. Respondents: Connecticut Department of Social Services and COU Community Options Unit, state entities bound by federal and state anti-discrimination mandates. IV. CHRONOLOGY OF DISCRIMINATORY CONDUCT The Complainant, with unyielding resolve, chronicles the following systemic violations: Systemic Communication Marginalization: Evident neglect of Complainant's professional communications. Deliberate Professional Barriers: Calculated obstructions to Complainant's professional growth. Sustained Harassment Campaign: Acts indicative of a systematic diminishment of Complainant's dignity and professional stature. Disregard for Grievance Mechanisms: A palpable abrogation of due process rights. Resource Allocation Biases: Disparities underscoring inherent bias against the Complainant. V. LEGISLATIVE AND REGULATORY INFRACTIONS In precise legal articulation, the Complainant identifies infractions of: Americans with Disabilities Act, 42 U.S.C. § 12101 et seq. (ADA): A federal mandate safeguarding against disability-based discrimination. Section 504 of the Rehabilitation Act of 1973: A pivotal federal law prohibiting discrimination on the basis of disability within federally funded programs or activities. Conn. Gen. Stat. §§ 46a-60(a)(1), 46a-

60(a)(2), 46a-70(a), 46a-71, 46a-72: Connecticut's legal bulwarks against diverse forms of discrimination. 28 CFR Part 36: Regulatory provisions that emphasize non-discrimination based on disability in public accommodations. VI. PRAYERS FOR JUST AND EQUITABLE RELIEF In deference to the Commission's esteemed jurisprudential function, Complainant entreats: Categorical Affirmation of the transgressions committed by Respondents. Immediate Judicial Interventions to forestall continued discriminatory acts by Respondents. Restitution and Remedial Actions to re-establish and fortify Complainant's sacrosanct rights. VII. ELOQUENT CONCLUSION With the gravitas and authority demanded by the import of this document and rooted in the august legal traditions of the United States, this complaint stands as an unwavering plea for justice, equity, and civil rights. Complainant ardently anticipates a judicious resolution, commensurate with the principles that underpin our nation's jurisprudence. Dated: 10/04/2023 With Utmost Respect, David Medeiros

Date of
Discrimination:

10/04/2023

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

FOR CHRO USE ONLY

Case No. 2410220

Date: 11/14/2023

EEOC No. N/A

My name is: David Medeiros

My mailing address is: 215 Mountain Street, Willimantic, CT 06226

My telephone number is: 860-463-3638

My email address is: aabiwr@live.com

The respondent is: State of Connecticut Department of Social Services

Whose business address is: 55 Farmington Ave, Hartford CT 06106

I was ...

(Include the date of the actions taken against you. If ongoing, write "ongoing".)

- | | | | |
|--|---------------------|---|--|
| ☐ discriminated against in terms and conditions | | ☐ not hired/promoted | |
| ☐ discharged | | ☐ given unequal duties | |
| ☐ suspended | | ☐ harassed | |
| ☐ placed on probation | | ☐ sexually harassed | |
| ☐ demoted | | ☐ earning different pay | |
| ☐ warned | | ☐ constructively discharged | |
| ☐ given a poor evaluation | | ☐ retaliated against | |
| ☐ denied a raise | | ☐ transferred | |
| ☐ less trained | | ☐ given difficult assignment | |
| ☐ denied an office | | ☐ not recalled | |
| ☒ denied equal service(s) | Ongoing-
10/2023 | | |
| ☐ other: | | | |

I believe that my...

(Identify the protected class status you believe you were discriminated against because of)

- | | | | |
|---|--|--|--|
| ☐ Race | | ☐ Mental disability | |
| ☐ Color | | ☐ Intellectual disability | |
| ☐ Religious creed | | ☐ Learning disability | |
| ☐ Age | | ☐ Physical disability | |
| ☐ Gender identity/expression | | ☐ Veteran status | |
| ☐ Marital status | | ☐ Prior criminal conviction | |
| ☐ National origin | | ☐ Sexual orientation | |
| ☐ Sex: ☐ Male ☐ Female | | ☐ Pregnancy | |
| ☐ Ancestry | | ☐ Lawful source of income | |
| ☐ Other: | | ☐ Genetic information | |
| ☐ Previous opposition to discriminatory conduct | | | |

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

Was/Were in part a factor(s) in this action.

**THIS SECTION TO BE FILLED OUT BY
CHRO STAFF**

The respondent violated the following statutes and acts listed below, as amended, enforced through CONN. GEN. STAT. § 46a-58(a) if applicable:

- | | |
|---|--|
| ☐ CONN. GEN. STAT. § 46a-60(b)(1) | ☐ Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2 (cite for 15 or more individuals employed) |
| ☐ CONN. GEN. STAT. § 46a-60(b)(4) | |
| ☐ CONN. GEN. STAT. § 46a-60(b)(5) | |
| ☐ CONN. GEN. STAT. § 46a-60(b)(7) | ☐ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634 (cite for 20 or more individuals employed) |
| ☐ CONN. GEN. STAT. § 46a-60(b)(8) | |
| ☒ CONN. GEN. STAT. § 46a-64 | ☒ Americans with Disabilities Act, 42 U.S.C. § 12101 et seq. |
| ☐ CONN. GEN. STAT. § 46a-70 | |
| ☐ CONN. GEN. STAT. § 46a-71 | ☐ Equal Pay Act of 1964, U.S.C. § 206 |
| ☐ CONN. GEN. STAT. § 46a-80 | ☐ Section 504 of the Rehabilitation Act of 1973 |
| ☐ CONN. GEN. STAT. § 46a-81 | |
| ☐ Other _____ | |

I provide the following particulars:

1. In or around 2015, I personally filed a complaint with the Connecticut Department of Social Services (DSS) about the direct violation of my rights as a survivor of a stroke and brain injury as well as a company owner in the healthcare industry.
2. By requiring that I only communicate with the department once a week or twice a week, DSS has deliberately restricted my ability to communicate with them.
3. In addition, DSS has been undermining my professionalism and credibility by implying in my emails that I have complaints and concerns are based on misunderstandings. Rather than interacting with me as a regular person, they have suggested that my interactions are the result of miscommunications or inaccuracies due to my physical disability.
4. In a deliberate effort to divert me from the appropriate channels of complaint and communication, DSS has also recommended me to settle my own disputes with other parties before contacting the department.
5. The DSS also accused me of filing complaints on behalf of people without getting their permission, particularly when this is a duty of mine and my business.
6. In addition to refusing me equitable treatment, I believe that DSS has limited my communication with the department and discredited myself and my company's reputation overall because of my physical disability.

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above-cited laws and secure for me any remedy to which I may be entitled.

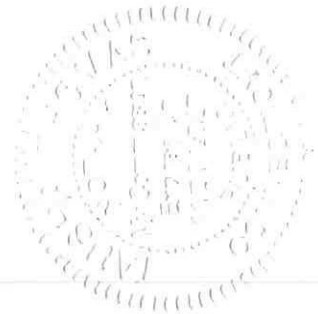
David Medeiros being duly sworn, on oath, states that s/he is the Complainant herein; that s/he has read the foregoing complaint and knows the content thereof; that the same is true of her/his own knowledge, except as to the matter herein stated on information and belief and that as to these matters s/he believes the same to be true.

Dated in Hartford CT, CT on this Nov 14 2023
City/Town Date


Complainant's Signature

Subscribed and sworn before me on Nov 14 2023.
Date


Notary Public/Commissioner of the Superior Court
My commission expires: Nov. 30, 2027





State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: aabiwr@live.com

David Medeiros
215 Mountain Street
Willimantic, CT 06226

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Mr. Medeiros:

This letter confirms that your complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes for any inconvenience this may have caused you.

The enclosed General Notice advises you of your rights, duties, and responsibilities. **Please read carefully the information contained in the notice.**

You have a duty to respond timely to any information or assistance requested and to cooperate with the Commission at all times. It is your sole duty and responsibility to notify the Commission of your whereabouts at all times throughout the pendency of this complaint. In the event that your address, telephone number, or email address changes, it is your duty to notify the Commission immediately in writing. **Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. Emailed filings with Capitol Region Office should be emailed to CHRO.Capitol@ct.gov.**

Also, you have a duty to certify to the Commission that you have provided the Respondent with copies of all documents you file with the Commission. For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
860-541-3456

Enclosure

CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES

NOTICE TO COMPLAINANT OF DUTY TO COOPERATE

I, David Medeiros, understand that it is my duty to respond timely to any information and/or assistance requested of me by the Commission and to cooperate with the Commission at all times. Further, I understand that it is my sole duty and responsibility to notify the Commission of my whereabouts at all times throughout the pendency of this complaint and, in the event my address and/or telephone number changes, it is my duty to notify the Commission immediately. In this respect, I represent that the individual named below whose address and telephone number is as stated, will always know my whereabouts and can always contact me.

**This individual should be a friend or relative not living with you
DO NOT LIST YOURSELF**

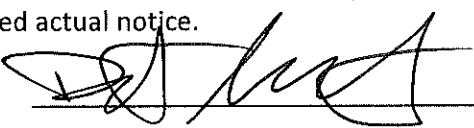
Name Laura Clark Address _____
City Plainfield State CT ZIP Code _____
Telephone 1860 287-0442 Email LauraC@ctbraininjury.com

Additionally, I promise to provide the Commission, within a period of time not to exceed two working days after my receipt of its copies of the following documents: [check applicable spaces]

- ☒ Yes ☐ No (a) copies of any and all decisions and or determination(s) made by the Connecticut Department of Labor, Division of Unemployment Compensation, respecting my eligibility to receive Unemployment Insurance Compensation; .
☒ Yes ☐ No (b) copies of any writings that my employer gives to the Connecticut Department of Labor as to its consent and/or objection to my receiving benefits;
☒ Yes ☐ No (c) copies of any transcript (s) and/or tape recordings of testimony given by myself and my employer to the Connecticut Department of Labor;
☒ Yes ☐ No (d) copies of any union grievance filed by co-workings or myself challenging the company's behavior, the outcome of any grievance etc., and;
☒ Yes ☐ No (e) other information, please describe:
- _____

If any time the Commission is unable to contact me, the Commission will be deemed to have provided me with actual notice by mailing two letters, first class mail, to my last known address. It will be presumed that, once the letters have been mailed out that I have received the correspondence unless the letters are returned to the Commission by the Post Office.

For the purposes of the EEOC notice requirements, when the Commission is unable to contact me, a letter will be sent certified mail, return receipt requested. Once this letter has been mailed I will be deemed to have received actual notice.

By:  Dated: Nov 14 2023

[Complainant must sign the original of this form and be given a copy.]

CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES

COMPLAINANT WITNESS LIST

CHRO No. 2410220

David Medeiros v. State of Connecticut Department of Social Services

☐ I IDENTIFY THE FOLLOWING WITNESSES AT THIS TIME

Witness Name, Address and Telephone	Relationship to Incidents Alleged	List Specifics to which this person can testify

☐ I HAVE NO WITNESSES AT THIS TIME.


Complainant's Signature

Date: Nov 14 2023

CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES

CHRO No 2410220

David Medeiros v. State of Connecticut Department of Social Services

**Information Regarding Complaints Previously Filed With The
Commission on Human Rights and Opportunities**

PLEASE PROVIDE THE FOLLOWING INFORMATION:

☒ I HAVE FILED _____ PREVIOUS COMPLAINT(S) WITH CHRO.

DATE(S) OF FILING: _____

CHRO CASE NO(S): _____

REGIONAL OFFICE(S): _____

INCIDENT(S) ALLEGED: _____

☐ I HAVE NOT PREVIOUSLY FILED A COMPLAINT WITH CHRO.

I UNDERSTAND THAT FAILURE TO DISCLOSE THIS INFORMATION MAY DELAY
PROCESSING OF MY COMPLAINT AND/OR RESULT IN ADVERSE CONSEQUENCES.



Complainant

Date: Nov 14 2023

CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES

CHRO No. 2410220

David Medeiros v. State of Connecticut Department of Social Services

**AUTHORIZATION TO RELEASE
INFORMATION FROM THE RECORDS OF**

David Medeiros
(Name of Undersigned)

I authorize disclosure by State of Connecticut Department of Social Services, 55 Farmington Ave, Hartford CT 06106

(Address)

to the representative of the CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES of the information and record specified below that concern my complaint filed with the COMMISSION.

☒ Medical Records *No*

☒ Personnel Records *No*

☐ Credit Rating, or information as listed below:

Refuse to authorize.

Signature of Complainant

Date: *Nov 14 2023*

Date of Birth: *12/30/1976*

215 Mountain Street, Willimantic, CT 06226
(Address)

860-463-3638
(Telephone Number with Area Code)



State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: deidre.gifford@ct.gov

Diedre S. Gifford, MD, MPH
Commissioner
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Commissioner Gifford:

A complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes about any inconvenience this may have caused the Respondent. A copy of the complaint is attached.

The enclosed General Notice advises you of your rights, duties, and responsibilities. Please read carefully the information contained in the notice. The enclosed Notice Regarding Out of State Attorneys advises that all attorneys practicing before the Commission must be admitted to practice law in Connecticut and that it is the responsibility of all counsel to comply with Connecticut practice rules. Also enclosed is important information with respect to the no fault conciliation process. The Commission is available to assist you if you wish to pursue settlement of this complaint. If you wish to conciliate the complaint prior to providing an answer, you must notify the Commission within **10 days** of receipt of the enclosed complaint.

You must file an answer to the complaint under oath with the Commission within 30 days of receipt of this complaint unless pre-answer conciliation has been requested. If you fail to answer the complaint within this time, you may be defaulted by the Commission. Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. You must email a scanned copy of your signed and notarized Answer to chro.capitol@ct.gov and dedra.morris@ct.gov.

CHRO No. 2410220
December 15, 2023

You have a duty to certify to the Commission that you have provided the complainant with copies of all documents you file with the Commission. You also have a duty to ensure that personal identifying information is redacted from any documents provided to the Commission. Personal identifying information includes an individual's mother's maiden name; motor vehicle operator's license number; Social Security number; other government issued identification number except for juris, license, permit or other business related identification numbers that are otherwise made available to the public directly by any government agency or entity; health insurance identification number; or any financial account number, security code or personal identification number (PIN). For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
860-541-3456

Enclosures

**SCHEDULE A – Public Accommodation
Request for Information**

CHRO No. 2410220

Case Name: David Medeiros v. State of CT, Department of Social Services

PUBLIC ACCOMMODATION

1. State the full legal name of the respondent.
2. State the proper address of the respondent's facility where the complainant alleges that an act or acts of discrimination occurred.
3. If the respondent is incorporated, indicate under what state's laws it is incorporated.
4. If the respondent is incorporated, state the address of respondent's corporate headquarters.
5. State the name and address of respondent's agent for service.
6. If the respondent is currently the subject of bankruptcy proceedings or has been the subject of bankruptcy proceedings during the past three years, provide documentation of the current status of such proceedings.
7. State the name, title and address, telephone number, fax number, and e-mail address if available of the individual to be contacted for further information in this matter. This person should be an employee of Respondent.
8. Separately state the number of respondent's employees in Connecticut and at the facility where the complainant alleges that discriminatory conduct occurred.
9. Submit a response, in "admit" "deny" format, to each allegation of the complaint. For each allegation that is denied, submit a statement that sets forth the facts upon which you rely in your denial. Please submit any and all documents and written statements of witnesses or participants to support your position.

10. Submit copies of all written rules, policies and procedures relating to the issue(s) raised in the complaint. If these are not in writing, explain the rules, policies and procedures.
11. If Complainant was denied services or subjected to any other adverse decision, submit the following information:
 - (a) Date complainant was advised of the act complained of;
 - (b) Explain in detail the reason(s) for the action taken;
 - (c) Identify the person(s) recommending the action(s) at issue, including name, position held, and physical disability;
 - (d) Identify the person(s) making the final decision, including name, position held, and physical disability;
 - (e) Provide a copy of any evaluation(s) or investigative report(s), and all other relevant documents relating to the act;
12. Provide any other information and/or explanation you deem relevant to this complaint, and any other information which will assist the Commission in reaching a decision in this matter.

A.B.I. Resources LLC

39 Kings Highway, Suite C

Gales Ferry CT, 06335

Phone: (860) 942-0365

Fax: (860) 465-9591

<https://www.CTbrainINJURY.com>

11/14/2022

To: Connecticut Commission on Human Rights and Opportunities
450 Columbus Boulevard.
Hartford, CT 06103-1835.

Request for Connecticut's CHRO official complaint form.

Would Connecticut's Commission on Human Rights and Opportunities please provide Connecticut's official discrimination complaint form regarding complaints against state agencies, public facilities, and services?

Best regards,
David Medeiros
David Medeiros CBIS
Brain Injury Survivor and
Founder of
ABI Resources, LLC



ABI RESOURCES LLC
39 KINGS HIGHWAY SUITE C
GALES FERRY, CT 06335
(860) 942-0365
WWW.CTBRRAININJURY.COM



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39 Kings Highway, Suite C

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Fax: (860) 465-9591

<https://www.CTbrainINJURY.com>

Date: 12/16/2023

Connecticut Commission on Human Rights and Opportunities (CHRO) Capitol
Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103-1835

Subject: **Complaint Against Connecticut CHRO for Disability Discrimination
and Whistleblower Retaliations. RE: David Medeiros v. State of CT,
Department of Social Services CHRO No. 2410220**
EEOC No. N/A

Dear Sir/Madam,

I, David Medeiros, a brain injury survivor and whistleblower, hereby file a formal complaint against the Connecticut Commission on Human Rights and Opportunities (CHRO) for disability discrimination and whistleblower retaliation.

It has come to my attention that CHRO is engaging in practices that undermine my rights for accommodation and ability to self-advocate. CHRO has been presenting and documenting false information as fact, manipulating and misinforming facts, and hindering my pursuit of justice. These actions appear to be a deliberate attempt to use my disability against me, thereby protecting the interests of the State of Connecticut.

Moreover, CHRO has failed to provide necessary accommodations, slowing and complicating the process for justice. This lack of accommodation and the purposeful obfuscation of processes directly violate my rights under federal and state disability laws.



Additionally, there is a concerning discrepancy in CHRO's documentation, specifically regarding the Commissioner of the Connecticut Department of Social Services. Despite Andrea Barton Reeves being announced as the Commissioner by Governor Ned Lamont, in 2022. CHRO's documentation fails to recognize this change and in fact is addressed to Dr. Deidre S. Gifford, who is NOT the Connecticut Department of Social Services Commissioner. This raises serious concerns about the accuracy and credibility of CHRO's records and processes.

I request a thorough investigation into these matters by both the CHRO and the Department of Justice. It is imperative that these violations of state and federal disability laws and whistleblower protections be addressed and rectified immediately.

I request your assistance in ensuring fair treatment and accommodations, which are crucial for my effective communication and participation in these matters. Additionally, I seek guidance and support from the state government to uphold my rights to self-advocate, both as an individual with a disability, a whistleblower, and as a business owner.

It is imperative that government entities respect and facilitate the participation of individuals like me in matters affecting our lives and businesses. I am committed to advocating for transparency and accountability, and I believe the government's intervention is crucial in rectifying the current situation.

Thank you for your attention to this matter.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member
Medicaid ABI Waiver Program Support Provider.



A.B.I. Resources LLC

39 Kings Highway, Suite C

Gales Ferry CT, 06335

Phone: (860) 942-0365

Fax: (860) 465-9591

<https://www.CTbrainINJURY.com>

Date: 12/15/2023

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103-1835

Complaint and Request for Intervention and Support in Addressing Misconduct and Ensuring Accommodations for Self-Advocacy and Protection from Whistleblower Retaliations.

Dear Office for Civil Rights,

I am writing to lodge a formal complaint against Matthew S. Antonetti of the Connecticut Department of Social Services regarding his correspondence dated December 13, 2023. As a brain injury survivor and the founder of A.B.I. Resources LLC, I have faced significant challenges in advocating for myself, my business and the disabled population we serve. Mr. Antonetti's letter contains misleading, inaccurate, non-accommodating and intimidating statements that undermine my efforts and rights as a person living with a brain injury and as a whistleblower.

I request your assistance in ensuring fair treatment and accommodations, which are crucial for my effective communication and participation in these matters.

Additionally, I seek guidance and support from the state government to uphold my rights to self-advocate, both as an individual with a disability, a whistleblower, and as a business owner.



It is imperative that government entities respect and facilitate the participation of individuals like me in matters affecting our lives and businesses. I am committed to advocating for transparency and accountability, and I believe the government's intervention is crucial in rectifying the current situation.

Thank you for your attention to this matter.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member
Medicaid ABI Waiver Program Support Provider.



Chro case.

FOIA Expediated from CT and Feds.
communications about David Medeiros and or
ABI Resources.

- Nadera Reeves Commis
- D gifford
- All CHRO
- All FOIA

Submit a discrimination complaint about
Commissioner.

ANY CT DSS DISCRIMINATION CHRO
complaints.

Media Press release with NAMES

Andrea

- Complaints against CHRO
- Complaints about CT DSS

Andrea reeves

Complaints on Matt

Complaints whistleblower

Make a foia for Dec 31 companion

New client not in sandata

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**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

FOR CHRO USE ONLY

Case No. 2410220 Date: 11/14/2023
EEOC No. N/A

My name is: David Medeiros
My mailing address is: 215 Mountain Street, Willimantic, CT 06226
My telephone number is: 860-463-3638
My email address is: aabiwr@live.com
The respondent is: State of Connecticut Department of Social Services
Whose business address is: 55 Farmington Ave, Hartford CT 06106

I was ...

(Include the date of the actions taken against you. If ongoing, write "ongoing".)

- | | |
|--|---|
| ☐ discriminated against in terms and conditions | |
| ☐ discharged | ☐ not hired/promoted |
| ☐ suspended | ☐ given unequal duties |
| ☐ placed on probation | ☐ harassed |
| ☐ demoted | ☐ sexually harassed |
| ☐ warned | ☐ earning different pay |
| ☐ given a poor evaluation | ☐ constructively discharged |
| ☐ denied a raise | ☐ retaliated against |
| ☐ less trained | ☐ transferred |
| ☐ denied an office | ☐ given difficult assignment |
| ☐ denied equal service(s) | ☐ not recalled |
| ISI <u>Ongoing-10/2023</u> | ☐ D |
| ☐ other: _____ | |

I believe that my...

(Identify the protected class status you believe you were discriminated against because of)

- | | |
|---|---|
| ☐ Race | ☒ Mental disability |
| ☐ Color | ☐ Intellectual disability |
| ☐ Religious creed | ☐ Learning disability |
| ☐ Age | ☐ Physical disability |
| ☐ Gender identity/expression | ☐ Veteran status |
| ☐ Marital status | ☐ Prior criminal conviction |
| ☐ National origin | ☐ Sexual orientation |
| ☐ Sex: ☐ Male ☐ Female | ☐ Pregnancy |
| ☐ Ancestry | ☐ Lawful source of income |
| ☐ Other: _____ | ☐ Genetic information |
| ☐ Previous opposition to discriminatory conduct | |

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

Was/Were in part a factor(s) in this action. _ _ _ _ _

**THIS SECTION TO BE FILLED OUT BY
CHRO STAFF**

The respondent violated the following statutes and acts listed below, as amended, enforced through CONN. GEN. STAT. § 46a-58(a) if applicable:

- | | |
|---|--|
| ☐ CONN. GEN. STAT. § 46a-60(b)(1) | ☐ Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2 (cite for 15 or more individuals employed) |
| ☐ CONN. GEN. STAT. § 46a-60(b)(4) | |
| ☐ CONN. GEN. STAT. § 46a-60(b)(5) | |
| ☐ CONN. GEN. STAT. § 46a-60(b)(7) | ☐ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634 (cite for 20 or more individuals employed) |
| ☐ CONN. GEN. STAT. § 46a-60(b)(8) | |
| ☒ CONN. GEN. STAT. § 46a-64 | |
| ☐ CONN. GEN. STAT. § 46a-70 | ☒ Americans with Disabilities Act, 42 U.S.C. § 12101 et seq. |
| ☐ CONN. GEN. STAT. § 46a-71 | |
| ☐ CONN. GEN. STAT. § 46a-80 | ☐ Equal Pay Act of 1964, U.S.C. § 206 |
| ☐ CONN. GEN. STAT. § 46a-81 | ☐ Section 504 of the Rehabilitation Act of 1973 |
| ☐ Other _____ | |

I provide the following particulars:

1. In or around 2015, I personally filed a complaint with the Connecticut Department of Social Services (DSS) about the direct violation of my rights as a survivor of a stroke and brain injury as well as a company owner in the healthcare industry.
2. By requiring that I only communicate with the department once a week or twice a week, DSS has deliberately restricted my ability to communicate with them.
3. In addition, DSS has been undermining my professionalism and credibility by implying in my emails that I have complaints and concerns are based on misunderstandings. Rather than interacting with me as a regular person, they have suggested that my interactions are the result of miscommunications or inaccuracies due to my physical disability.
4. In a deliberate effort to divert me from the appropriate channels of complaint and communication, DSS has also recommended me to settle my own disputes with other parties before contacting the department.
5. The DSS also accused me of filing complaints on behalf of people without getting their permission, particularly when this is a duty of mine and my business.
6. In addition to refusing me equitable treatment, I believe that DSS has limited my communication with the department and discredited myself and my company's reputation overall because of my physical disability.

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above-cited laws and secure for me any remedy to which I may be entitled.

David Medeiros being duly sworn, on oath, states that s/he is the Complainant herein; that s/he has read the foregoing complaint and knows the content thereof; that the same is true of her/his own knowledge, except as to the matter herein stated on information and belief and that as to these matters s/he believes the same to be true.

Dated in tk-rth,c a
City/Town

, CT on this Nov 14 2023
Date

Complainant's Signature

Subscribed and sworn before me on Nov 14 2023
Date


Notary Public/Commissioner of the Superior Court
My commission expires: Nov. 30, 2027





State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: aabiwr@live.com

David Medeiros
215 Mountain Street
Willimantic, CT 06226

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Mr. Medeiros:

This letter confirms that your complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes for any inconvenience this may have caused you.

The enclosed General Notice advises you of your rights, duties, and responsibilities. **Please read carefully the information contained in the notice.**

You have a duty to respond timely to any information or assistance requested and to cooperate with the Commission at all times. It is your sole duty and responsibility to notify the Commission of your whereabouts at all times throughout the pendency of this complaint. In the event that your address, telephone number, or email address changes, it is your duty to notify the Commission immediately in writing. **Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. Emailed filings with Capitol Region Office should be emailed to CHRO.Capitol@ct.gov.**

Also, you have a duty to certify to the Commission that you have provided the Respondent with copies of all documents you file with the Commission. For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
860-541-3456

Enclosure



State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: deidre.gifford@ct.gov

Diedre S. Gifford, MD, MPH
Commissioner
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

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CHRO No. 2410220
December 15, 2023

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If I can be of further assistance, please do not hesitate to contact me.

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
860-541-3456

Enclosures

**SCHEDULE A – Public Accommodation
Request for Information**

CHRO No. 2410220

Case Name: David Medeiros v. State of CT, Department of Social Services

PUBLIC ACCOMMODATION

1. State the full legal name of the respondent.
2. State the proper address of the respondent's facility where the complainant alleges that an act or acts of discrimination occurred.
3. If the respondent is incorporated, indicate under what state's laws it is incorporated.
4. If the respondent is incorporated, state the address of respondent's corporate headquarters.
5. State the name and address of respondent's agent for service.
6. If the respondent is currently the subject of bankruptcy proceedings or has been the subject of bankruptcy proceedings during the past three years, provide documentation of the current status of such proceedings.
7. State the name, title and address, telephone number, fax number, and e-mail address if available of the individual to be contacted for further information in this matter. This person should be an employee of Respondent.
8. Separately state the number of respondent's employees in Connecticut and at the facility where the complainant alleges that discriminatory conduct occurred.
9. Submit a response, in "admit" "deny" format, to each allegation of the complaint. For each allegation that is denied, submit a statement that sets forth the facts upon which you rely in your denial. Please submit any and all documents and written statements of witnesses or participants to support your position.

10. Submit copies of all written rules, policies and procedures relating to the issue(s) raised in the complaint. If these are not in writing, explain the rules, policies and procedures.
11. If Complainant was denied services or subjected to any other adverse decision, submit the following information:
 - (a) Date complainant was advised of the act complained of;
 - (b) Explain in detail the reason(s) for the action taken;
 - (c) Identify the person(s) recommending the action(s) at issue, including name, position held, and physical disability;
 - (d) Identify the person(s) making the final decision, including name, position held, and physical disability;
 - (e) Provide a copy of any evaluation(s) or investigative report(s), and all other relevant documents relating to the act;
12. Provide any other information and/or explanation you deem relevant to this complaint, and any other information which will assist the Commission in reaching a decision in this matter.



State of Connecticut COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Legal Division ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

GENERAL NOTICE: PARTIES' RIGHTS, DUTIES AND RESPONSIBILITIES

This notice briefly introduces the Commission's complaint investigation procedures. It is not a substitute for the statutes and regulations that govern Commission investigations. These provisions are available on the Commission's website, www.ct.gov/chro, along with other helpful information. Make sure you look at our statutes and regulations if you want to have a more complete understanding of our investigative process.

ARTICLE I: PARTIES' RIGHTS AND DUTIES

Section 1: Duty to Cooperate

Parties have a duty to cooperate with the Commission. Parties must respond to any information or assistance requested by the Commission within the time given to reply.

The Commission must be able to contact you by telephone, email or regular mail at all times. The primary means of communication with parties will be through email. If your email address, street address or telephone number changes, you must notify the Commission immediately in writing. If a party's contact information is not accurate and up to date, the Commission may dismiss the complainant's complaint or default the respondent.

Section 2: Right To Counsel

You may have an attorney represent you if you choose to hire one. Commission legal counsel represents the Commission and not the parties. Attorneys not admitted to the Connecticut bar must move for *pro hac vice* admission to practice before administrative agencies like the Commission on Human Rights and Opportunities. This is the result of the Connecticut Supreme Court decision in Persels & Associates, LLC v. Banking Commissioner, 318 Conn. 652 (2015) and a change to our practice rules in Practice Book § 2-16.

Non-Connecticut attorneys either must move for *pro hac vice* admission or another attorney or member of the firm admitted in Connecticut must file an appearance using our appearance form. Appearance forms are available on the Commission's website.

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Section 3: Duty To Provide Other Party With Information

When you send a document or other evidence to the Commission, you must send a copy of the same document or evidence to the other party. Attach a certification to whatever you are filing with the Commission that lists the name and address of the person(s) you have copied. If you do not attach a certification, the Commission may not accept the document.

If a party is represented by an attorney, you only need to send a copy of the document or other evidence to the attorney. You do not need to provide a separate copy to the party.

Section 4: Respondent's Duty To Answer Under Oath And Complainant's Right To Reply

The respondent must file with the Commission a written answer to the complaint under oath within 30 calendar days. One 15 day extension may be granted by the Commission for good cause. If the Respondent requests a Pre-Answer Conciliation within 10 calendar days of receipt of the Complaint, no answer will be due until 30 calendar days after the Commission determines the Pre-Answer Conciliation failed.

The Complainant has a right to file a rebuttal to the Respondent's Answer within 15 days of the Answer's receipt. Only rebuttals that are timely must be considered as part of the case assessment review. If the Respondent is given an extension for filing their Answer, the Complainant will be given the same extension for their time to file their rebuttal.

Section 5: Form of Oath

The Answer must be under oath. While the form of the oath is optional, the requirement of an oath is not. Answers not filed under oath are subject to default as outlined in Article II, Section 9.

The following is a form of the oath that may be used:

State of Connecticut

County of _____ . (name of town where oath taken)

Personally appeared (name of respondent, president or other competent witness) and made oath to the truth of the matter contained in the foregoing answer before me on this ____ day of _____, 20__.

Notary Public/Commissioner of the Superior Court

My commission expires:

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Section 6: Form of Respondent's Answer

The respondent must answer each and every allegation set out in the complaint. For each allegation the respondent should admit, deny or claim insufficient knowledge to answer. If the respondent admits or denies part of an allegation, it must do so even if it has insufficient knowledge as to another part of that allegation.

If the respondent denies an allegation, the Commission requests that it set out the facts on which it relies for the denial and attach any and all supporting documentation.

Section 7: Right To Inspect, Copy And Comment

The parties have a right to inspect and copy documents in the Commission's case file except as provided in state or federal law and to provide written or oral comment on the evidence before the investigator issues a finding.

Section 8: Right To Alternate Dispute Resolution

Although the Commission is available to assist you in settling this complaint, the parties may elect to use Alternative Dispute Resolution (ADR) at their own expense. ADR allows the parties to select a neutral third party to mediate and/or arbitrate their dispute. If you elect to pursue this process, the Commission will suspend its investigation into the complaint for a period of 90 days.

Section 9: Duty To Accept A Make Whole Relief Offer

The Commission may dismiss a complaint if the complainant fails to accept a make whole relief offer. A make whole relief offer is one where the respondent has eliminated the discriminatory practice complained of, taken steps to prevent a like occurrence in the future and offered full relief to the complainant.

Section 10: Right To Bring Action To Enforce Agreement

A party to a conciliation agreement who believes the agreement is being violated with may bring an action to enforce the agreement in the Superior Court within one year of the violation.

Section 11: Duty To Provide Information

The complainant has a duty to provide whatever information is in his or her possession or available by reasonable means to prove any allegation of the complaint that the respondent denies within 30 days of receipt of the respondent's answer.

The respondent has a duty to answer the complaint. While the Commission prefers that respondents provide all information in their possession or available by reasonable means voluntarily, the Commission has a right under statute to obtain information by subpoena or by other means if the information is not provided.

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Section 12: Duty To Participate In Mandatory Mediation

The Commission will schedule mediation conference in all cases that are retained after a case assessment review unless a Pre-Answer Conciliation was held. If a Pre-Answer Conciliation was held, a mediation may but need not be held. Both parties must participate if a mediation conference is scheduled. The purpose of mediation is to see whether there is a way the parties can agree to settle the dispute without having to conduct an investigation.

If the complainant fails to attend mandatory mediation without a showing of good cause then the complaint may be dismissed. If the respondent fails to attend mandatory mediation without a showing of good cause then the respondent may be defaulted.

Section 13: Right To Request Early Legal Intervention

If mediation was not successful, the Commission will assign an investigator to conduct an investigation within 15 days of the failure of mediation. At any time after mediation has been considered to have failed, the complainant, respondent or the Commission may ask for Early Legal Intervention. Within 90 days, an attorney in the agency's Legal Division will determine whether the complaint should proceed directly to public hearing, whether an investigation should be conducted, or whether a release of jurisdiction should be issued.

Section 14: Duty To Participate In A Fact-Finding Conference

A fact-finding conference is a hearing in which the investigator collects information that will help decide the case. If the investigator schedules fact-finding, it is the responsibility of the parties to bring any witnesses or documents that support your claims just as you would do if you had a trial in court

If witnesses will not voluntarily attend, you may contact the investigator well ahead of the fact-finding to see whether the Commission will issue a subpoena. Represented parties should seek subpoenas through their private attorneys pursuant to CONN. GEN. STAT § 51-85.

The Commission may default a respondent or dismiss a complaint for failure to attend a fact-finding conference without good cause.

Section 15: Right To Comment Upon Draft Summary

Parties have 15 days from the mailing of the preliminary draft finding to provide comment. The investigator must consider any comment received from a party before issuing a final finding.

Section 16: Right To Request Reconsideration

If the Commission determines that there is no reasonable cause to believe that the respondent committed a discriminatory practice, the complainant has 15 calendar days from the date the notice of dismissal is sent to the parties to request that the Commission reconsider the dismissal. The request must be in writing and state specific reasons why reconsideration should be granted. Requests for reconsideration not

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

received within 15 days *must* be rejected. If the 15th day falls on a day that the Commission's offices are closed (weekend, holiday, inclement weather closing, etc.), then the complainant has until the end of the next day that the Commission's offices are open to file the request.

Section 17: Right To Appeal

The complainant may appeal the dismissal of the complaint for no reasonable cause, an administrative dismissal, for failure to attend mediation, after a final order of a human rights referee or after reconsideration is rejected. The Commission and the respondent may appeal after a final order of a human rights referee.

The appeal is to the Superior Court. Any appeal must strictly comply with all applicable statutory and other requirements.

Section 18: Right To Bring An Action In Superior Court

Generally, all complaints alleging illegal discrimination must be filed with the Commission. A complainant may, however, file an action directly in court if the action involves an alleged discriminatory state practice, housing discrimination, discriminatory credit practices or to enforce a conciliation agreement.

Complainants who file complaints with the Commission may request a release of jurisdiction of their state law claims and proceed to Superior Court. If the request is received before a Case Assessment Review has been conducted, the Commission will first conduct an expedited Case Assessment Review before issuing the release. The complainant and respondent may jointly request a release at any time after a complaint has been filed. The Commission may defer to act on a request for a release of jurisdiction if there is reason to believe the complaint will be resolved within thirty days of the request's receipt. Generally, there will be reason to believe a complaint will be resolved within thirty days after draft findings of fact have been issued during an investigation. Requests for a release of jurisdiction made after draft findings have been issued will not, therefore, be acted upon until the expiration of thirty days or upon good cause.

ARTICLE II: COMMISSION PROCESSES AND PROCEDURAL DUTIES

Section 1: Pre-Answer Conciliation

Within 10 calendar days of receipt of the complaint, the respondent may provide written notice to the complainant and the Commission that it is electing to participate in Pre-Answer Conciliation. After receiving timely notice, the Commission will conduct Pre-Answer Conciliation within 30 days of receiving the respondent's notice. If conciliation is not successful, the Commission may decide not to hold a mediation conference following Case Assessment Review. Pre-Answer Conciliation is not available for complaints of housing discrimination.

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Section 2: Case Assessment Review

Within 60 days of the filing of the answer, the Commission will conduct a Case Assessment Review. The purpose of the review is to determine if the complaint fails to state a claim for relief or is frivolous on its face, if the respondent is exempt from the provisions of our law or if there is no reasonable possibility that further investigation will result in a finding of reasonable cause. Complaints alleging housing discrimination are not subject to Case Assessment Review.

The Case Assessment Review will be based on the complaint, the respondent's answer and responses to the Commission's requests for information, and the complainant's comments to the respondent's answer and information responses.

If the Commission dismisses the complaint at Case Assessment, a release of jurisdiction will be issued for the complainant to allow them to bring a civil action in Superior Court.

Section 3: Mandatory Mediation

Complaints that are not dismissed at case assessment will be scheduled for mandatory mediation. If the parties met for a Pre-Answer Conciliation, then the Commission may elect not to hold mediation at this stage and the case will proceed directly to an investigation. The mediator will be an investigator in the regional office, a Commission legal counsel or other person qualified to mediate. Whoever is assigned for the mediation will not be assigned to investigate the case should mediation fail. When a complaint is scheduled for mandatory mediation, both parties must attend the session.

Section 4: Complaint Processing Options

If mediation is not successful, the Commission will determine the best way to process the complaint. The Commission may investigate to determine whether there is reasonable cause for believing that a discriminatory practice has been or is being committed as alleged in the complaint. Alternatively, the Commission may, on its own initiative or at the request of either party, process the complaint through the Early Legal Intervention program.

Section 5: Investigation and Fact-Finding Conferences

The Commission may seek to process your complaint by conducting an investigation. This may include witness interviews, review of documents, site visits, issuance of requests for admissions of fact, interrogatories or any other lawful method of findings facts.

Most investigations will involve a fact-finding conference. A fact-finding conference is similar to a trial, except that an investigator rather than a judge is in control of the proceeding. Fact-finding gives the parties and their witnesses an opportunity to be heard under oath. A record of the conference will be kept as evidence. The investigator will control all questions and may allow the parties to question witnesses at the investigator's discretion.

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Following the conclusion of the conference, the investigator will examine the evidence in the record and make a finding of reasonable cause or no reasonable cause. In some instances the investigator may elect to continue the fact-finding or request additional information before making a finding.

Section 6: Determination

The purpose of an investigation is to determine whether there is reasonable cause for believing that a discriminatory practice has been or is being committed as alleged in the complaint. If reasonable cause is found, the investigator will attempt to eliminate the discrimination complained of by conciliation within 50 days of the finding. If conciliation is not successful, the investigator will certify the complaint and a public hearing will be held before a human rights referee.

If no reasonable cause is found, the Commission will dismiss the complaint and the Complainant has the right to request reconsideration or to appeal that decision.

Section 7: Early Legal Intervention

The Commission, on its own initiative or at the request of either party, may elect to have a Commission legal counsel consider how to process the complaint. The Commission will make a decision on how to process the complaint within 90 days of the request for Early Legal Intervention. The possible processing options are to have the complaint proceed directly to public hearing, to conduct an investigation, direct the investigator to make a finding of No Reasonable Cause-Administrative Dismissal, or to issue a release of jurisdiction. In making this decision, the Commission may conduct additional proceedings such as witness interviews, document requests, or additional mediation conferences.

Section 8: Dismissing A Complaint

The Commission may dismiss a complaint if the complainant, after notice and without good cause, fails to attend a fact-finding or mandatory mediation session or if the respondent has eliminated the discriminatory practice complained of, taken steps to prevent a like occurrence in the future, and offered the complainant full relief.

Section 9: Defaulting A Respondent

The Executive Director may default a respondent if the respondent fails to timely answer a complaint, fails to respond to a subpoena or answer interrogatories (any timely filed objection will be considered) or, after notice and without good cause, fails to attend a fact-finding conference or mandatory mediation session. Upon the issuance of a default, a hearing will be held for the sole purpose of fashioning an order requiring the respondent to make the complainant whole and to eliminate the discriminatory practice.

A.B.I. Resources LLC

39 Kings Highway, Suite C

Gales Ferry CT, 06335

Phone: (860) 942-0365

Fax: (860) 465-9591

<https://www.CTbrainINJURY.com>

Date: 12/16/2023

Connecticut Commission on Human Rights and Opportunities (CHRO) Capitol
Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103-1835

Subject: **Complaint Against Connecticut CHRO for Disability Discrimination
and Whistleblower Retaliations. RE: David Medeiros v. State of CT,
Department of Social Services CHRO No. 2410220**
EEOC No. N/A

Dear Sir/Madam,

I, David Medeiros, a brain injury survivor and whistleblower, hereby file a formal complaint against the Connecticut Commission on Human Rights and Opportunities (CHRO) for disability discrimination and whistleblower retaliation.

It has come to my attention that CHRO is engaging in practices that undermine my rights for accommodation and ability to self-advocate. CHRO has been presenting and documenting false information as fact, manipulating and misinforming facts, and hindering my pursuit of justice. These actions appear to be a deliberate attempt to use my disability against me, thereby protecting the interests of the State of Connecticut.

Moreover, CHRO has failed to provide necessary accommodations, slowing and complicating the process for justice. This lack of accommodation and the purposeful obfuscation of processes directly violate my rights under federal and state disability laws.



Additionally, there is a concerning discrepancy in CHRO's documentation, specifically regarding the Commissioner of the Connecticut Department of Social Services. Despite Andrea Barton Reeves being announced as the Commissioner by Governor Ned Lamont, in 2022. CHRO's documentation fails to recognize this change and in fact is addressed to Dr. Deidre S. Gifford, who is NOT the Connecticut Department of Social Services Commissioner. This raises serious concerns about the accuracy and credibility of CHRO's records and processes.

Addressing Disability Accommodations:

I wish to highlight the essential requirement for reasonable accommodations for my disability, as mandated by the Americans with Disabilities Act and Connecticut state laws. The failure of the CHRO to provide these necessary accommodations has significantly impeded my ability to participate fairly in my case, thus exacerbating the challenges posed by my disability.

Identifying Systemic Issues:

Furthermore, it appears there are systemic issues within the CHRO that have contributed to the discrimination and retaliation I've faced. These include possible patterns of bias against individuals with disabilities and whistleblowers, as well as procedural inconsistencies. Addressing these systemic issues is crucial not only for the resolution of my case but also to ensure equitable treatment of all individuals interacting with the CHRO.

I request a thorough investigation into these matters by both the CHRO and the Department of Justice. It is imperative that these violations of state and federal disability laws and whistleblower protections be addressed and rectified immediately.

I request your assistance in ensuring fair treatment and accommodations, which are crucial for my effective communication and participation in these matters.

Additionally, I seek guidance and support from the state government to uphold my rights to self-advocate, both as an individual with a disability, a whistleblower, and as a business owner.

It is imperative that government entities respect and facilitate the participation of individuals like me in matters affecting our lives and businesses. I am committed to advocating for transparency and accountability, and I believe the government's intervention is crucial in rectifying the current situation.

Thank you for your attention to this matter.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member
Medicaid ABI Waiver Program Support Provider.





State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office - 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

ad the matt 2"9#4:

December 15, 2023

NOT THE COMMISSIONER

Via email: deidre.gifford@ct.gov

Diedre S. Gifford, MD, MPH
Commissioner
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

RE: David Medeiros v. State of CT, Department of Social Services
CHAO No. 2410220
EEOC No. N/A

Dear Commissioner Gifford

A complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes about any inconvenience this may have the caused the Respondent. A copy of the complaint is **a d**.

The enclosed General Notice advises you of your rights, duties, and responsibilities. Please read carefully the information contained in the notice. The enclosed Notice Regarding Out of State Attorneys advises that all attorneys practicing before the Commission must be **ed to** practice law in Connecticut and that it is the responsibility of all counsel to comply with Connecticut practice rules. Also enclosed is important information with respect to the conciliation process. The Commission is available to assist you if you wish to pursue settlement of this complaint. If you wish to conciliate the complaint prior to providing an answer, you must notify the Commission within **10 days** of receipt of the enclosed complaint.

You must file an answer to the complaint under oath with the Commission within 30 days of receipt of this complaint unless pre-answer conciliation has been requested. If you fail to answer the complaint within this time, you may be defaulted by the Commission. Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. You must email a scanned copy of your signed and notarized Answer to chro.capitol@d.gov and dedra.morris@d.gov.

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Date: 12/16/2023

Connecticut Commission on Human Rights and Opportunities (CHRO) Capitol
Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103-1835

Subject: **Submission of a Secondary, Distinct Complaint.**

Complaint Against Connecticut CHRO for Disability Discrimination and
Whistleblower Retaliations. RE: David Medeiros v. State of CT, Department of
Social Services CHRO No. 2410220
EEOC No. N/A

Dear CHRO and Connecticut Government Officials,

I am writing as both the complainant and a victim of the inaction perpetuated by the Connecticut Commission on Human Rights and Opportunities (CHRO) concerning my complaint filed on March 28, 2023. After 262 days without proper accommodation or support, I received a letter dated December 15, 2023, acknowledging an administrative delay without providing a substantive resolution or accommodation.

As a brain injury survivor and the founder of ABI Resources, my ability to function effectively in both personal advocacy and professional capacity has been significantly compromised. The CHRO's lack of action is not merely unacceptable; it represents a systemic failure to uphold the legal mandates designed to protect individuals in my position.

The CHRO's inaction is demonstrative of:

Violation of the ADA's Mandate:

The inexplicable delay in processing my complaint directly violates the ADA's requirements for prompt resolution, thereby discriminating against me based on my disability.

Failure to Provide Accommodations:

The inadequate response in providing the accommodations to which I am legally entitled has critically hampered my ability to participate in legal proceedings and advocate effectively.

Erroneous documentation, including the misidentification of state officials, undermines the integrity and reliability of CHRO's records and processes.

Systemic Disregard:

The pattern of inaction suggests a systemic disregard for the rights of individuals with disabilities and whistleblowers such as myself, calling for an immediate and thorough examination.

Given these points, I am compelled to demand the following:

An External Audit: A comprehensive external audit of the CHRO's handling of my case, including a review of procedures and accommodations for individuals with disabilities and whistleblowers.

ADA Accommodations: Immediate provision of the accommodations to which I am entitled under federal and state law, ensuring my full and fair participation in the complaint process.

Public Formal Apology and Reparations: A formal public acknowledgment of the hardships imposed by the CHRO's negligence and a discussion of reparations for the

significant personal and professional toll it has taken on me as a person living with a brain injury advocating for myself, ABI resources and the Connecticut disabled community at large.

The gravity of these issues and their impact on my civil rights require urgent and decisive action. An affirmative response is expected promptly detailing the CHRO's corrective measures.

Call for Accountability and Action for Disability Discrimination and Communication Barriers

I must again express my profound concern and distress regarding the Connecticut Government's inaction and the barriers I face as a brain injury survivor. It is disheartening and unacceptable that the government, well aware of the cognitive challenges associated with brain injuries, has failed to provide the necessary support and accommodations required for fair and effective communication.

Brain injuries can lead to a myriad of cognitive difficulties, which I experience daily. These include, but are not limited to:

Memory Impairments: Difficulty in recalling information, which can lead to challenges in following through with complex procedures or remembering important dates and instructions.

Attention Deficits: Problems with concentration and being easily overwhelmed by excessive information or convoluted language, hindering the understanding of critical communications.

Executive Dysfunction: Trouble with planning, organizing, and executing tasks, which is exacerbated by the government's convoluted self-advocacy bureaucratic processes.

Language and Communication Issues: Difficulties in understanding or expressing

oneself, especially when faced with intricate legal jargon and lengthy documents.

Processing Speed Delays: Slowed cognitive processing, making it hard to keep up with time-sensitive matters and requiring additional time to understand and respond to information.

Fatigue: Increased cognitive fatigue from trying to navigate complex systems, which can lead to reduced capacity to engage with necessary processes effectively.

The government's lack of action not only overlooks these challenges but seems to exploit them by failing to provide clear, concise, and accessible communication. This approach effectively discriminates against individuals with disabilities like me by creating an environment where they cannot participate fully in their advocacy or seek justice on an equal footing.

The expectation is not just for reasonable accommodations but for proactive measures that ensure communications and processes are fair and accessible. I am urging the Connecticut Government to review its procedures and communication strategies to ensure they align with the principles of the Americans with Disabilities Act (ADA) and respect the rights and needs of brain injury survivors.

Immediate action is required to remedy this situation. The government must:

Implement clear and straightforward communication protocols.

Provide all information in accessible formats, with consideration for cognitive challenges.

Establish a direct and reliable point of contact for assistance in navigating government processes.

Ensure that all government employees interacting with the public are trained in disability awareness and ADA compliance.

The state's failure to act is not only a disservice to individuals with disabilities but a disregard for the values of inclusivity and accessibility. As a brain injury survivor, I implore the Connecticut Government to take immediate steps to correct these oversights and to foster an environment where all citizens are given the tools to participate fully in civic life.

I am requesting that the Connecticut government body protect and ensure my rights and the rights of people like me living with disabilities. Connecticut must take legal action to enforce and ensure compliance with the ADA and protect my rights as a disabled Connecticut brain injury survivor, and founder of ABI Resources in addition to protecting my rights as a whistleblower.

It is imperative that government entities respect and facilitate the participation of individuals like me in matters affecting our lives and businesses. I am committed to advocating for transparency and accountability, and the government's intervention is crucial in rectifying the current situation.

Thank you for your attention to this matter.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member
Medicaid ABI Waiver Program Support Provider.





State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: aabiwr@live.com

David Medeiros
215 Mountain Street
Willimantic, CT 06226

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Mr. Medeiros:

This letter confirms that your complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes for any inconvenience this may have caused you.

The enclosed General Notice advises you of your rights, duties, and responsibilities. **Please read carefully the information contained in the notice.**

You have a duty to respond timely to any information or assistance requested and to cooperate with the Commission at all times. It is your sole duty and responsibility to notify the Commission of your whereabouts at all times throughout the pendency of this complaint. In the event that your address, telephone number, or email address changes, it is your duty to notify the Commission immediately in writing. **Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. Emailed filings with Capitol Region Office should be emailed to CHRO.Capitol@ct.gov.**

Also, you have a duty to certify to the Commission that you have provided the Respondent with copies of all documents you file with the Commission. For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

NO NAME

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
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State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

NOT THE COMMISSIONER

Via email: deidre.gifford@ct.gov

Diedre S. Gifford, MD, MPH
Commissioner
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

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Date: 12/16/2023h

Connecticut Commission on Human Rights and Opportunities (CHRO) Capitol
Region Office
450 Columbus Boulevard, Suite 2
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Subject: **Submission of a Secondary, Distinct Complaint.**

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Given these points, I am compelled to demand the following:

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Public Formal Apology and Reparations: A formal public acknowledgment of the hardships imposed by the CHRO's negligence and a discussion of reparations for the

significant personal and professional toll it has taken on me as a person living with a brain injury advocating for myself, ABI resources and the Connecticut disabled community at large.

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The expectation is not just for reasonable accommodations but for proactive measures that ensure communications and processes are fair and accessible. I am urging the Connecticut Government to review its procedures and communication strategies to ensure they align with the principles of the Americans with Disabilities Act (ADA) and respect the rights and needs of brain injury survivors.

Immediate action is required to remedy this situation. The government must:

Implement clear and straightforward communication protocols.

Provide all information in accessible formats, with consideration for cognitive challenges.

Establish a direct and reliable point of contact for assistance in navigating government processes.

Ensure that all government employees interacting with the public are trained in disability awareness and ADA compliance.

The state's failure to act is not only a disservice to individuals with disabilities but a disregard for the values of inclusivity and accessibility. As a brain injury survivor, I implore the Connecticut Government to take immediate steps to correct these oversights and to foster an environment where all citizens are given the tools to participate fully in civic life.

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Thank you for your attention to this matter.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member
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State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

Via email: aabiwr@live.com

David Medeiros
215 Mountain Street
Willimantic, CT 06226

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Mr. Medeiros:

This letter confirms that your complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes for any inconvenience this may have caused you.

The enclosed General Notice advises you of your rights, duties, and responsibilities. **Please read carefully the information contained in the notice.**

You have a duty to respond timely to any information or assistance requested and to cooperate with the Commission at all times. It is your sole duty and responsibility to notify the Commission of your whereabouts at all times throughout the pendency of this complaint. In the event that your address, telephone number, or email address changes, it is your duty to notify the Commission immediately in writing. **Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. Emailed filings with Capitol Region Office should be emailed to CHRO.Capitol@ct.gov.**

Also, you have a duty to certify to the Commission that you have provided the Respondent with copies of all documents you file with the Commission. For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

NO NAME

Commission on Human Rights and Opportunities
Capitol Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103
860-541-3456

Main (860) 566-7710 ~ Fax (860) 566-1997
www.ct.gov/chro - Toll Free in Connecticut (800) 477-8737
Affirmative Action/Equal Opportunity Employer



State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Capitol Region Office ~ 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

December 15, 2023

NOT THE COMMISSIONER

Via email: deidre.gifford@ct.gov

Diedre S. Gifford, MD, MPH
Commissioner
Department of Social Services
55 Farmington Avenue
Hartford, CT 06105

RE: David Medeiros v. State of CT, Department of Social Services
CHRO No. 2410220
EEOC No. N/A

Dear Commissioner Gifford:

A complaint, referenced above, has been filed with the Commission on March 28, 2023, but due to an administrative error the service was delayed, the Commission apologizes about any inconvenience this may have caused the Respondent. A copy of the complaint is attached.

The enclosed General Notice advises you of your rights, duties, and responsibilities. Please read carefully the information contained in the notice. The enclosed Notice Regarding Out of State Attorneys advises that all attorneys practicing before the Commission must be admitted to practice law in Connecticut and that it is the responsibility of all counsel to comply with Connecticut practice rules. Also enclosed is important information with respect to the no fault conciliation process. The Commission is available to assist you if you wish to pursue settlement of this complaint. If you wish to conciliate the complaint prior to providing an answer, you must notify the Commission within **10 days** of receipt of the enclosed complaint.

You must file an answer to the complaint under oath with the Commission within 30 days of receipt of this complaint unless pre-answer conciliation has been requested. If you fail to answer the complaint within this time, you may be defaulted by the Commission. Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. You must email a scanned copy of your signed and notarized Answer to chro.capitol@ct.gov and dedra.morris@ct.gov.

Main (860) 566-7710 ~ Fax (860) 566-1997
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A.B.I. Resources LLC

39 Kings Highway, Suite C

Gales Ferry CT, 06335

Phone: (860) 942-0365

Fax: (860) 465-9591

<https://www.CTbrainINJURY.com>

Date: 12/16/2023h

Connecticut Commission on Human Rights and Opportunities (CHRO) Capitol
Region Office
450 Columbus Boulevard, Suite 2
Hartford, CT 06103-1835

Subject: **Submission of a Secondary, Distinct Complaint.**

Complaint Against Connecticut CHRO for Disability Discrimination and
Whistleblower Retaliations. RE: David Medeiros v. State of CT, Department of
Social Services CHRO No. 2410220
EEOC No. N/A

Dear CHRO and Connecticut Government Officials,

I am writing as both the complainant and a victim of the inaction perpetuated by the Connecticut Commission on Human Rights and Opportunities (CHRO) concerning my complaint filed on March 28, 2023. After 262 days without proper accommodation or support, I received a letter dated December 15, 2023, acknowledging an administrative delay without providing a substantive resolution or accommodation.

As a brain injury survivor and the founder of ABI Resources, my ability to function effectively in both personal advocacy and professional capacity has been significantly compromised. The CHRO's lack of action is not merely unacceptable; it represents a systemic failure to uphold the legal mandates designed to protect individuals in my position.