



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.



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.

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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:

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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.

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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

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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.

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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.

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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

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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.

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



A.B.I. Resources LLC

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Phone: (860) 942-0365

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<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: **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

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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
www.ct.gov/chro - Toll Free in Connecticut (800) 477-8737
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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.

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.

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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

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Date: 12/18/2023

Connecticut Department of Social Services

Office of the Commissioner Andrea Barton Reeves

And all Pertinent Departments with Connecticut gov.

Subject: New Complaint Addressing Systemic Injustice: Disability Discrimination and Whistleblower Retaliation Complaint.

I am writing to formally file a complaint of continued disability discrimination and whistleblower retaliation against myself, David Medeiros, and ABI Resources by the Connecticut Department of Social Services (DSS) and their systems.

1. Removal and premature closure of Sandata EVV Ticket #539494.

The recent incident involving the removal and premature closure of Sandata EVV Ticket #539494, without notification or consent, is a glaring example of this ongoing issue. This complaint, crucial to the operation and integrity of ABI Resources, was dismissed and marked as resolved, contrary to the actual unresolved status. This act not only undermines the trust and communication essential for our operations but also reflects a disturbing pattern of disregard for the rights and voices of those advocating for disability support services.

As you are aware there's a widespread problem related to the stop of companion authorizations within the Connecticut Departments of Social Services systems for consumers under the Medicaid ABI Waiver program after December 31st, 2023 serviced by ABI Resources.

This situation may lead to a disruption in necessary support services for many Connecticut Medicaid Acquired Brain Injury (ABI) Waiver Program consumers.

2. Unauthorized alteration of ABI Resources' contact information.

Furthermore, the recent unauthorized alteration of ABI Resources' contact information in Sandata's system, which was only rectified after our proactive inquiry today, suggests a deliberate attempt to hinder our ability to receive critical information and engage in necessary advocacy. This action, coupled with the previous complaint's dismissal, points to a systemic issue of discrimination and retaliation that must be addressed immediately.

As a brain injury survivor, I find these actions by the Connecticut DSS not only professionally concerning but also personally disheartening. They represent a breach of trust, a violation of whistleblower protections, and a disregard for the rights of individuals with disabilities.

The Connecticut Department of Social Services must fix this wrongdoing now and protect and ensure the rights of people living with brain injuries and consumers of the Medicaid ABI Waiver Program.

I request a thorough and transparent investigation into these actions and insist on the implementation of measures to prevent recurrence. I also seek assurance that ABI Resources and I will not face further discriminatory practices or retaliatory actions for our advocacy and whistleblower activities.

I expect a prompt and constructive response to this complaint, along with a commitment to upholding the principles of fairness, transparency, and respect for the rights of all individuals, especially those with disabilities.

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



12/18/23, 9:46 AM

Mail - ABI RESOURCES 860 942-0365 - Outlook

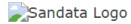
Re: CT DSS: No Authorization Scheduling-ABI RESOURCES 4103-Ticket 539494 ID: 539494 Account: [Sandata Technologies]

Lupson Pasteur (Sandata Technologies) <support@sandata.zendesk.com>

Mon 12/18/2023 9:15 AM

To: David Medeiros <aabiwr@live.com>

- Please type your reply above this line -##



PLEASE DO NOT FORWARD THIS EMAIL! Do not reply to this email unless it pertains to the issue referenced in this email.

Your request (539494) has been updated:

Lupson Pasteur (Sandata Technologies)

Dec 18, 2023, 9:15 AM EST

Heather and David,

I hope all is well. Please send me a screenshot of the authorization that shows in the state portal for each client showing the correct end date.

- Member Name:
- Member Medicaid ID:
- **ClientOtherID (Required in order to escalate):**
- Agency's AVRS ID Number:
- What Payor? Ct Medicaid Clinical/non clinical, MHW, Etc
- Member Authorization Number:
- Name of service code(s) missing:
- How many units/hours/visits:
- Dates of service(s) missing:
- Date Authorization Uploaded (Determination Date column in DSS Portal):
- Agency Confirmed Member in DSS Portal (Y/N):
- Client Eligibility in Portal- Agency should provide Verification Number in the Eligibility Verification Response field in portal:
- DSS Portal Status Column Reflects Approved or Auto-Approved (Y/N):
- Member Checked in EVV by Customer Care Agent (Y/N):

Thanks,

Check out Sandata on Demand (with the link below), your 24/7 resource to all things Sandata support! Review release notes, how to videos and other tips for using our software.

<https://sandata.zendesk.com/hc/en-us>

Lupson Pasteur

Specialist, Support-Tier 2

Sandata Technologies

[270 Duffy Avenue, Unit 266A, Hicksville, NY 11801](#)

Lupson Pasteur (Sandata Technologies)

Samantha Brown (Sandata Technologies)

Dec 14, 2023, 10:53AM EST

Thank you for contacting Sandata Customer Support today Heather.

We appreciate you taking the time to speak with us to resolve your issue with no authorization scheduling ticket [#539494](#).

- **Actions Taken**

- I advised Heather of why she was getting the authorization error when scheduling.

- **Next Steps**

- Heather should reach out to the case managers of the clients about the authorizations.

If you should have any additional issues or questions, please do not hesitate to reply back to this ticket!

Did you know that you can manage your tickets online and search for answers in real time? Visit us on Sandata on Demand at Sandata.zendesk.com at any time for information about our products and answers to many of your questions. You can even submit your question right there on that site 24 hours a day.

You will receive a two-question satisfaction survey from Sandata in the next few hours. We hope that you will take a couple of minutes to let us know how we did today and what we can do to serve you even better in the future.

Thank you again and have a wonderful day!

-Sandata Customer Support

Samantha Brown

Tier I Support Specialist

Sandata Technologies

[270 Duffy Avenue, Unit 266A, Hicksville, NY 11801](#)

Please reach out to your designated Customer Care email group or your designated phone number if you have any questions or concerns.

Sincerely,

<https://outlook.live.com/mail/0/inbox/id/AQQkADAwATNiZmYAZC1hNTUAOC0wYjQ3LTAwAi0wMAoAEADi9Soz3yZhTqAamdViojif>

2/3

Re: WBR Complaint

ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>

Tue 12/19/2023 12:44 PM

To: Morris, Kimberly <Kimberly.Morris@ct.gov>

Cc: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>

Would you please schedule a time for us to sit down and complete this?

Best regards,

David Medeiros

ABI Resources

Medicaid Acquired Brain Injury ABI Waiver Program Provider



From: Morris, Kimberly <Kimberly.Morris@ct.gov>**Sent:** Tuesday, December 19, 2023 12:36 PM**To:** ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>**Subject:** RE: WBR Complaint

Please fill out each line item on the complaint and have the complaint notarized, you can go to a bank to have the complaint notarized.

If you have questions regarding the procedures if this office, I'm willing to answer questions you may have.

From: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>**Sent:** Tuesday, December 19, 2023 12:24 PM**To:** Morris, Kimberly <Kimberly.Morris@ct.gov>**Subject:** Re: WBR Complaint**Importance:** High

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Assist me in completing all these documents and notarizing them.

Best regards,

David Medeiros

ABI Resources

Medicaid Acquired Brain Injury ABI Waiver Program Provider



From: Morris, Kimberly <Kimberly.Morris@ct.gov>**Sent:** Tuesday, December 19, 2023 12:22 PM**To:** ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>**Subject:** RE: WBR Complaint

What type of accommodations do you need?

From: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>**Sent:** Tuesday, December 19, 2023 12:21 PM**To:** Morris, Kimberly <Kimberly.Morris@ct.gov>**Cc:** ABI RESOURCES 860 942-0365 <AABIWR@live.com>**Subject:** Re: WBR Complaint**Importance:** High

You don't often get email from aabiwr@live.com. [Learn why this is important](#)

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Hello Ms. Morris,

Thank you for informing me about the need to complete the Whistleblower Retaliation (WBR) Complaint forms and having everything notarized. I appreciate your guidance in this process.

I am contacting you to request accommodations to assist me in completing all these documents and notarizing them.

Would you kindly provide me assistance with this process?

Your support would be greatly appreciated.

Thank you for your understanding.

Best regards,

David Medeiros

ABI Resources

Medicaid Acquired a Brain Injury ABI Waiver Program Provider

**From:** Morris, Kimberly <Kimberly.Morris@ct.gov>**Sent:** Tuesday, December 19, 2023 9:56 AM**To:** aabiwr@live.com <aabiwr@live.com>**Subject:** WBR Complaint

Good Morning,

It has come to our attention that you would like to file a WBR Complaint.
Please fill out the attached complaint form and have it notarized and sent back.

Thank you.

www.ct.gov/chro**Kimberly D. Morris** (she/her/hers)

Secretary II

Office of Public Hearings

Commission on Human Rights and Opportunities

450 Columbus Blvd., Suite 2

Hartford CT 06103 | AA/EOE

P: 860-418-8770 | F: 860-418-8780 | Direct: 860-541-4711 |

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Phone: (860) 942-0365

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<https://www.CTbrainINJURY.com>

Date: 12/23/2023

**Subject: Formal Complaint Regarding the Failure to Provide
Reasonable Accommodations by the Commission on Human Rights
and Opportunities (CHRO)**

Dear Governor Ned Lamont and Esteemed Members of the
Connecticut Government,

I am writing to emphasize the importance of effective communication and the dissemination of updated information regarding disability accommodations within our federal and state departments.

As an advocate for individuals with disabilities, I understand the critical role that timely and accurate information plays in ensuring that appropriate accommodations are provided. To this end, I kindly request your assistance in ensuring that all Federal and State Department Executives, along with their associated staff, are kept fully informed and updated about the latest developments, policies, and best practices in disability accommodations.

Your support in this initiative is not only crucial for compliance with legal standards but also embodies our collective commitment to creating an inclusive and supportive environment for all individuals, regardless of their abilities.

This is a formal complaint against the Commission on Human Rights and Opportunities (CHRO) for their failure to provide the necessary reasonable accommodations in line with the Americans with Disabilities Act (ADA). My

experiences as a person living with a brain injury and a stroke survivor have been met with significant challenges in the CHRO's processes, which I believe violate my rights under the ADA.

Despite clear and repeated requests for specific accommodations to assist me in completing the CHRO requirements – namely, assistance in understanding and completing complex documentation and a preference for written communication – these requests have been either misunderstood, misinterpreted as seeking legal advice, or inadequately addressed.

The lack of appropriate accommodations has severely hindered my ability to engage effectively in the CHRO process and has added unnecessary complications to an already challenging situation. This not only impacts my individual case but also sets a concerning precedent for others in similar circumstances seeking fair treatment and support from the CHRO.

The response from the CHRO suggesting I seek assistance from Legal Aid or the UConn School of Law Legal Clinic fails to recognize the nature of my request, which is for administrative support to navigate their procedures due to my disability, and not for legal advice.

I am seeking the following actions to be taken in response to this complaint:

1. A thorough review of my interactions with the CHRO, specifically focusing on their responses (or lack thereof) to my requests for reasonable accommodations.
2. Implementation of measures to ensure that the CHRO staff are adequately trained in ADA compliance, particularly in understanding and providing reasonable accommodations to individuals with disabilities.
3. Provision of the necessary accommodations to allow me to complete the CHRO process effectively, as originally requested.

I believe these steps are essential not only for addressing my individual situation but also for ensuring that the CHRO upholds its responsibilities under the ADA and provides an accessible and equitable process for all individuals, regardless of their abilities.

The legal case of David Medeiros v. State of CT, Department of Social Services, CHRO No. 2410220.'

- Whistleblower Report, Comprehensive Grievance Report and Request for Clarity. Addressing Issues within the Connecticut Medicaid Acquired Brain Injury (ABI) Waiver Program. Whistleblower Report Prepared by:
David Medeiros and ABI Resources LLC
Date: November 21, 2023
ABI Resources LLC
39 Kings Hwy STE C
Gales Ferry, CT. 06226
860 942-0365

These records are crucial for understanding the dynamics of interactions with these key figures in the context of disability rights and whistleblower protections.

Would you please ensure my request is provided to Federal and State Department Executives and Associated staff so they may ensure justice and stay completely updated and informed:

- Connecticut Department of Social Services Commissioner Andrea Barton Reeves
- U.S. Senators Richard Blumenthal and Chris Murphy
- U.S. House Representatives John Larson, Joe Courtney, Rosa DeLauro, Jim Himes, and Jahana Hayes
- Connecticut Governor Ned Lamont
- Lieutenant Governor Susan Bysiewicz
- Secretary of State Denise Merrill
- Attorney General William Tong
- State Treasurer Shawn Wooden
- State Comptroller Kevin Lembo
- State Auditors John Geragosian and Rob Kane
- U.S. Department of Health and Human Services (HHS) Secretary Xavier

Becerra

- Centers for Medicare & Medicaid Services (CMS) Administrator Chiquita Brooks-LaSure
- U.S. Department of Justice (DOJ) Attorney General Merrick Garland
- U.S. Equal Employment Opportunity Commission (EEOC) Chair Charlotte A. Burrows
- Office of Special Counsel (OSC) Special Counsel Henry J. Kerner
- Office for Civil Rights (OCR) at HHS Acting Director Melanie Fontes Rainer
- The Department of Labor DOL
- Government Accountability Office GAO
- Connecticut General Assembly CGA

Thank you for your attention to this matter. I look forward to a prompt and constructive response that serves the greatest good.

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





A.B.I. Resources LLC

39 Kings Highway, Suite C

Gales Ferry CT, 06335

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Date: 12/23/2023

**Subject: Formal Complaint Regarding the Failure to Provide
Reasonable Accommodations by the Commission on Human Rights
and Opportunities (CHRO)**

**Call for Systemic Change: CHRO's Failure in ADA Accommodation
Compliance**

Dear Governor Ned Lamont and Esteemed Members of the
Connecticut Government,

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As an advocate for individuals with disabilities, I understand the critical role that timely and accurate information plays in ensuring that appropriate accommodations are provided. To this end, I kindly request your assistance in ensuring that all Federal and State Department Executives, along with their associated staff, are kept fully informed and updated about the latest developments, policies, and best practices in disability accommodations.

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Opportunities (CHRO) for their failure to provide the necessary reasonable accommodations in line with the Americans with Disabilities Act (ADA). My experiences as a person living with a brain injury and a stroke survivor have been met with significant challenges in the CHRO's processes, which I believe violate my rights under the ADA.

Despite clear and repeated requests for specific accommodations to assist me in completing the CHRO requirements – namely, assistance in understanding and completing complex documentation and a preference for written communication – these requests have been either misunderstood, misinterpreted as seeking legal advice, or inadequately addressed.

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- Office of Special Counsel (OSC) Special Counsel Henry J. Kerner
- Office for Civil Rights (OCR) at HHS Acting Director Melanie Fontes Rainer
- The Department of Labor DOL
- Government Accountability Office GAO
- Connecticut General Assembly CGA

Follow-up Mechanism: I respectfully request a formal response to this complaint along with an action plan for addressing these concerns.

Call for External Review or Audit: I urge an independent audit of the CHRO's processes to ensure objective assessment and rectification.

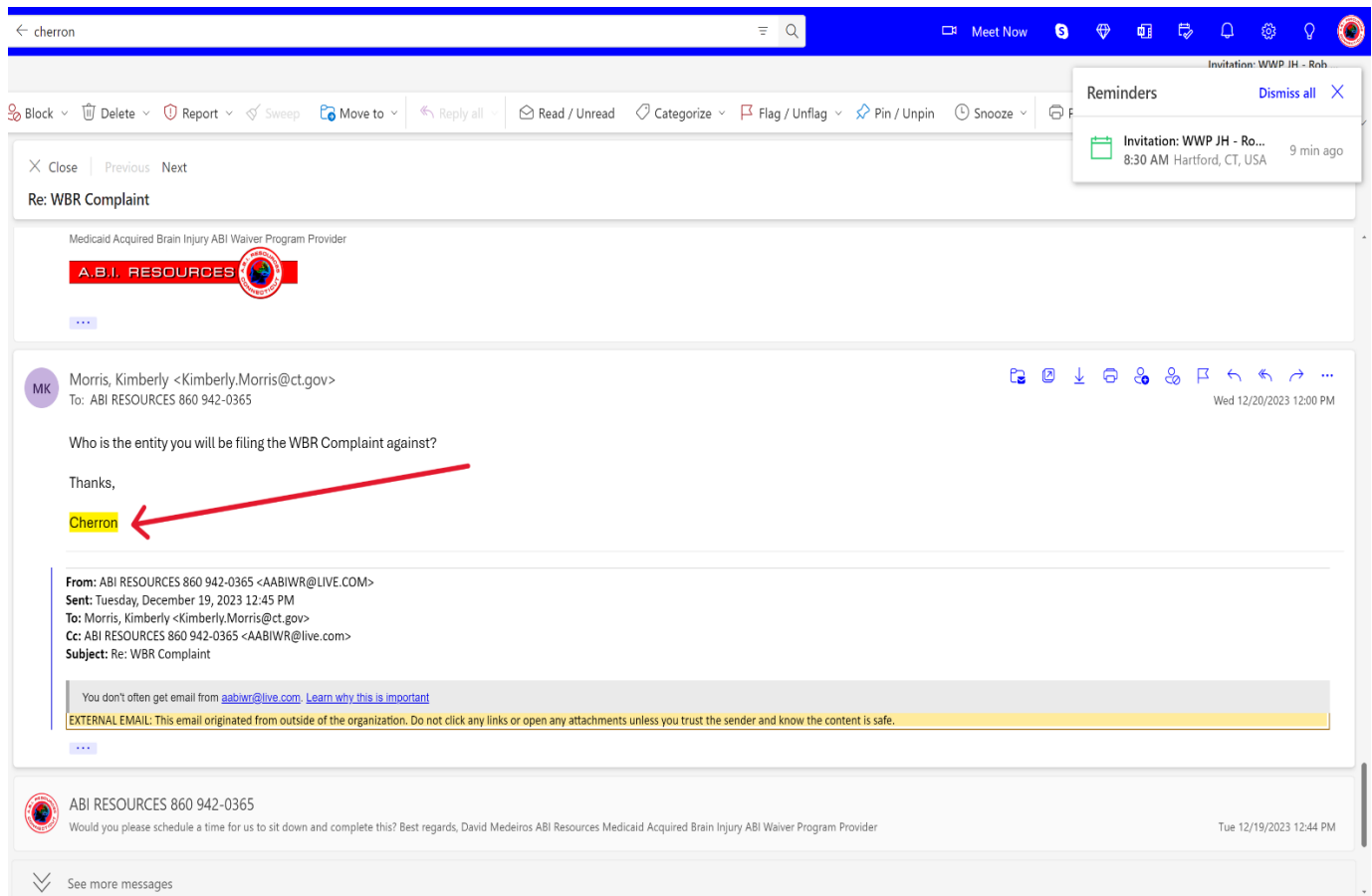
I trust that this matter will be addressed with the seriousness it warrants, not only for my case but for the benefit of all individuals with disabilities in Connecticut.

Thank you for your attention to this matter. I look forward to a prompt and constructive response that serves the greatest good.

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



CHRO Judge Dr. Cherron Payne



After a comprehensive discovery process, it has been identified that Dr. Cherron Payne, from Farmington, Connecticut, has been appointed to a significant role within the Connecticut Commission on Human Rights and Opportunities (CHRO). Governor Ned Lamont announced the appointment of Dr. Payne, along with Jon FitzGerald of Bristol, to serve as administrative law judges for the CHRO. Furthermore, Dr. Payne has been designated as the chief human rights referee by Governor Lamont.

The following are new concerns and complaints.

- Judge Dr. Payne, along with Jon FitzGerald of Bristol, serve as administrative law judges for the CHRO but more importantly, Judge Dr. Cherron Payne is to ensure that my civil rights are adhered to. The communication from Judge Dr. Cherron Payne serves as several significant conflicts of interest.
- CHRO failed the Connecticut General Assembly CGA audit dated December 20, 2023. CT's state auditors provide independent and objective audits of the operations of state government and protection against waste, fraud, and abuse.
- CHRO continues to complicate communication challenges in my self-advocacy efforts.
- CHRO continues to request information that has already been submitted.

- CHRO is responsible for ensuring equity and opportunity for Connecticut small and minority business enterprises owned by women, ethnic minorities, and people with disabilities. CHRO is not ensuring equity and opportunity.

NOT THE COMMISSIONER



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 the 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
www.ct.gov/chro - Toll Free in Connecticut (800) 477-8737
 Affirmative Action/Equal Opportunity Employer

263 DAYS LATER



**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



December 20, 2023

Today, our office released the audit [report](#) and audit [summary](#) on the Commission on Human Rights and Opportunities (CHRO) for the fiscal years ended June 30, 2021 and 2022.

The report notes that in all 21 discrimination complaints reviewed, CHRO did not consistently adhere to statutory processing deadlines. In addition, our review of CHRO's CO-59 asset management reports determined the reports were unreliable, due in part, to a lack of complete physical inventory inspections and reconciliations.

If you would like additional information, or if we can be of further assistance, please do not hesitate to contact us.

Sincerely,

John C. Geragosian
State Auditor

Clark J. Chapin
State Auditor



AUDIT SUMMARY

Commission on Human Rights and Opportunities

Fiscal Years Ended June 30, 2021 and 2022

ABOUT THE AGENCY



The principal duty of the Commission on Human Rights and Opportunities (CHRO) is to enforce state laws prohibiting discrimination in employment, housing, credit, and public accommodations through civil and human rights law enforcement.

CHRO processes discrimination complaints through case assessment, review, mediation, investigation, conciliation, prosecution, and adjudication. As part of its mission, CHRO acts as an advocate and provides education and outreach. It also enforces affirmative action laws and state agency contract compliance.

ABOUT THE AUDIT

We have audited certain operations of the Commission on Human Rights and Opportunities in fulfillment of our duties under Section 2-90 of the Connecticut General Statutes. The scope of our audit included, but was not necessarily limited to, the fiscal years ended June 30, 2021 and 2022. The objectives of our audit were to evaluate the:

1. Commission's internal controls over significant management and financial functions;
2. Commission's compliance with policies and procedures internal to the department or promulgated by other state agencies, as well as certain legal provisions; and
3. Effectiveness, economy, and efficiency of certain management practices and operations, including certain financial transactions.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

 **8 Findings**

Our audit identified internal control deficiencies; instances of noncompliance with laws, regulations, or policies; and a need for improvement in practices and procedures that warrant management's attention.

 **4 Repeat Finding**

NOTEWORTHY FINDINGS



Findings

1

In 21 of 21 discrimination complaints reviewed, CHRO did not consistently adhere to statutory processing deadlines.

2

Our review of CHRO's CO-59 asset management reports determined the reports were unreliable, due in part, to a lack of complete physical inventory inspections and reconciliations.

3

CHRO did not have sufficient information technology resources to effectively support its three areas of service in discrimination case management, contractor compliance, and affirmative action reporting.

4

CHRO was unable to document that it met statutorily required timelines for affirmative action plans submitted by contractors because it did not track the date that the plans were approved or disapproved.



Recommendations

CHRO should process discrimination complaints and determine reasonable cause within the statutory deadlines.

CHRO should work with the Department of Labor to ensure compliance with asset management requirements in Section 4-36 of the General Statutes and the State Property Control Manual.

CHRO should continue to pursue funding and obtain appropriate staffing resources to improve its information management capacity and agency efficiency. The commission should develop a strategy to upgrade its current information technology systems, provide training, and implement electronic processing of state agency and contractor affirmative action plans.

CHRO should improve monitoring over the review of contractor affirmative action plans to ensure that it meets statutory deadlines.



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Date 01.02.2024

Commission on Human Rights and Opportunities

Re: Comprehensive Complaint and Request for Escalation - CHRO
No. 2410220 David Medeiros v. State of Connecticut, Department of
Social Services

Re: Comprehensive Grievance Report and Request for Clarity.

Addressing Issues within the Connecticut Medicaid Acquired Brain
Injury (ABI) Waiver Program.

Whistleblower Report Prepared by: David Medeiros and ABI
Resources LLC Date: November 21, 2023

Re: Newly filed CHRO Complaint 12.29.2023 against CHRO and
DSS.

Esteemed Members of the Commission on Human Rights and Opportunities,

This comprehensive complaint is a cumulation of ongoing concerns, systemic issues, and personal grievances experienced in my interactions with the Commission on Human Rights and Opportunities (CHRO) and the Department of Social Services (DSS). It serves to illuminate the substantial and repetitive failures to adhere to the mandates of the Americans with Disabilities Act (ADA), the disregard for the proper treatment of whistleblowers, and the overall lack of procedural integrity.

I. Introduction and Background:

My journey as a brain injury survivor and stroke survivor has been marred by the CHRO's and DSS's failure to provide necessary ADA accommodations and civil rights. The lack of proper communication and assistance has hindered my ability to effectively engage in proceedings and advocate for my rights. Despite repeated requests for accommodations, such as assistance in understanding and completing complex documentation and a preference for written communication, I have faced misinterpretations and inadequate responses.

II. Allegations of Non-Compliance and Accommodation Failures:

The DSS's actions, including the initiation of complex email threads involving numerous parties, have contravened the clear, simplified communication methods necessary for my effective participation. Notably, the new email and involvement of Mr. Michael Slitt, given his prior engagements with the ABI Waiver Program, presents a glaring conflict of interest, potentially influencing the impartial handling of my case. CHRO email threads with state employees from CHRO and CT DSS Kimberly D. Morris, Debra Morris, CHRO Judge Dr. Cherron Payne, Ferron-Poole, Astread O Matthew. S. Antonetti, Micheal Sillt, Jennifer Nicole Zakrzewski, Deidre Gifford, Andrea Barton Reeves Commissioner, Connecticut Department of Social Services.

III. Whistleblower Protections and Retaliatory Actions:

As a whistleblower, I have reported significant issues within the ABI Waiver Program, placing me at risk of retaliatory actions from individuals within the DSS. The audit's identification of instances of noncompliance with laws, regulations, or policies by the CHRO is indicative of an environment where whistleblower protections are not adequately enforced.

IV. Demand for Investigation and Independent Adjudication:

I demand a detailed investigation into the CHRO's practices, especially regarding ADA accommodations and whistleblower retaliations. It is critical that my distinct complaints be adjudicated independently to prevent the conflation of issues.

V. Federal Escalation Given Audit Findings:

Given the audit findings, which include four repeat findings from previous audits, it is imperative that this matter be escalated to federal authorities, specifically the U.S. Department of Justice Civil Rights Enforcement and all appropriate Federal Departments for an impartial and exhaustive review.

Conclusion and Imperative for Immediate Action:

The systemic issues within the CHRO not only affect my individual case but suggest a broader pattern of noncompliance and disregard for civil rights protections. Immediate federal intervention is necessary to address these deficiencies and ensure justice for all individuals who rely on the CHRO's mandate. These compounding conflicts of interest are profound.

I implore the CHRO to act swiftly and decisively to address these systemic deficiencies, to uphold the rule of law, and to ensure justice for all individuals who rely on its mandate.

VI. Timeliness and Further Accommodations:

The significant delay in addressing CHRO Case 2410220, now exceeding 260 days, is unacceptable and contradicts the principles of timely justice. Such delays have not only affected the resolution of my complaints but also aggravated the challenges I face due to my disability and professional life.

VII. Systemic Changes and Audit Findings:

The recent audit findings have revealed systemic issues within the CHRO's processes, including internal control deficiencies and non-adherence to statutory processing deadlines. These findings correlate directly with the inefficiencies and obstacles I have encountered throughout my case. It is imperative that these systemic issues be addressed immediately to prevent future recurrence and to ensure that all individuals are treated fairly and with respect to their legal rights.

VIII. Escalation to Federal Authorities:

Given the gravity of these issues, and considering the potential limitations of the state-level jurisdiction to provide a comprehensive and unbiased resolution, I request the escalation of my case to the federal authorities. The involvement of entities such as the United States Department of Justice is crucial to ensure that my civil rights are adequately protected, and that justice is served.

IX. Conclusion and Call to Action:

The issues outlined in this comprehensive complaint, corroborated by the recent audit findings and my personal experiences, underscore the urgent need for a review and overhaul of the CHRO's current practices, particularly regarding ADA compliance and whistleblower protections. I request a formal investigation into my allegations, a review of the CHRO's practices by federal authorities, and a public acknowledgment of the failures and steps taken to prevent such failures in the future.

Your immediate and thorough attention to this matter is not only deeply appreciated but also crucial in upholding the principles of justice, fairness, and the rule of law. The systemic issues within the CHRO not only affect my individual case but also suggest a broader pattern of noncompliance and disregard for civil rights protections.

X. Detailed Issues and Specific Incidents:

The issues I've encountered with the CHRO and DSS have been numerous and varied, impacting my ability to seek justice and fair treatment. Notably, my disability accommodations are not met as per ADA guidelines. This includes, but is not limited to, divided complex communications, the improper management of my communications, lack of clear and accessible interactions, and failure to provide necessary support to understand and navigate the processes involved in my case.

XI. Impact on Personal and Professional Life:

The inadequate handling of my complaints and the need for ADA accommodations have had a profound impact on both my personal well-being and my professional endeavors. As the owner of ABI Resources LLC, these issues have not only affected my individual rights but have also hindered my company's operations, which serve individuals with similar disabilities.

XII. Request for Transparency and Accountability:

In the spirit of transparency and accountability, I urge the CHRO to disclose all communications and internal deliberations regarding my case. This includes the provision of detailed explanations for the involvement of new parties in the email thread initiated by DSS and the rationale behind any changes in the handling of my complaints.

XIII. Additional Allegations of Misconduct:

Beyond the initial allegations, I have observed a pattern of behavior that may constitute further misconduct, including the mishandling of sensitive information and a lack of responsiveness to critical issues raised. These actions suggest a systemic disregard for the rights of individuals seeking redress through the CHRO and DSS.

XIV. Remedial Actions and Systemic Reforms:

I call upon the CHRO to implement immediate remedial actions to address the specific issues outlined in this complaint. Furthermore, I advocate for systemic reforms within the CHRO to ensure that future complaints are handled with the requisite seriousness, professionalism, and adherence to legal standards.

XV. Legal and Ethical Implications:

The concerns raised herein have significant legal and ethical implications for the functioning of the CHRO and DSS. It is essential that these bodies operate within the bounds of the law and uphold the highest ethical standards to maintain public trust and ensure the protection of civil rights.

XVI. Conclusion and Expectation of a Timely Response:

In conclusion, the details provided in this comprehensive complaint paint a picture of a system that requires immediate attention and reform. I expect a timely response to each point raised and a detailed action plan outlining the steps the CHRO will take to address these concerns and prevent future failures.

Please regard this letter not as mere correspondence, but as a formal complaint necessitating immediate action and rectification. The issues discussed are not only detrimental to my life but reflect broader systemic problems that may impact others seeking justice through the CHRO and DSS.

XVII. Documentation and Evidence of Non-Compliance:

In support of my claims, I am prepared to provide a comprehensive dossier of all correspondence and records of interactions with the CHRO and DSS that demonstrate the patterns of non-compliance with ADA standards. The detailed log of incidents will illustrate the systemic failures and individual instances of negligence that have occurred throughout the handling of my case.

XVIII. Impact of Non-Compliance on Legal Proceedings:

The lack of ADA compliance has directly affected the legal proceedings related to my case. It has not only delayed the resolution of my complaints but also has compromised the integrity of the process, leaving me at a substantial disadvantage and impeding my right to a fair hearing.

XIX. Proposed Remedies and Accommodations:

I hereby propose the following remedies and accommodations to rectify the current situation:

Immediate implementation of a clear communication protocol that adheres to ADA requirements and civil rights.

Follow-up Mechanism: I respectfully request a formal response to this complaint along with an action plan for addressing these concerns.

XX. Need for Systemic Change and Training:

To prevent future occurrences of such failings, I call for systemic change within the CHRO and DSS, including comprehensive training for all staff on ADA compliance, disability awareness, and the proper handling of whistleblower complaints.

XXI. Assurance of Non-Retaliation:

In light of my status as a whistleblower and the sensitive nature of the issues raised, I seek assurances from the CHRO that there will be no form of retaliation or adverse action taken against me for bringing these matters to light.

XXII. Monitoring and Oversight:

I request that the CHRO establish a system of monitoring and oversight to ensure that the corrective actions proposed are effectively implemented and that compliance with ADA standards is maintained throughout all processes.

XXIII. Appeal for Justice and Integrity:

This complaint is an appeal to the CHRO to uphold the principles of justice and integrity that are the foundation of its mission. The resolution of these issues is not only crucial for my case but is also indicative of the CHRO's commitment to serving the community it is meant to protect.

I expect that this comprehensive complaint will be met with the seriousness it deserves and that immediate steps will be taken to address the concerns raised. The neglect of these issues not only undermines my trust in the CHRO but also casts doubt on the organization's ability to fulfill its mandate.

Thank you for your attention to these urgent matters. I look forward to a detailed response outlining the actions that will be taken to resolve these issues and restore my confidence in the CHRO's commitment to civil rights and justice.

Would you please ensure my complaint is provided to Federal and State Department representatives so they may be advised of civil rights and ensure justice in state processes:

- Connecticut Department of Social Services Commissioner Andrea Barton Reeves
- U.S. Senators Richard Blumenthal and Chris Murphy
- U.S. House Representatives John Larson, Joe Courtney, Rosa DeLauro, Jim Himes, and Jahana Hayes
- Connecticut Governor Ned Lamont
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- Office for Civil Rights (OCR) at HHS Acting Director Melanie Fontes Rainer
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- Connecticut General Assembly CGA

I trust that this matter will be addressed with the seriousness it warrants, for the benefit of all individuals with disabilities in Connecticut.

Thank you for your attention to this matter. I look forward to a prompt and positive response that serves the greatest good.

Best regards,
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Date 01.02.2024

Commission on Human Rights and Opportunities

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II. Allegations of Non-Compliance and Accommodation Failures:

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IV. Demand for Investigation and Independent Adjudication:

I demand a detailed investigation into the CHRO's practices, especially regarding ADA accommodations and whistleblower retaliations. It is critical that my distinct complaints be adjudicated independently to prevent the conflation of issues.

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Given the audit findings, which include four repeat findings from previous audits, it is imperative that this matter be escalated to federal authorities, specifically the U.S. Department of Justice Civil Rights Enforcement and all appropriate Federal Departments for an impartial and exhaustive review.

Conclusion and Imperative for Immediate Action:

The systemic issues within the CHRO not only affect my individual case but suggest a broader pattern of noncompliance and disregard for civil rights protections. Immediate federal intervention is necessary to address these deficiencies and ensure justice for all individuals who rely on the CHRO's mandate. These compounding conflicts of interest are profound.

I implore the CHRO to act swiftly and decisively to address these systemic deficiencies, to uphold the rule of law, and to ensure justice for all individuals who rely on its mandate.

VI. Timeliness and Further Accommodations:

The significant delay in addressing CHRO Case 2410220, now exceeding 260 days, is unacceptable and contradicts the principles of timely justice. Such delays have not only affected the resolution of my complaints but also aggravated the challenges I face due to my disability and professional life.

VII. Systemic Changes and Audit Findings:

The recent audit findings have revealed systemic issues within the CHRO's processes, including internal control deficiencies and non-adherence to statutory processing deadlines. These findings correlate directly with the inefficiencies and obstacles I have encountered throughout my case. It is imperative that these systemic issues be addressed immediately to prevent future recurrence and to ensure that all individuals are treated fairly and with respect to their legal rights.

VIII. Escalation to Federal Authorities:

Given the gravity of these issues, and considering the potential limitations of the state-level jurisdiction to provide a comprehensive and unbiased resolution, I request the escalation of my case to the federal authorities. The involvement of entities such as the United States Department of Justice is crucial to ensure that my civil rights are adequately protected, and that justice is served.

IX. Conclusion and Call to Action:

The issues outlined in this comprehensive complaint, corroborated by the recent audit findings and my personal experiences, underscore the urgent need for a review and overhaul of the CHRO's current practices, particularly regarding ADA compliance and whistleblower protections. I request a formal investigation into my allegations, a review of the CHRO's practices by federal authorities, and a public acknowledgment of the failures and steps taken to prevent such failures in the future.

Your immediate and thorough attention to this matter is not only deeply appreciated but also crucial in upholding the principles of justice, fairness, and the rule of law. The systemic issues within the CHRO not only affect my individual case but also suggest a broader pattern of noncompliance and disregard for civil rights protections.

X. Detailed Issues and Specific Incidents:

The issues I've encountered with the CHRO and DSS have been numerous and varied, impacting my ability to seek justice and fair treatment. Notably, my disability accommodations are not met as per ADA guidelines. This includes, but is not limited to, divided complex communications, the improper management of my communications, lack of clear and accessible interactions, and failure to provide necessary support to understand and navigate the processes involved in my case.

XI. Impact on Personal and Professional Life:

The inadequate handling of my complaints and the need for ADA accommodations have had a profound impact on both my personal well-being and my professional endeavors. As the owner of ABI Resources LLC, these issues have not only affected my individual rights but have also hindered my company's operations, which serve individuals with similar disabilities.

XII. Request for Transparency and Accountability:

In the spirit of transparency and accountability, I urge the CHRO to disclose all communications and internal deliberations regarding my case. This includes the provision of detailed explanations for the involvement of new parties in the email thread initiated by DSS and the rationale behind any changes in the handling of my complaints.

XIII. Additional Allegations of Misconduct:

Beyond the initial allegations, I have observed a pattern of behavior that may constitute further misconduct, including the mishandling of sensitive information and a lack of responsiveness to critical issues raised. These actions suggest a systemic disregard for the rights of individuals seeking redress through the CHRO and DSS.

XIV. Remedial Actions and Systemic Reforms:

I call upon the CHRO to implement immediate remedial actions to address the specific issues outlined in this complaint. Furthermore, I advocate for systemic reforms within the CHRO to ensure that future complaints are handled with the requisite seriousness, professionalism, and adherence to legal standards.

XV. Legal and Ethical Implications:

The concerns raised herein have significant legal and ethical implications for the functioning of the CHRO and DSS. It is essential that these bodies operate within the bounds of the law and uphold the highest ethical standards to maintain public trust and ensure the protection of civil rights.

XVI. Conclusion and Expectation of a Timely Response:

In conclusion, the details provided in this comprehensive complaint paint a picture of a system that requires immediate attention and reform. I expect a timely response to each point raised and a detailed action plan outlining the steps the CHRO will take to address these concerns and prevent future failures.

Please regard this letter not as mere correspondence, but as a formal complaint necessitating immediate action and rectification. The issues discussed are not only detrimental to my life but reflect broader systemic problems that may impact others seeking justice through the CHRO and DSS.

XVII. Documentation and Evidence of Non-Compliance:

In support of my claims, I am prepared to provide a comprehensive dossier of all correspondence and records of interactions with the CHRO and DSS that demonstrate the patterns of non-compliance with ADA standards. The detailed log of incidents will illustrate the systemic failures and individual instances of negligence that have occurred throughout the handling of my case.

XVIII. Impact of Non-Compliance on Legal Proceedings:

The lack of ADA compliance has directly affected the legal proceedings related to my case. It has not only delayed the resolution of my complaints but also has compromised the integrity of the process, leaving me at a substantial disadvantage and impeding my right to a fair hearing.

XIX. Proposed Remedies and Accommodations:

I hereby propose the following remedies and accommodations to rectify the current situation:

Immediate implementation of a clear communication protocol that adheres to ADA requirements and civil rights.

Follow-up Mechanism: I respectfully request a formal response to this complaint along with an action plan for addressing these concerns.

XX. Need for Systemic Change and Training:

To prevent future occurrences of such failings, I call for systemic change within the CHRO and DSS, including comprehensive training for all staff on ADA compliance, disability awareness, and the proper handling of whistleblower complaints.

XXI. Assurance of Non-Retaliation:

In light of my status as a whistleblower and the sensitive nature of the issues raised, I seek assurances from the CHRO that there will be no form of retaliation or adverse action taken against me for bringing these matters to light.

XXII. Monitoring and Oversight:

I request that the CHRO establish a system of monitoring and oversight to ensure that the corrective actions proposed are effectively implemented and that compliance with ADA standards is maintained throughout all processes.

XXIII. Appeal for Justice and Integrity:

This complaint is an appeal to the CHRO to uphold the principles of justice and integrity that are the foundation of its mission. The resolution of these issues is not only crucial for my case but is also indicative of the CHRO's commitment to serving the community it is meant to protect.

I expect that this comprehensive complaint will be met with the seriousness it deserves and that immediate steps will be taken to address the concerns raised. The neglect of these issues not only undermines my trust in the CHRO but also casts doubt on the organization's ability to fulfill its mandate.

Thank you for your attention to these urgent matters. I look forward to a detailed response outlining the actions that will be taken to resolve these issues and restore my confidence in the CHRO's commitment to civil rights and justice.

Would you please ensure my complaint is provided to Federal and State Department representatives so they may be advised of civil rights and ensure justice in state processes:

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Thank you for your attention to this matter. I look forward to a prompt and positive response that serves the greatest good.

Best regards,
David Medeiros
 David Medeiros
 ABI Resources, CEO, Director, Team Member
 Medicaid Acquired Brain Injury 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 01.02.2024

Commission on Human Rights and Opportunities

Re: Comprehensive Complaint and Request for Escalation - CHRO
No. 2410220 David Medeiros v. State of Connecticut, Department of
Social Services

Re: Comprehensive Grievance Report and Request for Clarity.

Addressing Issues within the Connecticut Medicaid Acquired Brain
Injury (ABI) Waiver Program.

Whistleblower Report Prepared by: David Medeiros and ABI
Resources LLC Date: November 21, 2023

Re: Newly filed CHRO Complaint 12.29.2023 against CHRO and
DSS.

Esteemed Members of the Commission on Human Rights and Opportunities,

This comprehensive complaint is a cumulation of ongoing concerns, systemic issues, and personal grievances experienced in my interactions with the Commission on Human Rights and Opportunities (CHRO) and the Department of Social Services (DSS). It serves to illuminate the substantial and repetitive failures to adhere to the mandates of the Americans with Disabilities Act (ADA), the disregard for the proper treatment of whistleblowers, and the overall lack of procedural integrity.

I. Introduction and Background:

My journey as a brain injury survivor and stroke survivor has been marred by the CHRO's and DSS's failure to provide necessary ADA accommodations and civil rights. The lack of proper communication and assistance has hindered my ability to effectively engage in proceedings and advocate for my rights. Despite repeated requests for accommodations, such as assistance in understanding and completing complex documentation and a preference for written communication, I have faced misinterpretations and inadequate responses.

II. Allegations of Non-Compliance and Accommodation Failures:

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



STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

CHRO NO: 1740195

DAVID MEDEIROS

COMPLAINANT

Vs.

Hartford Healthcare Corporation

And Windham Hospital

RESPONDENTS

Additional information

H.H.C Organization is now apparently fraudulently double billing me for services provided.

Bills included for review.

CPT Code 99291 is used to report the first 30-74 minutes of critical care on a given date. It should be used only once per date. Critically ill is defined as a critical illness or injury that acutely impairs one or more vital organ systems indicating a high probability of imminent or life threatening deterioration in the patient's condition.

CPT Code 93010 is defined as an "Electrocardiogram, routine ECG with at least 12-leads; interpretation and report only."

CPT Code 70450 The facility performs a CT of the head without contrast.

CPT Code 71010 Chest x-rays will not be reimbursed when billed with preventive evaluation/management services

To whom it concerns,

It is very clear to me that the hospital staff was disregarding David horribly and was being extremely different to him than they would a white male or woman from Mansfield. They were very rude and ignored him when in the room. They would not give him a moment to speak. David tried to ask questions and they would not look at him or answer him. When they ordered him to do something they did not look at him. The nurse threatened him many times and mocked him. The doctor asked the nurse "what up" the nurse said Willimantic he thinks his dying with a nasty annoyed tone. The doctor would ask a question while walking out, never giving David a chance to talk, he couldn't be bothered. Both the doctor and the nurse ignored his replies. The doctor walked in, ignored David and asked me if David speaks English and what's up with David, in a very annoyed tone. It was very clear that the doctor and nurse hated him, didn't care and already had pre-decided that David wasn't worth living. I could not believe how disgusting they were to him, even with me in the room. I witness the nurse rolling his eyes, talking under his breath and huffing and puffing. David tried many times to tell the nurse that the needle in his arm was sticking in his bone and the iv bag was not draining, the nurse ignored him. The doctor had to tell the nurse that the fluid bag was not draining to fix the iv bag about an hour after it was inserted. I watched the nurse mock David and forcibly yank on his arm and hand. He was mad and barely looked when he shoved the needle in his hand. I truly believe that they would have let him die alone and without any care. I have never witnessed a person being treated so horribly in my life. I am very worried for David's life if he is ever in need of emergency hospital services in the future. The doctor and nurse both knew that David was struggling to breath and move, they did not care. It was very clear that they wanted David to leave or die. When David explained that he was private pay the doctor quickly came in with discharge papers being very pushy and rushing him David out. David asked if he was having a stroke or having a heart attack, he asked if he needed and MRI. The doctor said that no one was there to do an MRI and it could take up to 2 days to get one. I will gladly talk with any person wishing to hear more details about how horrible and racist the hospital was to David.

I was also with David days later when he attempted to get a copy of his complaint and was denied.

Sincerely,

**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

☐ suspended

☐ placed on probation

☐ demoted

☐ warned

☐ given a poor evaluation

☐ denied a raise

☐ less trained

☐ denied an office

☒ denied equal service(s) Ongoing-
10/2023

☐ other:

☐ not hired/promoted

☐ given unequal duties

☐ harassed

☐ sexually harassed

☐ earning different pay

☐ constructively discharged

☐ retaliated against

☐ transferred

☐ given difficult assignment

☐ not recalled

I believe that my...

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

☐ Race

☐ Color

☐ Religious creed

☐ Age

☐ Gender identity/expression

☐ Marital status

☐ National origin

☐ Sex: ☐ Male ☐ Female

☐ Ancestry

☐ Other:

☐ Previous opposition to discriminatory conduct

☐ Mental disability

☐ Intellectual disability

☐ Learning disability

☐ Physical disability

☐ Veteran status

☐ Prior criminal conviction

☐ Sexual orientation

☐ Pregnancy

☐ Lawful source of income

☐ Genetic information

**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.

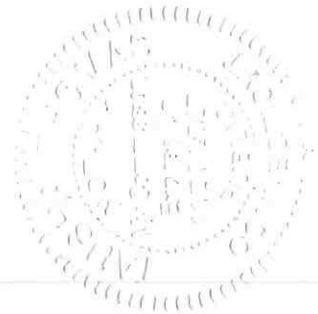
David Medeiros being duly sworn, on oath, states that s/he is the Complainant herein; that s/he has read the foregoing complaint and knows the content thereof; that the same is true of her/his own knowledge, except as to the matter herein stated on information and belief and that as to these matters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

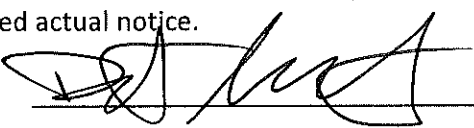
Name Laura Clark Address _____
City Plainfield State CT ZIP Code _____
Telephone 1860 287-0442 Email LauraC@ctbraininjury.com

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