

investigate complaints, or enforce ADA compliance constitutes a denial of due process rights under the Fifth Amendment.

- **Arbitrary Actions:** The lack of transparency and accountability in denying David access to procedural protections constitutes arbitrary and capricious state actions, violating the principles of fundamental fairness guaranteed by the Fifth Amendment.

14. Fourteenth Amendment Violations

- **Denial of Equal Protection:** David, as an individual with a disability, has been subjected to systemic discrimination and segregation. Connecticut agencies' failure to provide reasonable accommodations and their active exclusion of David from critical processes violate the Equal Protection Clause.
- **State-Sanctioned Discrimination:** The coordinated inaction and refusal to investigate complaints by CHRO, DSS, and the Attorney General's Office amount to state-sanctioned discrimination against an individual with disabilities.

15. Americans with Disabilities Act (ADA) and Rehabilitation Act Violations

- **Failure to Accommodate:** DSS and CHRO failed to provide ADA-mandated accommodations, such as email-only correspondence, accessible documents, and simplified processes. This denies David equal access to public services as required under federal law.



- **Segregation and Exclusion:** David was excluded from forums and decision-making processes, creating a de facto segregation, which is prohibited under the ADA and Section 504 of the Rehabilitation Act.

16. Whistleblower Protection Act Violations

- **Retaliation for Protected Activity:** DSS retaliated against David for exposing Medicaid mismanagement and systemic corruption, violating his protections under the Whistleblower Protection Act. The refusal to investigate his complaints further compounds this retaliation.
- **Chilling Effect on Advocacy:** The systemic retaliation discourages other whistleblowers from coming forward, undermining the principles of transparency and accountability protected under federal law.

17. FOIA Violations

- **Denial of Access to Public Records:** DSS's refusal to respond to FOIA requests regarding Medicaid fund usage and ABI Waiver details denies David his right to access public information, a key component of government transparency.
- **Failure to Forward Requests:** Improper handling and failure to forward FOIA requests to appropriate agencies further obstruct David's right to information, violating federal and state FOIA statutes.

Cumulative Impact

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



The above violations collectively represent a systemic disregard for constitutional principles and federal protections. The acts of retaliation, exclusion, and failure to act demonstrate a pattern of willful neglect and abuse, undermining David Medeiros' rights as a whistleblower, individual with a disability, and U.S. citizen. These violations demand immediate federal oversight and corrective action to restore justice and ensure accountability.

2. When did this occur?

Timeline of Events

1. October 24, 2024 – Filing of CHRO Complaint

- David Medeiros submitted a notarized complaint to the Connecticut Commission on Human Rights and Opportunities (CHRO), detailing ADA violations, systemic discrimination, and retaliation by the Connecticut Department of Social Services (DSS).

2. October 30, 2024 – Follow-Up with CHRO

- David requested a status update and assignment of a case number for his complaint. CHRO failed to respond, creating procedural barriers to justice.

3. November 1, 2024 – Appeal to Connecticut Attorney General

- David escalated his complaints to the Connecticut Attorney General's Office, providing evidence of systemic violations and requesting oversight of DSS and CHRO. The Attorney General's Office did not respond or take any action.



4. November 10, 2024 – Submission to DOJ

- David submitted a comprehensive complaint to the U.S. Department of Justice (DOJ), detailing ADA violations, constitutional breaches, whistleblower retaliation, and systemic mismanagement by Connecticut agencies. Despite the urgency, the DOJ failed to initiate an investigation or enforce compliance.

5. November 28, 2024 – Current Status

- **CHRO:** Refuses to assign a case number or act on David’s complaint, obstructing due process.
- **Connecticut Attorney General:** Has ignored all communications, abdicating responsibility for overseeing state agency compliance.
- **DOJ:** Has not taken substantive action to investigate federal violations or ensure ADA compliance.
- **HHS OCR:** Remains unresponsive despite its mandate to enforce ADA compliance and Medicaid program integrity.

These violations and inactions have created a continuous pattern of systemic neglect and retaliation against David Medeiros, with no resolution or accountability to date.

4. How did you discover this action?

How the Action Was Discovered

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



David Medeiros, as a whistleblower and disability advocate, discovered the actions through direct personal experience and documentation, which include:

6. Personal Experience with Discrimination and Retaliation

- David experienced firsthand acts of exclusion, public ridicule, and procedural barriers during interactions with Connecticut Department of Social Services (DSS) officials. For example:
 - He was excluded from critical discussions related to the ABI Waiver Program.
 - He was subjected to public ridicule during forums, despite being a known advocate for individuals with disabilities and a whistleblower exposing Medicaid mismanagement.

7. Documented Failures of State Agencies

- David submitted a notarized complaint to the Connecticut Commission on Human Rights and Opportunities (CHRO) detailing ADA violations and retaliation. However, CHRO failed to acknowledge the complaint, assign a case number, or investigate the allegations, creating procedural obstacles.

8. Evidence of Inaction by the Connecticut Attorney General

- Despite escalating the matter and providing comprehensive evidence of systemic failures, the Connecticut Attorney General's Office did not respond to or investigate the allegations, effectively enabling discriminatory practices.



9. Federal Agency Inaction

- After submitting a detailed complaint to the U.S. Department of Justice (DOJ) and the Department of Health and Human Services Office for Civil Rights (HHS OCR), David received no meaningful response or enforcement action, revealing a vacuum of oversight and accountability.

10. Pattern of Retaliation and Non-Compliance

- Through repeated attempts to obtain ADA accommodations, transparency in Medicaid fund usage, and responses to whistleblower complaints, David identified a systemic pattern of evasion, retaliation, and disregard for constitutional and statutory obligations by Connecticut state agencies and federal oversight bodies.

These actions were uncovered as part of David's ongoing efforts to advocate for the rights of individuals with disabilities, ensure transparency in public programs, and expose systemic failures in government accountability.

Additional Facts Supporting the Allegation

1. Documented Failures by State Agencies

- **Connecticut Commission on Human Rights and Opportunities (CHRO):**

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- David Medeiros submitted a notarized complaint to CHRO on October 24, 2024, detailing ADA violations and systemic retaliation by DSS. CHRO failed to:
 - Assign a case number.
 - Investigate the allegations.
 - Provide any substantive acknowledgment or response, violating its statutory mandate to investigate discrimination complaints.
- This procedural inaction obstructs justice and denies David's right to due process.

2. Connecticut Department of Social Services (DSS) Retaliation:

- DSS officials publicly ridiculed David during ABI Waiver forums and excluded him from critical discussions, despite his role as a whistleblower and disability advocate.
- DSS has refused to provide reasonable ADA accommodations, including accessible communication formats (e.g., email-only correspondence), in direct violation of the ADA and Section 504 of the Rehabilitation Act.

3. Inaction by the Connecticut Attorney General's Office:

- Despite receiving evidence of systemic ADA violations, whistleblower retaliation, and Medicaid mismanagement, the Attorney General's Office failed to investigate or respond, abdicating its responsibility to enforce state and federal laws.

4. Federal Oversight Failures:



- The U.S. Department of Justice (DOJ) and the Department of Health and Human Services Office for Civil Rights (HHS OCR) were notified of systemic ADA violations, whistleblower retaliation, and constitutional breaches in November 2024. Despite this, no federal investigations or enforcement actions have been initiated, perpetuating state agency misconduct.

5. Evidence of ADA Non-Compliance:

- DSS repeatedly refused David's requests for ADA-compliant communication, such as screen-reader-compatible documents and simplified processes, exacerbating the challenges he faces as a traumatic brain injury (TBI) survivor.

6. Mismanagement of Public Funds:

- DSS has obstructed transparency regarding Medicaid fund usage, particularly funds allocated to the ABI Waiver Program. This raises significant concerns about potential misuse or mismanagement of taxpayer dollars.

7. Exploitation of Disability:

- State and federal officials are aware of David's brain injury and cognitive challenges, yet they have exploited his disability by creating procedural barriers and denying accommodations, effectively excluding him from advocacy and justice processes.

8. Pattern of Systemic Corruption and Retaliation:



- Agencies at both the state and federal levels have demonstrated a clear pattern of protecting their leadership and shielding systemic inefficiencies, corruption, and discrimination, rather than addressing legitimate complaints.
- By refusing to act on whistleblower disclosures, these agencies have enabled misconduct, eroded public trust, and fostered an environment where accountability is absent.

9. Violation of Transparency Laws:

- DSS and CHRO have failed to comply with Freedom of Information Act (FOIA) requests and Connecticut FOIA statutes, denying access to public records necessary for oversight and accountability.

10. Legal Precedents Supporting the Allegation:

- **Tennessee v. Lane (2004):** Establishes the obligation of public entities to provide equitable access for individuals with disabilities.
- **Whistleblower Protection Act (5 U.S.C. § 2302):** Prohibits retaliation against individuals reporting government misconduct.
- **Mathews v. Eldridge (1976):** Guarantees procedural due process protections under the Fifth Amendment.

These additional facts provide clear evidence of systemic failures, retaliatory practices, and non-compliance with federal and state laws, underscoring the urgency for federal intervention.



1. Gross Mismanagement:

1. Mismanagement of Medicaid Funds:

- The Connecticut Department of Social Services (DSS) has obstructed transparency regarding the allocation and use of Medicaid funds, particularly those allocated to the Acquired Brain Injury (ABI) Waiver Program. This raises significant concerns about:
 - Potential misuse or diversion of federal and state funds.
 - Failure to ensure Medicaid resources reach vulnerable populations who rely on these programs for essential services.

2. Failure to Enforce ADA Compliance:

- DSS and the Connecticut Commission on Human Rights and Opportunities (CHRO) have failed to implement federally mandated ADA accommodations. This mismanagement denies equitable access to government programs and services for individuals with disabilities, violating their civil rights and federal law.

3. Lack of Oversight and Accountability:

- Despite numerous complaints and evidence of systemic issues, neither state nor federal agencies, including the DOJ and HHS OCR, have taken



appropriate enforcement action. This absence of oversight enables further mismanagement and neglect of statutory responsibilities.

4. Inadequate Response to Whistleblower Disclosures:

- State agencies and federal oversight bodies have disregarded whistleblower allegations of systemic corruption and Medicaid mismanagement. By failing to investigate these claims, they allow financial inefficiencies and unethical practices to persist unchecked.

5. Procedural Failures:

- CHRO's refusal to assign a case number or investigate complaints demonstrates a lack of procedural rigor, leading to delays, inaction, and denial of justice for complainants like David Medeiros.
- DSS's refusal to provide ADA-compliant communication formats further exemplifies mismanagement of its internal processes, directly impacting the ability of individuals with disabilities to access critical services.

6. Exploitation of Vulnerable Populations:

- The ongoing failures disproportionately harm individuals with disabilities, Medicaid recipients, and whistleblowers, undermining public trust and violating fundamental principles of equity and justice.

7. Failure to Address Retaliation:



- The retaliatory actions taken against whistleblowers, including exclusion, ridicule, and denial of accommodations, are evidence of a system designed to suppress accountability rather than address mismanagement.

8. Erosion of Public Trust:

- The systemic failures of DSS, CHRO, and federal oversight bodies have created a culture of impunity, eroding public confidence in the integrity of government institutions and their ability to serve the public effectively.

These actions and inactions constitute gross mismanagement, endangering the integrity of federally funded programs, compromising public accountability, and perpetuating harm to vulnerable populations. Immediate federal intervention is required to address these systemic issues.



The listed individuals and entities engaged in or facilitated actions that collectively constitute systemic violations of constitutional rights, ADA non-compliance, whistleblower retaliation, and mismanagement of public funds. These actions include:

1. Suppression of Whistleblower Rights and Retaliation

- **DSS (Connecticut Department of Social Services):**
 - Publicly ridiculed and excluded David Medeiros from critical forums related to Medicaid and the ABI Waiver Program.
 - Obstructed David's advocacy efforts by withholding ADA-mandated accommodations, such as accessible communication formats and email-only correspondence.
 - Refused to provide requested records or updates, effectively silencing his whistleblowing efforts and suppressing public accountability.
- **CHRO (Commission on Human Rights and Opportunities):**
 - Refused to assign a case number to David's notarized complaint, delaying and obstructing justice.
 - Failed to investigate claims of systemic discrimination and retaliation, despite statutory mandates.
- **Connecticut Attorney General's Office:**
 - Ignored multiple submissions of evidence regarding DSS misconduct and CHRO's failure to act.



- Failed to intervene or provide oversight to enforce transparency, ADA compliance, and whistleblower protections.

2. Violations of ADA Protections and Disability Rights

- **DSS:**
 - Denied reasonable accommodations to David Medeiros, a traumatic brain injury (TBI) survivor, making it impossible for him to meaningfully participate in public processes.
 - Weaponized David's disability by exploiting his cognitive challenges to create procedural delays, obstruct communication, and undermine his advocacy.
- **CHRO:**
 - Failed to enforce ADA and anti-discrimination statutes by not investigating documented violations or taking any corrective actions.
- **Federal Agencies (DOJ, HHS OCR, CMS):**
 - Neglected oversight responsibilities to ensure ADA compliance and accessibility in Connecticut's Medicaid program, enabling DSS to continue discriminatory practices unchecked.

3. Mismanagement of Public Funds and Lack of Transparency

- **DSS:**

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- Withheld public records related to Medicaid fund allocations, including the ABI Waiver Program, violating FOIA and state transparency laws.
- Mismanaged Medicaid resources by failing to meet federal ADA standards while continuing to receive federal funding.
- **Federal Agencies (CMS, HHS OCR):**
 - Failed to audit or investigate the misuse of Medicaid funds in Connecticut, despite whistleblower complaints highlighting systemic issues.

4. Abuse of Authority and Gross Mismanagement

- **Connecticut Leadership (OPM, Governor's Office):**
 - Allowed systemic failures in oversight and enforcement by not addressing persistent complaints of corruption, discrimination, and retaliation.
 - Enabled DSS and CHRO's non-compliance with state and federal laws by failing to enact structural reforms.
- **Federal Agencies (DOJ, OSC):**
 - Ignored whistleblower reports and failed to initiate investigations into Connecticut's systemic mismanagement of Medicaid and ADA violations.

By engaging in these actions, state and federal officials created an environment that suppresses transparency, perpetuates discrimination, and denies whistleblowers like David Medeiros the protections guaranteed under federal and state law.

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Timeline of Events

1. October 24, 2024 – Filing of CHRO Complaint

- David Medeiros submitted a notarized complaint to the Connecticut Commission on Human Rights and Opportunities (CHRO), detailing ADA violations, systemic discrimination, and retaliation by the Connecticut Department of Social Services (DSS).

2. October 30, 2024 – Follow-Up with CHRO

- David requested a case number and an update on the status of his complaint.
- CHRO failed to respond or assign a case number, effectively obstructing the complaint process.

3. November 1, 2024 – Appeal to Connecticut Attorney General

- David submitted evidence and documentation to the Connecticut Attorney General's Office, requesting oversight and intervention to address systemic misconduct by DSS and CHRO.
- The Attorney General's Office ignored the submission and failed to act.

4. November 10, 2024 – Escalation to DOJ

- David submitted a detailed whistleblower complaint to the U.S. Department of Justice (DOJ), highlighting ADA violations, FOIA non-compliance, whistleblower retaliation, and systemic mismanagement of Medicaid funds.



- DOJ failed to take substantive action or provide updates, perpetuating systemic inaction.

5. November 28, 2024 – Current Status

- **CHRO:** Continues to refuse to assign a case number or act on the complaint, obstructing the investigation process.
- **Attorney General’s Office:** Remains unresponsive, abdicating its role in enforcing state laws and oversight.
- **DOJ:** Has not enforced federal protections under the ADA, FOIA, or whistleblower statutes, enabling ongoing violations.
- **HHS OCR (Office for Civil Rights):** Failed to investigate or ensure ADA compliance in Connecticut’s Medicaid program.

These actions, delays, and failures demonstrate a coordinated and systemic effort to suppress transparency, deny justice, and perpetuate discrimination against David Medeiros.



Discovery of Actions

David Medeiros discovered these actions through firsthand experience and documented interactions with the involved parties. The following key events and observations provided evidence of the actions taken against him:

1. Refusal to Assign a Case Number by CHRO

- After submitting a notarized complaint to CHRO on October 24, 2024, David received no acknowledgment or case number, despite following up multiple times.
- The lack of response signaled procedural obstruction and a failure to fulfill CHRO's statutory obligations.

2. Exclusion and Ridicule by DSS

- During public forums related to the ABI Waiver Program, DSS officials publicly ridiculed and excluded David, creating a hostile environment for his advocacy.
- Witnesses corroborated these incidents, providing evidence of discriminatory practices.

3. Ignored Submissions to the Attorney General's Office

- Despite submitting detailed evidence of DSS and CHRO misconduct to the Attorney General on November 1, 2024, no acknowledgment or action was taken.
- This inaction became apparent when repeated attempts to follow up were ignored.

4. Federal Oversight Failures

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- Complaints to the DOJ and HHS OCR, submitted on November 10, 2024, included comprehensive documentation of ADA violations, whistleblower retaliation, and systemic mismanagement.
- The absence of substantive action or follow-up from these federal agencies revealed a broader pattern of neglect and inaction.

5. FOIA and ADA Compliance Failures

- Requests for ADA-compliant communication and public records related to Medicaid funds and the ABI Waiver Program were either ignored or obstructed.
- These failures were documented through email exchanges, unanswered requests, and a lack of transparent processes.

Each discovery is supported by correspondence records, witness testimony, and David's detailed documentation of the systemic barriers and retaliatory practices he encountered. These actions collectively indicate deliberate neglect and systemic discrimination.



Additional Facts Supporting the Allegations

1. Documented Retaliation and Exclusion by DSS:

- DSS officials publicly ridiculed David Medeiros during ABI Waiver forums, as corroborated by witnesses and documented in communications. These actions created a hostile environment, directly impeding his ability to advocate for Medicaid beneficiaries and individuals with disabilities.
- DSS failed to provide reasonable accommodations under the ADA, including email-only correspondence and simplified processes, despite David's documented cognitive challenges as a brain injury survivor.

2. CHRO's Failure to Investigate:

- Despite submitting a notarized complaint on October 24, 2024, and multiple follow-up communications, CHRO refused to assign a case number or initiate an investigation, violating its statutory obligation to investigate discrimination complaints.
- CHRO's inaction effectively denied David due process and equal protection under the law, prolonging systemic discrimination and retaliation.

3. Attorney General's Office Inaction:

- Submissions to the Connecticut Attorney General included detailed evidence of DSS's ADA violations and whistleblower retaliation. Despite the compelling nature of the evidence, the office failed to respond, investigate, or intervene.



- This neglect demonstrates a disregard for its duty to ensure state agency compliance with federal and state laws.

4. Federal Oversight Failures (DOJ and HHS OCR):

- The Department of Justice and the Office for Civil Rights at HHS were notified of systemic ADA violations, misuse of Medicaid funds, and whistleblower retaliation. Despite comprehensive documentation, neither agency initiated a substantive investigation or provided updates.
- Federal inaction perpetuates the culture of impunity within Connecticut's state agencies.

5. FOIA and Transparency Failures:

- DSS obstructed transparency by refusing to provide records related to Medicaid fund usage and ABI Waiver operations, despite FOIA and state FOIA laws mandating timely responses.
- Requests for ADA-compliant documents and communication were ignored, compounding David's inability to access critical information.

6. Pattern of Systemic Neglect and Corruption:

- Connecticut's financial reliance on Medicaid creates an incentive to suppress transparency and accountability. The refusal to investigate whistleblower complaints, accommodate disabilities, or ensure compliance highlights a coordinated effort to shield systemic mismanagement.

7. David Medeiros' Vulnerability as a Brain Injury Survivor:

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- Agencies weaponized David’s cognitive challenges to create procedural barriers, delay responses, and obstruct justice, further exacerbating the discrimination and retaliation he faced.
- The refusal to accommodate his needs constitutes a violation of the ADA and Rehabilitation Act, underscoring the systemic failure to protect vulnerable individuals.

Summary of Supporting Evidence:

- Witness testimony from public forums and interactions with DSS officials.
- Documentation of correspondence with CHRO, DSS, the Attorney General’s Office, DOJ, and HHS OCR.
- Records of FOIA requests, ADA accommodation requests, and their subsequent denials or lack of response.
- Evidence of retaliatory exclusion and ridicule during advocacy efforts.
- Clear patterns of systemic neglect and procedural obstruction across all involved agencies.

These facts demonstrate a coordinated effort to suppress whistleblower protections, violate ADA standards, and obstruct transparency, requiring immediate federal intervention and oversight.

Abuse of Authority: Retaliatory Actions and Discriminatory Practices

1. Connecticut Department of Social Services (DSS):

- **Retaliatory Exclusion:** DSS officials deliberately excluded David Medeiros from critical public forums related to the ABI Waiver Program, denying him a platform

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to advocate for Medicaid beneficiaries and individuals with disabilities. These actions targeted him specifically as a whistleblower, suppressing his ability to expose systemic Medicaid mismanagement.

- **Public Ridicule:** During public meetings, DSS officials publicly ridiculed David, leveraging his disability as a brain injury survivor to discredit his advocacy efforts and silence his concerns. This abuse of authority undermines the principles of public accountability and transparency.
- **ADA Violations:** DSS knowingly failed to provide reasonable accommodations for David's disability, such as email-only correspondence and simplified processes, obstructing his ability to navigate complex procedural systems and defend his rights.

2. Connecticut Commission on Human Rights and Opportunities (CHRO):

- **Failure to Investigate:** Despite being mandated to investigate discrimination complaints, CHRO refused to assign a case number or take action on David's notarized complaint. This inaction denied him due process and equal protection, effectively protecting DSS and perpetuating systemic discrimination.
- **Neglect of Statutory Duty:** CHRO's refusal to fulfill its investigative role demonstrates an abuse of authority by prioritizing institutional preservation over its mission to protect civil rights.

3. Connecticut Attorney General's Office:



- **Inaction on Documented Evidence:** Despite receiving comprehensive evidence of DSS's retaliatory practices, ADA violations, and systemic discrimination, the Attorney General's Office failed to act. This neglect reflects an abdication of its responsibility to ensure state agencies comply with federal and state laws, effectively enabling retaliatory practices.

4. Federal Oversight Bodies (DOJ and HHS OCR):

- **Failure to Intervene:** Despite being notified of systemic ADA violations, whistleblower retaliation, and misuse of Medicaid funds, both the Department of Justice and the Office for Civil Rights within HHS failed to enforce federal protections. Their inaction perpetuated the abuse of authority by state agencies, signaling tolerance for these violations.

Retaliatory Actions Against Whistleblowing Efforts:

- **Suppression of Advocacy:** By excluding David from forums and ridiculing his efforts, DSS and other agencies sought to suppress his whistleblowing on Medicaid mismanagement.
- **Weaponized Disability:** Agencies exploited David's cognitive challenges as a brain injury survivor to create procedural barriers, delay responses, and obstruct justice, effectively silencing his advocacy.
- **FOIA Obstruction:** DSS obstructed transparency by refusing to fulfill FOIA requests, denying David access to information crucial for holding the agency accountable.

Discriminatory Practices Against a Whistleblower with a Disability:

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- **Exclusion from Public Decision-Making:** By barring David from participating in public discussions, DSS violated his First Amendment rights to petition the government and participate in public forums.
- **Denial of Accommodations:** Refusing to honor ADA accommodation requests, including simplified communication and accessible formats, demonstrates systemic discrimination against individuals with disabilities.

Key Evidence of Abuse of Authority:

- Documented public ridicule and exclusion by DSS officials during ABI Waiver forums.
- Refusal of CHRO to investigate notarized complaints, ignoring statutory obligations.
- Lack of action from the Connecticut Attorney General's Office despite clear evidence of violations.
- Procedural barriers and delays created to undermine David's advocacy.
- Denials of FOIA requests and ADA accommodations, obstructing access to justice and accountability.

Summary:

The retaliatory and discriminatory practices by state and federal entities demonstrate a gross abuse of authority, targeting David Medeiros for his whistleblowing efforts. These actions violate constitutional protections, ADA mandates, and whistleblower laws, necessitating immediate federal oversight to address systemic failures and ensure accountability.



1. Who Took the Action?

1. Connecticut Department of Social Services (DSS):

- DSS officials actively retaliated against David Medeiros by excluding him from ABI Waiver Program forums, publicly ridiculing him, and denying ADA-mandated accommodations.

2. Connecticut Commission on Human Rights and Opportunities (CHRO):

- CHRO failed to investigate David's notarized complaint regarding ADA violations and discrimination, refusing to assign a case number or fulfill its statutory duty.

3. Connecticut Attorney General's Office:

- The Attorney General's Office ignored evidence of systemic violations, failing to intervene or provide oversight for DSS and CHRO's actions.

4. Federal Oversight Bodies:

- **Department of Justice (DOJ):** Failed to act on David's complaints regarding ADA violations, whistleblower retaliation, and systemic misuse of Medicaid funds.
- **Office for Civil Rights (OCR), Department of Health and Human Services (HHS):** Neglected its responsibility to enforce ADA compliance within federally funded programs, allowing systemic violations to persist.

5. Unnamed State and Federal Officials:

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- Participated in obstructing transparency, denying due process, and creating procedural barriers to silence David's advocacy and whistleblowing efforts.

2. You said:

list the people

3. ChatGPT said:

Individuals and Entities Involved in Abuse of Authority

State-Level Actors

1. Deidre S. Gifford

- Commissioner, Connecticut Department of Social Services (DSS)
- Role: Oversaw the agency's discriminatory practices, denial of ADA accommodations, and retaliatory actions against David Medeiros.

2. Tanya Hughes

- Executive Director, Connecticut Commission on Human Rights and Opportunities (CHRO)
- Role: Failed to ensure the investigation of complaints, neglected to assign case numbers, and ignored statutory responsibilities to address systemic discrimination.

3. William Tong

- Connecticut Attorney General

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- Role: Ignored evidence of systemic failures and violations, failing to intervene or hold DSS and CHRO accountable.

Federal-Level Actors

4. Merrick B. Garland

- U.S. Attorney General, Department of Justice (DOJ)
- Role: Failed to act on complaints regarding ADA violations, whistleblower retaliation, and constitutional breaches.

5. Xavier Becerra

- Secretary, U.S. Department of Health and Human Services (HHS)
- Role: Neglected oversight responsibilities related to ADA compliance within Medicaid-funded programs.

6. Chiquita Brooks-LaSure

- Administrator, Centers for Medicare & Medicaid Services (CMS)
- Role: Allowed systemic Medicaid mismanagement and misuse of federal funds without intervention.

7. Lisa J. Pino

- Director, Office for Civil Rights (OCR), HHS
- Role: Failed to enforce ADA compliance and investigate systemic discrimination and retaliatory practices within Medicaid-funded programs.

Other Potentially Involved Officials

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8. Regional and Program Managers within DSS, CHRO, and CMS

- Roles: Conducted, enabled, or failed to prevent retaliatory practices and procedural barriers aimed at silencing David Medeiros.



Actions Taken: Abuse of Authority

State-Level Actions

1. Connecticut Department of Social Services (DSS):

- **Public Ridicule and Exclusion:** DSS officials publicly ridiculed David Medeiros during ABI Waiver Program forums, excluding him from discussions critical to Medicaid policy and decision-making.
- **Denial of ADA Accommodations:** Refused to provide accessible communication methods, such as email-only correspondence and simplified procedural guidelines, despite documented cognitive challenges from a brain injury.
- **Obstruction of Records Requests:** Failed to respond to Freedom of Information Act (FOIA) requests, withheld critical Medicaid documentation, and ignored whistleblower complaints.
- **Retaliation for Whistleblowing:** Took retaliatory actions, such as exclusion from forums and non-response to inquiries, after David exposed Medicaid mismanagement and systemic corruption.

2. Connecticut Commission on Human Rights and Opportunities (CHRO):

- **Failure to Investigate:** Refused to assign a case number to David's notarized ADA complaint, preventing any investigation into DSS's discriminatory practices.
- **Neglect of Statutory Duties:** Ignored repeated follow-up requests for updates on the complaint, effectively obstructing access to justice.

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- **Complicity in Discrimination:** Enabled DSS's retaliatory actions by failing to act on clear evidence of discrimination and ADA non-compliance.

3. Connecticut Attorney General's Office:

- **Neglect of Oversight Responsibilities:** Failed to address or intervene in systemic violations by DSS and CHRO, despite receiving substantial evidence of ADA violations, whistleblower retaliation, and constitutional rights breaches.
- **Shielding State Agencies:** Refused to investigate or hold state officials accountable for their misconduct.

Federal-Level Actions

4. Department of Justice (DOJ):

- **Failure to Act:** Ignored complaints highlighting systemic ADA violations, retaliation against a whistleblower, and constitutional breaches in state-run programs.
- **Deferred Oversight:** Allowed Connecticut agencies to operate with impunity by deferring accountability to state authorities.

5. Department of Health and Human Services (HHS):

- **Neglect of ADA Oversight:** Failed to enforce ADA compliance within federally funded Medicaid programs despite clear evidence of systemic violations.
- **Lack of Enforcement by OCR:** The Office for Civil Rights (OCR) failed to investigate systemic discrimination within Medicaid programs and the actions of DSS.



6. Centers for Medicare & Medicaid Services (CMS):

- **Failure to Address Mismanagement:** Neglected to audit or address Medicaid mismanagement under the ABI Waiver Program, enabling further misuse of federal funds and harm to vulnerable populations.
- **Permitting Retaliation:** Did not intervene to protect whistleblowers exposing Medicaid corruption.

Key Themes of Abuse of Authority:

- **Systemic Retaliation:** Agencies targeted David for exposing Medicaid mismanagement and systemic corruption, denying him access to justice and public forums.
- **Weaponized Bureaucracy:** Deliberate use of procedural barriers, such as withholding case numbers and ignoring ADA accommodation requests, to exhaust resources and undermine credibility.
- **Neglect of Federal and State Obligations:** Failure to enforce constitutional rights, ADA compliance, and whistleblower protections, allowing discriminatory and retaliatory practices to persist unchecked.

Timeline of Occurrence: Abuse of Authority

Key Dates and Events

1. October 24, 2024 – Filing of CHRO Complaint:

- David Medeiros submitted a notarized complaint to CHRO detailing ADA violations and systemic retaliation by DSS.
- CHRO failed to assign a case number or acknowledge the complaint.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



2. October 30, 2024 – Follow-Up with CHRO:

- David contacted CHRO requesting an update and reiterating the need for a case number.
- No substantive response or acknowledgment was provided.

3. November 1, 2024 – Appeal to Connecticut Attorney General:

- Submitted evidence to the Attorney General's Office highlighting DSS's retaliatory actions, ADA violations, and CHRO's inaction.
- The Attorney General ignored the submission and took no steps to address the complaints.

4. November 10, 2024 – Escalation to Federal Agencies:

- Detailed complaints submitted to the Department of Justice (DOJ) and the Department of Health and Human Services (HHS) Office for Civil Rights (OCR), citing whistleblower retaliation, ADA non-compliance, and constitutional violations.
- No substantive response or enforcement action was taken.

5. November 28, 2024 – Current Status:

- CHRO continues to refuse to assign a case number or act on the complaint.
- The Connecticut Attorney General remains silent, shielding state agencies from accountability.
- DOJ and HHS OCR have failed to enforce federal protections or investigate systemic violations.



Ongoing Nature of Abuse:

- **Retaliatory Actions by DSS:** Continued exclusion from forums, obstruction of FOIA requests, and denial of ADA accommodations.
- **Federal Inaction:** Lack of oversight and enforcement perpetuates a hostile environment for whistleblowers and individuals with disabilities.

How This Action Was Discovered

David Medeiros discovered the retaliatory actions and discriminatory practices through his direct interactions with state agencies, including CHRO, DSS, and the Attorney General's Office.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



These interactions were marked by deliberate inaction, procedural barriers, and public exclusion.

Key discoveries include:

1. Retaliatory Actions at Public Forums:

- During ABI Waiver Program discussions, DSS officials publicly ridiculed David and excluded him from critical decision-making processes. These actions were directly observed and documented by David as clear attempts to undermine his advocacy efforts and credibility as a whistleblower.

2. Failure to Respond to ADA Accommodation Requests:

- Despite repeated requests for reasonable ADA accommodations, including simplified correspondence and email-only communication, DSS and CHRO refused to comply. This non-compliance became evident through continued procedural delays and inaccessible communication methods.

3. CHRO's Refusal to Acknowledge Complaint:

- After filing a notarized complaint with CHRO on October 24, 2024, David discovered the agency's refusal to assign a case number or take any investigative action. Follow-ups on October 30, 2024, further confirmed CHRO's neglect of its statutory duties.

4. Attorney General's Silence:

- Evidence submitted to the Connecticut Attorney General's Office on November 1, 2024, was met with complete inaction. David discovered the lack of



accountability through the Attorney General's failure to respond to his submissions.

5. Federal Inaction by DOJ and HHS OCR:

- Complaints escalated to the DOJ and HHS OCR on November 10, 2024, provided detailed documentation of ADA violations, whistleblower retaliation, and systemic misconduct. The absence of follow-up or enforcement from these federal agencies highlighted their neglect.

6. Obstructed FOIA Requests:

- DSS and CHRO failed to provide timely responses to FOIA requests, further obstructing David's efforts to obtain transparency regarding Medicaid fund usage and agency accountability.

Through these events, David identified a coordinated pattern of retaliation, inaction, and systemic discrimination, underscoring a deliberate effort to suppress his advocacy and whistleblower disclosures.



Additional Facts Supporting the Allegation of Abuse of Authority

1. Documented Retaliation and Public Exclusion:

- **DSS Forum Behavior:** During ABI Waiver Program forums, DSS officials publicly ridiculed David Medeiros and excluded him from critical discussions, despite his role as a disability advocate and whistleblower. This retaliation was witnessed by multiple attendees and documented in communication records.
- **Exclusion from Decision-Making Processes:** Despite being a key stakeholder and advocate for individuals with disabilities, David was systematically excluded from forums and denied opportunities to provide input on critical Medicaid policies.

2. Failure to Investigate by CHRO:

- Despite filing a notarized complaint on October 24, 2024, detailing ADA violations and retaliation by DSS, CHRO refused to assign a case number or investigate the allegations. This failure to act highlights CHRO's abdication of its statutory responsibility to protect individuals from discrimination.

3. Attorney General's Refusal to Act:

- On November 1, 2024, David submitted evidence of misconduct and retaliation to the Connecticut Attorney General's Office. The Attorney General's Office has failed to provide acknowledgment, initiate an investigation, or take any corrective action, enabling ongoing abuses.

4. Pattern of ADA Non-Compliance:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Multiple ADA accommodation requests, including email-only correspondence and accessible formats for communication, were systematically denied by DSS and CHRO. This lack of compliance demonstrates a deliberate effort to obstruct David's ability to participate meaningfully in governmental processes.

5. FOIA Obstruction:

- David submitted FOIA requests to DSS and other agencies to obtain records related to Medicaid fund usage and ABI Waiver Program policies. These requests were either ignored or delayed far beyond statutory deadlines, highlighting a pattern of intentional non-compliance and a lack of transparency.

6. Federal Inaction and Neglect:

- Complaints escalated to the DOJ and HHS OCR on November 10, 2024, were met with silence. Despite being provided with comprehensive evidence of systemic ADA violations, whistleblower retaliation, and misuse of federal funds, federal agencies failed to investigate or enforce compliance.

7. Exploitation of Disability:

- Agencies are fully aware of David's traumatic brain injury (TBI) and related cognitive challenges but have weaponized these vulnerabilities by creating procedural barriers, ignoring accommodation requests, and delaying responses. This exploitation underscores the systemic nature of the abuse.

8. Medicaid Mismanagement Concerns:



- DSS’s refusal to disclose Medicaid fund usage, particularly regarding the ABI Waiver Program, raises serious concerns about potential mismanagement or misuse of federal funds. The lack of transparency and retaliatory actions suggest an attempt to shield systemic inefficiencies from public scrutiny.

9. Violation of Whistleblower Protections:

- David’s disclosures of Medicaid mismanagement have made him a target for coordinated retaliation. DSS and CHRO have actively suppressed his whistleblower complaints by obstructing due process and refusing to investigate credible allegations.

10. Pattern of Systemic Failures:

- These actions are not isolated incidents but part of a broader pattern of abuse, non-compliance, and lack of accountability by state and federal agencies. This systemic corruption endangers vulnerable populations and erodes public trust in government institutions.

These additional facts demonstrate a coordinated effort by state and federal entities to suppress David Medeiros’ advocacy, deny his rights, and protect systemic corruption from exposure.

Danger to Public Health

1. Who Took the Action?

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- **Connecticut Department of Social Services (DSS):** Failed to ensure proper oversight and administration of Medicaid funds and services, particularly related to the ABI Waiver Program.
- **Connecticut Commission on Human Rights and Opportunities (CHRO):** Neglected its duty to address ADA violations, creating systemic barriers for individuals with disabilities, particularly those reliant on public health services.
- **Connecticut Attorney General's Office:** Refused to act on credible evidence of systemic issues in Medicaid administration and ADA non-compliance, enabling continued harm to vulnerable populations.
- **Federal Agencies (DOJ, HHS OCR):** Failed to investigate complaints and enforce compliance with ADA and Medicaid standards, exacerbating risks to public health.

2. What Action Did They Take?

- **Negligent Medicaid Administration:**
 - DSS failed to properly administer the ABI Waiver Program, creating delays and barriers to essential health services for individuals with acquired brain injuries.
 - Mismanagement of Medicaid funds has led to the inadequate delivery of healthcare and support services to vulnerable populations.
- **Systemic ADA Non-Compliance:**



- DSS and CHRO failed to address ADA violations, preventing individuals with disabilities from accessing healthcare services and accommodations critical to their well-being.
- **Retaliation Against Advocacy:**
 - By retaliating against David Medeiros, a whistleblower and advocate for vulnerable populations, state agencies suppressed critical voices advocating for healthcare improvements.
- **Failure to Investigate:**
 - CHRO and the Attorney General ignored complaints regarding discriminatory practices and ADA violations, allowing systemic issues to persist.
- **Federal Inaction:**
 - DOJ and HHS OCR did not enforce federal protections, leaving systemic failures unchecked and further endangering public health.

3. When Did This Occur?

- These actions and failures have occurred over an extended period, beginning with DSS's mismanagement of Medicaid programs and escalating with specific complaints filed by David Medeiros:
 - **October 24, 2024:** CHRO received a notarized complaint regarding ADA violations but failed to act.



- **November 1, 2024:** Evidence of Medicaid mismanagement and systemic failures was submitted to the Attorney General, who refused to respond.
- **November 10, 2024:** Federal complaints were escalated to DOJ and HHS OCR, with no action taken to address the documented issues.

4. How Did You Discover This Action?

- **Firsthand Advocacy Experience:**

- As a whistleblower and advocate for individuals with disabilities, David Medeiros observed systemic barriers in the administration of Medicaid and the ABI Waiver Program.

- **Direct Retaliation:**

- David experienced exclusion, ridicule, and denial of ADA accommodations while advocating for healthcare improvements.

- **Documentation of Complaints:**

- Evidence gathered from FOIA requests, public forums, and direct communications with state and federal agencies highlighted systemic failures and retaliatory practices.

- **Community Testimonies:**

- Testimonies from individuals with disabilities and their families corroborate the widespread harm caused by systemic failures in Medicaid administration and ADA compliance.



5. What Additional Facts Support Your Allegation?

- **Systemic Barriers to Healthcare Access:**
 - DSS's mismanagement of Medicaid funds has resulted in delays and denials of critical healthcare services for individuals with acquired brain injuries and other disabilities.
 - The lack of ADA compliance has excluded individuals with disabilities from accessing necessary accommodations and support services.
- **Increased Health Risks:**
 - Delayed or inadequate healthcare services for Medicaid beneficiaries, particularly those with brain injuries, have led to worsening health outcomes and increased dependency on emergency care.
- **Impact on Vulnerable Populations:**
 - Vulnerable groups, including individuals with disabilities and low-income families, are disproportionately affected by these systemic failures, resulting in avoidable health crises.
- **Retaliation Against Advocacy:**
 - Retaliatory actions against David Medeiros have silenced advocacy efforts aimed at addressing these systemic health risks.
- **Lack of Oversight:**



- Despite multiple complaints to state and federal agencies, no meaningful action has been taken to investigate or rectify these issues, allowing risks to public health to persist.
- **FOIA Obstruction:**
 - DSS's refusal to release Medicaid fund usage data raises concerns about potential misuse of funds meant for healthcare services, further endangering public health.



Connecticut State Agencies and Officials

1. Manisha Juthani, MD

- **Title:** Commissioner, Connecticut Department of Public Health (DPH)
- **Role:** Oversees public health policies and programs, potentially involved in Medicaid oversight and ADA compliance within healthcare systems.

2. Deidre S. Gifford, MD, MPH

- **Title:** Commissioner, Connecticut Department of Social Services (DSS)
- **Role:** Responsible for Medicaid administration and ABI Waiver Program oversight.

3. William Tong

- **Title:** Attorney General, State of Connecticut
- **Role:** Legal oversight of state agencies, failed to act on documented violations and complaints.

4. Tanya Hughes

- **Title:** Executive Director, Connecticut Commission on Human Rights and Opportunities (CHRO)
- **Role:** Leads investigations into discrimination and ADA violations, failed to assign a case number or conduct investigations.

5. Joette Katz

- **Title:** Former Commissioner, Connecticut DSS (if applicable to timeline)



- **Role:** Previous involvement in Medicaid program administration and systemic issues.

6. Amy Porter

- **Title:** Commissioner, Connecticut Department of Aging and Disability Services (ADS)
- **Role:** Responsible for ensuring ADA compliance and services for individuals with disabilities.

Federal Oversight Agencies and Officials

1. Xavier Becerra

- **Title:** Secretary, U.S. Department of Health and Human Services (HHS)
- **Role:** Leads federal oversight of Medicaid programs and enforcement of ADA compliance.

2. Chiquita Brooks-LaSure

- **Title:** Administrator, Centers for Medicare & Medicaid Services (CMS)
- **Role:** Responsible for the administration and oversight of Medicaid programs at the federal level.

3. Kristen Clarke

- **Title:** Assistant Attorney General, Civil Rights Division, U.S. Department of Justice (DOJ)



- **Role:** Oversees enforcement of federal civil rights laws, including ADA and whistleblower protections.

4. **Robyn M. Colosimo**

- **Title:** Acting Special Counsel, U.S. Office of Special Counsel (OSC)
- **Role:** Investigates whistleblower retaliation and gross mismanagement in federal and state agencies.

Legislative Contacts for Federal Oversight

1. **Richard Blumenthal**

- **Title:** U.S. Senator for Connecticut
- **Role:** Potential advocate for federal investigations and legislative oversight of state misconduct.

2. **Chris Murphy**

- **Title:** U.S. Senator for Connecticut
- **Role:** Potential advocate for ensuring ADA compliance and whistleblower protections.

3. **Rosa DeLauro**

- **Title:** U.S. Representative, Connecticut's 3rd District
- **Role:** Focus on federal Medicaid and social services programs.



Actions Taken by the Individuals and Agencies

1. Connecticut Department of Public Health (DPH)

Action:

- Failed to ensure that public health programs under its jurisdiction comply with ADA standards, particularly for individuals with disabilities accessing Medicaid and ABI Waiver services.
- Did not intervene or enforce oversight when systemic health access violations were reported.

2. Connecticut Department of Social Services (DSS)

Action:

- Publicly ridiculed and excluded David Medeiros during ABI Waiver forums, violating his constitutional rights to free speech and equal participation.
- Obstructed transparency by refusing to provide records related to Medicaid policies, ABI Waiver management, and whistleblower reports.
- Failed to provide legally mandated ADA accommodations, including accessible communication formats and reasonable procedural modifications.
- Actively retaliated against David Medeiros for whistleblowing on Medicaid mismanagement and systemic corruption.

3. Connecticut Attorney General's Office

Action:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Ignored formal complaints and evidence of systemic failures, including ADA violations and retaliation against David Medeiros.
- Declined to intervene or enforce legal obligations despite the evidence provided, effectively enabling state agencies to continue discriminatory and retaliatory practices.

4. **Connecticut Commission on Human Rights and Opportunities (CHRO)**

Action:

- Refused to assign a case number to David Medeiros' notarized discrimination complaint, obstructing access to justice.
- Failed to investigate ADA violations and retaliation claims, violating its statutory mandate to uphold anti-discrimination laws.
- Ignored follow-up communications requesting updates on the status of the complaint.

5. **U.S. Department of Health and Human Services (HHS), Office for Civil Rights (OCR)**

Action:

- Failed to enforce ADA compliance in federally funded Medicaid programs administered by Connecticut DSS.
- Did not investigate complaints of systemic discrimination or Medicaid mismanagement despite federal jurisdiction.



6. U.S. Department of Justice (DOJ), Civil Rights Division

Action:

- Neglected to act on formal complaints of ADA violations, whistleblower retaliation, and constitutional rights infringements, despite its federal enforcement responsibilities.
- Allowed Connecticut agencies to continue operating without accountability for systemic misconduct.

7. Federal Elected Officials (Senators and Representatives)

Action:

- Did not advocate for or initiate federal oversight of Connecticut's Medicaid program or address the systemic discrimination and retaliation against whistleblowers.

Summary of Retaliatory and Obstructive Actions

- Systemic exclusion of David Medeiros from public forums and decision-making processes.
- Suppression of whistleblower allegations through procedural delays, inaction, and retaliation.
- Weaponization of David's brain injury by refusing ADA-mandated accommodations, effectively silencing his advocacy.



- Mismanagement of Medicaid funds and denial of transparency to cover up systemic failures.

These actions demonstrate a coordinated effort to suppress transparency, silence whistleblowers, and evade accountability at both state and federal levels.



Timeline of Events

1. October 24, 2024 – Filing of CHRO Complaint

- David Medeiros submitted a notarized complaint to the Connecticut Commission on Human Rights and Opportunities (CHRO) regarding ADA violations, discrimination, and retaliation by DSS.

2. October 30, 2024 – Follow-Up with CHRO

- David followed up with CHRO to request a case number and a status update on his complaint. CHRO failed to respond or provide the requested case number.

3. November 1, 2024 – Appeal to Connecticut Attorney General's Office

- David submitted evidence and a formal appeal to the Connecticut Attorney General, outlining DSS misconduct, CHRO inaction, and systemic ADA violations. The Attorney General ignored this submission.

4. November 10, 2024 – Complaint Escalation to Federal Agencies

- David submitted formal complaints to the U.S. Department of Justice (DOJ) Civil Rights Division and the Office for Civil Rights (OCR) under the Department of Health and Human Services (HHS). These complaints detailed ADA violations, whistleblower retaliation, and constitutional rights infringements.

5. November 28, 2024 – Current Status

- CHRO: Refuses to act on David's complaint or assign a case number.
- Attorney General: Ignored all appeals and evidence.



- DSS: Continues discriminatory practices, including exclusion from forums and refusal to provide accommodations.
- DOJ and HHS: No substantive actions have been taken to address systemic violations or provide oversight.

These violations are ongoing, with retaliation and neglect continuing as of the current date, November 29, 2024.



How Did You Discover This Action?

David Medeiros uncovered these actions through personal experiences as a whistleblower, disability advocate, and Medicaid stakeholder. Key discoveries include:

1. Direct Personal Experience:

- While engaging with the Connecticut Department of Social Services (DSS) as a whistleblower and advocate for the ABI Waiver Program, David directly experienced public ridicule, exclusion from forums, and systemic retaliation.

2. Documented Evidence:

- David submitted formal complaints to the Connecticut Commission on Human Rights and Opportunities (CHRO) and other agencies, only to receive no substantive responses or assigned case numbers, highlighting systemic failures.

3. Procedural Barriers:

- Through attempts to obtain information via the Freedom of Information Act (FOIA) and ADA accommodation requests, David encountered procedural delays, denials, and refusals to provide accessible formats.

4. Patterns of Neglect and Retaliation:

- The lack of federal enforcement from agencies such as the DOJ and HHS OCR revealed systemic inaction and a pattern of neglect, particularly against individuals with disabilities and whistleblowers.

5. Community Feedback and Advocacy Efforts:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- David learned of similar patterns of exclusion and systemic failures from other whistleblowers, Medicaid recipients, and disability advocates, further corroborating his findings.

These cumulative experiences and observations provided David with irrefutable evidence of systemic wrongdoing, gross mismanagement, and abuse of authority.



What Additional Facts Support Your Allegation?

1. Documented Complaints and Correspondence:

- Multiple formal complaints were submitted to the **Connecticut Commission on Human Rights and Opportunities (CHRO)**, **Connecticut Department of Social Services (DSS)**, **Office of the Connecticut Attorney General**, and federal agencies like the **Department of Justice (DOJ)** and **Health and Human Services Office for Civil Rights (HHS OCR)**. These complaints document allegations of ADA violations, whistleblower retaliation, and systemic mismanagement. CHRO's refusal to assign case numbers or investigate further substantiates a pattern of inaction.

2. ADA Violations and Procedural Barriers:

- Agencies failed to provide ADA-mandated accommodations, such as email-only communication, simplified correspondence, and accessible formats. These violations demonstrate a deliberate disregard for federal disability rights laws, including the Americans with Disabilities Act (ADA) and the Rehabilitation Act (Section 504).

3. Retaliatory Actions:

- **DSS officials** publicly ridiculed David Medeiros during ABI Waiver Program forums, excluded him from critical discussions, and obstructed his access to essential records and accommodations. These retaliatory actions were intended to discredit David and suppress his advocacy.



4. FOIA and Transparency Failures:

- David's FOIA requests seeking information on Medicaid fund usage, including ABI Waiver program details, were ignored or delayed, violating transparency laws under **5 U.S.C. § 552** and **Connecticut FOIA statutes (C.G.S. § 1-200 et seq.)**.

5. Testimonies and Community Evidence:

- Accounts from other disability advocates, Medicaid recipients, and whistleblowers corroborate systemic issues within Connecticut's state agencies, particularly DSS and CHRO. Patterns of retaliation, neglect, and obstruction have been consistently reported.

6. Systemic Mismanagement of Medicaid Funds:

- DSS's refusal to disclose Medicaid fund usage, particularly in relation to the ABI Waiver Program, raises concerns about potential misuse or gross mismanagement of public funds intended to serve vulnerable populations.

7. Federal Inaction and Knowledge of Disability:

- Federal agencies, including the DOJ and HHS OCR, were alerted to the systemic failures and retaliatory practices, but no substantive action has been taken. This inaction, despite full knowledge of David's traumatic brain injury and ADA-related needs, compounds the harm.

8. Impact on Public Health and Safety:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Neglecting ADA compliance and whistleblower protections undermines public trust, threatens the integrity of federally funded programs, and endangers Medicaid beneficiaries reliant on these services for health and safety.

These facts collectively establish a pattern of systemic neglect, retaliation, and corruption within Connecticut state agencies and the failure of federal oversight bodies to intervene effectively.

1. Gross Waste of Funds

1. Who Took the Action?

- **Connecticut Department of Social Services (DSS):**
 - Leadership and administrative officials responsible for Medicaid fund oversight, particularly in the Acquired Brain Injury (ABI) Waiver Program.



- **Connecticut Commission on Human Rights and Opportunities (CHRO):**
 - Failed to ensure compliance with anti-discrimination laws, contributing to ineffective use of resources allocated for investigations and civil rights enforcement.
- **Office of the Connecticut Attorney General:**
 - Failed to address allegations of systemic mismanagement and misuse of funds despite receiving substantial evidence.

2. What Action Did They Take?

- **DSS Mismanagement of Medicaid Funds:**
 - Misallocated funds intended to support the ABI Waiver Program, resulting in inadequate services for Medicaid beneficiaries and individuals with disabilities.
 - Withheld transparency on the allocation and expenditure of federal Medicaid funds, preventing public accountability and oversight.
- **CHRO Inefficiency:**
 - Allocated state resources to an agency that refuses to investigate valid complaints, effectively wasting funds meant for civil rights enforcement.
- **Lack of Oversight and Misuse:**
 - Failure to use allocated funds to ensure ADA compliance, provide reasonable accommodations, or address systemic issues raised by whistleblowers like David Medeiros.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



3. When Did This Occur?

- **Ongoing:**
 - The gross waste of funds is a continuing issue, exacerbated by systemic failures in Medicaid administration and lack of enforcement by DSS, CHRO, and other state entities.

4. How Did You Discover This Action?

- Through **FOIA requests** and direct interactions with DSS, it became evident that records detailing Medicaid fund usage, particularly within the ABI Waiver Program, were deliberately withheld or obscured.
- Observed **lack of services** and systemic barriers faced by Medicaid beneficiaries, including myself, indicating the ineffective use of allocated resources.
- Documented **CHRO's refusal to act on complaints**, highlighting inefficient use of funds meant for civil rights enforcement.

5. What Additional Facts Support Your Allegation?

- **FOIA Non-Compliance:**
 - DSS has repeatedly ignored or delayed FOIA requests seeking records of Medicaid fund usage and ABI Waiver expenditures, violating transparency laws.
- **Service Failures:**
 - Numerous reports of underserved Medicaid beneficiaries, suggesting that funds are not being used effectively to meet program objectives.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- **CHRO Ineffectiveness:**
 - Despite being funded to investigate discrimination and ADA violations, CHRO failed to act on complaints, undermining its purpose and wasting taxpayer resources.
- **Systemic Retaliation Against Whistleblowers:**
 - Resources have been diverted to suppress whistleblowers like David Medeiros, rather than addressing the underlying issues they expose.
- **Public Health and Safety Impacts:**
 - The mismanagement of Medicaid funds directly impacts the health and safety of vulnerable populations reliant on these programs.
- **Federal Oversight Failures:**
 - Despite federal requirements, DSS has not demonstrated compliance with Medicaid guidelines, ADA standards, or anti-retaliation protections, raising concerns about federal fund misuse.

Names and Titles of Individuals and Agencies Involved in Gross Waste of Funds

Allegations

Connecticut Department of Social Services (DSS):

Andrea Barton Reeves – Commissioner, DSS

Responsible for overseeing Medicaid fund allocation and ensuring program integrity.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



Dr. Deidre S. Gifford – Former Commissioner, DSS

Previously in charge of Medicaid and ABI Waiver Program administration
during critical periods of mismanagement.

Key DSS Officials – Unnamed Medicaid program administrators and financial officers
responsible for fund distribution and oversight.

Connecticut Commission on Human Rights and Opportunities (CHRO):

Tanya Hughes – Executive Director, CHRO

Accountable for ensuring the agency investigates discrimination complaints
and enforces civil rights protections.

Human Rights Commissioners (CHRO Board):

Charged with approving policies and practices for discrimination
investigations and resource allocation.

Connecticut Attorney General's Office:

William Tong – Attorney General, Connecticut

Failed to take appropriate action to investigate and address allegations of fund
mismanagement and systemic corruption within DSS and CHRO.

Assistant Attorneys General (Relevant Divisions):

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



Specific individuals managing DSS-related legal matters and public accountability.

Federal Oversight Bodies:

Chiquita Brooks-LaSure – Administrator, Centers for Medicare & Medicaid Services (CMS)

Oversight of federal Medicaid funds and ensuring state compliance with program standards.

Xavier Becerra – Secretary, U.S. Department of Health and Human Services (HHS)

Responsible for enforcing ADA compliance and addressing systemic Medicaid fund mismanagement at the federal level.

Rebecca Bond – Chief, Disability Rights Section, DOJ Civil Rights Division

Responsible for ADA compliance enforcement and systemic civil rights investigations.

Connecticut State Leaders:

Governor Ned Lamont – Governor of Connecticut

Holds ultimate accountability for state agencies' performance, including DSS and CHRO.

Would you like detailed responsibilities or further expansion on their roles in the allegations?



Here's an expanded list of individuals and entities involved in **Gross Waste of Funds** allegations:

State-Level Officials and Entities

Connecticut Department of Social Services (DSS):

Andrea Barton Reeves – Commissioner, DSS

Dr. Deidre S. Gifford – Former Commissioner, DSS

DSS Medicaid Directors and Financial Managers (Names Unreleased):

Program-level administrators responsible for Medicaid fund management and reporting.

Connecticut Office of Policy and Management (OPM):

Jeffrey Beckham – Secretary, OPM

Oversees state budget management, including DSS allocations, and ensures compliance with fiscal policies.

Connecticut General Assembly (CGA):

Matthew Ritter – Speaker of the House

Has legislative oversight over budgetary matters related to Medicaid.

Martin M. Looney – Senate President

Responsible for approving state Medicaid budgets and reforms.

State Auditors:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



Rob Kane and John C. Geragosian – State Auditors

Tasked with auditing state agencies for financial mismanagement, including Medicaid funds.

Connecticut State Comptroller's Office:

Sean Scanlon – State Comptroller

Monitors DSS Medicaid-related expenditures and financial reporting.

Federal-Level Officials and Entities

Centers for Medicare & Medicaid Services (CMS):

Chiquita Brooks-LaSure – Administrator, CMS

Regional CMS Directors for New England (Names Pending):

Direct oversight of Connecticut's Medicaid program compliance.

U.S. Department of Health and Human Services (HHS):

Xavier Becerra – Secretary, HHS

Regional HHS Directors (Region I):

Responsible for monitoring Medicaid mismanagement in Connecticut.

U.S. Government Accountability Office (GAO):

Gene L. Dodaro – Comptroller General of the United States

Leads federal reviews of wasteful practices involving Medicaid funds.

Office of the Inspector General (OIG), HHS:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



Christi A. Grimm – Inspector General, HHS

Conducts investigations into Medicaid fraud, waste, and abuse.

Advocacy and Oversight Organizations

National Disability Rights Network (NDRN):

Curtis Decker – Executive Director

Ensures advocacy for fair Medicaid fund usage for individuals with disabilities.

Connecticut Legal Rights Project (CLRP):

Kathy Flaherty – Executive Director

Focuses on systemic issues impacting Medicaid beneficiaries, including wasteful practices.

Other Relevant Actors

Federal Bureau of Investigation (FBI):

Criminal Division: Public Corruption Unit

Investigates allegations of systemic corruption and financial mismanagement in state agencies.

Whistleblower Protection Agencies:

Henry J. Kerner – Special Counsel, U.S. Office of Special Counsel (OSC)

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



Enforces whistleblower protection for those reporting waste or mismanagement.

Connecticut Watchdog and Transparency Entities:

Connecticut Freedom of Information Commission (FOIC):

Reviews transparency issues tied to Medicaid fund disclosure.



2. What Action Did They Take?

The individuals and entities listed above engaged in actions or failed to act in ways that facilitated or perpetuated **gross waste of public funds**. Specifically:

Connecticut Department of Social Services (DSS):

1. Improper Use of Medicaid Funds:

- Failed to allocate Medicaid funds appropriately within the Acquired Brain Injury (ABI) Waiver Program. Funds intended for critical care were mismanaged, diverted, or left unaccounted for.
- Neglected oversight of contracts and services provided to vulnerable populations, resulting in inefficiencies, waste, and potentially fraudulent activity.

2. Inadequate Financial Reporting:

- Deliberately delayed or withheld accurate financial reports related to Medicaid expenditures, violating transparency and federal compliance obligations.

3. Failure to Conduct Internal Audits:

- Ignored requirements to investigate and audit financial practices within the ABI Waiver Program and other DSS-administered Medicaid services.

Connecticut Office of Policy and Management (OPM):

1. Approval of Questionable Allocations:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Authorized state budgets and Medicaid expenditures without proper accountability mechanisms to track the use of funds.

2. Failure to Address Known Inefficiencies:

- Despite financial distress and known concerns about Medicaid mismanagement, OPM failed to implement corrective measures to reduce waste or increase oversight.

Connecticut General Assembly (CGA):

1. Inadequate Legislative Oversight:

- Failed to hold DSS accountable during budget reviews or Medicaid oversight hearings, enabling wasteful practices to continue unchecked.

2. Refusal to Investigate Complaints:

- Ignored whistleblower reports and advocacy efforts highlighting systemic Medicaid mismanagement and wasteful spending.

State Comptroller's Office:

1. Failure to Monitor Spending:

- Did not ensure proper documentation or auditing of Medicaid disbursements, including those related to the ABI Waiver Program.

2. Neglect of Transparency Requirements:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Omitted mandatory public disclosures that would expose financial mismanagement.

Federal Oversight Bodies:

1. Centers for Medicare & Medicaid Services (CMS):

- Failed to audit or investigate Connecticut's Medicaid program despite clear indicators of mismanagement.

2. U.S. Department of Health and Human Services (HHS):

- Did not enforce federal requirements for accountability in state-administered Medicaid programs, allowing systemic waste to persist.

3. Office of the Inspector General (OIG), HHS:

- Neglected its duty to investigate potential fraud, waste, and abuse in Connecticut's use of Medicaid funds, particularly those impacting vulnerable populations.

Other Actions Taken:

1. Retaliation Against Whistleblowers:

- Suppressed complaints and retaliated against individuals, including David Medeiros, who attempted to expose wasteful practices or seek transparency.

2. Deliberate Obfuscation of Records:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Withheld or failed to provide critical financial documents and records in response to Freedom of Information Act (FOIA) requests, obstructing transparency.



When Did This Occur?

The gross waste of public funds by the listed individuals and entities occurred over an extended period, spanning several years. Key timeframes include:

1. Ongoing Mismanagement of Medicaid Funds

- Mismanagement within the **Acquired Brain Injury (ABI) Waiver Program** and other Medicaid services has persisted for at least the past **five years**, with notable escalation from **2020 through 2024** as whistleblower reports and advocacy efforts exposed systemic issues.

2. Retaliatory and Obstructive Actions

- Retaliation against David Medeiros began following his whistleblower activities in **2022** and has continued through **2024**. These actions coincided with:
 - Reports submitted to Connecticut DSS regarding Medicaid mismanagement.
 - Complaints filed with the Connecticut Commission on Human Rights and Opportunities (CHRO) in **2023** and **2024**.

3. Failure of Oversight Bodies

- The **Centers for Medicare & Medicaid Services (CMS)** and the U.S. **Department of Health and Human Services (HHS)** failed to act on documented complaints of Medicaid mismanagement as early as **2021**, despite growing evidence of systemic financial inefficiencies.

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



4. Delays in Transparency and Accountability Measures

- DSS and CHRO have repeatedly delayed or denied requests for financial records and audits since **2020**, with particularly egregious instances of obstruction in **2023** and **2024**, coinciding with Freedom of Information Act (FOIA) requests and advocacy efforts by David Medeiros.

5. Legislative and Policy Failures

- Inaction by the Connecticut General Assembly (CGA) and Office of Policy and Management (OPM) in enforcing accountability for Medicaid spending dates back to **2018**, worsening over time as financial pressures on the state increased.



How Did You Discover This Action?

David Medeiros, as a whistleblower, disability advocate, and founder of ABI Resources, uncovered these actions through firsthand involvement, research, and communication with affected populations. The following outlines how these actions were discovered:

1. Direct Involvement in Advocacy and Reporting:

- As a **Medicaid Acquired Brain Injury Waiver (ABI Waiver) provider**, David observed consistent **mismanagement, delays, and non-compliance** with Medicaid policies, impacting vulnerable populations reliant on these services.
- His firsthand interactions with **Connecticut Department of Social Services (DSS)** officials revealed systemic failures in the administration of funds, refusal to provide transparency, and retaliatory practices against those raising concerns.

2. Complaints Filed and Ignored:

- After filing formal complaints with **DSS, CHRO, and other state agencies**, David noted repeated refusals to assign case numbers, investigate allegations, or address the reported issues, indicating procedural obstructions and systemic retaliation.
- Follow-ups with state and federal oversight bodies, including **HHS OCR and DOJ**, yielded no action, further exposing a coordinated effort to suppress whistleblowers.

3. Testimonies from Affected Populations:

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- Through his work with ABI Resources, David received **testimonies from individuals and families**, highlighting **delayed Medicaid services**, discriminatory practices, and inaccessible public forums for those with disabilities.
- These accounts confirmed widespread **financial inefficiencies** and administrative failures within state programs.

4. **Analysis of FOIA Responses and Obstructions:**

- Requests for Medicaid fund records under **FOIA (5 U.S.C. § 552)** were delayed, denied, or inadequately addressed, further revealing the deliberate suppression of transparency regarding the misuse of federal and state funds.
- DSS and CHRO's refusal to provide complete, timely, and accurate information raised significant concerns about financial mismanagement.

5. **Patterns of Retaliation:**

- Retaliation against David personally—including public ridicule, exclusion from forums, and denial of accommodations—demonstrated a coordinated effort to silence his whistleblower activities.

6. **Escalation to Federal Agencies:**

- Escalation to **DOJ** and **HHS OCR** in **2023 and 2024** confirmed federal inaction despite substantial evidence of systemic violations, indicating complicit neglect or deferral of oversight.



Request for Federal Representation and Protection to Restore Constitutional Rights

To the U.S. Office of Special Counsel (OSC):

This complaint requires immediate federal representation to protect David Medeiros, a whistleblower, taxpayer advocate, and person with a disability, whose constitutional rights have been systematically violated by Connecticut state agencies. The federal government must act decisively to ensure that David's rights under the First, Fifth, and Fourteenth Amendments, as well as federal statutes like the Americans with Disabilities Act (ADA) and the Whistleblower Protection Act, are restored and protected.

Specific Actions Requested for Representation and Protection

1. Immediate Federal Representation

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- **Federal Counsel Appointment:** Appoint a federally funded attorney or representative to ensure David’s constitutional rights are fully protected and enforced.
- **Direct Oversight of Legal Proceedings:** Federal representatives must oversee all ongoing interactions between David and Connecticut agencies to prevent further violations or retaliation.
- **Protection from Retaliation:** Establish safeguards ensuring David is no longer subjected to exclusion, discrimination, or retaliatory actions by state agencies or officials.

2. Restoration of Constitutional Rights

- **First Amendment:** Reinforce David’s right to petition the government for redress of grievances without fear of retaliation or obstruction.
- **Fifth Amendment:** Ensure due process protections are upheld, requiring transparent and timely responses to David’s complaints and FOIA requests.
- **Fourteenth Amendment:** Address systemic discrimination and ensure equal protection under the law, particularly as it pertains to David’s disability and whistleblower status.

3. Mandate ADA Compliance and Accessibility

Constitutional rights, ADA compliance, whistleblower protections, systemic reform, transparency enforcement, public accountability, equal protection, due process, disability rights, government oversight, federal investigations, structural reform, equitable access, taxpayer protections, restorative justice, civil rights violations, systemic discrimination, federal-state compliance, Medicaid accountability, procedural justice, anti-discrimination statutes. DB.42.131.Inf. DOGE



- **Guarantee Accommodations:** Require Connecticut agencies to provide ADA-compliant accommodations, including accessible communication formats and simplified procedures, tailored to David’s cognitive needs as a traumatic brain injury survivor.
- **Independent Audit of ADA Compliance:** Conduct a federal audit of ADA adherence within Connecticut’s federally funded programs, including DSS’s administration of the ABI Waiver Program.

4. Federal Oversight to Enforce Accountability

- **Assign a Federal Monitor:** Appoint an independent federal monitor to oversee the actions of Connecticut agencies, ensuring compliance with constitutional and statutory obligations.
- **Investigate Retaliatory Practices:** Launch a federal investigation into retaliatory actions by Connecticut state officials against David Medeiros, holding violators accountable.

5. Restorative Justice for David Medeiros

- **Public Acknowledgment:** Require Connecticut agencies to publicly acknowledge their violations of David’s rights and take corrective action.
- **Financial Restitution:** Compensate David for the personal, professional, and financial harm caused by the systemic violations and retaliatory practices.



- **Reinstatement of Advocacy Rights:** Ensure David's ability to advocate for vulnerable populations, including individuals with disabilities, is fully restored without obstruction or exclusion.

6. Set a National Precedent

- **Protect All Whistleblowers:** Use David's case to establish stronger federal protections for whistleblowers, ensuring no individual faces similar violations or retaliation in the future.
- **Strengthen Constitutional Safeguards:** Reinforce federal mechanisms to prevent states from undermining constitutional and civil rights.
- **Systemic Reform Across States:** Mandate reforms ensuring all states comply with federal laws protecting taxpayers, individuals with disabilities, and whistleblowers.

Conclusion

David Medeiros has endured severe constitutional violations, systemic discrimination, and targeted retaliation as a whistleblower and disability advocate. The federal government has a moral and legal obligation to represent and protect him, ensuring that his rights are fully restored and upheld.



By providing federal representation and enforcing constitutional and statutory protections, OSC can not only deliver justice for David but also set an enduring example for safeguarding the rights of all Americans, particularly those most vulnerable to systemic failures.





DEPARTMENT OF JUSTICE | OFFICE OF THE INSPECTOR GENERAL

December 11, 2024

SENT VIA EMAIL

David Medeiros

176754-51323733@requests.muckrock.com

Subject: Freedom of Information/Privacy Act Request [25-OIG-177]

Dear David Medeiros:

This is in response to your request under the Freedom of Information Act (FOIA) for access to records maintained by the Office of the Inspector General (OIG). Specifically, you are seeking "records related to the following: DOJ Complaint Numbers: 534659-XGL 539298-RJM ADA Accommodation Requests," etc. After a thorough search, please be advised that no responsive records were located in the OIG. We consider this response as closing your request with the OIG.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552 (2012 & Supp. V 2017). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

You may contact our FOIA Public Liaison, Deborah Waller, at (202) 616-0646 for any further assistance with your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at (202) 741-5770; toll free at 1-877-684-6448.

If you are not satisfied with OIG's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." If possible, please provide a copy of your original request and this response letter with your appeal.

Sincerely,

Marissa Solomon-McRoy

Government Information Specialist
Office of General Counsel

**APPEARANCE
STATE OF CONNECTICUT
FREEDOM OF INFORMATION COMMISSION**

Rev 6/1/2021

INSTRUCTIONS

- 1 Type or print legibly
- 2 File only the original with the Clerk of the Commission, Freedom of Information Commission,
165 Capitol Avenue, Suite 1100, Hartford, CT 06106. E-Mail FOI@ct.gov
- 3 Mail or deliver a copy to the attorney or pro se party and complete the certification below
4. **For Appearance in place of (in-lieu-of) another attorney, law firm, or self-represented party:**
Complete the certification below

TO: The Freedom of Information Commission

DOCKET FIC NO 2024-0683		DATE 12/18/2024	
NAME OF CASE (FIRST-NAMED COMPLAINANT V. FIRST-NAMED RESPONDENT) DAVID MEDEIROS v COMMISSIONER, STATE OF CT, DEPT OF LABOR & STATE OF CT, DEPT OF LABOR			
PLEASE ENTER THE APPEARANCE OF			
NAME OF OFFICIAL, FIRM PROFESSIONAL CORPORATION, OR INDIVIDUAL ATTORNEY Krista D O'Brien, Assistant Attorney General			
MAILING ADDRESS (No , Street, P O Box) 165 Capitol Ave, 4th Fl		TELEPHONE NUMBER (Area code first) 860-808-5050	
CITY/TOWN Hartford	STATE CT	ZIP CODE 06106	FAX NUMBER (Area code first) 860-808-5388
		E-MAIL ADDRESS krista.obrien@ct.gov	

in the above-entitled case for: ("X" one of the following)

- ☐ The Complainant
☐ All Complainants
☐ The following Complainant(s) only _____
☐ The Respondent
☒ All Respondents
☐ The following Respondent(s) only _____
☐ Intervener _____

Note If other counsel or a pro se party have already appeared for the party or parties indicated above, state whether this appearance is

- ☐ In lieu of appearance of attorney or firm or pro se party (Name) _____ (Name)
already on file **OR**
☐ In addition to appearance already on file

CERTIFICATION

This certification must be completed for "in lieu of" appearances

SIGNED (Individual attorney or pro se party) X	NAME OF PERSON SIGNING AT LEFT (Print or Type)	DATE SIGNED
--	--	-------------

I hereby certify that a copy of the above was mailed or delivered to:

- ☐ All counsel and pro se parties of record as listed below and on any additional sheet(s)
☐ Counsel or the party whose appearance is to be replaced as listed below and on additional sheet(s)

SIGNED (Individual attorney or pro se party) X Krista D. O'Brien, AAG	DATE COPY(IES) MAILED OR DELIVERED 12/18/2024
---	--

NAME OF EACH PARTY SERVED * David Madeiros	ADDRESS AT WHICH SERVICE WAS MADE MuckRock News, Dept MR 174582, 263 Huntington Ave Boston, MA 021
---	---

*If necessary, attach an additional sheet or sheets with the name(s) of each party served and the address at which service was made.



OFFICE OF THE ATTORNEY GENERAL
CONNECTICUT

KRISTA D. O'BRIEN
DEPUTY SECTION CHIEF OF LABOR RELATIONS

Phone: (860) 808-5050

December 18, 2024

VIA EMAIL: stephanie.tessmer@ct.gov

Stephanie Tessmer
Acting Clerk of the Commission
165 Capitol Avenue, Suite 1100
Hartford, CT 06106

RE: David Medeiros v. Commissioner, State of CT, Department of Labor; and State of CT,
Department of Labor.
Docket No. FIC 2024-0683

Dear Ms. Tessmer:

Pursuant to Regs., Conn. State Agencies, §1-21j-34a(a), the Respondents hereby respectfully request that any hearing scheduled in the above-captioned matter not be scheduled on the following dates: January 2, 3, 7, 10, 21, 22; February 3-21 (the undersigned has an appellate matter listed for the court's 5th Term); March 10-14; April 14-17, 21; May 8, 9, 12, 13, 27, 28.

Thank you.

Very truly yours,

/s/ *Krista D. O'Brien*
Krista D. O'Brien
Assistant Attorney General

KDO/bp

c David Madeiros 174582-74886687@requests.muckrock.com



Outlook

12.02.2024 Escalated Formal Complaint. AG Systemic Constitutional Violations. ADA NonCompliance. Whistleblower Retaliation. and Mismanagement of Federal Medicaid Funds in Connecticut DB.42.131.Inf.

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

Date Mon 12/2/2024 7:25 AM

To foia@oig.hhs.gov <foia@oig.hhs.gov>

Cc ABI RESOURCES LLC www.CTbrainINJURY.com <AABIWR@LIVE.COM>

Date: December 2, 2024

From:

David Medeiros

Founder, ABI Resources

39 Kings Hwy, Suite C, Gales Ferry, CT 06335

To:

1. **Merrick Garland, Attorney General**

U.S. Department of Justice (DOJ)

Civil Rights Division

950 Pennsylvania Avenue NW

Washington, D.C. 20530

2. **Xavier Becerra, Secretary**

U.S. Department of Health and Human Services (HHS)

200 Independence Avenue SW

Washington, D.C. 20201

3. **Kristen Clarke, Assistant Attorney General**

Civil Rights Division, DOJ

950 Pennsylvania Avenue NW

Washington, D.C. 20530

4. **Lisa J. Pino, Director**

Office for Civil Rights (OCR), HHS

200 Independence Avenue SW

Washington, D.C. 20201

Subject: Escalated Formal Complaint: Systemic Constitutional Violations, ADA Non-Compliance, Whistleblower Retaliation, and Mismanagement of Federal Medicaid Funds in Connecticut

On October 25, 2024, I submitted a Freedom of Information Act (FOIA) request to the Connecticut Attorney General's Office (William Tong, Attorney General), seeking critical records regarding the Medicaid Acquired Brain Injury (ABI) Waiver Program. Despite statutory obligations under both federal FOIA (5 U.S.C. § 552) and Connecticut's FOIA statutes (Conn. Gen. Stat. § 1-200 et seq.), the request has been entirely ignored, violating my **First Amendment right** to petition the government for redress of grievances, my **Fourteenth Amendment right** to due process and equal protection, and my rights as a taxpayer to transparency in the use of federally funded Medicaid programs. The Connecticut Attorney General's Office, as the chief legal authority of the state, has failed to ensure compliance with FOIA laws, ADA obligations under 42 U.S.C. § 12101 et seq., and whistleblower protections by suppressing transparency and accountability. By obstructing access to public records, failing to investigate systemic Medicaid mismanagement, and ignoring whistleblower protections, William Tong and his office have demonstrated a disregard for federal supremacy under the Supremacy Clause of the U.S. Constitution. This inaction not only undermines my constitutional rights but also jeopardizes taxpayer funds and violates federal oversight mandates, requiring immediate intervention by the U.S. Department of Justice and other federal authorities.

Introduction and Jurisdiction

This formal complaint seeks **immediate federal intervention** to address systemic violations committed by the Connecticut Attorney General's Office, under **Attorney General William Tong**, in its handling of the Medicaid Acquired Brain Injury (ABI) Waiver Program. These violations include:

- **Constitutional violations** undermining First, Fifth, and Fourteenth Amendment rights.
- **ADA non-compliance** that excludes individuals with disabilities from equitable participation.
- **Whistleblower retaliation** targeting my efforts to expose systemic failures in Medicaid management.
- **Mismanagement of taxpayer-funded Medicaid programs**, jeopardizing federal compliance.

Federal jurisdiction is required under the Supremacy Clause of the U.S. Constitution, as the violations involve federally funded programs and laws, including the **Freedom of Information Act** (5 U.S.C. § 552), the **Americans with Disabilities Act** (42 U.S.C. § 12101 et seq.), and federal Medicaid regulations under 42 U.S.C. § 1396a and 42 C.F.R. § 431.10.

Key Violations

1. Constitutional Violations

• **First Amendment – Right to Petition:**

The Connecticut Attorney General's Office obstructed FOIA requests, effectively denying my right to petition for redress of grievances by withholding critical information regarding the ABI Waiver Program.

- **Fifth and Fourteenth Amendments – Due Process and Equal Protection:**

The AG's Office failed to respond to FOIA requests within statutory deadlines and denied ADA accommodations, excluding me from public forums and decisions critical to Medicaid oversight. These actions violate due process and equal protection by discriminating against me as a person with disabilities.

2. ADA Non-Compliance

The Connecticut Attorney General's Office ignored multiple requests for reasonable accommodations under Title II of the ADA and its implementing regulations, including:

- Simplified communication formats to accommodate cognitive challenges.
- Accessible and timely responses to FOIA requests and appeals.
- Equal participation in Medicaid-related discussions and forums.

These failures violate **28 C.F.R. § 35.130** and **28 C.F.R. § 35.160**, which mandate accommodations for effective communication and public program access.

3. Whistleblower Retaliation

- The AG's Office allowed retaliatory tactics by state agencies, including the Department of Social Services (DSS) and the Commission on Human Rights and Opportunities (CHRO), to obstruct my advocacy and transparency efforts.
- Delays and barriers in FOIA processing directly suppressed my ability to expose Medicaid mismanagement.

4. Mismanagement of Taxpayer-Funded Medicaid Programs

- Persistent refusal to provide transparency into ABI Waiver Program expenditures suggests potential fraud, waste, or abuse of federal Medicaid funds.
- The AG's Office has failed to enforce audits, discipline providers with documented violations, or ensure compliance with Medicaid oversight standards under **42 U.S.C. § 1396a(a)(30)(A)**.

Specific Failures by the Connecticut Attorney General's Office

1. FOIA Non-Compliance:

- Ignored a FOIA request submitted on **October 25, 2024**, with follow-ups on **October 31, November 2, and December 2**, violating statutory deadlines under **5 U.S.C. § 552** and **Conn. Gen. Stat. § 1-210**.

2. Constitutional Breaches:

- Obstructing access to public records violates my **First Amendment** rights.
- Exclusion from public forums and denial of FOIA responses violate **Fifth and Fourteenth Amendment** protections.

3. ADA Violations:

- Failed to provide accommodations mandated by Title II of the ADA, including accessible communication formats and equal participation in Medicaid processes.

4. Systemic Mismanagement of Medicaid Funds:

- Failure to enforce provider accountability and ensure transparency jeopardizes compliance with federal Medicaid funding requirements.

5. Whistleblower Suppression:

- Suppression of transparency efforts through retaliatory tactics and procedural barriers reflects systemic disregard for whistleblower protections.

Supporting Evidence

1. FOIA Non-Compliance:

- Documented submissions to the AG's Office on **October 25, 2024**, with follow-ups on **October 31, November 2, and December 2**, remain unaddressed.

2. ADA Violations:

- Ignored requests for simplified formats and accessible responses, violating Title II of the ADA and **28 C.F.R. § 35.160**.

3. Retaliation Evidence:

- Exclusion from public forums and documented ridicule during DSS meetings.

4. Transparency Failures:

- Persistent refusal to provide Medicaid ABI Waiver Program records raises concerns of financial mismanagement.

Broader Implications

1. **Erosion of Public Trust:** Connecticut's systemic failures undermine public confidence in government institutions.
2. **Harm to Vulnerable Populations:** Denial of transparency and ADA accommodations disproportionately affects individuals reliant on Medicaid services.
3. **Federal Compliance Risks:** Mismanagement and lack of accountability jeopardize federal Medicaid funding and oversight obligations.

Demands for Immediate Action

1. Launch a Federal Investigation:

- DOJ to investigate constitutional violations, ADA non-compliance, and whistleblower retaliation.

- HHS OCR to audit Medicaid ABI Waiver Program expenditures and oversight processes.

2. Enforce Accountability:

- Disciplinary actions against Attorney General William Tong and responsible officials.
- Mandate corrective action plans addressing procedural failures and ADA violations.

3. Implement Systemic Reforms:

- Mandatory ADA compliance training for all state agencies.
- Establish federal oversight mechanisms for Medicaid-related FOIA and ADA complaints.

4. Provide Restorative Justice:

- Public acknowledgment and apology for systemic failures and retaliation.
- Compensation for damages caused by procedural barriers and suppressed advocacy efforts.

Legal Precedents and Counterarguments**1. Administrative Backlog is Not Justifiable:**

- FOIA and ADA statutes impose strict deadlines. Delays exceeding these without just cause are clear violations.

2. State Sovereignty Does Not Override Federal Laws:

- The Supremacy Clause ensures federal jurisdiction over Medicaid programs and ADA enforcement.

3. Documented Harm Demonstrates Federal Interest:

- Exclusion from public forums, ADA failures, and suppression of transparency efforts demonstrate clear harm to constitutional and federally protected rights.

Conclusion

The systemic failures of the Connecticut Attorney General's Office demand immediate federal action. These violations not only harm me as a whistleblower and person with disabilities but also undermine constitutional rights, ADA compliance, and the integrity of federally funded Medicaid programs.

Sincerely,

David Medeiros

Founder, ABI Resources

TBI and Stroke Survivor DB.42.131.Inf.

Attachments

1. Timeline of FOIA Requests and Correspondence.
2. ADA Accommodation Requests and Responses.
3. Documentation of Retaliation and Exclusion.
4. Medicaid Transparency Concerns.

Best regards,
David Medeiros

[ABI Resources](#)

Medicaid Acquired Brain Injury ABI Waiver Program Provider

Honor all, Be the best.



NOTE: This e-mail may contain sensitive and/or privileged information. If you are not the intended recipient (or have received this email in error) please notify the sender immediately and destroy this e-mail. Any unauthorized copying, disclosure, or distribution of the material in this e-mail is strictly forbidden. Under the Privacy Act of 1974, all data of a private nature must be protected from unauthorized disclosure. [Rise Above Challenges](#) DB.42.131.Inf.

From: DAVID MEDEIROS

10/25/2024

Subject: Connecticut Freedom of Information Act Request: State and Federal FOIA Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry | Connectic

Fax

To Whom It May Concern:

Pursuant to the Connecticut Freedom of Information Act, I hereby request the following records:

State and Federal FOIA Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry | Connecticut

State FOIA Request

To:

FOIA Officer and Supervisory Officers

Connecticut Department of Social Services

55 Farmington Avenue
Hartford, CT 06105

Federal FOIA Request

To:
FOIA Officer and Supervisory Officers
Centers for Medicare & Medicaid Services (CMS)
Freedom of Information Act Office
Mail Stop N2-20-16
7500 Security Boulevard
Baltimore, Maryland 21244

Re: Freedom of Information Act Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry and Related Documents
Dear FOIA Officer and Supervisory Officers,

Pursuant to the Freedom of Information Act (5 U.S.C. § 552) and Connecticut's FOIA statutes (Conn. Gen. Stat. § 1-200 et seq.), I am writing to request the following records related to the Medicaid Acquired Brain Injury (ABI) Waiver Program:

Requested Records:

Complete and current provider registry, including:

- Provider names
- Contact details (physical addresses, email addresses)
- Areas of specialty and services offered
- Provider enrollment dates and current status
- Documents governing provider inclusion, such as:

Policies, regulations, or statutes detailing the criteria for selecting, monitoring, and removing providers from the ABI Waiver Program registry
Records of complaints, violations, or disciplinary actions, including:

Any and all records related to complaints, violations, or actions taken against providers in connection with their participation in the ABI Waiver Program
Correspondence or documentation regarding registry maintenance, including:

Documentation outlining the process and frequency of updating the registry, who is responsible for maintaining the records, and how updates are communicated to the public

Agencies to Provide Information or Enforce Compliance:

In recognition of the public's right to transparency in the administration of Medicaid and public health programs, this request emphasizes that multiple state and federal agencies may provide the requested information or compel compliance:

Connecticut Freedom of Information Commission (FOIC)

Enforces compliance with state FOIA laws.
Contact: 18-20 Trinity Street, Hartford, CT 06106
Phone: (860) 566-5682

U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR)

Ensures proper management of Medicaid programs and enforces civil rights laws.
Contact: 200 Independence Avenue, S.W., Washington, D.C. 20201
Phone: (800) 368-1019

Centers for Medicare & Medicaid Services (CMS)

Oversees state Medicaid programs and can compel state agencies to provide records.
Contact: FOIA_Request@cms.hhs.gov | Phone: (410) 786-5353

HHS Office of Inspector General (OIG)

Investigates fraud or abuse in Medicaid programs.
Contact: Wilbur J. Cohen Building, 330 Independence Ave., SW, Washington, D.C. 20201
Phone: (800) 447-8477

Medicaid Fraud Control Unit (MFCU) – Connecticut Attorney General's Office

Investigates Medicaid fraud or improper management.
Phone: (860) 808-5318

U.S. Department of Justice (DOJ) – Civil Rights Division

Enforces ADA and other civil rights laws related to Medicaid services.
Phone: (202) 514-4609

Connecticut State Auditors of Public Accounts

Conducts audits of state agencies, including CT DSS.
Phone: (860) 240-8651

Legal Basis for Request:

This request is made under 5 U.S.C. § 552 (FOIA) and Connecticut's FOIA laws (Conn. Gen. Stat. § 1-200 et seq.). These statutes obligate public agencies to provide records necessary for the public's oversight of government operations, particularly those involving public health and Medicaid services.

Request for Expedited Processing:

Given the critical need for transparency in the Medicaid ABI Waiver Program, I request expedited processing under 5 U.S.C. § 552(a)(6)(E). Delays in providing this information may hinder public oversight and efforts to ensure proper care for individuals with acquired brain injuries.

Request for Accommodation and Fee Waiver:

As an individual living with a brain injury and a stroke survivor, I request reasonable accommodations under the Americans with Disabilities Act (42 U.S.C. § 12101 et seq.). Please provide all requested records directly via email to AabiWR@live.com. Do not use any portals or third-party websites that pose barriers to accessing this information.

Additionally, I request a waiver of all fees associated with this request, as it is made in the public interest to ensure transparency and accountability in the Medicaid ABI Waiver Program, and not for commercial purposes.

Response Time:

Under federal FOIA and Connecticut public records laws, agencies are required to respond to this request within specified timeframes. Please notify me promptly if any part of this request requires clarification or additional time to process. Contact me exclusively via email at AabiWR@live.com.

Conclusion:

I look forward to your prompt and complete response. Thank you for your attention to this important matter.

Sincerely,

David Medeiros

Founder & Owner, ABI Resources

39 Kings HWY STE C

Gales Ferry, Connecticut, 06335

AabiWR@live.com

Key Legal Citations:

5 U.S.C. § 552 (FOIA) – Federal statute governing public access to government records.

Conn. Gen. Stat. § 1-200 et seq. – Connecticut's Freedom of Information laws.

Americans with Disabilities Act (42 U.S.C. § 12101 et seq.) – Ensures reasonable accommodations for individuals with disabilities. The Disabilities Act (42 U.S.C. § 12101 et seq.) – Provides for reasonable accommodations for individuals with disabilities.

I also request that, if possible and pursuant to Conn. Gen. Stat. § 1-212(d), fees be waived as I believe this request is in the public interest and not made for commercial gain. The requested documents will be made available to the public at MuckRock.com.

In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 4 business days, as the statute requires.

Sincerely,

DAVID MEDEIROS

From: Muckrock Staff

10/31/2024

Subject: RE: Connecticut Freedom of Information Act Request: State and Federal FOIA Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry | Conn

Fax

To Whom It May Concern:

I wanted to follow up on the following Connecticut Freedom of Information Act request, copied below, and originally submitted on Oct. 28, 2024. Please let me know when I can expect to receive a response.

Thanks for your help, and let me know if further clarification is needed.

From: Muckrock Staff

11/15/2024

Subject: RE: Connecticut Freedom of Information Act Request: State and Federal FOIA Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry | Conn

Fax

To Whom It May Concern:

I wanted to follow up on the following Connecticut Freedom of Information Act request, copied below, and originally submitted on Oct. 28, 2024. Please let me know when I can expect to receive a response.

Thanks for your help, and let me know if further clarification is needed.

From: Muckrock Staff

12/02/2024

Subject: RE: Connecticut Freedom of Information Act Request: State and Federal FOIA Request for Medicaid Acquired Brain Injury (ABI) Waiver Program Provider Registry | Conn

Fax

To Whom It May Concern:

I wanted to follow up on the following Connecticut Freedom of Information Act request, copied below, and originally submitted on Oct. 28, 2024. Please let me know when I can expect to receive a response.

Thanks for your help, and let me know if further clarification is needed.

Best regards,
David Medeiros

[ABI Resources](http://ABIResources.com)

Medicaid Acquired Brain Injury ABI Waiver Program Provider

Honor all, Be the best.



NOTE: This e-mail may contain sensitive and/or privileged information. If you are not the intended recipient (or have received this email in error) please notify the sender immediately and destroy this e-mail. Any unauthorized copying, disclosure, or distribution of the material in this e-mail is strictly forbidden. Under the Privacy Act of 1974, all data of a private nature must be protected from unauthorized disclosure. [Rise Above Challenges](#) DB.42.131.Inf.

My Cases

[Start a New Complaint \(/efilecomplaint/\)](/efilecomplaint/)

Not Yet Submitted

Click on each item below to complete the submission process. You will have an opportunity to review and make any necessary changes to the information already entered. You will also be prompted to provide specific details about your complaint or disclosure and attach documents. Case Titles containing **(DI)** are disclosures; **(HA)** are Hatch Act complaints; and **(MA)** are prohibited personnel practice (PPP) complaints.

Case Title	David Medeiros (MA) 11/25/2024 10:13 AM (/mycases/editcomplaint/?id=fd8554cf-3fab-ef11-b8e9-001dd8098529)
Complainant Display	Medeiros, David
Case Status	Not Submitted
Created On	11/25/2024 10:13 AM
	▼
Case Title	David Medeiros (MA) 11/27/2024 7:33 AM (/mycases/editcomplaint/?id=61d4adc2-bbac-ef11-b8e9-001dd8055213)
Complainant Display	Medeiros, David
Case Status	Not Submitted
Created On	11/27/2024 7:33 AM
	▼
Case Title	David Medeiros (MA) 11/27/2024 7:36 AM (/mycases/editcomplaint/?id=231bee42-bcac-ef11-b8e9-001dd809b9cc)
Complainant Display	Medeiros, David
Case Status	Not Submitted
Created On	11/27/2024 7:36 AM
	▼
Case Title	David Medeiros (MA) 11/28/2024 11:13 AM (/mycases/editcomplaint/?id=68a984b3-a3ad-ef11-b8e9-001dd809b9cc)
Complainant Display	Medeiros, David
Case Status	Not Submitted
Created On	11/28/2024 11:13 AM
	▼
Case Title	David Medeiros (MA) 12/6/2024 12:33 PM (/mycases/editcomplaint/?id=3d0ce52e-f8b3-ef11-b8e9-001dd809b958)
Complainant Display	Medeiros, David
Case Status	Not Submitted
Created On	12/6/2024 12:33 PM
	▼

Submitted

Please note, you cannot use the portal to make changes to submitted complaints. If you would like to provide additional information about a submitted complaint, please contact the attorney or investigator assigned to your case or email info@osc.gov. You **should not** use the portal to make changes or add additional informat

to existing open complaints; doing so may delay the review of your new information. If you mistakenly submit such information through the portal or file a duplicate complaint, your new submission will be given a status of "Duplicate/Add'l Info." The information you provided in the new submission will be added to your existing complaint, and the new submission will be deleted. Please note that submitting a new filing that is of a different type will not delay or otherwise impact your current filing.

Case Title	DI-25-000379 (Medeiros, Health and Human Services) (/savedandsubmittedcomplaintsview/?id=902cd8be-60b2-ef11-b8e9-001dd8055213)
Complainant Display	Medeiros, David
Case Status	Closed
Case Opened Date	12/9/2024

< 1 2 >

You cannot access a copy of your complaint filing from the list above; a copy was emailed to the email address provided when your complaint was submitted.



Your Office of Special Counsel Complaint Has Been Received

From Filing NoReply <filing-noreply@osc.gov>

Date Mon 11/25/2024 11:21 AM

To Medeiros, David <aabiwr@live.com>

Your submission was received by the Office of Special Counsel. In the near future, we will email you to provide more specific information about your filing, including a case number and contact person at OSC. If you filed using our Online Filing Portal, you will receive a second email containing a copy of the information you submitted. Please note: Changes cannot be made using the Online Filing Portal. If you need to amend or add information regarding your complaint, please contact the attorney/investigator assigned or email info@osc.gov.

Please bear in mind that OSC receives a large number of filings each year. While we attempt to handle them as expeditiously as is possible, we generally process them in the order received.



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

Do not use this form to submit classified information.

For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

IMPORTANT INFORMATION ABOUT FILING A DISCLOSURE

OSC WHISTLEBLOWER DISCLOSURE CHANNEL

Under 5 U.S.C. § 1213 and related provisions, the Office of Special Counsel (OSC) serves as a secure channel for federal employees, former federal employees, and applicants for federal employment with reliable knowledge of the wrongdoing to disclose:

- a violation of law, rule or regulation;
- gross mismanagement;
- gross waste of funds;
- an abuse of authority;
- a substantial and specific danger to public health or safety; and/or
- censorship related to scientific research.

OSC JURISDICTION

OSC has no jurisdiction over disclosures filed by:

- employees of the U.S. Postal Service and the Postal Regulatory Commission;
- members of the armed forces of the United States (*i.e.*, non-civilian military employees);
- state employees operating under federal grants;
- employees of federal contractors;
- other employees or federal agencies that are exempt under federal law; and
- Congressional or judicial branch employees.

ANONYMOUS SOURCES

While OSC will protect the identity of persons who make disclosures, it will not consider anonymous disclosures. If a disclosure is filed by an anonymous source, the disclosure will be referred to the Office of Inspector General in the appropriate agency. OSC will take no further action.

RETALIATION

Do you believe you suffered retaliation by your agency for disclosing wrongdoing? If yes, you may file a complaint of retaliation by navigating back to "My Cases" and selecting "New Complaint." Select Option 1 to complete and submit a Complaint of Prohibited Personnel Practice or other Prohibited Activity (PPPs). *If you have already completed the Complaint of Prohibited Personnel Practice or other Prohibited Activity above, please continue with this Disclosure.* PPPs are employment-related activities that are banned in the federal workforce.



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*Denotes required fields.

PPPs generally involve some type of personnel decision or action and may result in personal relief for people who have been subject to a PPP. For example, if we find that you were removed from federal service in retaliation for whistleblowing, OSC may act to get your job back. PPPs can also include allegations of harassment, failure to issue appraisals, and improper hiring. Do not file a disclosure to report retaliation or other PPPs.

CONTACT INFORMATION

Title:

First Name:* David

Middle Initial:

Last Name:* Medeiros

International Address?: No

Address:*

215 Mountain St
Willimantic, CT 06226

Cell Phone Number:

Home Phone Number:

Office Phone Number:

Ext.

Email Address:* aabiwr@live.com

Preferred means of contact:

Email: Yes

Cell phone: No

Home phone: No

Office phone: No

REPRESENTATIVE INFORMATION

Do you have representation? No

Information about representative, if applicable.

First Name:*

Middle Initial:

Last Name:*

International Address?:

Address: *



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

Do not use this form to submit classified information.

For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

Office Phone Number:

Ext.

Cell Phone Number:

Home Phone Number:

Email Address:

EMPLOYMENT INFORMATION

Name of Department/Agency about which you are making a disclosure.

Department:* Health and Human Services

Agency:* Centers For Medicare & Medicaid Services

Agency subcomponent: Medicaid Oversight for the Connecticut Acquired Brain Injury (ABI) Waiver

Street Address: 7500 Security Boulevard City: Baltimore State: Maryland Zip Code: 21244

City: Baltimore **State:** MD

Zip Code: 21244

Employment Status:* Non-Federal Employee (please specify)

Title	Series	Grade

Please provide your dates of employment in this position.

Employment Service Type	Employment Service Subtype	If Other (specify)
Excepted Service	Other	Private Citizen, Advocate, and Whistleblower
Other	Other	Private Citizen, Advocate, and Whistleblower

Are you covered by a collective bargaining agreement?

I don't know



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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*Denotes required fields.

DETAILS OF YOUR DISCLOSURES

Please identify the type of wrongdoing that you are alleging. You can make multiple disclosures, but you **MUST** choose one option. If you check "violation of law, rule, or regulation," specify, if you can, the particular law, rule or regulation violated (by name, subject, and/or legal citation). For each allegation, please answer the following questions (be as specific as possible). Please keep in mind that you will have an opportunity to provide more information and someone from OSC will contact you.

If OSC determines there is a substantial likelihood of wrongdoing, OSC will refer your disclosures to the involved agency for an investigation and report. To meet the substantial likelihood standard, there must be a significant probability that the information reveals wrongdoing that falls within one or more of the categories above. In its evaluation, OSC considers the strength, reliability, and credibility of the disclosures. If the substantial likelihood determination cannot be made, OSC will determine whether there is sufficient information to exercise its discretion to refer the allegations.

DISCLOSURES

Allegation	Violation of Law, Rule or Regulation
What action did they take?	Enabled systemic mismanagement of Medicaid funds, refused ADA accommodations, and obstructed FOIA requests.
When did this occur?	on going
How did you discover this action?	Advocating for medicaid consumers.
What additional facts support your allegation?	Delayed or denied FOIA responses, failed to provide requested accommodations for accessible formats.

DISCLOSURE SUBJECTS

Name of individual you believe is responsible for the wrongdoing disclosed.

First Name	Last Name	Title	Chain of Command
Andrea	Barton Reeves	Commissioner	Head of DSS, oversees Medicaid programs,



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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*Denotes required fields.

			including the ABI Waiver Program.
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REQUESTED OSC ACTION

What action would you like OSC to take?

1. What type of wrongdoing are you reporting?

(Check all that apply):

Gross Mismanagement

Violation of Law, Rule, or Regulation

Abuse of Authority

Danger to Public Health or Safety

2. Describe the wrongdoing.

Connecticut's Department of Social Services (DSS) and associated agencies have engaged in systemic misconduct involving gross mismanagement, violations of federal law, and abuse of authority. These actions harm vulnerable populations reliant on Medicaid and suppress transparency and accountability.

Key Wrongdoing Includes:

Gross Mismanagement of Medicaid Funds:

DSS operates a monopolistic referral system within the Acquired Brain Injury (ABI) Waiver Program, restricting consumer access to diverse providers and prioritizing financial gain over care quality.

Federal Medicaid funds are funneled to select providers without accountability, raising concerns about misuse of taxpayer dollars.

ADA and FOIA Violations:

DSS systematically denies or delays reasonable accommodations under the Americans with Disabilities Act (ADA), creating barriers for individuals with disabilities.

Freedom of Information Act (FOIA) requests for critical Medicaid provider data are ignored, delayed, or denied without valid exemptions, obstructing transparency.

Retaliation Against Whistleblowers:



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DSS and other entities retaliated against me for reporting systemic issues by excluding me from discussions, delaying complaint resolutions, and discrediting my advocacy.

Danger to Public Health and Safety:

By limiting consumer access to diverse providers and neglecting ADA compliance, DSS endangers the health and well-being of Medicaid recipients, particularly those with disabilities or acquired brain injuries.

3. Who committed the wrongdoing?

Connecticut Department of Social Services (DSS):

Key Individuals:

Andrea Barton Reeves (Commissioner, DSS)

DSS FOIA Officers

DSS Medicaid Program Administrators

Role: Mismanaged Medicaid programs, denied ADA accommodations, and obstructed FOIA compliance.

Connecticut Commission on Human Rights and Opportunities (CHRO):

Key Individuals:

Tanya Hughes (Executive Director, CHRO)

Cheryl Sharp (Deputy Director, CHRO)

Role: Mishandled ADA complaints and failed to address whistleblower retaliation.

Federal Oversight Agencies:

Chiquita Brooks-LaSure (Administrator, CMS)

Role: Failed to enforce federal Medicaid and ADA compliance standards in Connecticut.

4. When did this occur?

Misconduct began escalating in 2013-2014 following systemic changes to Connecticut Medicaid administration and continues to the present.

Specific incidents include:

ADA accommodation denials from 2021-2024.

FOIA delays and denials from 2020-2024.

Retaliatory actions increasing since 2022.

5. How did you learn about the wrongdoing?

Personal Experience: I directly experienced ADA accommodation denials, FOIA obstructions,



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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and retaliatory actions as a whistleblower advocating for systemic reform.

Reports from Medicaid Consumers: Multiple individuals reported restricted access to diverse providers under DSS's monopolistic referral system.

FOIA Requests: Delayed and incomplete responses revealed DSS's lack of transparency and non-compliance with federal standards.

6. What evidence supports your claim?

FOIA Documentation:

Copies of delayed, denied, or incomplete FOIA responses from DSS and federal agencies.

ADA Accommodation Requests:

Written requests for cognitive support and accessible communication formats, alongside DSS's failure to act.

Grievance Records:

Complaints filed with CHRO and DSS regarding ADA non-compliance, FOIA delays, and retaliation.

Consumer Reports:

Statements from Medicaid recipients detailing restricted provider access and neglect of care quality.

7. Why is this important?

This misconduct violates federal laws, undermines public trust, and disproportionately harms vulnerable populations, including individuals with disabilities. Without intervention, these actions will continue to waste taxpayer dollars, endanger public health, and suppress advocacy for systemic reform.

WHERE ELSE DID YOU REPORT THIS MATTER?

I have also disclosed this information to:

Other Action Type	Action Taken Date
Department of Justice	
Congress or congressional committee	
Inspector General of department / agency involved	
Other office of department / agency involved	



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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*Denotes required fields.

Additional information about reports to Inspectors General, if applicable.

First Name: Last Name:

Title:

Address:

Email Address:

Telephone Number:

Case ID #:

a. **What is the status of the matter?**

NOTE: MATTERS INVESTIGATED BY AN OFFICE OF INSPECTOR GENERAL

It is the general policy of OSC not to transmit allegations of wrongdoing to the head of the agency involved if the agency's Office of Inspector General has fully investigated, or is currently investigating, the same allegations.

ATTACHMENTS

Please note that the space available for attachments is limited. Therefore, DO NOT attach every document and email that may be relevant to your claim. You will have an opportunity to make additional submissions at a later date. We recommend limiting attachments to official forms and correspondence that document the action(s) at issue in your disclosure if these documents are relevant to your allegations.

I have attached the following documents to my filing:

File Name
09.24.2024 Federal Intervention_HHS_OIG_CMS_GAO_DOJ_OCR_Whistleblower_Report_2024.pdf
Comprehensive Grievance Report and Request for Clarity Whistleblower Report Medicaid ABI Waiver Programs.pdf
01.12.2024 Notice Regarding HHS CMS Medicaid Administration in Connecticut FOIA Non Compliance ADA Concerns and Whistleblower Retaliations Complaint Appeals and Request for Transparency.pdf
DOJ 11.23.2024 Binder2.docx
requests (3).csv



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*Denotes required fields.

CONSENT

Do you consent to the disclosure of your identity to others outside OSC if it becomes necessary in taking further action on this matter?*

I consent to disclosure of my identity.

Yes

I do not consent to disclosure of my identity. (Even if you do not consent, OSC may disclose your identity if necessary due to an imminent danger to public health or safety or imminent violation of any criminal law. See 5 U.S.C. § 1213(h).)

No

CERTIFICATION

I certify that all of the statements made in this complaint are true, complete, and correct to the best of my knowledge and belief. I understand that a false statement or concealment of a material fact is a criminal offense punishable by a fine, imprisonment, or both. 18 U.S.C. § 1001.*

Yes

BURDEN: The burden for this collection of information (including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the form) is estimated to be an average of one hour to submit a disclosure of information alleging agency wrongdoing, one hour and fifteen minutes to submit a complaint alleging a prohibited personnel practice or other prohibited activity, or 30 minutes to submit a complaint alleging prohibited political activity. Please send any comments about this burden estimate, and suggestions for reducing the burden, to the U.S. Office of Special Counsel, General Counsel's Office, 1730 M Street, NW, Suite 218, Washington, DC 20036-4505.

This Disclosure of Information was Received by OSC on: 11/25/2024



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

PLEASE KEEP A COPY OF YOUR COMPLAINT, ANY SUPPORTING DOCUMENTATION, AND ANY ADDITIONAL ALLEGATIONS THAT YOU SEND TO OSC NOW OR AT ANY TIME WHILE YOUR COMPLAINT IS PENDING.
REPRODUCTION CHARGES UNDER THE FREEDOM OF INFORMATION ACT MAY APPLY TO ANY REQUEST YOU MAKE FOR COPIES OF MATERIALS THAT YOU PROVIDED TO OSC.



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*Denotes required fields.

IMPORTANT INFORMATION ABOUT FILING A DISCLOSURE

OSC WHISTLEBLOWER DISCLOSURE CHANNEL

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- a violation of law, rule or regulation;
- gross mismanagement;
- gross waste of funds;
- an abuse of authority;
- a substantial and specific danger to public health or safety; and/or
- censorship related to scientific research.

OSC JURISDICTION

OSC has no jurisdiction over disclosures filed by:

- employees of the U.S. Postal Service and the Postal Regulatory Commission;
- members of the armed forces of the United States (*i.e.*, non-civilian military employees);
- state employees operating under federal grants;
- employees of federal contractors;
- other employees or federal agencies that are exempt under federal law; and
- Congressional or judicial branch employees.

ANONYMOUS SOURCES

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RETALIATION

Do you believe you suffered retaliation by your agency for disclosing wrongdoing? If yes, you may file a complaint of retaliation by navigating back to "My Cases" and selecting "New Complaint." Select Option 1 to complete and submit a Complaint of Prohibited Personnel Practice or other Prohibited Activity (PPPs). *If you have already completed the Complaint of Prohibited Personnel Practice or other Prohibited Activity above, please continue with this Disclosure.* PPPs are employment-related activities that are banned in the federal workforce.



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CONTACT INFORMATION

Title:

First Name:* David

Middle Initial:

Last Name:* Medeiros

International Address?: No

Address:*

215 Mountain St
Willimantic, CT 06226

Cell Phone Number:

Home Phone Number:

Office Phone Number:

Ext.

Email Address:* aabiwr@live.com

Preferred means of contact:

Email: Yes

Cell phone: No

Home phone: No

Office phone: No

REPRESENTATIVE INFORMATION

Do you have representation? No

Information about representative, if applicable.

First Name:*

Middle Initial:

Last Name:*

International Address?:

Address: *



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

Do not use this form to submit classified information.

For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

Office Phone Number:

Ext.

Cell Phone Number:

Home Phone Number:

Email Address:

EMPLOYMENT INFORMATION

Name of Department/Agency about which you are making a disclosure.

Department:* Health and Human Services

Agency:* Centers For Medicare & Medicaid Services

Agency subcomponent: Medicaid Oversight for the Connecticut Acquired Brain Injury (ABI) Waiver

Street Address: 7500 Security Boulevard City: Baltimore State: Maryland Zip Code: 21244

City: Baltimore **State:** MD

Zip Code: 21244

Employment Status:* Non-Federal Employee (please specify)

Title	Series	Grade

Please provide your dates of employment in this position.

Employment Service Type	Employment Service Subtype	If Other (specify)
Excepted Service	Other	Private Citizen, Advocate, and Whistleblower
Other	Other	Private Citizen, Advocate, and Whistleblower

Are you covered by a collective bargaining agreement?

I don't know



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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*Denotes required fields.

DETAILS OF YOUR DISCLOSURES

Please identify the type of wrongdoing that you are alleging. You can make multiple disclosures, but you **MUST** choose one option. If you check "violation of law, rule, or regulation," specify, if you can, the particular law, rule or regulation violated (by name, subject, and/or legal citation). For each allegation, please answer the following questions (be as specific as possible). Please keep in mind that you will have an opportunity to provide more information and someone from OSC will contact you.

If OSC determines there is a substantial likelihood of wrongdoing, OSC will refer your disclosures to the involved agency for an investigation and report. To meet the substantial likelihood standard, there must be a significant probability that the information reveals wrongdoing that falls within one or more of the categories above. In its evaluation, OSC considers the strength, reliability, and credibility of the disclosures. If the substantial likelihood determination cannot be made, OSC will determine whether there is sufficient information to exercise its discretion to refer the allegations.

DISCLOSURES

Allegation	Violation of Law, Rule or Regulation
What action did they take?	Enabled systemic mismanagement of Medicaid funds, refused ADA accommodations, and obstructed FOIA requests.
When did this occur?	on going
How did you discover this action?	Advocating for medicaid consumers.
What additional facts support your allegation?	Delayed or denied FOIA responses, failed to provide requested accommodations for accessible formats.

DISCLOSURE SUBJECTS

Name of individual you believe is responsible for the wrongdoing disclosed.

First Name	Last Name	Title	Chain of Command
Andrea	Barton Reeves	Commissioner	Head of DSS, oversees Medicaid programs,



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

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*Denotes required fields.

			including the ABI Waiver Program.
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REQUESTED OSC ACTION

What action would you like OSC to take?

1. What type of wrongdoing are you reporting?

(Check all that apply):

Gross Mismanagement

Violation of Law, Rule, or Regulation

Abuse of Authority

Danger to Public Health or Safety

2. Describe the wrongdoing.

Connecticut's Department of Social Services (DSS) and associated agencies have engaged in systemic misconduct involving gross mismanagement, violations of federal law, and abuse of authority. These actions harm vulnerable populations reliant on Medicaid and suppress transparency and accountability.

Key Wrongdoing Includes:

Gross Mismanagement of Medicaid Funds:

DSS operates a monopolistic referral system within the Acquired Brain Injury (ABI) Waiver Program, restricting consumer access to diverse providers and prioritizing financial gain over care quality.

Federal Medicaid funds are funneled to select providers without accountability, raising concerns about misuse of taxpayer dollars.

ADA and FOIA Violations:

DSS systematically denies or delays reasonable accommodations under the Americans with Disabilities Act (ADA), creating barriers for individuals with disabilities.

Freedom of Information Act (FOIA) requests for critical Medicaid provider data are ignored, delayed, or denied without valid exemptions, obstructing transparency.

Retaliation Against Whistleblowers:



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DSS and other entities retaliated against me for reporting systemic issues by excluding me from discussions, delaying complaint resolutions, and discrediting my advocacy.

Danger to Public Health and Safety:

By limiting consumer access to diverse providers and neglecting ADA compliance, DSS endangers the health and well-being of Medicaid recipients, particularly those with disabilities or acquired brain injuries.

3. Who committed the wrongdoing?

Connecticut Department of Social Services (DSS):

Key Individuals:

Andrea Barton Reeves (Commissioner, DSS)

DSS FOIA Officers

DSS Medicaid Program Administrators

Role: Mismanaged Medicaid programs, denied ADA accommodations, and obstructed FOIA compliance.

Connecticut Commission on Human Rights and Opportunities (CHRO):

Key Individuals:

Tanya Hughes (Executive Director, CHRO)

Cheryl Sharp (Deputy Director, CHRO)

Role: Mishandled ADA complaints and failed to address whistleblower retaliation.

Federal Oversight Agencies:

Chiquita Brooks-LaSure (Administrator, CMS)

Role: Failed to enforce federal Medicaid and ADA compliance standards in Connecticut.

4. When did this occur?

Misconduct began escalating in 2013-2014 following systemic changes to Connecticut Medicaid administration and continues to the present.

Specific incidents include:

ADA accommodation denials from 2021-2024.

FOIA delays and denials from 2020-2024.

Retaliatory actions increasing since 2022.

5. How did you learn about the wrongdoing?

Personal Experience: I directly experienced ADA accommodation denials, FOIA obstructions,



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and retaliatory actions as a whistleblower advocating for systemic reform.

Reports from Medicaid Consumers: Multiple individuals reported restricted access to diverse providers under DSS's monopolistic referral system.

FOIA Requests: Delayed and incomplete responses revealed DSS's lack of transparency and non-compliance with federal standards.

6. What evidence supports your claim?

FOIA Documentation:

Copies of delayed, denied, or incomplete FOIA responses from DSS and federal agencies.

ADA Accommodation Requests:

Written requests for cognitive support and accessible communication formats, alongside DSS's failure to act.

Grievance Records:

Complaints filed with CHRO and DSS regarding ADA non-compliance, FOIA delays, and retaliation.

Consumer Reports:

Statements from Medicaid recipients detailing restricted provider access and neglect of care quality.

7. Why is this important?

This misconduct violates federal laws, undermines public trust, and disproportionately harms vulnerable populations, including individuals with disabilities. Without intervention, these actions will continue to waste taxpayer dollars, endanger public health, and suppress advocacy for systemic reform.

WHERE ELSE DID YOU REPORT THIS MATTER?

I have also disclosed this information to:

Other Action Type	Action Taken Date
Department of Justice	
Congress or congressional committee	
Inspector General of department / agency involved	
Other office of department / agency involved	



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Additional information about reports to Inspectors General, if applicable.

First Name: **Last Name:**

Title:

Address:

Email Address:

Telephone Number:

Case ID #:

a. **What is the status of the matter?**

NOTE: MATTERS INVESTIGATED BY AN OFFICE OF INSPECTOR GENERAL

It is the general policy of OSC not to transmit allegations of wrongdoing to the head of the agency involved if the agency's Office of Inspector General has fully investigated, or is currently investigating, the same allegations.

ATTACHMENTS

Please note that the space available for attachments is limited. Therefore, DO NOT attach every document and email that may be relevant to your claim. You will have an opportunity to make additional submissions at a later date. We recommend limiting attachments to official forms and correspondence that document the action(s) at issue in your disclosure if these documents are relevant to your allegations.

I have attached the following documents to my filing:

File Name
09.24.2024 Federal_Intervention_HHS_OIG_CMS_GAO_DOJ_OCR_Whistleblower_Report_2024.pdf
Comprehensive Grievance Report and Request for Clarity Whistleblower Report Mediciad ABI Waiver Programs.pdf
01.12.2024 Notice Regarding HHS CMS Medicaid Administration in Connecticut FOIA Non Compliance ADA Concerns and Whistleblower Retaliations Complaint Appeals and Request for Transparency.pdf
DOJ 11.23.2024 Binder2.docx
requests (3).csv



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CONSENT

Do you consent to the disclosure of your identity to others outside OSC if it becomes necessary in taking further action on this matter?*

I consent to disclosure of my identity.

Yes

I do not consent to disclosure of my identity. (Even if you do not consent, OSC may disclose your identity if necessary due to an imminent danger to public health or safety or imminent violation of any criminal law. See 5 U.S.C. § 1213(h).)

No

CERTIFICATION

I certify that all of the statements made in this complaint are true, complete, and correct to the best of my knowledge and belief. I understand that a false statement or concealment of a material fact is a criminal offense punishable by a fine, imprisonment, or both. 18 U.S.C. § 1001.*

Yes

BURDEN: The burden for this collection of information (including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the form) is estimated to be an average of one hour to submit a disclosure of information alleging agency wrongdoing, one hour and fifteen minutes to submit a complaint alleging a prohibited personnel practice or other prohibited activity, or 30 minutes to submit a complaint alleging prohibited political activity. Please send any comments about this burden estimate, and suggestions for reducing the burden, to the U.S. Office of Special Counsel, General Counsel's Office, 1730 M Street, NW, Suite 218, Washington, DC 20036-4505.

This Disclosure of Information was Received by OSC on: 11/25/2024



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PLEASE KEEP A COPY OF YOUR COMPLAINT, ANY SUPPORTING DOCUMENTATION, AND ANY ADDITIONAL ALLEGATIONS THAT YOU SEND TO OSC NOW OR AT ANY TIME WHILE YOUR COMPLAINT IS PENDING. REPRODUCTION CHARGES UNDER THE FREEDOM OF INFORMATION ACT MAY APPLY TO ANY REQUEST YOU MAKE FOR COPIES OF MATERIALS THAT YOU PROVIDED TO OSC.



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IMPORTANT INFORMATION ABOUT FILING A DISCLOSURE

OSC WHISTLEBLOWER DISCLOSURE CHANNEL

Under 5 U.S.C. § 1213 and related provisions, the Office of Special Counsel (OSC) serves as a secure channel for federal employees, former federal employees, and applicants for federal employment with reliable knowledge of the wrongdoing to disclose:

- a violation of law, rule or regulation;
- gross mismanagement;
- gross waste of funds;
- an abuse of authority;
- a substantial and specific danger to public health or safety; and/or
- censorship related to scientific research.

OSC JURISDICTION

OSC has no jurisdiction over disclosures filed by:

- employees of the U.S. Postal Service and the Postal Regulatory Commission;
- members of the armed forces of the United States (*i.e.*, non-civilian military employees);
- state employees operating under federal grants;
- employees of federal contractors;
- other employees or federal agencies that are exempt under federal law; and
- Congressional or judicial branch employees.

ANONYMOUS SOURCES

While OSC will protect the identity of persons who make disclosures, it will not consider anonymous disclosures. If a disclosure is filed by an anonymous source, the disclosure will be referred to the Office of Inspector General in the appropriate agency. OSC will take no further action.

RETALIATION

Do you believe you suffered retaliation by your agency for disclosing wrongdoing? If yes, you may file a complaint of retaliation by navigating back to "My Cases" and selecting "New Complaint." Select Option 1 to complete and submit a Complaint of Prohibited Personnel Practice or other Prohibited Activity (PPPs). *If you have already completed the Complaint of Prohibited Personnel Practice or other Prohibited Activity above, please continue with this Disclosure.* PPPs are employment-related activities that are banned in the federal workforce.



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PPPs generally involve some type of personnel decision or action and may result in personal relief for people who have been subject to a PPP. For example, if we find that you were removed from federal service in retaliation for whistleblowing, OSC may act to get your job back. PPPs can also include allegations of harassment, failure to issue appraisals, and improper hiring. Do not file a disclosure to report retaliation or other PPPs.

CONTACT INFORMATION

Title:

First Name:* David

Middle Initial:

Last Name:* Medeiros

International Address?: No

Address:*

215 Mountain St
Willimantic, CT 06226

Cell Phone Number:

Home Phone Number:

Office Phone Number:

Ext.

Email Address:* aabiwr@live.com

Preferred means of contact:

Email: Yes

Cell phone: No

Home phone: No

Office phone: No

REPRESENTATIVE INFORMATION

Do you have representation? No

Information about representative, if applicable.

First Name:*

Middle Initial:

Last Name:*

International Address?:

Address: *



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Office Phone Number:

Ext.

Cell Phone Number:

Home Phone Number:

Email Address:

EMPLOYMENT INFORMATION

Name of Department/Agency about which you are making a disclosure.

Department:* Health and Human Services

Agency:* Centers For Medicare & Medicaid Services

Agency subcomponent: Office of the Inspector General (OIG)

Street Address: 200 Independence Avenue, SW

City: Washington

State: DC

Zip Code: 20201

Employment Status:* Non-Federal Employee (please specify)

Title	Series	Grade

Please provide your dates of employment in this position.

Employment Service Type	Employment Service Subtype	If Other (specify)
Excepted Service	Other	Private Citizen, Advocate, and Whistleblower
Other	Other	Private Citizen, Advocate, and Whistleblower

Are you covered by a collective bargaining agreement?

DETAILS OF YOUR DISCLOSURES



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Please identify the type of wrongdoing that you are alleging. You can make multiple disclosures, but you **MUST** choose one option. If you check "violation of law, rule, or regulation," specify, if you can, the particular law, rule or regulation violated (by name, subject, and/or legal citation). For each allegation, please answer the following questions (be as specific as possible). Please keep in mind that you will have an opportunity to provide more information and someone from OSC will contact you.

If OSC determines there is a substantial likelihood of wrongdoing, OSC will refer your disclosures to the involved agency for an investigation and report. To meet the substantial likelihood standard, there must be a significant probability that the information reveals wrongdoing that falls within one or more of the categories above. In its evaluation, OSC considers the strength, reliability, and credibility of the disclosures. If the substantial likelihood determination cannot be made, OSC will determine whether there is sufficient information to exercise its discretion to refer the allegations.

DISCLOSURES

Allegation	Gross Waste of Funds
What action did they take?	
When did this occur?	
How did you discover this action?	
What additional facts support your allegation?	
Allegation	Violation of Law, Rule or Regulation
What action did they take?	The Connecticut Office of the State Comptroller, led by General Counsel Yamuna (Yam) Menon, failed to comply with state and federal Freedom of Information Act (FOIA) requirements by: Failing to conduct adequate records searches. Failing to redirect or identify responsible agencies holding requested records. Failing to provide legally required Vaughn Indexes or explanations for withheld information. Additionally, the Connecticut Department of Social Services (DSS), in collaboration with contractors such as Accenture and Manatt, contributed to potential violations by failing to ensure public



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	transparency and compliance with Medicaid oversight regulations under 42 CFR § 430.35.
When did this occur?	Timeframe: The violations began on or around October 29, 2024, when I submitted a Freedom of Information Act (FOIA) request to the Connecticut Office of the State Comptroller and other agencies. These violations are ongoing as the agencies have failed to provide adequate responses, conduct sufficient records searches, or adhere to federal and state transparency laws.
How did you discover this action?	I discovered these actions through my direct engagement with the Freedom of Information Act (FOIA) process and my involvement as an advocate for Medicaid recipients, particularly individuals relying on the Acquired Brain Injury (ABI) Waiver. The following key events revealed the systemic issues: 1. FOIA Requests and Responses On October 29, 2024, I submitted a FOIA request to the Connecticut Office of the State Comptroller, Connecticut Department of Social Services (DSS), and other agencies for records related to Medicaid programs, ABI Waiver amendments, and contractor activities involving Accenture and Manatt. Agencies failed to conduct adequate searches, provide redirections, or adhere to legal timelines, as evidenced by their incomplete responses and appeals communications between October 30 and November 12, 2024. 2. ADA Accommodation Requests I submitted ADA accommodation requests alongside my FOIA filings, as required by my traumatic brain injury (TBI)-related needs. The agencies failed to implement these accommodations, creating procedural barriers and violating federal law. This became evident during their responses to my FOIA requests and appeals in October and November 2024. 3. Medicaid Program Advocacy Through my advocacy work as the founder of ABI Resources, I identified long-standing concerns with Medicaid program transparency and contractor influence. Patterns of mismanagement emerged during reviews of Medicaid amendment processes and stakeholder communications dating back to 2012. The lack of publicly available documentation



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	regarding ABI Waiver amendments and related policies further highlighted systemic failures. 4. Contractor Influence Concerns regarding contractor influence (Accenture and Manatt) were raised by stakeholders and whistleblowers in my network. Their activities, including policy advising without adequate oversight, were identified as contributing to a lack of transparency and potential fiscal waste.
What additional facts support your allegation?	The following facts and documentation substantiate my allegations regarding violations of law, gross mismanagement, abuse of authority, and systemic accountability failures: 1. FOIA Non-Compliance Failure to Conduct Adequate Searches: The Connecticut Office of the State Comptroller failed to certify search methodologies or consult appropriate personnel, violating 5 U.S.C. § 552(a)(3) and Conn. Gen. Stat. § 1-211. No redirections to responsible agencies were made, despite clear indications that records related to Medicaid amendments and contractors (Accenture and Manatt) exist elsewhere. The absence of a Vaughn Index or justification for withheld records violates transparency standards upheld in <i>NARA v. Favish</i> (2004). Documentation: FOIA requests and appeals filed between October 29, 2024, and November 12, 2024, show consistent procedural failures. Agency responses, including a lack of clarity from the Office of the State Comptroller, confirm incomplete searches and non-compliance with FOIA laws. 2. ADA Violations Failure to Provide Accommodations: Requests for email-only communication, embedded text in email bodies, and screen-reader-compatible PDFs were ignored. This violates 42 U.S.C. § 12132 and Section 504 of the Rehabilitation Act, which mandate equal access for individuals with disabilities. The procedural barriers created by these failures disproportionately impacted my ability to process records effectively, constituting discrimination under <i>Tennessee v. Lane</i> (2004). Documentation: ADA accommodation requests submitted alongside FOIA filings show non-compliance



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	with reasonable accommodation standards. Agency correspondence from November 2024 fails to address accommodation needs explicitly, despite repeated reminders. 3. Gross Mismanagement of Medicaid Programs Lack of Oversight in ABI Waiver Amendments: Connecticut Department of Social Services (DSS) engaged contractors (Accenture and Manatt) to advise on Medicaid amendments and managed care models without adequate public transparency or oversight. Failure to comply with federal Medicaid regulations (42 CFR § 430.35) raises concerns about state accountability for program administration. Documentation: No records have been provided to substantiate claims of federal or state review of ABI Waiver amendments or contractor activities. Whistleblower insights suggest contractors influenced policy decisions without addressing stakeholder concerns about accessibility and equity. 4. Abuse of Authority Suppression of Whistleblowers: Whistleblowers reporting systemic Medicaid mismanagement and potential conflicts of interest involving contractors have faced barriers to disclosure, violating the Whistleblower Protection Act (5 U.S.C. § 2302). Agency responses demonstrate a lack of clear mechanisms for reporting or addressing whistleblower concerns. Documentation: Reports from stakeholders highlight systemic suppression of dissent and insufficient safeguards for whistleblower anonymity. Corresp
Allegation	Gross Mismanagement
What action did they take?	The following individuals and contractors, under the leadership of the Connecticut Department of Social Services (DSS), engaged in actions and inactions that violated constitutional law rights, the Americans with Disabilities Act (ADA), Medicaid regulations, taxpayer accountability standards, and whistleblower protections. Their combined failures perpetuated systemic inequities, regulatory non-compliance, and a lack of transparency and accountability in Medicaid program administration, particularly the Acquired Brain Injury (ABI) Waiver. Key Individuals and Their Actions 1. Andrea Barton Reeves



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	Role: Commissioner of the Connecticut Department of Social Services (DSS) (Appointed 2023) Actions and Violations: Failure to Uphold Constitutional Rights: Obstructed transparency guaranteed under the First Amendment, infringing on the public's right to access government information and participate in policymaking. Ignored due process and equal protection obligations under the Fifth and Fourteenth Amendments by failing to implement ADA accommodations and equitable Medicaid policies. Violation of Federal Medicaid Standards: Allowed DSS to proceed with Medicaid amendments, including ABI Waiver updates, without ensuring compliance with 42 U.S.C. § 1396 et seq. and 42 CFR § 430.35, which mandate equity, accessibility, and accountability in Medicaid-funded programs. Failed to address systemic inequities that disproportionately impact individuals with brain injuries and disabilities. Transparency Failures: Ignored state and federal Freedom of Information Act (FOIA) requests, obstructing access to public records related to Medicaid funding, contractor agreements, and policy development. Repeatedly denied ADA accommodation requests, violating 42 U.S.C. § 12132, and creating procedural barriers for individuals with disabilities seeking access to public information. Fiscal Mismanagement: Oversaw contracts with Accenture and Manatt, Phelps & Phillips, LLP, resulting in potential misuse of taxpayer dollars without measurable deliverables or fiscal transparency. 2. Dr. Mehul Dalal Role: Chief Policy Advisor, DSS (Appointed July 2023) Actions and Violations: Policy Decisions Without Public Accountability: Directed Medicaid policies, including ABI Waiver amendments, without adequately consulting Medicaid recipients, providers, or advocacy groups. Ignored federal accessibility requirements under the ADA (42 U.S.C. § 12132) and related Medicaid statutes. Failure to Monitor Contractor Activities: Neglected to establish oversight mechanisms for contractors influencing key Medicaid decisions, allowing Accenture and Manatt to operate
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	without transparency or accountability. Constitutional and Regulatory Breaches: Violated the Fourteenth Amendment's Equal Protection Clause and Medicaid accessibility regulations under 42 CFR § 440.180 by failing to protect Medicaid recipients' rights to equitable services. 3. Joel Norwood Role: Deputy Chief Policy Advisor, DSS (Appointe
When did this occur?	The systemic mismanagement and failures in the administration of the Medicaid program, particularly the Acquired Brain Injury (ABI) Waiver, have occurred over an extended period. Key timeframes illustrate how these issues evolved and were perpetuated under the leadership of Andrea Barton Reeves, Dr. Mehul Dalal, and Joel Norwood, and through contractor influence from Accenture and Manatt, Phelps & Phillips, LLP. These actions and inactions span from 2012 to the present, with specific incidents detailed below: Key Timeframes and Incidents 1. Initial Contractor Engagement and Longstanding Issues (2012–2022) 2012: DSS engaged Accenture and Manatt, Phelps & Phillips, LLP as contractors to advise on Medicaid program development and amendments. During this period, systemic issues in transparency and accountability began to emerge as contractors influenced Medicaid policy without adequate oversight mechanisms. Federal and state accessibility requirements were often overlooked in policy deci
How did you discover this action?	How Did You Discover This Action? The actions and systemic failures in the administration of Medicaid programs, particularly the Acquired Brain Injury (ABI) Waiver, were uncovered through a comprehensive approach combining advocacy efforts, FOIA engagement, stakeholder testimonies, procedural analysis, and legal research. Each method revealed patterns of mismanagement, non-compliance with federal and state laws, and significant gaps in transparency and accountability. 1. Direct Advocacy Efforts As the founder of ABI Resources, I have worked extensively with Medicaid recipients, healthcare providers, and advocacy organizations. My work uncovered: Systemic Barriers to



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	Services: Medicaid recipients reported consistent difficulties accessing equitable care, particularly under the ABI Waiver. These included: Delayed access to providers and services. Inadequate outreach and support for individuals with brain injuries. Confusion about eligibility changes and amendments to Medicaid programs. Stakeholder Concerns: Providers raised alarms about delays in reimbursements and unclear guidance from DSS, pointing to inefficiencies in Medicaid administration. Advocacy groups expressed frustration over the lack of meaningful consultation during key policy changes, indicating that Medicaid recipients and stakeholders were often excluded from the decision-making process. 2. FOIA Requests and Engagement Initial FOIA Requests (October 29, 2024): I filed FOIA requests with DSS, the Connecticut Office of the State Comptroller, and related agencies to obtain records detailing: Medicaid program management. ABI Waiver amendments and updates. Contractor involvement with Accenture and Manatt. Responses revealed: Incomplete or obstructed records searches. Lack of compliance with FOIA transparency standards under 5 U.S.C. § 552 and Conn. Gen. Stat. § 1-211. No justification for withheld documents, violating transparency precedents such as <i>NARA v. Favish</i> (2004). FOIA Appeals (October 30–November 12, 2024): Appeals to FOIA denials further highlighted systemic barriers, including: Procedural delays and inadequate records searches. Refusal to implement ADA accommodations, such as email-only communication and simplified summaries for complex records, violating 42 U.S.C. § 12132 (ADA). 3. Stakeholder Reports and Testimonies Medicaid Recipients: Individuals relying on ABI Waiver services reported barriers such as: Inequitable access to healthcare providers. Delays in receiving services critical to their health and quality of life. Difficulty navigating program changes due to lack of clear communication from DSS. Healthcare Providers and Advocacy Groups: Providers cited inefficiencies in DSS policies that created financial strain and administrative delays. Advocacy
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	groups expressed concerns about DSS's reliance on contractors like Accenture and Manatt, highlighting the lack of public consultation or oversight in Medicaid policy decisions. 4. Procedural and Regulatory Analysis
What additional facts support your allegation?	What Additional Facts Support Your Allegation of a Violation of Law, Rule, or Regulation? The Connecticut Department of Social Services (DSS), under Andrea Barton Reeves' leadership, along with Dr. Mehul Dalal, Joel Norwood, and contractors Accenture and Manatt, Phelps & Phillips, LLP, engaged in actions and inactions that violated multiple federal and state laws, regulations, and constitutional protections. The following detailed facts substantiate the allegations of these violations: 1. Violations of the Freedom of Information Act (FOIA) Failure to Conduct Adequate Records Searches DSS failed to conduct reasonable and thorough searches for FOIA-requested records concerning Medicaid program amendments, ABI Waiver updates, and contractor agreements, violating 5 U.S.C. § 552(a)(3) and Conn. Gen. Stat. § 1-211. No certification of search methodology or systems consulted was provided, leaving the scope and integrity of the search unclear. Failure to Provide Justifications for Withholding Records DSS did not provide legally required Vaughn Indexes or other detailed explanations for records that were withheld or redacted, violating transparency standards established in <i>NARA v. Favish</i> (2004). The refusal to disclose contracts and communications with Accenture and Manatt raises concerns about deliberate obstruction. Evidence of FOIA Non-Compliance FOIA requests submitted on October 29, 2024, and appeals filed between October 30 and November 12, 2024, demonstrate: Incomplete searches and refusals to produce responsive documents. Persistent delays and procedural barriers. 2. Violations of the Americans with Disabilities Act (ADA) Denial of ADA Accommodations DSS failed to provide legally mandated accommodations requested alongside FOIA filings, including: Email-only communication for accessibility. Screen-reader-compatible PDF formats. Simplified



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	summaries for complex documents. These failures violated 42 U.S.C. § 12132 and Section 504 of the Rehabilitation Act, which mandate equal access for individuals with disabilities. Procedural Barriers The lack of accommodations created additional barriers for individuals with disabilities, depriving them of their constitutional right to equal protection under the Fourteenth Amendment. 3. Non-Compliance with Federal Medicaid Regulations Failure to Meet Federal Accessibility and Equity Standards DSS neglected to ensure that amendments to the ABI Waiver complied with 42 CFR § 430.35, which mandates equity, accessibility, and proper federal oversight in Medicaid-funded programs. Medicaid recipients, particularly those with brain injuries, reported delays and inequities in accessing services, demonstrating DSS's failure to implement accessible and equitable care under 42 U.S.C. § 12132. Inadequate Oversight of Contractor Activities Contractors Accenture and Manatt played significant roles in advising on Medicaid amendments and managed care models, but DSS failed to establish: Transparency mechanisms for their recommen
Allegation	Abuse of Authority
What action did they take?	2. What Action Did They Take? The individuals responsible for the Connecticut Department of Social Services (DSS) and related entities engaged in actions and inactions that violated constitutional rights, ADA requirements, state and federal Medicaid laws, taxpayer accountability standards, FOIA transparency obligations, and whistleblower protections. These actions collectively contributed to systemic failures, mismanagement, and inequities in Medicaid program administration, particularly the Acquired Brain Injury (ABI) Waiver. Key Individuals and Their Actions 1. Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS) Actions and Violations: Constitutional Violations: Denied access to public records, violating the First Amendment guarantee of transparency and public participation in government accountability. Failed to



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	uphold due process and equal protection rights under the Fifth and Fourteenth Amendments by neglecting to implement ADA accommodations and equitable Medicaid policies. Non-Compliance with Medicaid Standards: Allowed DSS to implement Medicaid amendments, including ABI Waiver updates, without ensuring compliance with 42 U.S.C. § 1396 et seq. and 42 CFR § 430.35, which mandate equity, accessibility, and federal oversight. Ignored systemic barriers that disproportionately affect Medicaid recipients with disabilities, violating federal accessibility requirements under 42 U.S.C. § 12132. FOIA and Transparency Failures: Repeatedly obstructed public access to Medicaid program records by failing to respond adequately to FOIA requests, violating 5 U.S.C. § 552 and Conn. Gen. Stat. § 1-211. Ignored FOIA appeals and refused to provide Vaughn Indexes or certifications of record searches, demonstrating a deliberate obstruction of transparency laws. Mismanagement of Medicaid Funds: Authorized contracts with Accenture and Manatt, Phelps & Phillips, LLP, without adequate oversight or accountability mechanisms, raising concerns about potential misuse of taxpayer dollars. 2. Dr. Mehul Dalal Title: Chief Policy Advisor, DSS Actions and Violations: Policy Development Without Oversight: Played a leading role in shaping Medicaid policies, including amendments to the ABI Waiver, without ensuring alignment with federal regulations or addressing stakeholder concerns about inequities. ADA and Medicaid Violations: Failed to implement policies that met federal accessibility standards under 42 U.S.C. § 12132 and 42 CFR § 440.180, leaving individuals with disabilities underserved. Transparency Failures: Did not address procedural barriers in FOIA responses, obstructing public accountability and violating transparency laws. 3. Joel Norwood Title: Deputy Chief Policy Advisor, DSS Actions and Violations: Neglect of Oversight Responsibilities: Shared responsibility for inadequate monitoring of ABI Waiver amendments, resulting in gaps in equity and
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	accessibility for Medicaid recipients. Procedural and Accountability Failu
When did this occur?	When Did This Occur? The systemic violations and abuses of authority in the administration of Medicaid programs, particularly the Acquired Brain Injury (ABI) Waiver, span over a decade, beginning in 2012 with contractor engagements and escalating in 2023 under the leadership of Andrea Barton Reeves. These failures continued through November 2024, with key incidents highlighting worsening transparency violations, non-compliance with federal laws, and inequities in Medicaid services. Below is a comprehensive timeline with specific legal references and examples of harm: _____ 1. Initial Contractor Engagements and Policy Decisions (2012–2022) • 2012: • DSS engaged Accenture and Manatt, Phelps & Phillips, LLP to provide consulting services for Medicaid program development, including amendments to the ABI Waiver and managed care models. • Contractor influence occurred without adequate oversight or accountability mechanisms, violating transparency standards
How did you discover this action?	The systemic abuses of authority, transparency failures, and regulatory violations within the Connecticut Department of Social Services (DSS) were uncovered through a multi-pronged approach, including direct advocacy efforts, FOIA requests and appeals, stakeholder testimonies, procedural analysis, and legal research. Each method revealed evidence of persistent mismanagement, non-compliance with state and federal laws, and systemic inequities affecting Medicaid recipients.
What additional facts support your allegation?	The systemic abuses of authority, transparency failures, and regulatory violations within the Connecticut Department of Social Services (DSS) were uncovered through a multi-pronged approach, including direct advocacy efforts, FOIA requests and appeals, stakeholder testimonies, procedural analysis, and legal research. Each method revealed evidence of persistent mismanagement, non-compliance with state and federal laws, and systemic