



RE: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

From Keogh, Jo <Jo.Keogh@ct.gov>

Date Tue 8/19/2025 11:04 AM

To ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Cc Annon, Paulette <Paulette.G.Anon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Thank you, Mr. Mederios. As previously stated, the CHRO has no issue with your recording the conference. I will send out a formal conference notice shortly.

Sincerely,
Jo

Please contact me via email or mobile as I may be teleworking.



www.ct.gov/chro



Jo Keogh

Human Rights and Opportunities Representative
Legal Division

Commission on Human Rights and Opportunities

450 Columbus Blvd. Suite 3

Hartford, CT 06103 | AA/EOE

Office: 860-541-3420 | Mobile: 475-331-0251 | Fax: 860-241-4869 |

Jo.Keogh@ct.gov

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

Sent: Monday, August 18, 2025 3:57 PM

To: Keogh, Jo <Jo.Keogh@ct.gov>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Cc: Annon, Paulette <Paulette.G.Anon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Subject: Re: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

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CHRO Case No. 2510183 – Scheduling Confirmation, ADA Accommodation, and Federal Compliance Notice

Dear Ms. Keogh, Attorney Quinn, and all recipients,

I confirm my availability for the proposed dates of **September 24 or 25, 2025**, with the fact-finding conference to begin at **9:00 a.m.** as previously requested. This scheduling confirmation is **expressly contingent** upon compliance with outstanding federal requirements.

1. ADA Accommodation (Recording)

Under **Title II of the ADA (42 U.S.C. § 12131–12165)**, **Section 504 of the Rehabilitation Act (29 U.S.C. § 794)**, and the **Supremacy Clause of the U.S. Constitution (Art. VI, cl. 2)**, I am exercising my right to **video and audio record the proceeding** as a reasonable modification and auxiliary aid.

This right is affirmed by **28 C.F.R. § 35.130(b)(7)**, **Olmstead v. L.C., 527 U.S. 581 (1999)**, and **Tucker v. Tennessee, 539 F.3d 526 (6th Cir. 2008)**.

- CHRO's internal recording does not replace this right.
- Written confirmation of accommodation remains outstanding.
- For the record: **failure to confirm in writing constitutes denial of the accommodation.**

2. Due Process and Equal Protection

The **14th Amendment** requires that I be afforded **meaningful access and participation** in this proceeding. Any denial or failure to confirm my ADA accommodation constitutes not only a violation of ADA/Section 504 but also a **constitutional violation enforceable under 42 U.S.C. § 1983**.

3. Federal Preservation and Self-Reporting

Notices dated **July 29, August 11, and August 18, 2025** required written proof of **self-reporting** to the DOJ Civil Rights Division, FBI Civil Rights Unit, HHS Office for Civil Rights, and CMS Center for Program Integrity.

No such proof has been provided. This is a continuing violation of:

- **45 C.F.R. § 80.7(b)** – Civil Rights Compliance Reporting
- **42 C.F.R. § 455.15** – Medicaid Fraud & Abuse Reporting
- **28 C.F.R. § 35.171** – ADA Enforcement by DOJ

Failure to self-report constitutes **obstruction (18 U.S.C. § 1505)**, **destruction or concealment of records (18 U.S.C. § 1519)**, and **spoliation of evidence (FRCP 37(e))**. These are **personal, non-delegable duties**; each official who received these notices is individually responsible.

4. Whistleblower Retaliation

This matter also falls under federal whistleblower protections. Any interference with my ADA or federal rights constitutes **retaliation** under:

- **5 U.S.C. § 2302(b)(8)** – Whistleblower Protection Act
- **31 U.S.C. § 3730(h)** – False Claims Act Retaliation

5. Remedies

For clarity, failure to comply exposes parties to:

- **Injunctive relief** (to compel ADA compliance).
- **Compensatory and punitive damages** under 42 U.S.C. § 1983.
- **Attorney's fees and costs** under 42 U.S.C. § 1988.

6. Federal Jurisdiction

This matter is now under active jurisdiction of:

- U.S. Department of Justice, Civil Rights Division
- Federal Bureau of Investigation, Civil Rights Unit
- U.S. Department of Health & Human Services, Office for Civil Rights
- Centers for Medicare & Medicaid Services, Center for Program Integrity
- U.S. Office of Special Counsel
- U.S. Government Accountability Office

Any denial, delay, or silence regarding ADA compliance or federal self-reporting will be treated as **ongoing retaliation and obstruction** and referred immediately to these agencies.

7. Certification

This correspondence is submitted under **28 U.S.C. § 1746 (penalty of perjury)** and will be filed with DOJ, FBI, HHS OCR, CMS, OSC, and GAO as evidence of compliance or noncompliance with federal law.

Respectfully,
David Medeiros
Founder, ABI Resources LLC
Complainant, CHRO Case No. 2510183
Medicaid Acquired Brain Injury Waiver Program Provider

Best regards,
David Medeiros
[ABI Resources](#)
Medicaid Acquired Brain Injury ABI Waiver Program Provider
Honor all, Be the best.



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From: Keogh, Jo <Jo.Keogh@ct.gov>

Sent: Monday, August 18, 2025 8:15 AM

To: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Subject: RE: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

Good morning Mr. Mederios,

Please let me know by the end of the day whether you would prefer to schedule the fact-finding conference in this matter on Wednesday, September 24th or Thursday, September 25th at 10:00 a.m.

Sincerely,
Jo

Please contact me via email or mobile as I may be teleworking.



www.ct.gov/chro



Jo Keogh

Human Rights and Opportunities Representative
Legal Division

Commission on Human Rights and Opportunities
450 Columbus Blvd. Suite 3

Hartford, CT 06103 | AA/EOE

Office: 860-541-3420 | Mobile: 475-331-0251 | Fax: 860-241-4869 |

Jo.Keogh@ct.gov

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

Sent: Monday, August 11, 2025 10:07 PM

To: Keogh, Jo <Jo.Keogh@ct.gov>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Subject: Re: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

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08/11/2025

FEDERAL PRESERVATION, VIOLATION & SELF-REPORT NOTICE – CHRO Case No. 2510183 – Federal Jurisdiction Activated

TO:

UNITED STATES DEPARTMENT OF JUSTICE – CIVIL RIGHTS DIVISION

FEDERAL BUREAU OF INVESTIGATION – CIVIL RIGHTS UNIT

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES – OFFICE FOR CIVIL RIGHTS

CENTERS FOR MEDICARE & MEDICAID SERVICES – CENTER FOR PROGRAM INTEGRITY

U.S. OFFICE OF SPECIAL COUNSEL

CONNECTICUT OFFICE OF THE ATTORNEY GENERAL

CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION

Federal Oversight Activation

This email serves as formal notice under the **First Amendment**, **Fourteenth Amendment**, and **Supremacy Clause** that all recipients are under **active federal oversight** in connection with CHRO Case No. 2510183 – *Medeiros v. Connecticut Department of Consumer Protection*.

Receipt of this notice constitutes **actual knowledge** under:

- 45 C.F.R. § 80.7(b) – Civil Rights Compliance Reporting
 - 42 C.F.R. § 455.15 – Medicaid Fraud & Abuse Reporting
 - 28 C.F.R. § 35.171 – ADA Enforcement by DOJ
-

Personal Duty to Self-Report

Every individual receiving this notice has a **direct, non-delegable duty** to:

1. **Self-report** any personal involvement in violations connected to this matter.
2. **Report others** within your agency, office, or organization who may be involved.

Failure to comply will be treated as:

- **Obstruction of proceedings** – 18 U.S.C. § 1505
 - **Destruction, alteration, or concealment of records** – 18 U.S.C. § 1519
 - **Professional misconduct** under applicable bar or agency ethics rules, including Connecticut Rules of Professional Conduct 3.3 and 8.3.
-

Mandatory Preservation Order

Effective immediately, all recipients must preserve **all records, communications, and data** relevant to CHRO Case No. 2510183.

Any deletion, alteration, or failure to preserve after receipt of this notice will be deemed **spoliation** under **FRCP Rule 37(e)** and obstruction under **18 U.S.C. §§ 1505, 1519**.

Deadlines

1. **Written proof of self-reporting** to DOJ, HHS OCR, CMS, and FBI – **within 5 business days**.
 2. **Confirmation of ADA Title II and Section 504 compliance** for the CHRO fact-finding conference – **by August 18, 2025**.
 3. **Immediate assurance of preservation compliance** – upon receipt.
-

Attachments Provided

1. **Federal Unified Master Notice** – including enforcement notice, constitutional/statutory authority, Exhibit A – Federal Self-Reporting Matrix, and Certification of Service.
 2. **Service Certification Log** – for tracking and verification of notice delivery.
-

Enforcement & Referral

Noncompliance will be documented and referred to:

- DOJ Civil Rights Division
- FBI Civil Rights Unit

- HHS Office for Civil Rights
- CMS Center for Program Integrity
- U.S. Office of Special Counsel
- Relevant state bar disciplinary authorities

Submitted under penalty of perjury pursuant to 28 U.S.C. § 1746

Respectfully,

David Medeiros

Founder, ABI Resources LLC

Complainant, CHRO Case No. 2510183

Best regards,

David Medeiros

[ABI Resources](#)

Medicaid Acquired Brain Injury ABI Waiver Program Provider

Honor all, Be the best.



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From: Keogh, Jo <Jo.Keogh@ct.gov>

Sent: Monday, August 11, 2025 11:39 AM

To: Quinn, Rebecca <Rebecca.Quinn@ct.gov>; ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Subject: RE: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

Thank you for your response, Attorney Quinn. I am available on both Wednesday, September 24th and Thursday, September 25th at 10:00 a.m.

Mr. Medeiros, do you have availability on either of those dates?

Please contact me via email or mobile as I may be teleworking.



www.ct.gov/chro

Jo Keogh

Human Rights and Opportunities Representative

Legal Division

Commission on Human Rights and Opportunities

450 Columbus Blvd. Suite 3

Hartford, CT 06103 | AA/EOE



Office: 860-541-3420 | Mobile: 475-331-0251 | Fax: 860-241-4869 |
Jo.Keogh@ct.gov

From: Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Sent: Monday, August 11, 2025 11:00 AM

To: Keogh, Jo <Jo.Keogh@ct.gov>; ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>

Subject: Re: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

Hello all, the proposed dates will not work for DCP. They are available Sept. 24th and 25th. A 10 AM or later start is best due to conflicts.

Please note that the month of October will not work for DCP unless there is no alternative.

Mr. Medeiros, please be advised that while DCP agreed to allow you to record the fact-finding hearing with the understanding that CHRO's recording will be the official recording, it is not doing so as a reasonable accommodation under the law as it has no legal authority to do so in these circumstances.

Thank you,
Becky

From: Keogh, Jo <Jo.Keogh@ct.gov>

Sent: Wednesday, August 6, 2025 8:56:51 AM

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

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Subject: RE: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

Dear Mr. Medeiros,

I have no objection to your recording the fact-finding conference in this matter, although the CHRO recording of the conference will be the official recording of record for the CHRO's purposes. Attorney Quinn, does the Respondent agree?

As previously stated, the CHRO's conference recordings are provided to both parties upon request.

I have availability on the following dates in late September:

Monday, September 29, 2025, at 9:00 a.m.

Tuesday, September 30, 2025, at 9:00 a.m.

If both parties would please inform me of your availability on those dates, I would appreciate it.

Sincerely,
Jo

Please contact me via email or mobile as I may be teleworking.



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Jo Keogh

Human Rights and Opportunities Representative
Legal Division

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Jo.Keogh@ct.gov

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

Sent: Tuesday, July 29, 2025 4:42 PM

To: Keogh, Jo <Jo.Keogh@ct.gov>

Cc: Annon, Paulette <Paulette.G.Annon@ct.gov>; Avallone, Julianne <Julianne.Avallone@ct.gov>; CHRO.Capitol <CHRO.Capitol@ct.gov>; Quinn, Rebecca <Rebecca.Quinn@ct.gov>

Subject: CHRO Case 2510183 – Request for Late Scheduling, Earliest Time, and ADA Recording Confirmation

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Confirmation

Dear Ms. Keogh,

Thank you for honoring the separation of CHRO Case No. **2510183**. I respectfully request that the fact-finding conference be scheduled:

- On the **latest available date** (preferably late September or October)
- At the **earliest time slot available** in the morning (9:00 AM or earlier)
- On a **separate day** from any other case

Additionally, I respectfully request **formal written confirmation** from all parties that:

1. I am fully authorized to **video and audio record** the conference as an ADA accommodation under federal law.
2. No party, including CHRO or DCP legal counsel, will object to or interfere with this accommodation.
3. CHRO's internal recording will also be made available to me upon request.

This accommodation aligns with:

- 28 C.F.R. § 35.130(b)(7)
- *Olmstead v. L.C.*, 527 U.S. 581 (1999)
- *Tucker v. Tennessee*, 539 F.3d 526 (6th Cir. 2008)

If any party disagrees, I respectfully request a written response. This message and all related communications will be maintained as part of my federal case file.

Thank you for your time and attention.

Sincerely,
David Medeiros
Founder, ABI Resources
aabiwr@live.com | 860-942-0365

Best regards,
David Medeiros
[ABI Resources](#)
Medicaid Acquired Brain Injury ABI Waiver Program Provider
Honor all, Be the best.



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