



**OFFICE OF THE ATTORNEY GENERAL  
ANNUAL REPORT- FISCAL YEAR 2024-2025**

**At a Glance**

**WILLIAM TONG,**  
*Attorney General*

**EILEEN MESKILL,**  
*Deputy Attorney General*

*Established – 1897*

*Statutory authority: Conn. Gen. Stat. §§3-124 to 3-131*

*Central Office: 165 Capitol Avenue, Hartford, CT 06106*

*Average number of full-time employees: 323*

*Recurring General Fund operating expenses: \$ 37,126,466.00*

*Revenues Generated: \$ 445,704,536.00*

**Mission**

The critical missions of this office are to represent and vigorously advocate for the interests of the state and its citizens by performing, with diligence and integrity, the duties and directives assigned to the Attorney General by law, to ensure that state government acts within the letter and spirit of the law, to protect public resources for present and future generations, to safeguard the rights of all consumers, including our most vulnerable citizens, and to preserve and enhance the quality of life of all citizens of the State of Connecticut.

**Statutory Responsibility**

The Attorney General is the chief civil legal officer of the state. The Office of the Attorney General (OAG) serves as legal counsel to all state agencies. The Connecticut Constitution, statutes and common law authorizes the Attorney General to represent the people of the State of Connecticut to protect the public interest.

## **REVENUE ACHIEVED BY THE OFFICE OF THE ATTORNEY GENERAL**

During the 2024-2025 fiscal year, \$ 445,704,536.00 was generated by the Attorney General's Office, as described below, including \$ 173,974,069.00 deposited to the General Fund. The remaining monies were directly paid to, protected and/or used to benefit constituents, businesses, and other entities.

### **A. Revenue Generated for the General Fund**

Tobacco Settlement Fund Collections	\$ 105,476,995
Child Support Collections	24,432,575
DAS Collections	7,679,997
Privacy Violation Settlements	3,335,241
Department of Social Services Collections / Civil	5,771,724
DAS Workers Compensation Collections	1,251,348
Consumer Protection Collections	13,158,126
Miscellaneous Collections	12,868,064

**Total Revenue Generated for General Fund** **\$ 173,974,069**

### **B. Revenue Generated for Special Funds**

Opioid Settlement Fund	\$ 29,041,938
Special Environmental Projects	810,000
Unpaid Wage, Civil Penalty & Unemployment Tax	104,803
Consumer Fund Collection	2,160,056
Second Injury Fund Collection	295,912

**Total Revenue Generated for Special Funds** **\$ 32,412,709**

### **C. Revenue Generated for Individuals, Agencies and Businesses**

Child Support Collected/Enforced for Families	\$ 192,527,720
Consumer Assistance Section - Recovered for Consumers	1,950,923
Home Improvement Contractors - Consumer Restitution from Criminal Prosecution	268,073



Administrative Proceedings

Instituted	751
Completed	935
Pending	3,426

Antitrust/Fraud Investigations

Instituted	92
Completed	95
Pending	184

Consumer Protection Investigations

Instituted	48
Completed	21
Pending	83

Privacy Investigations

Instituted	1,867
Completed	1,916
Pending	334

Miscellaneous Investigations

Instituted	26
Completed	23
Pending	41

Home Improvement Contractor Cases

Instituted	63
Completed	66
Pending	218

Legal Documents Examined

Instituted	2,849
Completed	3,141
Pending	1,221

Health Care Advocacy Public Inquiries

Instituted	343
Completed	344
Pending	3

Consumer Advocacy Public Inquiries

Instituted	5,658
Completed	3,725
Pending	3,362

Consumer Protection Public Inquiries

Instituted	263
Completed	265
Pending	5,179

Privacy Public Inquiries

Instituted	142
Completed	128
Pending	33

Financial and Revenue Services Inquiries

Instituted	1
Completed	1
Pending	1

OAG Administration Public Inquiries

Instituted	1,214
Completed	381

Miscellaneous Public Inquiries

Instituted	1
Completed	1
Pending	1

Formal Opinions Issued	2
Informal Opinions Issued	22

**AFFIRMATIVE ACTION**

The Office of the Attorney General is firmly committed to equal employment opportunity. Exactly 58.67 % of the full-time attorney workforce consists of women and minorities. Women and minorities comprise 61.76 % of entry-level attorneys and 56.10 % of middle and higher-level attorneys.

**APPEALS DIVISION**

The Appeals Division directs all the Office’s appellate matters. It also prepares the Attorney General’s formal opinions and coordinates informal opinions.

In most of its appellate matters, the Office represents a party. That means the State – or its officials, agencies, and employees – is an active litigant with a direct stake in the case. In a significant minority of appellate cases, the Office is weighing in as a friend of the court – an *amicus curiae*. In those cases, the State is not officially a party but has an important interest in the outcome.

**PARTY REPRESENTATION DATA**

The OAG opened 159 appellate matters in which the Office represented a party during the fiscal year and closed 186.

<b>Table 1:</b>		7/1/21-6/30/22	7/1/22-6/30/23	7/1/23-6/30/24	7/1/24-6/30/25
Four-year trend of appellate representation matters (excludes <i>amicus</i> )	<i>Matters opened</i>	192	176	175	159
	<i>Matters closed</i>	211	155	218	186

The bulk of the office’s appellate representation came in child protection and public safety matters, which together made up more than 54% of the cases the Office opened during the year.

<b>Table 2:</b>		<i>Opened matters</i>	<i>% of all opened</i>
Share of new appellate matters opened by section (excludes <i>amicus</i> ), 7/1/24 – 6/30/25	<i>Administration</i>	2	1%
	<i>Child Protection</i>	55	34%
	<i>Collections/Child Support</i>	2	1%
	<i>Employment/Workers' Compensation</i>	9	6%
	<i>Energy/Environment</i>	18	11%
	<i>Finance</i>	4	3%
	<i>Health</i>	6	4%
	<i>Public Safety</i>	31	20%
	<i>Special Litigation</i>	23	14%
	<i>Torts</i>	1	1%
	<i>Transportation</i>	8	5%
	<i>TOTAL</i>	159	

As usual, the bulk of our appellate representation matters during the year were in state, rather than federal, appellate courts:

<b>Table 3:</b>		<i>Opened matters</i>	<i>% of all opened</i>
Share of appellate matters opened by court (excludes <i>amicus</i> ), 7/1/24– 6/30/25	<i>Connecticut Appellate Court</i>	88	55%
	<i>Connecticut Supreme Court</i>	27	17%
	<i>U.S. Court of Appeals – Second Circuit</i>	35	22%
	<i>Other federal appellate courts, including the U.S. Supreme Court</i>	9	6%

## SOME KEY CASES RESOLVED DURING THIS FISCAL YEAR

### Protecting Public Servants from Retaliatory Litigation: *Ammar v. Department of Children & Families*

DCF social workers testify in thousands of child abuse and neglect cases every year. The question here was whether a parent who loses custody or parental rights during one of those trials can later sue the social worker for alleged discriminatory conduct during the trial. The OAG persuaded the Connecticut Supreme Court that such suits are barred by the “litigation privilege” – a legal rule that prevents people from being sued for things they say or do during court proceedings. With this ruling, DCF workers can continue to vigorously advocate in court for vulnerable children without fear of retaliatory lawsuits from upset parents. Those parents can always defend themselves in an abuse or neglect case by claiming the worker discriminated against them outside of court. They just can’t separately suit the DCF worker for alleged discrimination based on the worker’s in-court conduct.

### Guarding Against Private Criminal Prosecutions: *In re Criminal Complaint & Application for Arrest Warrant*

The State’s Attorneys have exclusive authority to prosecute crimes, including criminal voter fraud. Yet, in this case, three Bridgeport voters tried to take matters into their own hands. Using an old law that hadn’t been invoked in decades, they asked a judge to issue arrest warrants for two people they believed illegally handled absentee ballots during the 2023 Bridgeport mayoral election. When the judge refused their request (saying the law was unconstitutional), the voters tried to appeal the decision.

At the OAG’s urging, the Connecticut Supreme Court dismissed their appeal, ruling that ordinary citizens can’t challenge a judge’s decision about whether to issue arrest warrants for other people. Even though the voters were allowed to make the original request, they can’t appeal when it gets denied because their interest in fair elections is no different from any other citizen’s general interest in the community.

### Defending Public Utility Ratemaking: *Aquarion Water Co. of Conn. v. PURA*

Aquarion Water Company, which supplies water to about 685,000 Connecticut residents, asked state regulators in 2022 to raise customer rates to cover \$700 million they had spent on infrastructure improvements since 2013, plus other costs like employee bonuses and conservation programs. PURA – Connecticut’s utility regulator – let Aquarion recover most of those costs from customers but excluded the employee bonuses and \$42 million worth of infrastructure improvements as unjustified. On appeal to the Connecticut Supreme Court, the OAG successfully defended most of PURA’s ruling, arguing that PURA had reasonably distinguished the excluded costs as lacking evidentiary support.



AMICUS

When the Office appears as a friend of the court, it often joins briefs written in partnership with other like-minded states and jurisdictions. Sometimes, the OAG leads the way, writing on its own or as the primary author in multistate efforts.

This fiscal year, the Office was the primary author in two amicus briefs. The first, filed in *AAPD v Dudek*, No. 1:25-cv-977 (D. D.C.), opposed actions by the Social Security Administration that jeopardized the agency’s ability to fulfill its statutory obligations. The second, filed in *Backus Federation of Nurses v. William Backus Hospital*, No. 3:24-cv-01658 (D. Conn.), highlighted the history of Connecticut General Statutes § 19a-490l and its role in safeguarding public health and safety.

We reviewed, analyzed, and sometimes contributed to well over 100 amicus briefs written by other states. During this fiscal year, the State joined 96 of those briefs. The briefs we joined addressed some of the most important issues, in some of the most important cases, resolved this year. At the U.S. Supreme Court, for instance, we advocated for continued access to critical preventative care in *Kennedy v. Braidwood Management, Inc.*, sought to prevent the proliferation of ghost guns in *Bondi v. Vanderstock*, and fought to protect access to gender affirming care for transgender youth in *U.S. v. Skrmetti*,

OPINIONS

A formal opinion is a published written opinion on a question of law, requested by legislative leaders, executive department heads, or state boards and commission. Formal opinions are archived on the Attorney General’s website. Informal opinions are private, confidential legal questions from the OAG’s client agencies.

Table 5:		7/1/21-6/30/22	7/1/22-6/30/23	7/1/23-6/30/24	7/1/24-6/30/25
Four-year trend of formal opinions	Number of formal opinions	0	5	1	2

We offered dozens of informal opinions to state agencies, and this year we published two formal opinions. The first explained that the General Assembly’s 2024 budget process adhered to Connecticut’s Constitution and other applicable laws, and the second explained that the transfer of interest earned on ARPA funds from the Treasurer’s Interest Credit Program to the General Fund did not violate Special Act 21-1.

## **SECTIONS**

### **ANTITRUST SECTION**

#### **Antitrust Enforcement**

The Section's antitrust mandate is focused on identifying and deterring anticompetitive conduct and obtaining civil penalties, restitution, and injunctive relief through fair and effective enforcement of antitrust laws. This benefits the people, state agencies, and businesses of Connecticut by promoting transparent and competitive pricing, increasing consumer choice, and expanding access to high-quality products and services. During the past year the Section devoted significant resources to ensuring competition in Connecticut's healthcare, housing, and technology markets. In addition, the Section has advocated for effective competition policy at the state and national levels by promoting procompetitive legislation and filing legal briefs in important antitrust cases.

#### **1. Generic Pharmaceutical Manufacturers**

The Office of the Attorney General ("the Office") has continued to lead the bipartisan Multistate civil prosecution of generic pharmaceutical companies and certain of their executives responsible for alleged price fixing and market allocation agreements that increased generic drug costs for state governmental purchasers and consumers. The Multistate is litigating three comprehensive complaints filed in 2016, 2019, and 2020.

These cases, commonly referred to as "GDMS", originated in July 2014. At that time, the Office initiated an investigation into the cause of suspicious price increases of certain generic pharmaceuticals. In the fall of 2016, after accumulating significant evidence of potential antitrust violations, the Office organized a bipartisan working group of state Attorneys General to assist with the investigation, which had broadened considerably since its inception.

In December 2016, the Office and 19 other state Attorneys General filed the first of the three federal antitrust lawsuits in Connecticut against six generic pharmaceutical manufacturers alleging the companies had engaged in a well-coordinated and long-running conspiracy to fix prices and allocate markets for two generic pharmaceuticals: doxycycline hyclate delayed release and glyburide. The lawsuit was subsequently transferred to a Multidistrict Litigation (MDL) in the Eastern District of Pennsylvania to coordinate with the ongoing private generic pharmaceutical actions that involved common questions of fact.

In May 2019, the Office led an expanded 44-state coalition by filing a second lawsuit against Teva Pharmaceuticals and 19 of the nation's largest generic drug manufacturers, alleging a vast conspiracy to inflate and manipulate prices, reduce competition and unreasonably restrain trade for more than 100 different generic drugs. The lawsuit, which was filed in U.S. District Court for the District of Connecticut and subsequently transferred to the federal court in the Eastern District of Pennsylvania, also names 15 individual senior executive defendants at the heart of the conspiracy who were responsible for sales, marketing, pricing, and operations. The drugs at issue account for billions of dollars of sales in the United States, and the increased prices affect the health insurance market, taxpayer-funded healthcare programs like Medicare and Medicaid, and individuals who

must pay artificially inflated prices for their generic prescription drugs.

In 2020, the Office led the filing of the third lawsuit in the coalition's ongoing investigation into price fixing in the U.S. generic drug market. The civil lawsuit, brought on behalf of 51 states and U.S. territories, alleges that 26 corporate defendants and 10 individual defendants fixed the prices on 80 topical generic drugs that account for billions of dollars of sales in the United States. The topical drugs at the center of the complaint include creams, gels, lotions, ointments, shampoos, and solutions used to treat a variety of skin conditions, pain, and allergies. The complaint was filed in the U.S. District Court for the District of Connecticut and again subsequently transferred to the federal court in the Eastern District of Pennsylvania. The Complaint, akin to the first two actions, seeks damages, civil penalties, and actions by the court to restore competition to the generic drug market.

In May 2021, the Court selected the third Complaint as the bellwether case, reconsidering its earlier ruling selecting the Teva case as bellwether due to the intervening indictment of Teva by the U.S. Department of Justice on related claims. In November 2021, various Defendants filed motions to dismiss the June 2020 Complaint and the Multistate responded. In February 2023, the Court granted in part and denied in part the defendants' motion to dismiss claims for injunctive relief under federal law. The Court denied all other motions to dismiss except the motion to dismiss the state law claims.

In January 2024, the Multistate, relying on the passage of the 2022 State Antitrust Enforcement Venue Act that provides state Attorneys General the authority to choose where to litigate state antitrust actions, moved the federal Judicial Panel Multidistrict Litigation (JPML) to have the three Complaints sent back to federal district court in Connecticut. The JPML remanded the trio of cases to Connecticut, thereby separating them from the expansive generic pharmaceutical MDL centralized in Pennsylvania. The remand was a significant win as it validated the intent of 2022 State Antitrust Enforcement Venue Act and affords state Attorneys General the same benefit federal antitrust enforcers receive—a level of choice as to where to litigate. The three actions are now before the United States District Judge Michael P. Shea of the District of Connecticut.

In November 2024, Judge Shea granted in part and denied in part 36 Defendants' joint motion to dismiss the state law claims. He determined that Connecticut's state law claims could proceed along with the majority of the other States' claims.

In 2025, the Multistate announced a \$10 million dollar settlement with Heritage Pharmaceuticals, a main conspirator in the first case Complaint and a \$39.1 million dollar with Apotex Corp. a conspirator sued in both the first and second Complaints. In July 2025, the Multistate prevailed in its partial motion for summary judgment against Sandoz Inc., Taro Pharmaceuticals USA Inc., and Hector Armando Kellum, a former Sandoz Executive, for federal and state per se violations alleged in the third Complaint. The violations include price fixing, market allocation, and bid rigging related to these defendants' deferred prosecution agreements in their criminal cases with the Department of Justice (DOJ) and, therefore, are limited in time and scope.

Litigation in all three cases is ongoing and, although not scheduled, the first trial is expected to commence before 2029.

## **2. Housing: RealPage**

In August 2024, the Office joined the DOJ and eight other states in filing a civil antitrust lawsuit against RealPage, and subsequently six of the nation's largest multifamily landlords. Plaintiffs allege that RealPage contracts with competing landlords who agree to share with RealPage nonpublic, competitively sensitive information about their apartment rental rates and other lease terms to train and run RealPage's algorithmic pricing software. This software then generates recommendations, including on apartment rental pricing and other terms, for participating landlords based on their and their rivals' competitively sensitive information. The complaint further alleges that in a free market, these landlords would otherwise be competing independently to attract renters based on pricing, discounts, concessions, lease terms, and other dimensions of apartment leasing. RealPage also uses this scheme and its substantial data trove to maintain a monopoly in the market for commercial revenue management software.

The case is before the United States District Judge William L. Osteen, Jr. in the Central District of North Carolina. RealPage and the Defendant Landlords filed their motions to dismiss the operative complaint in February 2025, and April 2025, respectively. Plaintiffs most recently filed their response in opposition to Defendant Landlord's motions in May 2025. The motions have been fully briefed and are pending.

## **3. Big Tech**

Over the last few years, policymakers, members of the business community, consumer advocates, and academia have raised concerns about the size and potential market power of large U.S.-based technology companies—“Big Tech”—and their respective ability to raise prices, diminish quality, and stifle innovation and competition in established and burgeoning markets. To address those issues the Attorney General is working in collaboration with other Attorneys General to investigate the business practices of large technology companies. These complex antitrust investigations and resulting litigation are ongoing.

### **a. Amazon**

In September 2023, the Office, as a multistate lead with the New York and Pennsylvania Offices of Attorneys General, joined the Federal Trade Commission (FTC) and more than 14 other states in suing Amazon.com alleging the online retail and technology company is a monopolist that uses a set of interlocking anticompetitive and unfair strategies to illegally maintain its monopoly power. The FTC and States allege that Amazon's actions allow it to stop rivals and sellers from lowering prices, degrade quality for shoppers, overcharge sellers, stifle innovation, and prevent rivals from fairly competing against Amazon. Plaintiffs also allege that Amazon violates the law not because it is big, but because it engages in a course of exclusionary conduct that prevents current competitors from growing and new competitors from emerging. Amazon ensures that no current or future rival can threaten its dominance. Amazon's far-reaching schemes impact hundreds of thousands of products bought by over a hundred million shoppers, amounting to hundreds of billions of dollars in retail sales every year. Connecticut is also one of six states seeking disgorgement for Amazon's pricing algorithm codenamed “Project Nessie,” through which Amazon tested its ability to lead competitors in raising prices on certain products.

The case is before the United States District Judge John Chun in the Western District of Washington. Amazon filed a motion to dismiss the operative Complaint on December 8, 2023. The motion has been fully briefed and is pending. The parties are eight months into fact discovery, which will close in October 2025. Expert discovery will close in June 2026. A bench trial is anticipated in February 2027.

b. Google Search

Since 2020, the Attorney General joined a coalition of 48 other Attorneys General in litigating a case against Google, alleging a monopoly position that derives principally from its overwhelming dominance of the market for general internet searches. The suit, often referred to as the “Google Search” case, alleges that Google uses its massive financial resources to lock up opportunities that competitors might otherwise be able to use to reach consumers. The Multistate Google Search Case and separate Department of Justice Google Search cases were coordinated and went to trial before the U.S. District Judge Amit Mehta in the U.S. District Court for the District of Columbia in September 2023 with closing arguments in May 2024. In August 2024, Judge Mehta issued a decision in the liability phase and found that Google illegally maintained its monopoly power in the “google search” and the “general search text advertising” markets by entering exclusive dealing agreements with certain partners (e.g., Apple, Samsung and Verizon) making Google’s search engine the exclusive default on smart phones and web browsers. As part of these agreements, Google paid these companies tens of billions of dollars in exchange for the exclusive default status, which Judge Mehta determined had allowed Google to maintain its dominant share in the markets for more than ten years. Judge Mehta presided over the remedies phase of the case in April and May 2025. A remedies decision is expected to be issued in August 2025.

c. Google In App Play Store Settlement

The Attorney General and a bipartisan coalition of 52 Attorneys General filed a lawsuit in 2021 against Google alleging antitrust violations involving the tech giant’s app store, often referred to as the “Google Play Store” case. The suit alleged exclusionary conduct relating to the Google Play Store for Android mobile devices and Google Billing, including using its monopoly power to substantially shut out competing app distribution channels while charging consumers as much as 30 percent for purchasing apps and in-app purchases. On the cusp of trial scheduled for late 2023 in the U.S. District Court for the Northern District of California, the States and Google entered mediation and reached a \$700 million settlement agreement requiring Google to pay restitution to consumers and make significant changes to how it allows app developers to sell products on Android devices. The settlement funds were placed in escrow while the Court turned its attention to *Epic Games, Inc. v. Google LLC*, in which private plaintiff alleged similar claims. In July 2025, the Court held in Epic’s favor in *Epic Games, Inc. v. Google LLC* and returned to the States’ proposed settlement. The States’ settlement is now pending preliminary approval, contingent upon a showing that it does not conflict with the injunctive relief sought by Epic.

d. Google Ad Tech

In January 2023, the Attorney General joined the U.S. Department of Justice (DOJ) and seven states in bringing a new civil antitrust suit challenging Google's dominant grip on the online advertising industry, which allows the company to dictate how digital ads are sold and the terms under which its rivals can compete. The lawsuit, often referred to as "Google AdTech", alleges that Google uses its monopoly power to exclude rivals from the publisher, the advertiser, and the ad exchange sections of the digital advertising market, thereby monopolizing multiple digital advertising technology products. A three-week bench trial opened in September 2024, before Judge Leonie M. Brinkema in the U.S. District Court for the Eastern District of Virginia. Closing arguments were delivered in November 2024. In April 2025, Judge Brinkema issued a decision in the liability phase and found Google liable for illegally acquiring and maintaining monopoly power in two AdTech markets: the publisher ad server market (which manage the sale and display of advertisements on the publisher's website) and the ad exchange market for open-web display advertising (which conduct the real-time auctions to place display advertisements on websites). The Judge also found Google liable for tying its products in the two markets together. The remedies phase of the case is scheduled to begin on September 22, 2025.

e. Apple

In March 2024, the Office joined the DOJ and 15 other Attorneys General in filing a civil antitrust lawsuit against Apple for monopolization or attempted monopolization of smartphone markets in violation of Section 2 of the Sherman Act. The DOJ and attorneys general amended their complaint on June 11, 2024, adding as plaintiffs Indiana, Massachusetts, Nevada, and Washington.

The Plaintiffs filed suit in the United States District Court for the District of New Jersey and allege that Apple illegally maintains a monopoly over the smartphone markets by selectively imposing contractual restrictions on, and withholding critical access points from, developers of applications that may compete with Apple. Apple undermines apps, products, and services that would otherwise make users less reliant on the iPhone and the Apple ecosystem, promote interoperability, and lower costs for consumers and developers. Apple exercises its monopoly power to extract more money from a broad range of market participants including consumers, developers, content creators, artists, publishers, small businesses, and merchants. Through this monopolization lawsuit, the DOJ and state Attorneys General are seeking relief to restore competition to these markets on behalf of the American public.

In August 2024, Apple moved to dismiss the amended complaint and Judge Julien Neals denied Apple's motion in June 2025. The parties are now engaged in discovery, which will close on January 8, 2027.

**4. Entertainment: Ticketmaster-Live Nation**

In May 2024, the Office joined the DOJ and a bipartisan coalition of 28 other Attorneys General in filing a civil antitrust lawsuit against Ticketmaster LLC (Ticketmaster) and its parent company Live Nation Entertainment Inc. (Live Nation) for monopolization and other unlawful conduct that thwarts competition in markets across the live entertainment industry. The lawsuit was filed in the United States District Court for the Southern District of New York and seeks structural relief including restoration of competition in the live concert industry, increased choices and lower prices for fans,

and aims to open venue doors for working musicians and other performance artists.

Plaintiffs allege that Ticketmaster-Live Nation unlawfully exercises its monopoly power in violation of Section 2 of the Sherman Act to the detriment of fans, performers, and venues, promoters, and rival ticketing platforms. As a result of its conduct, music fans in the United States are deprived of ticketing innovation and forced to use outdated technology while paying more for tickets than fans in other countries.

Plaintiffs further allege that Ticketmaster-Live Nation has unlawfully maintained monopolies in several concert promotions and primary ticketing markets and engaged in other exclusionary conduct affecting live concert venues, including arenas and amphitheaters. Ticketmaster-Live Nation's exclusionary practices fortify and protect what it refers to as its "flywheel," which is Ticketmaster-Live Nation's self-reinforcing business model that captures fees and revenue from concert fans and sponsorship, uses that revenue to lock artists into exclusive promotion deals, and then uses its powerful cache of live content to sign venues into long term exclusive ticketing deals, thereby starting the cycle all over again. As long as Ticketmaster-Live Nation is controlling the market through its flywheel model, rivals cannot compete on the merits.

The lawsuit asks the court to restore competition in the live entertainment industry by ordering Live Nation to divest Ticketmaster and prohibiting Live Nation from engaging in its anticompetitive practices. The State Plaintiffs are also seeking damages and civil penalties.

In March 2025, the court denied Defendants' motion to dismiss, holding the Plaintiffs plausibly allege a tying claim and that the State Plaintiffs plausibly allege antitrust standing for their damage's claims.

Trial is scheduled to begin in March 2026. In May 2025, Judge Arun Subramanian granted the Plaintiffs' motion to bifurcate the trial with liability and damages to be tried first, followed by a second phase for equitable remedies.

## **5. Healthcare Markets**

Ensuring open and vigorous competition in Connecticut's health care markets is a chief law enforcement objective of the Attorney General. The benefits to consumers from competitive and healthcare markets usually take the form of lower prices, sufficient consumer choice, access to providers, and high-quality care. During this fiscal year, the Antitrust Section reviewed several proposed acquisitions of physician group practices by hospitals, health systems, payors, and other entities, as well as possible anticompetitive conduct in the Connecticut healthcare market. These investigations are confidential and non-public unless the Attorney General ultimately challenges the acquisition or anticompetitive conduct in court or reaches a settlement.

### **a. Northwell**

In 2024, the Attorney General and the Attorney General of New York reached an agreement of assurances with Northwell Health, Inc. and Northwell Healthcare, Inc. (collectively "Northwell") and Nuvance Health (Nuvance) to preserve labor and delivery services at Sharon Hospital and to strengthen access to local healthcare in Western Connecticut, resolving the antitrust investigation

into the proposed affiliation between the two hospital systems. Nuvance is comprised of Danbury Hospital, New Milford Hospital, Norwalk Hospital, and Sharon Hospital in Connecticut, as well as three hospitals in New York, and Northwell Health is a comprehensive, integrated health care delivery system that is comprised of 21 hospitals across New York.

Under the agreement, Northwell Health agreed to several enforceable conditions for five years to maintain competition in the healthcare market and affordable access to healthcare. The key conditions included: preserving, strengthening, and expanding women's health services, including maternity and labor and delivery services at Sharon Hospital; committing financial and operational resources towards the installation of a unified electronic medical records system, including related IT and cybersecurity expertise required for improvements of Nuvance's IT infrastructure and enhancement of data security; and negotiating rates for reimbursement of services independently for Connecticut and New York facilities.

b. Physician Group Practice Merger Settlement Agreement

In May 2025, the Office reached a settlement agreement with a large single specialty physician practice following a physician group notice of material change filing whereby it notified the Office of its intent to acquire a small physician practice in the Western Connecticut Planning Region that would have otherwise closed its doors absent the acquisition due to unsustainable staffing and physician burnout. Under the terms of the settlement, the surviving entity agreed to significant conditions, including committing to continued participation in Medicaid, waiving physician non-competes, and implementing an antitrust compliance program. The Office determined that these conditions were appropriate to significantly mitigate the transaction's presumptively anticompetitive impact and accepted them in lieu of continuing its investigation or seeking to block the acquisition.

## **6. Opioids**

Connecticut continues to be a leader in negotiating settlements with the opioids and pharmacy industry. Connecticut received \$29,447,617.93 in the past fiscal year through the Attorney General's previously negotiated landmark settlements with distributors, manufacturers, pharmacies, and marketing firms. This amount does not include the 15% of settlements that went directly to participating municipalities across Connecticut. In January 2025, the Attorney General announced new \$7.4 billion-dollar national settlements with Purdue Pharma and members of the Sackler family to resolve claims related to the company and its former owners' role in fueling the prescription opioid crisis. In June 2025, the Attorney General announced that all 55 Attorneys General eligible to do so signed on to the settlement, putting the settlement on track for a tentative effective date in the first quarter of 2026. Connecticut expects to receive up to \$64 million over eight years from the settlements to help address the opioid crisis.

## **7. Asphalt Industry**

In December 2024, the Office finalized a \$360,756 settlement with two asphalt paving companies and their principals, resolving an investigation initiated in early 2023 into illegal bid-rigging on a state paving contract in violation of the Connecticut Antitrust Act. The investigation, conducted by the Section, found that the companies, owned by a husband and wife, shared sensitive pricing information and pre-coordinated winning bids. Under the settlement agreement, the two companies



and their respective principals were alleged to have harmed competition in the supply of asphalt paving services to state agencies and municipalities that relied upon the bids submitted under the state contract by engaging in a bid-rigging conspiracy that created a false appearance of competition and manipulated the competitive bidding process for subcontracted work in violation of federal and state antitrust laws. In addition to the civil penalties, the companies and their principals agreed to divest and dissolve one of the two companies. The remaining company agreed to adopt a robust antitrust compliance program to help ensure that they do not violate the antitrust laws in the future and to cooperate with future antitrust investigations.

## **8. Other Investigations**

In addition to the specific investigations and cases listed, the Antitrust Section received and investigated complaints from Connecticut residents and businesses that led to several non-public inquiries and investigations across a variety of industries in a number of geographic and product markets. These inquiries and investigations, while non-public, are a crucial to deterring anticompetitive conduct and ensuring consumer choice and access to high-quality products and services.

## **CHILD PROTECTION SECTION**

The Child Protection Section represents the Department of Children and Families (DCF), which is the state agency responsible for protecting Connecticut's children from abuse and neglect; strengthening families by enhancing parental capacity for good childcare; and providing a safe and nurturing home for children when necessary. *See* Conn. Gen. Stat. § 17a-101(a). To accomplish these goals, DCF investigates reports of abuse and neglect and provides treatment services and other non-legal interventions to support families across the state. When DCF substantiates reports of abuse or neglect and initiates legal proceedings to protect a child, the Assistant Attorneys General (AAG) of the Child Protection Section advocate on behalf of DCF in the Superior Court for Juvenile Matters.

In the 11 juvenile courts throughout the state, the attorneys and support staff of the Child Protection Section help DCF obtain the authority to supervise neglected children who remain in their parents' care or remove children who cannot safely remain in the home and place them in foster care. After a juvenile court orders DCF to remove a child, our staff litigates the case as DCF attempts to reunify the child with their parents or, if those efforts fail, secure an alternative permanent home for the child through a transfer of guardianship or adoption following termination of parental rights. In 2024-25, Child Protection AAGs – with the invaluable assistance of the section's secretaries, administrative assistant, and paralegals – were responsible for handling over a thousand trial matters, which led to approximately 500 children being adopted and finding their “forever” home.

Because of the enormous trial load, the Section also handles a large volume of appeals in our state appellate courts, most of which consists of parents appealing the termination of their parental rights. In 2024-2025, the Child Protection Section handled approximately 35 appeals in

the Connecticut Appellate Court, and 3 at the Connecticut Supreme Court. In approximately 20 of those appeals, the appellants sought further appellate review with the Connecticut Supreme Court and our AAGs successfully persuaded the Connecticut Supreme Court to deny further review. Though many of the appeals raised issues of evidentiary sufficiency, several presented complex issues. Most notably, the Child Protection Section successfully sought reversal of a trial court's decision to return two young children to an unsafe parent who remained homeless, suicidal, and under the influence of illicit substances – a decision that the trial court rendered unilaterally, without providing DCF an opportunity to present evidence. In another appeal, the Appellate Court, for the first time, addressed and defined the standard for placing children in out-of-state foster homes. Other appeals involved issues such as foster parents' ability to intervene, a parent's right to substantive and procedural due process; a parent's fifth amendment right to remain silent; a parent's right to equal protection of the laws; ineffective assistance of counsel; writs of mandamus; and evidentiary issues.

Lastly, in addition to representing DCF in our state juvenile and appellate courts, the members of the Child Protection Section also represent DCF in all administrative appeals brought in the Superior Court challenging the rulings of DCF administrative hearing officers. In the past year, the Child Protection Section successfully defended multiple administrative appeals in which the Superior Court upheld DCF's decision to place certain perpetrators of sexual and physical abuse on its Central Registry to protect all children from them.

### **COLLECTIONS/CHILD SUPPORT SECTION**

The Child Support and Collections Section instituted and litigated approximately 4,118 child support and civil collections cases this past year in state and federal courts. Section staff effectively coordinated with our agency partners to collect \$ 237 million in child support payments for the benefit of the State of Connecticut and out-of-state families. The vast majority of this amount benefitted needy children.

The section's collections efforts on behalf of the Department of Administrative Services (DAS) and several other state agencies recovered over \$11.5 million dollars for the General Fund.

#### **Child Support**

The section partners with the Office of Child Support Services within the Department of Social Services (DSS-OCSS) and the Support Enforcement Services division of the Connecticut Judicial Branch (SES) to effectuate Title IV-D of the Federal Social Security Act.

This Act requires states to provide child support services for all children in state and some without the state. The section attorneys represent DSS-OCSS to establish parentage and child support obligations and assists SES with its enforcement and modification of child support orders. This support work is performed by 14 attorneys devoted primarily to child support matters. They are required to appear in numerous courts and venues. These include thirteen (13) Superior Court Judicial District-Family Divisions, where attorneys are exposed to matters on a daily basis often with little notice; fourteen (14) Family Support Magistrate (FSM) courts, covering at least (forty) 40 dockets throughout the month; sixty (60) Probate Courts in order to monitor Termination of Parental Rights petitions filed by or against child support obligors; and Juvenile Courts on appeals from

Probate Court and Superior Court-Family Matters on appeals from the FSM.

During the 2025 Fiscal Year, 3,367 child-support cases were opened in our section on behalf of DSS-OCSS. The section's attorneys represented SES in approximately 242 cases involving modifications to existing support orders. In addition, section attorneys assisted SES with the enforcement of out-of-state orders under the Uniform Interstate Family Support Act. Section support staff reviewed close to 20,000 dissolution and custody actions in Superior Court Family Matters for a state interest and section attorneys filed appearances in approximately 1102 of those cases. Staff also reviewed 515 termination petitions in Probate Court to ensure that the state's and children's financial interests were protected. Section Attorneys filed 12 Objections to self-termination petitions brought by child support obligors seeking to avoid payment and of the 8 that went to disposition all were either denied, dismissed or withdrawn. The section attorneys also argued several child support related matters on appeal to the Superior Court.

### **Collections**

The section's collection efforts helped to recover over \$11.5 million in reimbursement to the State's General Fund.

The collections work involves representing DAS to recover debts owed to the state, including Medicaid and costs of incarceration. The section staff who focus on collections are responsible for monitoring numerous trusts and estates in Probate Court. The attorneys are responsible to litigate the more complex and highly contested cases on behalf of numerous state agencies, boards and commissions. In addition to DAS, these include on a regular basis DSS, Department of Revenue Services (DRS), Department of Corrections (DOC), and can include the Department of Higher Education, the Unemployment Division of the Department of Labor (DOL), the Second Injury Fund, the Connecticut State University System, the Office of the Secretary of the State, and the State Elections Enforcement Commission.

Part of the total amount recovered by collections staff includes \$2,737,957.25 in penalties and fines from foreign (unregistered) businesses in cooperation with the Secretary of the State's Commercial Recording Division. The section also recovered approximately \$34,000 on behalf of the DOC for cost of incarceration owed by inmates and approximately \$15,000 for unpaid medical care provided by John Dempsey Hospital.

### **Foreclosure Unit:**

The foreclosure team within collections recovered \$959,185.42 for DRS, DAS, DOL, DSS IV-D and SIF through 37 cases during the last fiscal year and opened 210 new foreclosures. They are currently monitoring 306 open cases and have reviewed approximately 1,400 new matters and writs to determine if there is equity, whether DRS has been paid, or the matter needs to be forwarded to DRS for inchoate succession tax.

### **Bankruptcy Unit:**

The section's bankruptcy attorneys and support staff collected approximately \$471,000 this fiscal year on behalf of numerous agencies in federal proceedings throughout the country. These attorneys

are responsible for protecting tax claims of the DRS and DOL as well as the interests of other state agencies such as DAS, DSS, DOB, DECD, the Second Injury Fund, Connecticut State Universities and Community Colleges, Superior Court Judges, and the Client Security Fund. This fiscal year we have initiated protocols to ensure that DSS's interest in child support debt in bankruptcy cases is protected and debtor's child support obligations are paid. The Section's bankruptcy attorneys litigate complicated questions of law involving matters of first impression and provide ongoing guidance to all state agencies. The bankruptcy attorneys provide general assistance to other sections such as the Labor/Worker's Compensation unit regarding wage claims and unemployment fraud cases in bankruptcy and will assist other sections in cases involving bankruptcy issues which greatly reduces legal fees that would otherwise be paid to private local counsel. The unit successfully defended Colleges and Universities against trustees alleging that tuition paid by debtors on behalf of adult children are fraudulent conveyances and must be returned to the estate. The unit's work in this area greatly reduced the state's exposure and seems to have eliminated the filing of such claims over the course of the last year.

### **Appeals**

The section also participated in several appeals filed in the Superior Court from the FSM court and Probate court. We are currently appellee before the Appellate Court in two matters on appeal from Superior Court decisions in child support matters, one originating in the FSM and the other originating in a dissolution action in the Superior Court for Family Matters.

### **Cross-Section Collaboration**

The staff in Child Support and Collections also perform work outside their regular section assignments, including defending cases for Public Safety in federal court; assisting Special Litigation's defense in federal court against the ACLU's constitutional challenge to Cost of Incarceration statutes; participating on the litigation team handling Consumer Protection's multi-district litigation against META, Snapchat, and TikTok for violations of COPPA and CUTPA.

### **DEI**

The Child Support and Collections staff are committed to the office's DEI initiatives and to promoting comradery and a positive work environment. Several staff members actively participate in the DEI and Work Culture committees, including chairing sub- committees, organizing DEI and Work Culture events, leading the Women's ERG, and facilitating the internship program for the Farmington Valley Training School.

## **CONSUMER ADVOCACY SECTION**

The Consumer Advocacy Section ("CAS"), during this FY 2024 – 2025, consisted of three attorneys, one investigator, three secretaries, and was supervised by Section Chief Inez Diaz-Galloza. CAS works tirelessly to educate and assist constituents with thousands of consumer related complaints and inquiries. CAS is responsible for responding to thousands of phone calls, triaging, and referring calls as appropriate, processing incoming complaints, investigating, mediating disputes

between parties, and referring complaints to the proper department or partner agency for possible enforcement and review. CAS staff are the front line of the OAG's consumer and constituent advocacy efforts and often connect with consumers at their most vulnerable and challenging times.

During the past fiscal year, CAS received and responded to thousands of electronic, written and telephone complaints. Due to CAS' mediation efforts, over \$1,950,933.80 was refunded or credited to Connecticut's consumers.

CAS received 5,595 complaints across multiple areas, including, but not limited to, auto, home improvement/repair, travel, social media, telecommunication, and internet/cable as well as reports of potential scams. Moreover, CAS fielded over 7,743 telephone calls and thousands of additional emails from concerned constituents.

CAS improved cross collaboration both with other sections in the OAG and state agencies, resulting in enhanced communication and processes, which supports both the ongoing litigation of the OAG and better results for constituents. CAS staff analyzes complaint-driven data to track patterns of potential unfair trade practices and compliance with the Office's major settlements and stipulated judgments. CAS further provides essential resources to constituents and consumers as it engages in front-facing communications with constituents regarding, for example, the OAG's lawsuits against various solar power companies and auto dealerships, as well as local and nation-wide data breaches.

The Office continued to staff, manage, and operate the Elder Justice Hotline which has been instrumental in assisting thousands of Connecticut seniors facing significant financial, social, and physical issues related to aging. In addition to responding to 1,578 incoming hotline calls, CAS referred numerous complaints to our local, State and Federal partners within the Coalition of Elder Justice and also opened and responded to over 112 new Elder Justice focused complaints. CAS also educated the public and targeted its outreach efforts to promote the hotline and provide numerous scam prevention talks at Senior Centers throughout the State.

## **CONSUMER PROTECTION SECTION**

The Consumer Protection Section protects Connecticut's consumers by investigating and litigating consumer protection matters under the authority of the Connecticut Unfair Trade Practices Act ("CUTPA") and other state and federal statutes. The section advises the Attorney General and the Commissioner of the Department of Consumer Protection on consumer protection matters and represents and defends the Department of Consumer Protection in court. The section also advocates on behalf of Connecticut's energy and utility ratepayers in state and federal fora. Some highlights from the 2024-2025 fiscal year are described below.

### **Stone Academy**

On July 13, 2023, the Attorney General sued Stone Academy following the abrupt closure of the school, alleging numerous violations of the Connecticut Unfair Trade Practices Act. The State also asked the court to attach millions of dollars of Stone's and Joseph Bierbaum's assets during the pendency of the litigation to prevent defendants from offloading or shifting resources to evade accountability. On February 27, 2025, the Connecticut Superior Court approved a \$5 million settlement with Stone Academy and its owners to resolve the State's claims. The bulk of this

settlement will go directly to impacted students. The State will not retain any of the \$5 million, aside from \$150,000 which will be used to help Stone students prepare for exit exams. In addition to the \$5 million cash payment, the settlement outlines a series of measures to assist impacted students in completing their education and professional exams, including remedial programs and the potential for students to complete their studies through Griffin Hospital School of Allied Health Careers. In addition, Stone owner Joseph Bierbaum will be barred from employment anywhere in higher education for five years and should Stone Academy's former owners and officers seek to open, own or operate any other for-profit schools in Connecticut, they must notify the Office of the Attorney General. And separately, the Office of the Attorney General has petitioned the United States Department of Education to discharge student loan debt related to Stone Academy.

### Ghost Guns

On September 4, 2024, the Attorney General announced a \$425,000 settlement with Hell Fire Armory, a North Carolina gun dealer, following illegal ghost gun sales in Connecticut. The company has further agreed to reconfigure its website and add disclaimers and controls to prevent sales in Connecticut and for six years, Hell Fire will be required to report their compliance to the Office of the Attorney General. If the company complies with all terms of the agreement for those six years, all but \$16,000 of the civil penalty will be suspended.

And, on October 2, 2024, the Attorney General announced a settlement with Utah-based AR Industries arising from the company's sale of illegal untraceable ghost gun parts. Pursuant to this settlement, AR Industries must dissolve, surrender its internet domain, and deactivate all social media accounts. Moreover, AR's principal must report annually whether she or any agents of AR have formed any business to resume sale of ghost gun parts. Should any agents resume sale of ghost gun parts through a new business, she must attest to full compliance with Connecticut laws. Should AR associates sell illegally in Connecticut, or violate any other terms of the settlement, a \$205,000 penalty will be enforced.

### Delta-8

The Attorney General continues to combat the proliferation of dangerous high-THC products in Connecticut, as evidenced by the \$4.93 million judgment the Office obtained against Planet Zaza of East Haven. Building on the Office's earlier success, the Attorney General also obtained judgments against New Haven retailer Anesthesia Smoke Shop, which was ordered to pay a civil penalty of \$50,000, \$25,000 of which was suspended. The Attorney General also obtained a judgment against wholesaler Star Enterprise 74, which was ordered to pay a \$20,000 civil penalty, \$15,000 of which was suspended. The Office has ongoing actions against retailers Smoker's Corner of Norwich and Greenleaf Farms New London, as well as wholesalers RZ Smoke, Inc. located in Suffield, and Shark Wholesale Corporation located in Bridgeport. The Attorney General has also worked with the legislature to enhance the enforcement tools available to both the Attorney General's Office and municipalities in combatting the sale of high-THC products.

### Planet Zaza

On May 1, 2025, the Attorney General secured a \$4.93 million judgment against Planet Zaza of East Haven and its owner, Mohamed Alraishani in his personal capacity, following persistent illegal

cannabis sales in spite of a court order and repeated law enforcement visits. This is the largest civil penalty ever imposed in Connecticut for illegal cannabis sales, underscoring the egregious nature of Planet Zaza's misconduct.

Attorney General Tong first sued Planet Zaza and Mohamed Alraishani in January 2024 for violations of the Connecticut Unfair Trade Practices Act after multiple unannounced inspections conducted by the Department of Consumer Protection and Office of the Attorney General found numerous high-THC cannabis edibles, including those more potent than any authorized for sale in Connecticut. Investigators also discovered unauthorized labels, including fake prescription labels falsely indicating that the store was a licensed dispensary and that the illegal products were medical-use cannabis. The products were not produced in a licensed facility or tested in accordance with state law, and many contained youth-appealing packaging. These illegal sales persisted after the complaint was filed, and after multiple visits from DCP and the East Haven Police Department.

On November 12, 2024, the judge issued a temporary injunction, ordering Planet Zaza and Alraishani to cease illegal sales, but Planet Zaza and Alraishani ignored the court's order. The Office of the Attorney General sought penalties of \$5,000 per day for everyday Planet Zaza and Alraishani offered for sale cannabis products in violation of CUTPA. Due to the egregious nature of Planet Zaza and Alraishani's misconduct and the ongoing threat to public safety, the court this week ordered Planet Zaza and Alraishani to pay \$5,000 for each of the 621 days they willfully violated CUTPA, and \$25,000 for each of the 73 days the defendants violated the court's temporary injunction, for a total civil penalty of \$4.93 million. The Attorney General's Office would like to thank the Department of Consumer Protection and the East Haven Police Department for their assistance in this matter.

#### CNG/SCG

On October 4, 2024, the Public Utilities Regulatory Authority agreed with the Attorney General's Office when it issued a final decision rejecting the proposed rate increases for both Connecticut Natural Gas (CNG) and Southern Connecticut Gas (SCG). The final decision decreased revenue by roughly \$24 million for CNG, or approximately 5.4 %, lowering bills by approximately \$7-8 per month and decreased SCG's revenues by \$11 million, or approximately 2.5 %, lowering bills by approximately \$3.50-4.00 per month as well. CNG had sought a \$19.7 million increase. SCG had sought a \$43 million increase.

The Attorney General had argued that the rate hikes proposed by SCG and CNG were excessive and unwarranted, particularly with regard to CNG, which had reported overearnings.

#### Verizon Frontier Change of Control

On June 11, 2025, the Public Utilities Regulatory Authority approved the proposed acquisition by Verizon Communications, Inc. of Frontier Communications Parent, Inc. The Attorney General advocated for, and the Authority approved, additional commitments regarding cybersecurity planning and Verizon's structure of control in Connecticut. These commitments will help ensure that Verizon has a seamless and secure transition as it acquires 100 percent of Frontier and its subsidiaries.

## **EMPLOYMENT RIGHTS, LABOR AND WORKERS COMPENSATION SECTION**

### **Employment Section**

The Employment Section devotes most of its resources to defending state agencies, including the University of Connecticut, the UConn Health Center, the Connecticut State Colleges and Universities, and state officials in employment related litigation in court and before administrative agencies. Employment Section attorneys work to effectively defend employment claims brought against the state and state officials – thereby limiting or avoiding the state's exposure to financial liability and other costs associated with litigation -- while ensuring protection of state employees' rights guaranteed by state and federal law.

The Section provides legal advice and counsel, both orally and in writing, to state agencies on a variety of employment matters. The Section's role continues to increase in this regard as the issues facing state agencies become more complex. Employment Section attorneys also participate in training state agencies and managers in employment laws including the Connecticut Fair Employment Practices Act, the Civil Rights Act of 1964, and the Americans with Disabilities Act. The Employment Section is currently defending the State in approximately 270 employment cases. The Employment Section has 70 employment cases pending in the state and federal courts, (one) 1 Second Circuit Court appeal, and (three) 3 Connecticut Appellate Court appeals. In addition to these cases, the Section is currently defending approximately 196 complaints before the Connecticut Commission on Human Rights and Opportunities ("CHRO"), the Connecticut Office of Public Hearings, the Connecticut Office of the Claims Commissioner the Connecticut Freedom of Information Commission ("FOIC"), and the federal Equal Employment Opportunity Commission ("EEOC").

During the past year, the Employment Section successfully defended state agencies in numerous cases in the state and federal courts. Significantly, the Section was able to obtain judgment in favor of the state and its officials in many cases, including (seven) 7 summary judgment motions, (four) 4 granted in state court and (three) 3 granted in federal court, thus eliminating the need for trials in those cases. These victories are important as they eliminate not only the need to expend resources at trial, but they also eliminate the uncertainty and exposure the state has to large jury awards. The Section filed approximately 12 summary judgment motions, (three) 3 in federal court and (nine) 9 in state court during fiscal year 2024-2025. The Employment Section is currently awaiting rulings on (nine) 9 pending summary judgment motions.

During fiscal year 2024-2025, Employment Section attorneys defended the state in 4 trials in state court. Employment Section attorneys also tried 3 matters at the Office of Public Hearings. Section attorneys achieved a defense verdict in 2 of the state court trials. The Section is awaiting 2 verdicts in state court and 1 verdict in a trial before the Office of Public Hearings. Section attorneys successfully defended 3 federal district court decisions in appeals before the Second Circuit Court of Appeals and prevailed in 3 appeals before the Connecticut Supreme Court during fiscal year 2024-2025.

The Employment Section was also successful in avoiding the state's exposure to financial liability



by entering into favorable settlement agreements and by engaging in pre-trial motions practice is multiple cases resulting in dismissals by the courts and various administrative agencies.

### **Workers' Compensation and Labor Section**

The Labor and Workers' Compensation Section represents the State Treasurer as the Custodian of the Second Injury Fund, the Workers' Compensation Commission and the Department of Administrative Services in its capacity as the administrator of the state employees' workers' compensation program, as well as DAS Personnel, the Labor Department, the Office of Labor Relations, the Office of the Claims Commissioner, the State Employees Retirement Commission, the Teachers' Retirement Board, and others.

The Section's workers' compensation attorneys and paralegals represent the Second Injury Fund in cases involving potential liability of the Fund for workers' compensation benefits and the State of Connecticut in contested workers' compensation claims filed by state employees. The Section's workers' compensation attorneys and paralegals also devote significant time to third party tortfeasor cases that result in the recovery of money for the State and the Fund, as well as handling a large number of appeals to the Compensation Review Board and the Appellate and Supreme Courts.

The Section's labor attorneys represent various state agencies before administrative agencies such as the Freedom of Information Commissioner and the Claims Commissioner, as well as represent the State in Superior Court when administrative appeals are taken from entities such as the Employees' Review Board and the Employment Security Appeals Division. The labor attorneys represent the Commissioner of Labor in Superior Court and affirmatively initiate collection proceedings for unpaid wages due to Connecticut employees in the private sector, and for the recoupment of civil penalties assessed for wage and hour violations. In addition, the Section's labor attorneys conduct extensive document review and handle appeals to both the Appellate and Supreme Court.

During the past fiscal year, Workers' Compensation Section attorneys and paralegals appeared for the Fund and the State in 3,194 hearings before workers' compensation commissioners. Section attorneys and paralegals were responsible for recouping \$1,251,348.33 for the State of Connecticut and \$206,579.98 for the State of Connecticut, Second Injury Fund through third party interventions in Superior Court and negotiated settlements in lieu of litigation. These sums represent reimbursements to the State of money which was paid out in workers' compensation benefits for injuries caused by third parties.

During the past fiscal year, the Section's labor attorneys opened one hundred and eleven (111) new cases and completed fifty-seven (57). The labor attorneys also completed the review of sixty (60) contracts on behalf of the State and collected \$104,803.77 in unpaid wages and civil penalties for Connecticut citizens whose employers failed to pay them in accordance with Connecticut's wage and hour laws.

## **ENVIRONMENT SECTION**

The Environment Section represents the state Department of Energy and Environmental Protection (DEEP) and the Department of Agriculture in state and federal court and administrative proceedings. The Section continues to have important success in abating pollution and in enforcing environmental laws. This year the Section initiated and participated in a number of cases that sought to protect the environment and the citizens of the State of Connecticut. The Section also continued to coordinate with other states on national efforts to keep Connecticut's air clean and help protect its citizens from the impacts of air pollution transported to our state and from climate change.

Specifically, in the continuing effort to improve Connecticut's air quality, the Environment Section participated in a number of legal actions to enforce the Clean Air Act, including actions seeking to reduce the impact in Connecticut from air pollution generated in other states. We will continue to work with DEEP and the multistate group to pursue tools that reduce greenhouse gas emissions and meet Connecticut's climate goals.

In addition, the Section worked with other states to support and defend federal rules intended to promote cleaner air in Connecticut. The Section also worked to ensure that rules intended to protect Connecticut from upwind pollution are enforced and not eliminated. These efforts included joining a multistate group that sought to protect vehicle emissions laws that are at the heart of Connecticut's air pollution program.

This year the Section also secured a number of legal victories on behalf of the DEEP that furthered the State's efforts to enforce and defend environmental laws. The Section entered into a settlement that required a series of penalties and payments totaling \$350,000 to be paid by Soundview Transportation for violations related to a November 2022 oil tanker accident in Norfolk, resulting in the largest gasoline spill in Connecticut history. In addition to the penalties, Soundview is fully responsible for the ongoing remediation and clean-up of the site, costing millions of dollars. This year the Section also secured a \$2 million settlement against Pike Fuels (formerly Gulf Oil) following numerous violations of the environmental laws at the New Haven petroleum distribution facility. The settlement with Pike Fuels included a \$1.2 million civil penalty, in addition to \$800,000 to support environmental remediation, mitigation and monitoring. Included in the remediation funding is \$100,000 to support first responders in New Haven and \$100,000 for environmental justice initiatives in New Haven.

The Environment Section also continued to prosecute the major enforcement action against 28 chemical manufacturers responsible for knowingly contaminating Connecticut waters and natural resources and harming public health with toxic PFAS "forever chemicals." Last year the Section filed two complaints that seek to hold the companies responsible for dangerous PFAS chemical contamination from two sources—aqueous film forming foam (AFFF) used in firefighting, and chemicals used in manufacturing and added to consumer products, such as food packaging, cookware, carpeting, upholstery, clothing, and cosmetics, to make products resistant to stains, water, and heat. PFAS chemicals are toxic and can persist in the environment indefinitely. PFAS chemicals can travel through the environment, including into drinking water sources, and accumulate in human

blood. Even modest releases of PFAS can cause widespread pollution and damage. PFAS is known to cause severe adverse human health effects, including increased risk of kidney, breast, pancreas, prostate, and testicular cancers, liver damage, decreased birth weight and birth defects, decreased vaccine response, high cholesterol, infertility, and diabetes. The complaints seek both injunctive and monetary relief—compelling the companies to dispose of their toxic chemical stocks, abate all pollution in Connecticut, disclose all research, and to compensate the state for past and future remediation and testing expenses.

The Section also represented and worked extensively with the DEEP to negotiate consent orders and resolve outstanding administrative proceedings that are intended to protect the environment, remediate pollution and impose penalties for past violations.

The Section also represented the DEEP in bankruptcy proceedings to thwart polluters' efforts to avoid environmental liability by filing bankruptcy. The Section handled numerous bankruptcy filings this year, representing DEEP's interests in bankruptcy courts. The Section's work in bankruptcy court seeks to ensure that contaminated properties are not abandoned and left to taxpayers to clean up.

The Section also continues to represent and assist the Department of Agriculture ("DoAg") in animal cruelty cases, working with DoAg to protect neglected and cruelly treated animals. This past year, this Section continued its work on behalf of the Chief Animal Control Officer of the DoAg to gain permanent custody of animals that were neglected and cruelly treated as defined in CGS 22-329a.

This past year the Environment Section also provided legal support to DoAg in preserving valuable Connecticut farmland by acquiring the development rights through the Farmland Preservation Program, thereby protecting the land from commercial or residential development. The Section also continues to provide legal support to DoAg's Aquaculture Division and assists DoAg in leasing hundreds of acres for oyster farming and other commercial aquaculture activities, thereby generating millions of dollars for the State's economy.

In addition, the Environment Section continues to provide a full range of other diverse legal services to both DEEP and DoAg, including defense of Claims Commissioner matters, contract review, regulation review, opinions, legal advice and counsel.

### **FINANCIAL & REVENUE SERVICES SECTION**

The Financial and Revenue Services Section ("Section") provides legal services to several state agencies, including the Connecticut Insurance Department, Department of Banking, the Department of Revenue Services, the Department of Economic and Community Development, the Office of Policy and Management, the Office of Health Strategy, the Office of Workforce Strategy, the State Insurance Risk Management Board, the Public Utility Regulatory Authority and the Siting Council. The Section handles litigation in federal and state courts for these agencies, including regulatory enforcement actions, administrative appeals, actions requiring the defense of state laws, as well as proceedings before the Freedom of Information Commission and the Claims Commissioner. The Section provides advice to these agencies on a wide variety of legal and regulatory issues that arise

in their daily operations, including the review of contracts and regulations for legal sufficiency.

The Section also is responsible for a variety of tobacco-related matters. These include implementation and enforcement of the Tobacco Master Settlement Agreement ("MSA") between fifty-two states and territories, including Connecticut, and more than forty participating tobacco product manufacturers. The Section also engages in a variety of affirmative efforts to protect Connecticut's residents, particularly youth, from the deleterious health effects of smoking and vaping.

#### State Agency Representation

During the past fiscal year, the Section's work on behalf of state agencies included representing the Department of Banking in several administrative enforcement actions and other litigation matters and providing the Department of Economic and Community Development with legal assistance regarding grant, loan, and economic development programs. The Section also defended numerous decisions issued by the Public Utility Regulatory Authority and the Siting Council throughout the administrative appeal process. Other work performed by the Section included assisting the Office of Health Strategy and the Office of Workforce Strategy by providing legal advice with respect to their statutory responsibilities and guidance on state contract requirements. The Section also represented the Department of Revenue Services in 303 tax warrant proceedings seeking to collect overdue and delinquent state taxes, as well as several tax matter before the Claims Commissioner and in the appellate courts.

Representative litigation matters included the following:

- *1st Alliance Lending, LLC v. Dept of Banking*, 229 Conn. App. 664 (2024), *cert. denied*, 351 Conn. 906 (2025) –The Connecticut Appellate Court affirmed the decision of the Superior Court upholding the Banking Commissioner's revocation of the plaintiff's mortgage lender license and imposition of civil penalties for the plaintiff's violations of the Connecticut SAFE Act. The Court held that the Commissioner had the authority to revoke the plaintiff's license based on the substantive SAFE Act violations even though the Commissioner had previously revoked the plaintiff's license for failing to maintain the required surety bond (*see 1st Alliance Lending, LLC v. Dept of Banking*, 342 Conn. 273 (2022)); the trial court did not improperly defer to the Commissioner's statutory interpretation of the SAFE Act; the Commissioner did not improperly apply the SAFE Act retroactively; the trial court properly concluded that the substantial evidence in the record supported the Commissioner's finding that the plaintiff failed to comply with an administrative subpoena; and the Commissioner did not deprive the plaintiff of due process.
- *Consumer Financial Protection Bureau v. 1st Alliance Lending LLC et al.*, 3:21cv00055 — The Connecticut District Court quashed the defendants' document and deposition subpoenas directed at the Banking Department for, inter alia, insufficient relevance. The defendants attempted to use third-party discovery under the federal regulator's CFPA enforcement action as a sword to attack the Banking Department's state law regulatory actions still unresolved under appeal. The District Court agreed that federal matter discovery was limited to CFPB's allegations of defendants' actions and legitimate affirmative defenses.

The defendants were precluded from conducting a fishing expedition to attempt to impugn the actions of their state regulator.

- *Legal Funding, LLC v. Dept. of Banking*, Docket No. HHB-CV23-6081708-S, 2024 Conn. Super. LEXIS 2424 (Ct. Super. Ct. Nov. 12, 2024) – A litigation financing company appealed from an August 8, 2023, order of the Department of Banking imposing sanctions for violation of the Small Loan and Related Activities Act. The plaintiff argued that its financing did not constitute a small loan and thus the department had no jurisdiction over the plaintiff's activities. The court concluded, based on public policy reasons, that the broad definition of "loan" as advanced by the department was correct and that the department has jurisdiction over the plaintiff's operation under the Small Loan Act. The court further held that simply because plaintiff arranges for the lending of funds to litigants, the department's regulation of plaintiff does not constitute regulation of attorneys reserved to the judicial department. The Section is continuing to defend this case at the Connecticut Appellate Court.
- *Lycaste, LLC v. Conn. Dept of Banking*, No. CV-24-6085346-S, 2025 Conn. Super. LEXIS 658 (Conn. Super. Ct. Apr. 1, 2025) – The Superior Court upheld the Banking Commissioner's decision finding that the plaintiffs had violated Connecticut law by operating as consumer collection agencies without a license. It also upheld the Commissioner's imposition of civil penalties on the plaintiffs. The plaintiffs' activities consisted of buying debt that was delinquent or in default and then hiring licensed third-party collection agencies to collect. In a matter of first impression, the Commissioner and then the Superior Court had to construe the statutory language prohibiting a person from acting as a consumer collection agency "indirectly" through "debt buying." The Superior Court ultimately rejected the plaintiffs' statutory construction, agreed with the Commissioner's that the plaintiffs had indirectly engaged in consumer collection conduct through debt buying, and therefore dismissed the plaintiffs' administrative appeal. The Section is continuing to defend this case at the Connecticut Appellate Court.
- *United Illuminating Co. v. Public Utilities Regul. Authority*, 350 Conn. 660 (2024) – In this proceeding, the Public Utilities Regulatory Authority ("PURA") prevailed on the primary financial issue before the Court, which was whether PURA properly imposed \$1.2 million in civil penalties for The United Illuminating Company's noncompliance with certain identified performance standards. This appeal is the first challenge to expanded authority granted to PURA in Conn. Gen. Stat. § 16-32i.
- *United Public Service Employees Union-COPS Local 895 v. City of West Haven and the Municipal Accountability Review Board*, NNH-CV-23-6138430-S – This section provides legal counsel to the Municipal Accountability Review Board ("MARB"), which renders financial assistance and accountability to designated distressed municipalities, with the authority to approve and reject a municipality's various undertakings, to include all collective bargaining agreements under Conn. Gen. Stat. § 7-576e(a)(3)(iv). In 2023, one of the MARB's supervised municipalities, the City of West Haven ("the City") approved a collective bargaining agreement with the labor union representing the City's police officers ("the Police Union"). The City then presented the agreement to the MARB for approval. Instead, the MARB tabled the agreement and informally advised the City and the Police

Union that it was too costly and required revision. On December 5, 2023, the Police Union filed suit seeking a writ of mandamus to compel the MARB to confirm that the agreement was approved by operation of law on account of the MARB's failure to timely act in accordance with Conn. Gen. Stat. § 7-576e(a)(3)(iv). After eighteen months of litigation, due to the improved financial outlook of West Haven, the MARB voted to release the City from supervision. The City – free of MARB supervision – approved the collective bargaining agreement and the Police Union withdrew the case as moot.

- *Woodbridge Newton Neighborhood Environmental Trust v. Connecticut Siting Council*, 349 Conn. 619 (2025) – The Connecticut Supreme Court affirmed a decision of the Superior Court upholding a Connecticut Siting Council (CSC) decision approving a cell tower in Woodbridge, Connecticut. Opponents of the CSC decision claimed that the CSC was required to consider the effect on local property values notwithstanding that no party or intervenor offered any sworn testimony or other evidence regarding property values before the CSC at its evidentiary hearing. The Supreme Court upheld the CSC's interpretation of its governing statute, holding that it contained no requirement that the CSC consider property values, although the CSC was free to consider them.

Along with the work it does directly on behalf of state agencies, the Section also focuses on consumer financial protection issues by conducting investigations, leading multistate enforcement committees, negotiating settlements, drafting and reviewing regulatory and other comment letters, and handling consumer inquiries. Areas of focus include financial services, securities regulation, consumer lending, residential mortgage loan origination and servicing, for-profit education, student loan servicing, and debt collection.

#### Tobacco Enforcement and Advocacy

In April 2025, Connecticut received over \$105 million in annual payments from tobacco product manufacturers that have signed the Tobacco Master Settlement Agreement (MSA). Section attorneys work to ensure that Connecticut continues to receive the monetary payments it is owed under the MSA from Participating Manufacturers, that those manufacturers also comply with the public health provisions of the MSA, that Nonparticipating Manufacturers selling cigarettes in Connecticut make their requisite escrow deposits for Connecticut's benefit, and that all tobacco product manufacturers abide by other requirements of state and federal law. In the past year, Section attorneys have continued to be at the forefront of multistate efforts to disrupt the illegal market of tobacco and nicotine products, and they work to prevent these products from entering the Connecticut marketplace, including by partnering with federal agencies. Section attorneys also provide information to client agencies and state legislators, so legislation protecting the welfare of Connecticut residents, particularly youth, can be proposed and enacted.

To that end, this past year, the Finance Department assisted with the drafting and passage of Section 12-285(b), Section 21a-418, and Section 53-344b of the General Statutes as well as assisted the Consumer Protection Department with the drafting and passage of Public Act 25-166, "An Act Concerning The Regulation Of Tobacco, Cannabis, Hemp And Related Products, Conduct And Establishments." These legislative initiatives ensure that heat not burn products, such as IQOS, are taxed as cigarettes and retailers always demand identification prior to selling an e-cigarette or vapor product. Public Act 25-166, in addition to providing the Department of Consumer Protection with more enforcement tools over e-cigarette retailers, enacts an e-cigarette delivery ban that states that

shipping of e-cigarettes directly to consumers is a common nuisance and a per-se violation of CUTPA.

### **GENERAL LITIGATION SECTION**

The General Litigation Section defends state agencies, officials and employees in tort, civil rights, and other matters, including high exposure personal injury, medical malpractice and wrongful death cases. Many of the section's cases are brought by parties alleging injuries or civil rights violations at state facilities or while receiving services from state agencies.

The section's cases reflect the wide and varied activities and programs in which the state is involved: administering technical high schools, colleges and universities; providing care and assistance to persons with mental illness, substance abuse disorders, and intellectual or developmental disabilities; maintaining recreational parks and swimming areas; owning buildings and land; protecting abused or neglected children; issuing orders to keep our state's residents safe in health crises; and providing numerous other services. Claimants often seek large sums of monetary damages. The section has saved the state and its taxpayers millions of dollars through the years by negotiating fair settlements and obtaining favorable judgments.

One hundred eighty-eight of the section's cases are ongoing. Many involve a death, assault or serious injury. Most of these cases are pending in the U.S. District Court, Connecticut Appellate Court, Connecticut Superior Court, and the Office of the Claims Commissioner. To defend these cases, the section engages in extensive investigation, legal research, discovery and briefing, including complicated electronic forensic examinations and consultation with expert witnesses.

During the past fiscal year, the section defended several complex, high-exposure, wrongful death, medical malpractice, civil rights, intentional tort, and personal injury cases. The section appeared for the state, its employees or officials from 25 state agencies and institutions; and successfully argued in most cases that the claims lacked merit, had jurisdictional defects, or failed to state a legally sufficient cause of action. The state prevailed or obtained withdrawals in 84 of the 187 cases the section closed this year after section attorneys filed dispositive motions or defended the state in trials on the merits. In 11 cases, section attorneys were successful in negotiating reasonable and just settlements. Of the remaining cases the section concluded, 10 were not pursued by the claimant, some after discussion with our attorneys. In 20 cases the claims commissioner or the general assembly granted permission to sue in the superior court where our section continued to defend the state.

As an outgrowth of handling the many supervisory and premises liability claims filed, the section advises agencies on issues relating to physical or policy changes designed to increase safety or ameliorate unsafe conditions or practices in the future. This advice contributes to reduced risk of state liability, resulting in savings of state taxpayer funded resources. When the law permits recovery from plaintiffs who owe money to the state, the section has been successful in recovering that money or reducing settlements by the amounts owed.

If an alleged injury is covered by an insurance policy that a private party purchased as a term and condition of a contract or lease with a state agency -- or a state contract requires a private contractor

to indemnify the state -- the section seeks indemnification and insurance coverage to ensure that the state is covered for any liability and reimbursed for expenses. In such cases, the section has been successful in persuading contractors to settle and pay claims against the state, saving the state the cost of defense and potential awards. Many of the parties who decided not to pursue claims against the state this year did so because our section's attorneys insisted that the contractors assume liability for the injuries or risk reimbursing the state for the costs of defense.

### **GOVERNMENT PROGRAM FRAUD SECTION**

The Government Fraud Section protects Connecticut tax dollars from fraud, waste, abuse, and corruption. Once again, the Section's attorneys, investigators, and staff obtained significant results from investigations, civil enforcement actions, and settlements. The Section continued to participate in numerous multistate healthcare Fraud settlements with pharmaceutical companies and other healthcare providers related to violations of the Connecticut False Claims Act that affected the Connecticut Medicaid Program. The Attorney General joined six (6) multistate settlements with healthcare companies and obtained a total recovery (federal and state) of more than \$1,974,859 for the Connecticut Medicaid Program. In addition to the multistate healthcare fraud settlements, the Attorney General pursued several Connecticut-specific investigations and enforcement actions. Significant actions this year included the following:

- In August 2024, the Attorney General William Tong announced a \$186,731 civil judgment secured against a Newtown registered nurse following a pervasive illegal scheme to bill the Connecticut Medicaid program for psychotherapy and medical services she never provided.
- In August 2024, the Attorney General announced a \$1.7million settlement with dentists in Bridgeport, Hartford, and Stamford resolving allegations that they violated state and federal False Claims Acts through prohibited fees paid to a “patient recruiting” company. This was the second settlement arising from a joint state and federal civil investigations into alleged kickback-tainted claims for services rendered to Connecticut Medicaid patients referred by third-party patient recruiting companies.
- In September 2024, the Attorney General announced a \$1,729,977 settlement with a Farmingdale, New York clinical laboratory resolving allegations that the lab overbilled the Connecticut Medicaid program for testing services in violation of the Connecticut False Claims Act.
- In October 2024, the Attorney General announced that following a 7-day trial the Hartford Superior Court found a Florida-based pharmacy liable for \$39 million in treble damages and civil penalties under the Connecticut False Claims Act in a kickback scheme involving illegal payments to retired state employees for costly compound drug prescriptions.
- In December 2024, the Attorney General announced that a Hartford home health agency and its owners entered a settlement to pay \$361,520 to resolve allegations that they were paid for home health care services that violated Medicaid regulations relating to plans of care.
- In January 2025, the Attorney General announced that a New Haven psychiatrist entered into a settlement agreement with the federal and state governments and agreed to pay \$455,439.26 to resolve allegations that he violated the federal and state False Claims Acts and the civil provisions of the Controlled Substances Act (“CSA”) relating to his issuance of medically unnecessary



controlled substances prescriptions. The psychiatrist also agreed to cease the practice of medicine, and to not renew his physician license.

- In January 2025, the Attorney General announced a \$608,296 settlement with a New Haven dentist resolving allegations that they violated state and federal False Claims Acts through prohibited fees paid to a “patient recruiting” company. This was the third settlement arising from a joint state and federal civil investigations into alleged kickback-tainted claims for services rendered to Connecticut Medicaid patients referred by third-party patient recruiting companies.
- In May 2025, the Attorney General announced that Connecticut, along with Massachusetts, Indiana and Oklahoma, joined a whistleblower suit and filed a complaint in intervention against CVS Pharmacy, Inc. alleging the pharmacy fraudulently overbilled state Medicaid programs for prescription drugs dispensed at its retail pharmacies. The complaint centers around state regulations that ensure pharmacies and providers do not charge Medicaid more than they charge other customers for the same prescriptions and services.
- In May 2025, the Attorney General announced a \$495,721 settlement agreement with Norwalk dentists resolving allegations that they violated state and federal False Claims Acts through prohibited fees paid to a “patient recruiting” company. This was the fourth settlement arising from a joint state and federal civil investigations into alleged kickback-tainted claims for services rendered to Connecticut Medicaid patients referred by third-party patient recruiting companies.

### **Pension Revocation**

The Section continued to prosecute civil actions to revoke and reduce the pensions of public officials, State employees, and municipal employees who commit crimes related to their government office.

### **Whistleblower Matters**

The Section, in coordination with the Auditors of Public Accounts, continued to investigate a variety of complaints alleging corruption, unethical practices, mismanagement, gross waste of funds and abuse authority.

### **Health Care Advocacy Matters**

Health Care Advocacy (“HCA”) continues to assist patients and their doctors by resolving disputes with health benefit plans. Some of the more prominent issues addressed during fiscal year 2024-2025 relate to managed care denials of coverage, the most pressing of which relate to the medical necessity of care. It has helped recover approximately \$356,744.51, derived primarily from improperly denied claims and illegally billed services. HCA continues its role as the investigator of individual allegations of HIPAA Privacy Rule violations. HCA participates in the annual Health Insurance Rate Forum convened by the Connecticut Insurance Department at the state legislature. HCA also helps the Connecticut Long Term Care Ombudsman Program (LTCOP) by providing legal guidance and participating in weekly issue discussion with Regional Ombudsman. In furtherance of that mission, HCA also interacts with DSS and DPH on behalf of LTCOP.

## **HEALTH AND EDUCATION SECTION**

The Health and Education Section of the OAG (the “Section”) provides legal services and representation to the state’s institutes of higher education (IHEs) and their constituent units, including the University of Connecticut (UConn), the UCONN Health Care Center and John Dempsey Hospital, the Connecticut State Colleges and Universities (CSCU), the Office of Higher Education (OHE), the State Library and Librarian; the State Department of Education (SDE) and the Connecticut Technical High Schools (CTECS). The Section also represents the state’s health and social services agencies, including the Department of Public Health (DPH) and the sixteen provider licensing boards and commissions, the Department of Social Services (DSS), the Department of Mental Health and Addiction Services (DMHAS), the Office of Health Strategy (OHS), the Department of Aging and Disability Services, the Department of Developmental Services (DDS), the Department of Veterans Affairs (DVA), the Office of Early Childhood (OEC), the Psychiatric Security Review Board (PSRB), the Commission on Human Rights and Opportunities (CHRO), and the Office of the Chief Medical Examiner.

The Section litigates in federal and state courts in matters including class actions, administrative appeals, regulatory enforcement actions, non-employee discrimination claims, civil rights actions, probate proceedings, bankruptcy. and receivership actions. The Section also appears in administrative proceedings, representing and advising adjudicating agencies, boards, and commissions. The Section also prosecutes administrative actions involving day care and health facilities on behalf of OEC and DPH and represents agencies in proceedings before the Office of Claims Commissioner, the Freedom of Information Commission and the CHRO.

The Section’s client IHEs and agencies routinely seek advice and guidance on a number of topics, including: regulatory issues for health care facilities and professions; emergency medical services; child day care services; environmental public health issues \such as public water supply, lead paint, and asbestos; Medicaid and other public assistance including the Supplemental Nutrition Assistance Program (SNAP); nursing home and hospital rates; health care facility certificates of need; confidentiality of medical, educational, and public assistance records; civil commitment law and medical/psychiatric/substance abuse treatment at state facilities; property acquisitions; state contract law; disability accommodations for students; state and federal education law; and oversight of public and private educational entities. The Section also reviews and approves for legal sufficiency regulations and contracts for its client IHEs and agencies.

Several Section members have been supporting the OAG’s role in numerous multistate actions that have been brought challenging various Executive Orders issued by the Trump Administration, many of which involve education and health and human service issues.

### **Health**

This fiscal year, the Section continued to represent the state’s health agencies in significant matters that impact Connecticut’s residents in their daily lives by ensuring: that people receive adequate care in our state’s nursing facilities; that there are sufficient hospital services to meet the needs of each

community; that complaints concerning licensed health care providers are investigated and providers properly disciplined; and that those who are unable to live independently have access to the services they need. Examples of this work include the following.

The Section successfully defended DDS in several administrative appeals including several cases involving DDS' abuse and neglect registry, which is maintained so that employees who have abused or neglected individuals receiving DDS services are not eligible for future employment in these settings.

The Section defends DSS and its administration of the assistance programs it administers, including Medicaid, in both federal and state court. This litigation includes challenges to DSS' eligibility determinations or regulations, and also files for receiverships for nursing homes with significant financial difficulty and/or substantial violations of the Public Health Code.

The Section also represents DPH and DSS in ongoing negotiations to protect the residents and employees of nineteen financially troubled nursing homes, whose owner has faced increasing complaints about the condition of the homes, payment and benefits due to its employees. This time-intensive work has resulted in a change of ownership of twelve of the nineteen homes have changed ownership and the closure of two others. The Section is currently advising DPH on the change of ownership pre-licensure consent orders for the remaining five homes. Other significant cases this fiscal year include the Second Circuit's affirmation of the district court's decision dismissing a dentist's fourteen count complaint seeking damages for alleged due process and statutory discrimination violations in connection with two licensure discipline proceedings. The Connecticut Appellate Court also affirmed the Superior Court's dismissal of this dentist's administrative appeal of the Connecticut State Dental Commission's order sanctioning him for failing to comply with the probation terms it previously imposed. The Section also successfully represented DMHAS in a district court case where a Whiting Forensic Hospital patient claimed that DMHAS had not complied with a 1990 consent decree, *Roe v. Hogan*, by allegedly keeping him in a more restrictive facility than necessary. Significantly, the Court held that the consent decree does not allow the Court to second-guess Whiting medical professionals' medical judgments.

The Section also defended two OHS decisions in the Connecticut Appellate and Supreme Courts regarding the establishment of new facilities based on the needs of the community; both cases were brought by entities asserting a financial interest in the matter.

### **Education**

The Section provides legal services to each of the state's IHEs, defending and enforcing the laws that ensure that students in Connecticut are protected from discrimination of any kind. The Section defended the state's colleges and universities within the Connecticut State Colleges and University (CSCU) system in litigation matters in state and federal court and administrative forums. The Section also continued to provide legal advice on issues including First Amendment free speech rights, contract disputes, discrimination, Title IX proceedings, due process and confidentiality of records. The Section also represented the University of Connecticut in complex litigation and administrative proceedings including challenges to student disciplinary decisions pursuant to Title IX and discrimination claims raised by students. The Section provides legal review, negotiation and approval of highly complex transactions and contracts.

The University of Connecticut Health Center continues to present broad and challenging legal issues that arise from the operation of an academic health center.

The Section represents the OHE in matters involving higher education institutions that have failed to protect the interests of the students they serve. This fiscal year, the Section, working closely with the OAG Consumer Protection Section, announced a settlement of (three) 3 related Stone Academy lawsuits for \$5 million dollars. Stone Academy offered a program for students to become Licensed Practical Nurses in less than two years, but abruptly closed in February 2023, with no notice to students. Investigations by DPH, OEC, and the Consumer Protection Section revealed that Stone Academy had not complied with several OHE and DPH requirements, including that it did not provide adequate clinical training. The settlement also included remedial programs and the potential for students to complete their studies and potential eligibility for participation in the recently amended Student Loan Reimbursement program.

The Section also continued to vigorously defend the state's laws regarding vaccination in schools in both federal and state courts.

### **INFRASTRUCTURE & ECONOMIC DEVELOPMENT SECTION**

The Infrastructure Section of the Office of the Attorney General provides representation for the following state agencies: Department of Transportation ("DOT"), Department of Administrative Services ("DAS"), Bureau of Information Technology Solutions ("BITS") part of DAS, Division of Construction Services "DCS") part of DAS, Department of Motor Vehicles ("DMV"), Department of Housing ("DOH"), Department of Energy and Environmental Protection ("DEEP") for real property matters, and the State Historic Preservation Office ("SHPO"). In addition, the Infrastructure Section provides representation for various occupational licensing boards within the Department of Consumer Protection ("DCP"). The representation of the foregoing state agencies/boards includes, but is not limited to, counseling and advice on legal issues, the prosecution or defense of lawsuits or claims in both federal and state courts and before various administrative entities, including the defense of claims filed with the Office of the Claims Commissioner pursuant to Chapter 53 of the Connecticut General Statutes.

#### **Contracting and Property Matters**

The Infrastructure section advises virtually all state agencies on contract matters and drafts many of the state's significant transactional matters. In conjunction with agency staff, the Infrastructure section also assists with the development and amending of various master agreements for use in all areas of contracting at the DOT, DAS, DCS, and DOH with the goal of streamlining the State's contracting process. Finally, the Infrastructure section has amended the templates for standard contracting provisions consistent with legislative changes and assisted state agencies in the implementation of both new and revised standard State contracting languages required by statute.

During the past year, the Infrastructure Section has assisted 4 different state agencies in approximately 599 real estate and contract related matters to review contracts in substance and form and provided substantive advice in connection with the negotiation of several significant State transactions including:

- Assisted all agencies and the OAG with the implementation of new and revised standard State contracting language required by statute. Assisted fellow AAG's throughout the office with contract review issues.
- Assisted DOT with the review of agreements to include: amendment to the agreement related to the operation of rest area sites located throughout the State; an agreement for the provision of construction to various rest area sites located throughout the State; agreements for the installation of charging stations for electric buses; agreements with the State of Rhode Island related to bridge replacement along US Route 1 and general bridge inspection and maintenance; template agreement for bus shelter installation.
- Assisted DOT with rail related agreements to include: the review and negotiation of a cost sharing agreement with Amtrak for general revenue and expenses with Amtrak as well as for cost sharing agreements for the Walk Bridge Project in Norwalk, Connecticut and the replacement of a rail bridge spanning the Connecticut River in the Old Saybrook/Old Lyme area; also assisted DOT with the drafting of template contract for rail platform construction projects.
- Assisted DOT with the drafting of template construction manager at risk contracts for construction projects in Hartford, Waterbury, and New Haven. Also assisted DOT with the review and approval of various construction contracts, service contracts, consultant contracts, and contract templates.
- Assisted DOT with various property transfers, easements, leases, licenses, and requests for breaks in non-access highway lines.
- Assisted DEEP with various property related agreements to include: the review and approval of various grant agreements and conservation easements in connection with the statutory Open Space and Watershed Land Acquisition Grant Program; the purchase of various properties pursuant to its statutory land acquisition authority; and the review and approval of various leases and easements.
- Assisted DOH with the review and approval of various personal service agreements, personal service agreement amendments, assistance agreements, other contracts and agreements, and agreement templates.
- Assisted DAS with the conveyance of property to the Town of Stratford required pursuant to statute, including reciprocal easements for utilities, maintenance, and access and the conveyance of properties located on Trinity Street in the City of Hartford. Also assisted DAS with the review, negotiation, and approval of various agreements related to property purchases, sales, licenses, leases, and various construction/construction consultant agreements.
- Assisted DAS with contract with the Commonwealth of Massachusetts for offsite computer storage services and the review and approval of various grant agreements for digital equity related projects.
- Participated on the selection committee for two outside counsel RFPs for DOT and DoAG.

Other legal assistance involving contracts is provided in resolving public contracting bid protests, interpreting, and drafting contract language, and addressing problems that arise during large construction and statewide procurement projects.

### **Litigation Matters and Construction Claims**

The Infrastructure section litigates a wide array of cases on behalf of DOT, DAS, DOH, and DMV in virtually all the tribunals of the State to include: the Claims Commission, the AAA, state and federal courts, and the Appellate Court and Supreme Court of our State. In addition to prosecuting and defending lawsuits in court on behalf of our client agencies, the Infrastructure section regularly assists agency personnel in the pre-suit analysis and settlement of disputes to avoid expensive and time-consuming litigation. In doing so, the Infrastructure section has minimized adverse operational and financial impacts to our client agencies and the public treasury.

The following represents a summary of the cases handled by the Infrastructure section during the past fiscal year:

- a) The Infrastructure section defended a complex construction case on behalf of DAS brought pursuant to Conn. Gen. Stat. section 4-61 in the AAA. In that case, the Infrastructure section successfully pursued an application for preliminary injunction. That case is now pending at the appellate court. Additionally, the Infrastructure section successfully defended DOT in a novel “disappointed bidder” case which resulted in a dismissal of the action. The Infrastructure section also settled several construction matters prior to the filing of suit resulting in savings of over \$100,000.
- b) The Infrastructure section also pursued several claims on behalf of DOT to damages to bridges and highways because of motor vehicle accidents. So far, the Infrastructure section recovered approximately \$750,000 for DOT in one bridge strike case and \$118,000 in a second claim. There are two pending claims that the Infrastructure section is pursuing to recover damages that exceed \$20 million.
- c) In the Superior Court, the Infrastructure section favorably resolved several administrative appeals. The Infrastructure section also handled three condemnation trials in the superior court. Finally, the Infrastructure section successfully defended the DMV in two hearings at the CHRO as well as two DUI appeals in the superior court.
- d) This year, the Infrastructure section handled a high volume of appellate matters. Two significant appeals that the Infrastructure section handled at the appellate and supreme court include an appeal challenging the DMV’s calculations of towing rates for non-consensual tows. The Infrastructure section successfully defended that appeal. The supreme court granted certification which this section briefed and argued in May of this year; a decision remains pending. Next, the Infrastructure section is also handling a novel DUI appeal at the appellate court level which challenges a new section of 14-227b(g).
- e) The Infrastructure section received many favorable decisions from the Office of the Claims Commission dismissing actions brought against the State saving the State tens of thousands of dollars.
- f) Finally, the Infrastructure section provided legal consultation to all four (4) of its client agencies on a variety of legal issues. In particular, the Infrastructure section provided legal guidance to DAS as it assumed the operations of the Materials Innovation and Recycling Authority (MIRA) following its dissolution.

## **Environmental Matters**

In addition, the Infrastructure section is deeply involved in various environment matters associated with public works projects, roads, and bridges projects, and other activities of its client agencies. Our attorneys continue to provide legal assistance and guidance to those agencies to ensure that there is compliance with applicable federal and state environmental laws in the planning of projects and the operation of state facilities. In particular, the Infrastructure section assists these agencies in complying with the requirement of the National Environmental Policy Act (“NEPA”), the Connecticut Environmental Policy Act (“CEPA”) and other federal and Connecticut regulations that have been enacted to balance the need to develop our state economy and governmental services with the need to protect the resources of the natural resources of the state. In these cases, the Infrastructure section works to ensure compliance with federal and state laws while assisting stakeholders in negotiating reasonable and feasible alternatives to destruction when possible. In this regarding, the Infrastructure Section has advised DOT regarding several permitting issues necessary at DEEP for road improvement projects.

## **Conclusion**

As a result of the size and complexity of the state agencies that the Infrastructure section represents, the section remains busy as it continues to address and resolve a broad scope of complex legal issues; playing an integral role in the smooth operation of our state government and stewardship of public resources.

## **PRIVACY SECTION**

The Privacy Section handles matters related to the protection of Connecticut residents’ personal information and data. The Section advises the Attorney General regarding the enforcement of state and federal privacy laws. These laws include Connecticut’s breach notification statute, Connecticut’s safeguards law, the Connecticut Unfair Trade Practices Act (CUTPA), the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA), the federal Children’s Online Privacy Protection Act (COPPA), and the federal Fair Credit Reporting Act (FCRA). In addition, the Section provides the Attorney General with advice on proposed legislation and other matters regarding privacy and data security and engages in extensive outreach to citizens and businesses.

Effective July 1, 2023, these laws include the groundbreaking Connecticut Data Privacy Act (“CTDPA”), which empowers Connecticut residents with rights over their personal data and establishes privacy protection standards for businesses that process personal data. Connecticut was one of the first U.S. states to pass a comprehensive consumer data privacy law. By enacting the CTDPA, we joined the ranks of a growing list of states taking innovative but necessary steps to protect consumers’ privacy. The CTDPA grants the Attorney General sole enforcement authority and has significantly expanded the Privacy Section’s workload.

## **CTDPA**

In the two years since the CTDPA took effect, the Privacy Section has taken significant steps to prompt compliance with the law. On February 1, 2024, we issued an [Initial CTDPA Enforcement Report](#) highlighting our early enforcement efforts under the CTDPA. In that Initial Report, we noted that, in just six (6) months, we had already issued over a dozen notices of violation, as well as a number of broader information requests regarding concerning privacy practices. We also highlighted our focus on key aspects of the CTDPA related to privacy notices, sensitive data and minors' data, among other areas.

In April 2025, we issued an [Updated CTDPA Enforcement Report](#) which walks through our expanded enforcement efforts since the Initial Report. In the Updated Report, we noted that the Privacy team has now issued *dozens* of notices of violation, as well as a number of broader information requests, under the Act. We remain focused on key aspects of the CTDPA related to transparency and sensitive data processing but have also broadened our efforts to address problematic cookie banners and dark patterns that trick consumers into allowing third parties to track and sell their personal data. We also noted that our priorities have further expanded as new legislation related to minors' privacy and consumer health data took effect, and as our universal opt-out provisions came online.

## **Data Breaches**

The Section reviews all data breaches reported to the Office under Connecticut's breach notification statute. The number of breach notices received by the Office has increased dramatically over the years— we received 800 data breach notices in 2019, 1,200 in 2020, over 1,500 both in 2021 and 2022, 1,800 in 2023, and 1,900 in 2024. The Privacy team reviews each notification for compliance with our breach notice and data security laws. We frequently follow up with companies for further details concerning notice timelines, the privacy protections offered to affected residents, the safeguards in place at the time of the breach, and post-breach remedial measures.

In the past year, our team has issued numerous “warning letters” to companies concerning lengthy breach notice timelines. Connecticut law requires that notice be provided both to our Office and Connecticut residents without unreasonable delay, but not later than sixty (60) days after breach discovery. *See Conn. Gen. Stat. § 36a-701b(b)(1)*. More and more, we are seeing breach notice timelines stretch in contravention of the requisite period in Connecticut law, and we are focused on ensuring timely notices going forward. In our warning letters, we continue to stress that we view the statutory notice period to run from the date that a company *becomes aware of suspicious activity*, not the date it determines the full impact to personal information. Further, we underscore that Connecticut residents must receive notice of a data breach as soon as possible so that they may take appropriate steps to protect themselves from identity theft.

More recently, we have taken these efforts a step further, pursuing several breaches involving egregious notice timelines and requiring Assurances of Voluntary Compliance (“AVCs”) from the reporting companies. These AVCs, among other things, require the companies to implement clear incident response and notification plans, and provide timely notice of data breaches going forward. The AVCs also require payments to the State reflective of the impact to Connecticut residents, and



as a penalty for failure to comply with Connecticut law.

### **Horne LLP**

For example, in November 2024, we finalized an AVC with Horne LLP (“Horne”), a Mississippi-based professional services firm that provides a wide range of consulting and advisory services, including audits and cybersecurity, due to an over two-year delay in providing notice to three (3) Connecticut residents who were impacted by a 2021 ransomware attack. Though the breach occurred in December of 2021, notice to our Office and the three (3) impacted Connecticut residents did not go out until January 25, 2024. Taking into account both the substantial delay and the low impact, we addressed this matter through an AVC requiring Horne to implement and maintain a comprehensive information security program, including an incident response and notification plan, and specific security safeguards. In addition, Horne made a \$15,000 payment to the State.

### **Investigations & Settlements**

The Section also conducts investigations into data breaches involving violations of state consumer protection and privacy laws and/or federal laws protecting personal information. The Section has led or assisted with numerous multistate investigations of large-scale data breaches and other high-profile privacy matters. Recent settlements of note are as follows:

#### **Connexin**

On August 8, 2024, we finalized a \$1.5 million (fully suspended) settlement to resolve our investigation—which we conducted with PA, NY, OR, and NC—into a data breach reported by Connexin Software, Inc. d/b/a Office Practicum (“Connexin”), a company that provides electronic medical records and practice management software, billing services, and business analytic tools to its client physicians’ practice groups. This ransomware attack impacted approximately 2.2 million individuals, including approximately 13,500 Connecticut residents—the majority of whom were minors. Between July 16, 2022 and August 26, 2022 the threat actors were able to gain access to Connexin’s system; exploit two corporate user accounts that were escalated to an administrative role; and exfiltrate data including SSNs, demographic information, health insurance information, medical and/or treatment information, and billing and/or claims information. We reached an agreement through an AVC” requiring the company to strengthen its data security. The AVC further requires Connexin to undergo an information security assessment and thereafter complete a remediation report explaining how it remediates all deficiencies identified in the assessment. We considered the company’s financial condition in arriving at the \$1.5 million fully suspended payment. Should any of the triggering conditions be met requiring Connexin to make a payment to the states, Connecticut’s share will be \$275,000. In the interim, Connexin has agreed to spend \$1.5 million to strengthen its data and information security over the next four years and provide the states with proof of such expenditures upon completion.

#### **Enzo Biochem**

On August 13, 2024, we announced a \$4.5 million settlement to resolve our investigation—which we conducted with NY and NJ—into Enzo Biochem, Inc. and Enzo Clinical Labs, Inc. (“Enzo”), a biotechnology company that offered diagnostic testing at laboratories in Connecticut, New York,

and New Jersey until August 2023. Enzo experienced a data breach in April 2023 that impacted the personal information of approximately 2.47 million individuals, including 193,234 Connecticut residents. The ransomware group was able to leverage two compromised administrator accounts, that were controlled by multiple employees that were senior level IT personnel and move laterally through Enzo's system across eight servers that stored clinical test information and SSNs. The threat actor claimed to have exfiltrated 1.4 terabytes of information, some of which was posted on the dark web. We reached an agreement through an AVC requiring the company to strengthen its data security practices, undergo third-party assessments for three (3) years, and make a \$4.5 million payment to the states. Connecticut's share was \$743,110.76.

## **Marriott**

On October 9, 2024, we announced a \$52 million multistate settlement related to the data breach that Marriott reported publicly on November 30, 2018. Connecticut served as primary lead in this large multistate (which included all states except California). Here, the threat actor was able to access databases containing 131.5 million U.S. guest records. The compromised information included largely "soft data"—namely, name, mailing address, phone number, email address, dates of birth, gender, arrival and departure information, reservation dates, and room preferences. However, 100,000 unexpired, unencrypted payment card numbers and 2,000 unencrypted passport numbers were also exfiltrated. We reached an agreement through a Stipulated Judgment including novel provisions. For example, the settlement creates consumer deletion rights even for states without consumer data privacy laws on the books. Further, the data security requirements are grounded in a risk-based approach that includes "risk of harm to others," a paradigm shift in Marriott's policies that previously focused on risk to the corporation only. This resolution should serve as a new foundation for breach settlements given its risk-based approach, comprehensive data security requirements and consumer relief. As lead state, Connecticut received **\$1,992,130.00**.

## **Guardian Analytics, Inc./ Actimize, Inc.**

On October 10, 2024, we finalized a \$500,000 settlement to resolve our investigation into Guardian Analytics, Inc. ("Guardian") and its successor Actimize, Inc. ("Actimize"). Guardian is a cloud-based financial crime risk management solution provider. On January 20, 2023, Guardian was informed by one of its financial institution customers that files that appeared to be from Guardian's systems were available on an unauthorized website. Guardian's forensic investigator was thereafter able to locate Guardian data on two separate ransomware group websites. The investigation further revealed that the unauthorized access spanned from November 27, 2022, through January 22, 2023, during which time the threat actors were able to perform network reconnaissance, install a file transfer tool, execute an unauthorized script to transfer data out of the network, and encrypt systems in the network. We learned through our investigation that when Actimize acquired Guardian, failures during the integration process resulted in Actimize being unaware of the impacted network segments existence and therefore left the network segment unprotected. The breach impacted the personal information of 157,629 Connecticut residents—all of whom were Webster Bank, N.A. customers. We reached an agreement through an AVC requiring Guardian and Actimize to strengthen their data security practices, improve the acquisition process, undergo a third-party assessment, and make a \$500,000 payment to Connecticut.

## **TicketNetwork**

On June 3, 2025, we finalized a settlement with TicketNetwork, Inc. (“TicketNetwork”), a Connecticut-based company that operates an online ticket exchange, to resolve our concerns that it failed to timely remedy facial deficiencies in its privacy notice. The privacy notice was inordinately unreadable, missing key data rights, and contained rights mechanisms that were inoperable. We sent a cure notice to TicketNetwork in November 2023. Under the CTDPA, TicketNetwork had sixty (60) days from the date it received our notice to cure the deficiencies. However, and despite several back-and-forths with company counsel, TicketNetwork did not resolve those deficiencies until December 19, 2024 – or 346 days beyond the CTDPA’s cure period. Under the AVC, TicketNetwork must review its privacy notice for compliance with the CTDPA on at least an annual basis and upon any material change in their privacy practices. The AVC also requires that TicketNetwork document the consumer rights requests it receives from Connecticut consumers and provide a report to our Office identifying, among other variables, the type of requests received, the number of requests, the average length of time to complete the requests, whether the requests were fulfilled or rejected and, if rejected, the reason for the rejection. TicketNetwork also made a payment to Connecticut of \$85,000.

## **Legislation**

The Section monitors federal and state privacy and data security initiatives and provides the Attorney General with counsel on proposed Connecticut legislation. In particular, over the past several years, our office carefully reviewed consumer data privacy bills raised in the state as well as across the country. We prepared testimony in support of consumer data rights while working with legislators to address issues impacting our Office’s enforcement authority.

Even after the CTDPA took effect in July 2023, the Privacy Section has continued to advocate for updates to the strengthen the laws’ protections. Our [Initial CTDPA Enforcement Report](#), which we issued in February 2024, included various legislative recommendations aimed at addressing weaknesses in the law. In April 2025, we issued an [Updated CTDPA Enforcement Report](#) expanding upon our legislative recommendations and providing additional context for our proposed changes. Given that the CTDPA has become a model for other states seeking to pass comprehensive consumer data privacy laws, our proposals drew attention from industry, consumer advocates, lawmakers, and multistate colleagues. Ultimately, the legislature raised and passed SB 1295 which incorporated many of our suggestions. The amended CTDPA law will take effect on July 1, 2026.

While the bill ultimately did not pass this term, our team weighed in on the language proposed in HB6857 An Act Concerning the Attorney General’s Recommendations Regarding Social Media and Minors (“SMP bill”). The SMP bill focuses on preventing entities from using problematic algorithms designed to keep minors addicted to their platforms. Our team met with other members of our Office throughout the drafting process.

Artificial intelligence (“AI”) is another area that has seen a flurry of legislative activity in Connecticut. Over the Fall of 2023, the Privacy Section participated in an AI-focused legislative task force, which ultimately led to the introduction of the 2024 bill (SB2) on AI. We reviewed the 2024 AI bill and provided feedback to strengthen its provisions and ensure its enforceability. In the Fall of 2024, we again participated in various meetings with legislators and other stakeholders

concerning draft AI legislation. After the 2025 AI bill was introduced, we continued to review and offer input on the initial version along with all updates. Most recently, we banded together with other states and state privacy enforcers to issue joint letters opposing the proposed AI moratorium at the federal level. The moratorium was subsequently dropped.

### **NAAG Privacy Working Groups & Internet Safety Committee**

The Section participates in various National Association of Attorneys General (“NAAG”) working groups involving data security and privacy. In particular, the Section leads the NAAG Medical Privacy Group, through which we host quarterly calls between the states, with participation from the U.S. Section of Health and Human Services’ Office for Civil Rights, to share information and encourage coordination in investigating breaches and other matters impacting medical privacy.

We also participate in a broader NAAG Privacy Working Group and a separate working group focused on tech platforms. Out of the Privacy Working Group, we formed and lead a subgroup dedicated to discussion of state privacy legislation. Finally, we are assisting the Attorney General in his role as co-chair of the NAAG Privacy/ Internet Safety Committee.

### **Education & Outreach**

The Section engages in extensive outreach to constituents, community groups and businesses. For example, we have participated in events hosted by the Connecticut Bar Association, our local chapter of the International Association of Privacy Professionals, and the Practicing Law Institute’s Cybersecurity Seminars. The Section also participated in a series of outreach events for local Chambers of Commerce chapters with the Attorney General, including to raise awareness about the serious and ongoing threat of ransomware. We have expanded these efforts to include events highlighting the importance of the CTDPA and discussing our Office’s early enforcement efforts under the Act.

Most recently, we have updated our CTDPA [FAQ page](#) to highlight the Act’s consumer health data, minors’ privacy, and the universal opt-out provisions. We also engaged in an extensive outreach project related to the CTDPA’s universal opt-out provisions, which came online on January 1, 2025. More specifically, on December 30, 2024, we issued a [press release](#) regarding the universal opt-out provisions, emphasizing that this is a key step forward for consumer privacy rights and urging consumers to take advantage of this right to control their data. We also worked with one of our privacy consultants to develop additional resources (including videos) for consumers seeking to learn how to send their opt-out preference signal (“OOPS”), and for businesses seeking to configure their online services to honor the Global Privacy Control signal. We issued a [press release](#) highlighting these resources for Connecticut consumers and businesses and posted the videos on our website.

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## **PUBLIC SAFETY SECTION**

The Public Safety Section represents the Department of Correction; the Department of Emergency Services and Public Protection, including the Division of State Police, the Division of Emergency Management and Homeland Security; the Military Department; the State Marshal's Commission and the Department of Consumer Protection Liquor Control Division. The Section also provides legal services and representation to a number of associated boards, commissions and agencies, including the Division of Criminal Justice, the Division of Public Defender Services, the Office of Adult Probation, the Governor's Office (Interstate Extradition), the Statewide Emergency 9-1-1 Commission, the State Police Special Licensing and Firearms Unit, the Board of Firearms Permit Examiners, the Commission on Fire Prevention and Control, the Board of Pardons and Paroles and the Police Officer Standards and Training Council. Within the last year, attorneys in the Section have also represented several units within the Judicial Branch in various litigation matters.

### **The Department of Correction**

The Department of Correction ("DOC") is the Section's largest client agency. With over 6,000 employees, approximately 10,000 inmates and another 2,500 offenders supervised in community placements, all of the attorneys in the Section devote most of their time to representation of the DOC. Much of this work is done in defense of the agency and its employees in lawsuits brought by and on behalf of prisoners. The Section continues to defend a large number of lawsuits in state and federal court challenging conditions of confinement in state correctional facilities and the administration of community programs. The pending corrections cases in the U.S. District Court alone continue to represent approximately 15% of the overall federal court docket. These lawsuits collectively seek millions of dollars in money damages and seek to challenge and restrict the statutory authority and discretion of the Department of Correction. The Section's efforts in defense of these cases save the State of Connecticut millions of dollars in damages claims and preserve the state's authority to safely and securely manage an extremely difficult prison population free of costly and onerous court oversight as has been the experience in other states. Significant areas of litigation in the last year include: the continued defense of the DOC's classification of former death row inmates; defense of various challenges to limitations on access to courts by inmates; accommodation of rights to observe religious practices while incarcerated; defense of policy restrictions on the ability of restrictive housing inmates to move out of cell without restraints; litigation challenging DOC's classification of sex offenders and limitations on inmate access to gang materials; class action environmental claims arising from exposure to Radon, PCBs and other hazardous conditions at several correctional facilities; litigation brought by certain violent groups that seek to be recognized as religious organizations; and inmates challenging their classification as members of security risk groups.

Because the inmate population continues to age and presents exceptionally challenging medical and mental health issues, we continue to see a considerable increase in the number of complex medical cases involving issues such as: suicides; the alleged misdiagnosis of cancer and other serious chronic illnesses; viral infections allegedly resulting in blindness; loss of organ function; medical claims of individuals impacted by the opioid epidemic and other addictions; and the adequacy of

dental care and specialty care in prisons. Additionally, we continue to initiate emergency proceedings to allow for extraordinary measures to reverse the physical effects of inmates actively engaged in hunger strikes or other acts of self-harm. This Section continues to work with the Department of Correction, the University of Connecticut Health Center, and outside medical and mental health experts not only to defend litigation, but also to develop policies addressing inmate patient care to avoid systemic issues that may lead to unfavorable patient outcomes and reduce the state's exposure to substantial damages awards.

A great number of inmate claims addressing conditions of confinement continue to be brought as habeas corpus cases. Thus, the Section continues to defend inmate challenges to prison conditions and the application of the "good time" statutes to multiple sentences. The DOC utilizes a "Risk Reduction Earned Credit" program to reduce the inmate population by awarding sentence credits for participation in designated inmate programming. Inmates who feel they have not received a sentence decrease frequently litigate these claims by means of habeas corpus cases. Over the course of several legislative sessions, statutory changes have altered the calculation of the award of discretionary sentence credits. This has resulted in a significant increase in habeas cases. The legislature has also implemented numerous changes to parole and pardon eligibility. There has been a resulting rapid increase in the number of parole eligibility cases defended by the attorneys in this Section. We also continue to see an increase in medical claims in habeas court.

In the last year, Public Safety attorneys have participated in negotiations with the U.S. Department of Justice to address concerns arising from investigations into the provision of mental health and education services to the youth population as well as policies governing the accommodation of religious practices throughout the agency.

In addition to our litigation commitments, Public Safety attorneys continue to advise the Commissioner of Correction on the legal aspects of a myriad of policy initiatives and legal issues, including: oversight of inmate medical care and the retention of contract providers outside of government; provision of necessary services to inmates discharging from custody; accommodating the practices of several religious faiths of the inmate population; management of high profile inmates; maintaining appropriate services for mentally ill offenders; developing and maintaining appropriate administrative directives; and implementing safety and security procedures that protect staff and the public while also accommodating evolving constitutional standards as articulated in developing case law. We regularly provide training to DOC staff and supervisors through their academy program, and in turn DOC staff provide training to the Section's attorneys on correctional practices.

The Section also continues to monitor compliance with agreements resolving litigation that arose from the conditions of confinement in the women's prison and treatment of HIV infected inmates. As the DOC continues to shift its focus to increasing community placements and reducing the number of inmates assigned to restrictive housing settings, the Section works closely with the agency to implement policies governing these new initiatives that comport with statutory and constitutional mandates. These obligations will continue to challenge the Department as retirements and budget constraints take a toll on the correctional system.

## **Board of Pardons and Paroles**

The Section continues to defend a number of cases involving the Board of Pardons and Paroles ("BOPP"). These cases involve challenges to the Board's authority relative to the granting, rescission and revocation of paroles, as well as parole eligibility and changes to the parole statutes. More recently, as the standards for the granting of pardons have been relaxed by the legislature, we are seeing an increase in pardon-related litigation in state and federal courts. The Public Safety Section continues to provide the Board with advice and training on legal issues involving its hearing procedures and developing legal trends.

## **Department of Emergency Services and Public Protection**

Section attorneys defend all lawsuits involving the State Police, a division of the Department of Emergency Services and Public Protection ("DESPP"), where plaintiffs seek money damages arising from the exercise of police powers. The Section caseload of police litigation continues to grow in both number and complexity. The cases include false arrest and excessive force cases claims, wrongful death claims arising from police shootings, Second Amendment challenges to DESPP's practices relating to issuance of handgun permits, administrative proceedings before the Commission on Human Rights and opportunities arising from racial profiling of persons stopped and/or arrested by CSP, and contract claims arising from the agency's relationships with outside service providers. In addition to the Section's litigation efforts, Section attorneys meet regularly with State Police command staff and in-house counsel to review the agency's policies and procedures and to address legal issues relating to release of confidential information, compliance with subpoenas, and relations with other agencies.

Section attorneys also give advice to DESPP staff counsel, and when necessary, appear on behalf of the agency in state and federal court and before the Freedom of Information Commission to address the many different statutory provisions that mandate confidentiality, and even erasure, of police records. Our attorneys also appear on behalf of DESPP in matters before the Commission on Human Rights and Opportunities in matters relating to racial profiling and discrimination based on past criminal history.

With the recent passage of significant police accountability legislation, this Section is seeing an increase in police misconduct litigation in state court, as well as an increase in administrative proceedings arising from the revocation of the credentials of municipal police officers by the Police Officers' Standards and Training Council. We regularly advise POSTC as it conducts hearings to consider the revocation of police officer certification and defend appeals and other legal challenges to POSTC decisions.

## **Board of Firearms Permit Examiners**

During the past year, the Section provided legal advice and representation to the Board of Firearms Permit Examiners on a number of issues, including appeals from denials of permits based on mental health and medicinal marijuana use. The Section has handled several appeals to the Superior Court from the Board's decisions, including efforts to compel towns to issue permits in accordance with the orders of the Board. The Section also continues to field many public inquiries related to the concealed and open carrying of firearms under Connecticut law and the recently enacted firearms

legislation as it relates to the licensing of firearms owners and their purchases of firearms and ammunition. The Section continues to work with the Board to enforce the firearms laws of the State of Connecticut.

### **Liquor Control Division**

During the past year, the Section has handled administrative appeals involving permits and licenses that are within the purview of the Liquor Control Division. In addition, Section staff provided the Division with advice on legal issues concerning enforcement of the state's liquor laws.

### **State Marshal Commission**

During the past year, the Section continued to provide legal advice to the State Marshal Commission on several matters, particularly with respect to the duties of state marshals and the removal of state marshals. This Section also represented the Commission in actions where individual state marshals challenged disciplinary actions taken against them. In addition, attorneys in the Section continue to review operations policies submitted to us by the SMC.

### **Division of Criminal Justice & Division of Public Defender Services**

The Section continues to defend numerous cases involving the Division of Criminal Justice and the Division of Public Defender Services. These cases often raise constitutional questions involving governmental immunity and relate to the core duties of prosecutors and public defenders throughout the criminal justice process. In addition, the Section works closely with the Office of the Chief State's Attorney and several State's Attorneys in areas of overlapping jurisdiction, such as complex habeas corpus matters in state and federal courts. In addition, we serve on the DNA Oversight Committee, which is responsible for overseeing policies governing the state's DNA databank. Finally, the Section oversees the contract between the Office of the Chief State's Attorney and outside labor counsel.

### **Military Department**

The Section continues to work closely with the Military Department on a variety of issues, particularly in review and approval of substantial contracts and funding programs from the U.S. Department of Defense.

### **Prosecution of Home Improvement Contractors**

Assistant Attorney General Matthew Beizer oversees the Attorney General's program for prosecution of fraudulent and/or unlicensed home improvement contractors. Under this program, several of the office's AAGs are appointed as special assistant state's attorneys to prosecute new home construction contractors and home improvement contractors for various crimes including failure to obtain proper licensing and refusing to refund deposits. The program's AAGs review and approve warrant applications leading to the arrest of individuals who violate the laws governing home improvement and new home construction contractors. The AAGs then prosecute the cases to



completion in criminal court and recover restitution for victims of unscrupulous home improvement contractors.

### **Wrongful Incarceration Claims**

The Section continues to represent the State in claims for wrongful incarceration brought in the Claims Commission pursuant to Conn. Gen. Stat. § 54-102uu and in the state and federal courts. Since the legislature created this remedy, more than 50 individuals have filed claims seeking millions of dollars in damages for being wrongfully convicted of, and incarcerated for, crimes they did not commit. This Section reviews each claim to determine whether a claimant is eligible for damages, which requires examination of the underlying criminal case files and consultation with prosecutors. In several of the cases where it appeared the claimants were not eligible for damages; the Section contested the claim in litigation before the Claims Commissioner. Defense of these claims usually requires lengthy discovery and administrative proceedings before the Commissioner.

### **Contracts**

Each year, the Section works closely with its client agencies, including DOC, DESPP, DEMHS, and the Military Department, to review and approve contracts for the Commissioners' and Major General's signature. Included are memoranda of understanding, grants, and agreements with service providers as well as with local/federal government entities. The contracts are carefully reviewed to ensure compliance with all applicable statutes and regulations. This year the Section reviewed approximately 100 contracts, requiring authorization of the Commissioners and Major General for expenditures totaling in excess of \$50 million dollars.

AAGs in the Section advises the agencies in the negotiation of problematic contractual provisions to ensure agency policies and practices are effectuated, as well as educating and training its agency staff in contract law.

### **Appeals**

This Section has a substantial appellate practice in state and federal courts. The issues on appeal range from Second Circuit appeals raising complex constitutional issues, to State Appellate and Supreme Court cases arising from habeas court and the regular session of the Superior Court. Our attorneys work closely with the Solicitor General on these appeals.

### **SPECIAL LITIGATION & CHARITIES SECTION**

The Special Litigation Section represents the Governor, the Lieutenant Governor, the Attorney General, the Secretary of the State, the Treasurer, the Comptroller, the General Assembly, the Judicial Branch, the Auditors of Public Accounts, the State Elections Enforcement Commission, the Office of State Ethics, the Department of Consumer Protection, the State Board of Accountancy, the Office of Governmental Accountability, the State Contracting Standards Board, the State Properties Review Board, the Judicial Review Council, the Judicial Selection Commission, the Statewide Grievance Committee, the Probate Court Administrator, the Office of the Child Advocate, and the Office of the Victim Advocate. In addition, through its Public Charities Unit, the Section protects the public interest in public land, gifts, bequests and devises for charitable purposes, and, in conjunction with the Department of Consumer Protection, enforces state laws regulating charities and professional fundraisers who solicit from the public.

In addition to the Section's work defending the State in litigation, and protecting charitable interests, the Section recently expanded its role to include affirmative litigation and advocacy in the areas of civil rights and reproductive rights. Since 2023, the Section has led the Office's efforts to protect and defend Reproductive Health Care rights through the leadership of Co-Special Counsels for Reproductive Rights. In October 2024, Attorney General Tong appointed another Assistant Attorney General as Special Counsel for Civil Rights. Each of these Special Counsel AAGs provide public guidance on key civil and reproductive rights protections, work on legislative initiatives to protect civil and reproductive rights, conduct outreach to engage with key stakeholders, represent the state in multistate actions defending civil and reproductive rights, and contribute to amicus briefs and multistate initiatives on these issues.

The Section continues to assist in the preparation of appeals and opinions in the Office. It often participates as amicus curiae in litigation involving other states, the federal government and private parties in which important state interests are implicated. In addition, a considerable portion of the Section's resources is committed to defending the State's interests in self-represented litigation against judges and other state officials.

In the past year, the Section represented the State's interests in a number of important matters, including:

#### ***Constitutional Litigation and Other Matters***

- Special Litigation continued in its role of assisting the Attorney General in his efforts to fight to expand and defend civil and reproductive rights. The Section works to lead and facilitate Connecticut's national role to protect, preserve and expand those rights. In particular, the Section works closely with other jurisdictions to bring and defend litigation in this area and also to discuss and develop policy initiatives to expand and protect civil rights, reproductive health and access to safe and private reproductive health care for men and women.
- The Section has been very involved in the Office's federal response initiatives responding to new federal Administration's executive orders and other policy changes that affect Connecticut residents. By way of a few examples, the Section has been involved in litigation opposing the Administration's unconstitutional attempt to eliminate citizenship for Americans born in the United States to parents from other countries, *New Jersey, et al. v. Trump et. al.*, 1:25-cv-10139-LTS (D. Mass.). The Section has also assisted in opposing the Administration's attempt to encroach on states' constitutional authority to regulate elections and the Administration's efforts to make voting registration more burdensome, *California, et al. v. Trump et. al.*, 1:25-cv-10810-DJC (D. Mass.). It also assisted in opposing the Administration's creation of the Department of Governmental Efficiency (DOGE) and DOGE's attempts to downsize and dismantle federal agencies, *New Mexico v. Musk*, 1:25-cv-00429-TSC (D. D.C.).
- The Section continued its representation of the Secretary of the State in election-related litigation and other matters. The Section worked with a multi-state task force in 2024 to ensure that Connecticut's 2024 elections were safe, orderly, secure and transparent. The Section successfully defended the Secretary in various election litigation, such as *Peterson v. Thomas*, Docket No. HHD-CV24-5085675-S, where it obtained a dismissal of an election contest action in which a plaintiff sought to remove the Democratic Party nominee from the ballot on the eve of the November elections.

- The Section also defended several important First Amendment speech cases and provided counsel to various state agencies on First Amendment issues. The Section defended the constitutionality of a statute that protects employees from being forced to listen to their employer’s non-work-related political rhetoric and religious views while at work in *Chamber of Commerce of the United States, et al. v. Bartolomeo, et al.* 3:22-cv-01373 (KAD) (D.Conn.). The Section defended the ability of the Attorney General and other state officials to speak freely on matters of public concern in *Mohammadi v. Tong*, Docket No. HHD-CV-23-6168859-S, appeal pending, Docket No. AC 47598.
- The Section continues its defense of Connecticut’s firearm statutes and regulations. The Section represents the Department of Energy and Environmental Protection in *Nastri v. Dykes*, 3:23-cv-00056 (VAB) (D.Conn.) defending a Second Amendment challenge to the prohibition on carrying firearms in State parks and forests. The Section is also defending a Second Amendment challenge to Connecticut’s laws that prohibit the possession of handguns by people under age 21 in *Succow v. Higgins*, 3:25-cv-250 (SVN) (D.Conn.).
- The Section is defending the Judicial Branch in a trade secrets case at both the state court trial and appellate levels in *Pavonix v. State of Connecticut*, Docket No. HHD-CV24-6191630-S, appeal pending, Docket No. A.C. 48506. The Section is also defending the Judicial Branch from undue encroachment by an executive branch agency upon the Branch’s constitutional power to regulate the conduct of Connecticut barred attorneys and to impose appropriate attorney discipline in *State of CT, Judicial Branch v. Office of Public Hearings, Commission on Human Rights, et al.*, Docket No. A.C. 48127.
- The Section frequently works collaboratively with and supports other Sections in the Office to assist in the defense of statutes and regulation. The Section, in conjunction with the Child Support and Collections Section, successfully concluded, *Beatty v. Lamont*, 3:22-cv-380 (JAM) (D.Conn.), an Eighth Amendment challenge to the constitutionality of Connecticut’s ability to recover some of the “costs of incarceration” incurred by taxpayers as a result of plaintiffs’ incarceration when Plaintiffs withdrew their remaining claims. The Section assisted the Employment Rights Section in defending several employment discrimination Title VII and constitutional claims. It also assisted the Public Safety Section in defending several Section 1983 actions. The Section assisted the Consumer Protection Section in defending Connecticut’s recently enacted regulations of intoxicating “delta-8 THC” products in *Abdul al Qadomi, et al. v. Ned Lamont, et al.*, 3:24-cv-1852-VAB (D. Conn.). The Section took over a Connecticut Supreme Court appeal concerning the authority of the Claims Commissioner to abrogate absolute quasi-judicial immunity from the General Litigation Section, *Jamie Genovese, Administrator v. State*, Docket No. S.C. 20997.

### ***Tribal Matters***

The Section continued its long-standing role of representing the interests of the State in tribal matters. Each year the Section provides advice to the Governor, legislative leaders, state agencies, and other OAG Sections regarding Indian issues and tribal matters. The Section often advises on issues related to Connecticut’s two federally acknowledged Indian tribes—the Mohegan and Mashantucket Pequot tribes—with a frequent focus on the tribes’ authority

over tribal lands, casino operations, and gaming. The Section also advises on the State recognized tribes and non-recognized tribes petitions for federal acknowledgement.

- This year, the Section led litigation against the U.S. Department of Interior challenging the Federal Bureau of Indian Affairs (BIA) efforts to acquire property in Ledyard on behalf of the Mashantucket Pequot tribe. The Section commenced the lawsuit seeking a stay of the BIA's "land-into-trust" acquisition in the United States District Court for Connecticut, *State of Connecticut v. Department of Interior, et al.* Docket No. 3:25-cv-580 (VDO). On July 9, 2025, United States District Court Judge Oliver granted Connecticut's request for a stay of the DOI's land-into-trust proceedings. The matter remains pending.
- In a separate land-into-trust matter, *Connecticut v. Regional Director*, pending at the Interior Board of Indian Appeals, the Section is leading an appeal challenging the Regional Director's decision to take a different parcel in the Town of Ledyard into trust on behalf of the Mashantucket Pequot tribe.
- The Section continued to oppose rulemaking at the BIA to permit re-petitioning for groups who have previously sought but been denied federal tribal acknowledgement. The Section worked with other stakeholders in the State with an interest in tribal matters to encourage the BIA to adhere to its long practice of barring re-petitioning by previously denied groups. Connecticut's comments on the BIA's proposed rule were successful in obtaining some positive changes to the rule but the BIA ultimately adopted the final rule that allows groups that previously sought and were denied federal acknowledgement by the BIA another opportunity to seek federal acknowledgement under certain criteria set forth in the new rule.
- The Section continued to provide advice regarding the federally acknowledged tribes—the Mohegan and Mashantucket Pequot tribes—production of cannabis, taxation of tribal cannabis and its sale. The Section also advises on existing and proposed gaming within the State, including sports betting and online gaming.

#### **Public Land Use and Charitable Matters**

- The Section's Public Charities Unit protects the public interest in gifts, bequests and devises for charitable purposes, and, in conjunction with the Department of Consumer Protection, it enforces state laws regulating charities and professional fundraisers who solicit from the public. The Charities Unit also protects the public's interest in access to public lands. This past year in particular, the Public Charities Unit protected and worked on matters affecting an estimated \$52 million in charitable assets, it reviewed nearly 10,000 Probate Court notices through the Probate Court's TurboCourt filing system to determine whether estates with charitable interests were being administered appropriately. The Charities Unit also had a number of notable accomplishments. As just a few examples:
- In *William Tong v. John Allen*, the Charities Unit obtained a \$97,000 judgment against John Allen, who, as the Executor of the Estate of Alberta Florenzano, misappropriated thousands of dollars from the estate for his personal use that Ms. Florenzano had designated for distribution to charities.
- In *St. Vincent's Medical Center Foundation, Inc. and SVMC Holdings, Inc. v. William Tong*, the Charities Unit worked cooperatively with the St. Vincent's Medical Center Foundation, Inc. to facilitate the judicial transfer of over 150 restricted charitable funds, valued at over \$34 million, to ensure that those funds will benefit the people of the Bridgeport area as the donors intended.

- In a matter involving the Spaulding Pond Preserve in Norfolk, Connecticut, the Charities Unit continues to work with parties to facilitate a global resolution of a dispute related to the pond and an aging dam. The resolution will solidify and strengthen the donors' original charitable intent for the future management and use of the Preserve.
- In a matter involving the Morgan Trust/Pierson School Property in Clinton, the Charities Unit assisted in obtaining a judicial order releasing a charitable educational restriction imposed by Mr. Charles Morgan in his 1870 trust on property. With the release of that restriction, the previously underutilized Pierson School property can be developed for low-income senior housing and a town senior center to better serve the residents of Clinton.
- In a matter involving the Beth Sholom B'nai Israel Endowment Foundation, the Charities Unit supported a judicial action that allowed charitable assets of the Foundation to be reallocated to more productive and suitable charitable purposes.
- The Charities Unit continued its monitoring and oversight of Quinnipiac University's transitioning of art collection of the Ireland's Great Hunger Museum to ensure the protection of charitable gifts and the selection of an appropriate future holder of the Museum's art collection.
- The Charities Unit protected the public interest in numerous probate court matters to ensure that charitable gifts in trusts or estates were not improperly diminished through unreasonably high attorney or administration fees.
- The Charities Unit also consults frequently with land trusts, municipalities and private parties seeking to modify conservation and preservation restrictions to ensure proposed modifications are consistent with state law, donor intent and the public interest.
- The Charities Unit also contributed to national charitable organizations. A Charities Unit attorney serves as a board member on the 10-person National Association of State Charities Officials (NASCO). NASCO is an association of state charities officials charged with preventing the misuse of charitable assets, ensuring that trustees of charitable trusts fulfill their fiduciary duties, and enabling donors to make informed choices about which charitable causes to support. The AAG is also the co-chair for the NASCO Education Committee. That Committee trains NASCO members at seminars, webinars, and through other materials to improve members' knowledge of charitable trust laws and regulations. The AAG also works with NASCO on the International Charity Fraud Awareness week that is held each October or November.

### ***Intra-Agency Matters***

The Section represents the interests of its clients in intra-agency matters every year. In the past year, the Section represented the State's interests in a number of intra-agency matters, including:

- advising and representing the Governor, Secretary of the State, Comptroller and legislators before the Freedom of Information Commission (FOIC).
- training and advising OAG attorneys and support staff on issues related to the Freedom of Information Act and the Freedom of Information Commission.
- training and advising OAG attorneys on issues related to ethics and professional responsibility.
- assisting agencies on issues related to unclaimed property.
- reviewing and approving state contracts related to goods and services, information technology and outside counsel legal representation.
- reviewing and approving proposed agency regulations.
- assisting in preparation of OAG appeals at the Connecticut Appellate Court, Connecticut Supreme Court and the Second Circuit Court of Appeals.
- assisting the Office of Policy and Management (OPM) in developing the legal framework for data sharing both between state agencies and between the State and private institutions, including the creation of data sharing agreement and memorandums of understanding templates.