

FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Linda Wihbey,

Complainant

against

Docket # FIC 2025-0079

Attorney General, State of
Connecticut, Office of the Attorney
General; and State of Connecticut,
Office of the Attorney General,

Respondents

January 28, 2026

The above-captioned matter was heard as a contested case on June 9, 2025 and August 4, 2025, at which times the complainant and respondents appeared and presented testimony, exhibits, and argument on the complaint.¹

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.
2. It is found that, on June 12, 2015, a federal qui tam² action was filed under seal by Brittany Ames Mahoney (“the relator,” i.e., informer) against Dr. Abbas Mohammadi and his businesses, Columbia Dental, P.C. and Columbia Oral Maxillofacial Imaging, LLC (collectively “Columbia Dental”). Such action alleged violation of both the Federal False Claims Act³ for overbilling for dental services and other related matters under the Connecticut Medicaid Assistance Program (the “qui tam action”).⁴

¹ Pursuant to a briefing schedule issued by the undersigned hearing officer, on November 4, 2025, the parties submitted to the Commission simultaneous, initial post-hearing briefs. Subsequently, on November 6, 2025, the respondents submitted a “Motion to Strike the Complainant’s Improper ‘Exhibit A’ and All References to the Improper ‘Exhibit A,’ ” contending that the “Exhibit A” attachment to the complainant’s initial post-hearing brief was not part of the record and, therefore, should not be considered by the Commission. Such Motion to Strike is granted.

² A qui tam action is “[a]n action brought by an informer, under a state statute which establishes a penalty for the commission or omission of a certain act, and provides that the same shall be recoverable in a civil action, [with] part of the penalty to go to any person who... bring[s] such action and the remainder to go to the state or some other institution....” Black’s Law Dictionary 1126 (5th ed. 1979).

³ 31 U.S.C. §3729, et seq.

⁴ See United States of America/State of Connecticut v. Columbia Dental P.C., et al., Docket No. 3:15-cv-00918-SRU.

3. It is found that, on July 13, 2015, the respondents joined the qui tam action in an amended complaint as a co-plaintiff with the relator and the US DOJ. Such amended complaint additionally alleged violations of the Connecticut False Claims Act⁵ by Columbia Dental.

4. It is found that, on August 25, 2015, the court temporarily stayed the qui tam action to allow the respondents to conduct a joint investigation with the US DOJ and determine whether to intervene in the relator's qui tam action.

5. It is found that, on August 23, 2020, the respondents, the US DOJ, and the relator entered into a stipulated judgment and settlement agreement with Columbia Dental to resolve the qui tam action.

6. It is found that, on September 23, 2020, the court entered judgment in the qui tam action in favor of the United States and the State of Connecticut against Columbia Dental in the amount of \$300,000. Such judgment was based upon the terms of the settlement agreement described in paragraph 5, above.

7. It is found that, on October 1, 2020, respondent Attorney General William Tong (the "Attorney General") and the former Commissioner of the Department of Social Services, Deirdre S. Gifford (the "former DSS Commissioner") issued a press release announcing the settlement, claiming that they had uncovered Medicaid fraud and abuse by Columbia Dental on a large scale.

8. It is found that, on May 11, 2023, Columbia Dental filed an action in state court against the respondent Attorney General and the former DSS Commissioner, alleging that the defendants' statements in the October 1, 2020 press release were false and defamatory; violated the constitutional rights of Columbia Dental's owner, Dr. Mohammadi; and harmed his businesses (the "pending state action").⁶

9. It is found that, on September 13, 2024, the complainant,⁷ on behalf of Columbia Dental, filed a federal action against Marcus Campbell, DSS's current Program Administration Manager; the former DSS Commissioner; the current Commissioner of DSS, Andrea Barton Reeves; and the respondent Attorney General, alleging abuse of authority and violations of constitutional rights and due process (the "pending federal action").⁸

⁵ Conn. Gen. Stat. §4-274, et seq.

⁶ Based upon evidence provided by the parties, it is found that, on April 18, 2024, the trial court dismissed the complaint in its entirety based upon the defendants' qualified immunity. On April 25, 2024, Dr. Mohammadi and his dental businesses appealed the trial court's decision to the Appellate Court, where the matter remains pending as of the Final Decision in this matter. See Abbas Mohammadi, et al. v. William M. Tong, et al., AC 47598.

⁷ The Commission notes that the complainant is a licensed Connecticut attorney.

⁸ Based upon evidence provided by the parties, it is found that the federal action was filed against Mr. Campbell, the former and current Commissioners of DSS, and the respondent Attorney General in their official capacities, and against Mr. Campbell and the former and current Commissioners of DSS, in their individual capacities. Such federal action remains pending as of the Final Decision in this matter. See Abbas Mohammadi, et al. v. William Tong, et al., Docket No. 3:24-cv-01473-KAD.

10. It is found that, by email dated January 3, 2025, the complainant requested from the respondents copies of the following categories of records, among others:⁹

- (a) All intra-agency and inter-agency written hard-copy or electronic correspondence, memoranda and communications concerning, relating or referencing the qui tam action.
- (b) All hard copies or electronic notes, transcripts, memoranda, correspondence or other documents made or prepared by any person or entity and within the control of the respondents' office concerning conversations or conferences with, or interviews or depositions of, the relator in the qui tam action, Brittany Ames Mahoney.
- (c) All hard copies or electronic notes, transcripts, memoranda, correspondence or other documents made or prepared by any person or entity and within the control of the respondents' office concerning conversations or conferences with, or interviews or depositions of, any other witness or informant, including then-current or former employees of any of the defendants in the qui tam action.
- (d) The "written disclosure of substantially all material evidence and information" the relator in the qui tam action, Brittany Ames Mahoney, was required to serve on the federal government under 31 U.S.C. §3730(b)(2).
- (e) All hard copies or electronic correspondence between the respondents' office and/or between any other office and John F. O'Brien, the relator's counsel; and between the respondents' office and/or any other office and Arnold I. Menchel, the defendants' counsel (hereinafter, "complainant's request").

11. By email, filed with and received by the Commission on February 6, 2025, the complainant appealed to this Commission, alleging that the respondents violated the Freedom of Information ("FOI") Act by denying her request for certain public records.

12. Section 1-200(5), G.S., provides the following:

"[p]ublic records or files" means any recorded data or information relating to the conduct of the public's business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under

⁹ The Commission notes that, as part of her January 3, 2025 request to the respondents, the complainant had also sought five additional categories of records; however, such requests are not addressed herein because the complainant stated on the record at the June 9, 2025 contested case hearing that they were no longer at issue.

section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

13. Section 1-210(a), G.S., provides the following in relevant part:

[e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to (3) receive a copy of such records in accordance with section 1-212.

14. Section 1-211(a), G.S., provides the following in relevant part:

Any public agency which maintains public records in a computer storage system shall provide, to any person making a request pursuant to the Freedom of Information Act, a copy of any nonexempt data contained in such records, properly identified, on paper, disk, tape or any other electronic storage device or medium requested by the person, including an electronic copy sent to the electronic email address of the person making such request, if the agency can reasonably make any such copy or have any such copy made

15. Section 1-212(a), G.S., provides in relevant part that “[a]ny person applying in writing shall receive, promptly upon request, a plain, facsimile, electronic or certified copy of any public record.”

16. It is concluded that the records requested by the complainant are public records and are maintained by the respondents in both paper and electronic form, within the meaning of §§ 1-200(5), 1-210(a), 1-211(a), and 1-212(a), G.S.

17. It is found that, by email on January 7, 2025, the respondents acknowledged the complainant’s request.

18. It is found that, on January 30, 2025, the respondents provided to the complainant records that they purported to be responsive to the complainant’s request. It is found that such records were comprised of approximately 1,013 pages of records and five compact discs. It is further found that the respondents claimed, via hand-delivered letter on that same date, that certain records responsive to the complainant’s request were exempt from disclosure within the meaning of § 1-210(b)(13), G.S.

19. The respondents represented at the contested case hearings on this matter that many of the records described in paragraph 18, above, were released solely to the complainant due to her status as counsel of record to the plaintiff, Columbia Dental, in the pending federal action

against the respondents. The respondents further represented that such records are otherwise exempt from public disclosure.

20. The complainant contended at the contested case hearings on this matter and on post-hearing brief that the responsive records withheld by the respondents are not exempt from disclosure and requested that the Commission conduct an in camera review of such records. Specifically, the complainant contends that the respondent Attorney General waived his authority to invoke any statutory exemptions to disclosure for the records at issue. The complainant asserts that the respondent Attorney General's public statements contained in the October 1, 2020 press release, described in part in paragraph 7, above, constitute a waiver of any statutory provisions that mandatorily or permissively exempt from disclosure investigatory records related to the qui tam action against Columbia Dental.

21. On September 30, 2025, pursuant to an order of the undersigned hearing officer, the respondents submitted 6,532 unredacted records for in camera inspection, comprised of 6,466 pages of hardcopy records and 66 electronic files. Along with such records, the respondents submitted a detailed Index to Records Submitted for In Camera Inspection ("Index"). Such in camera records are identified herein as IC-2025-0079-000001 through IC-2025-0079-006532.

22. It is found that the Index reflects that the respondents withheld certain responsive records in their entirety pursuant to the mandatory statutory exemption from disclosure for investigative information obtained under the Connecticut False Claims Act (§4-276, G.S.) as well as the following permissive exemptions in the alternative: investigative records (§1-210(b)(13), G.S.); attorney work product privilege (§1-210(b)(10), G.S.); attorney-client privilege (§1-210(b)(10), G.S.); and pending litigation (§1-210(b)(4), G.S.).¹⁰

Section 4-276, G.S., False Claims Act Investigative Information

23. First, the respondents contend that all of the in camera records are mandatorily exempt from disclosure in their entirety pursuant to §4-276, G.S., of the Connecticut False Claims Act, which provides:

The Attorney General may, within available appropriations, investigate any violation subsection (a) of section 4-275. Any information obtained pursuant to such an investigation shall be exempt from disclosure under section 1-210. If the Attorney General finds that a person has violated or is violating any provision of subsection (a) of section 4-275, the Attorney General may bring a civil action in the superior court for the judicial district

¹⁰ The Commission notes that, for all records submitted for in camera inspection, the respondents claimed multiple statutory exemptions to disclosure in the alternative. Accordingly, the Commission need not address every exemption claimed for each record so long as at least one exemption is found to be applicable. Therefore, several exemptions will not be addressed herein, specifically those claimed by the respondents pursuant to the common interest privilege (§1-210(b)(10), G.S.); personnel, medical, and similar files (§1-210(b)(2), G.S.); and 5 U.S.C. §§522(b)(5), 522(b)(6) and 522(b)(7).

of Hartford under this section in the name of the state against such person.

(Emphasis added.)

24. The Commission has found no case law, nor has the complainant provided any such judicial authority to the Commission, concerning the respondents' ability to waive the provisions in §4-276, G.S., that prohibit public disclosure of certain records at issue.

25. Based upon careful in camera inspection, it is found that the in camera records identified in Appendix A, affixed to this decision, contain information obtained by the respondents during the course of an investigation that they conducted pursuant to §§4-276 to 4-280, G.S., inclusive.

26. It is therefore concluded that the records identified in Appendix A are mandatorily exempt from disclosure within the meaning of §4-276, G.S. Accordingly, it is concluded that the respondents did not violate the disclosure provisions of §§1-210(a), 1-211(a), and 1-212(a), G.S., when they declined to disclose to the complainant a copy of such records identified in Appendix A.

27. However, based upon careful in camera inspection, it is further found that the remainder of the records that the respondents claimed were mandatorily exempt from disclosure do not constitute “information obtained [by the Attorney General] pursuant to such [False Claims Act] investigation” within the meaning of §4-276, G.S. (Emphasis added.) The respondents also claimed various exemptions in the alternative for such records, which are addressed below.

Section 1-210(b)(10), G.S., Common Law Privileges

28. The respondents next claim, in the alternative, that many of the remaining in camera records are exempt from disclosure in their entirety pursuant to §1-210(b)(10), G.S., which provides, in relevant part, that “[n]othing in the [FOI] Act shall be construed to require the disclosure of” records exempted by “any...privilege established by the common law” Specifically, the respondents claim the attorney work product and attorney-client privileges for various responsive records.

Attorney Work Product Privilege

29. In Docket #FIC 2019-0707, Ian Cooke v. Commissioner, State of Connecticut, Department of Emergency Services and Public Protection, et al. (Oct. 9, 2024) (“Cooke”), the Commission concluded that the attorney work product doctrine is a “privilege established by the common law,” within the meaning of §1-210(b)(10), G.S.¹¹ In accordance with the Supreme Court’s formulation in Stanley Works v. New Britain Redevelopment Agency, 155 Conn. 86, 95 (1967), a public record is protected by the work product doctrine, and therefore exempt from

¹¹ Prior Commission decisions that reached a contrary conclusion with regard to whether such doctrine is a privilege established at common law were overruled by Cooke. The Commission notes that its final decision in Cooke is the subject of a pending administrative appeal. See Ian T. Cooke v. Freedom of Info. Comm’n, Docket No. HHB-CV24-5037203-S.

disclosure pursuant to §1-210(b)(10), G.S., if (1) it was prepared in anticipation of litigation, (2) the attorney was performing duties normally attended to by attorneys in connection with the creation of the record in question, and (3) if the record was not created by an attorney, the attorney's work formed an essential step in the creation of such record.

30. However, like the attorney-client privilege, the work product doctrine is subject to waiver when attorney work product is voluntarily disclosed to a third party. Harp v. King, 266 Conn. 747, 767 (2003). The disclosure of confidential communications or attorney work product to a testifying expert witness is a voluntary disclosure to a third party that occasions the waiver of the privilege or doctrine. Morganti Group, Inc. v. Stamford Phase Four JV, LLC, Superior Court, judicial district of Hartford, Docket No. CV-X07-HHD-CV-18-6117069S, 2022 WL 620372 at *3 (Feb. 2, 2022), reconsideration granted on other grounds, CV-X07-18-6117069S, 2022 WL 1072983 (Mar. 3, 2022).

31. Based on the foregoing, and upon careful in camera inspection, it is found that the in camera records identified in Appendix B, affixed to this decision, were prepared in anticipation of litigation by attorneys performing duties normally attended to by attorneys in connection with the creation of the records in question, and thereby constitute privileged records by the attorney work product doctrine within the meaning of §1-210(b)(10), G.S., inclusive.

32. Therefore, it is concluded that the records identified in Appendix B are exempt from disclosure pursuant to §1-210(b)(10), G.S. It is therefore concluded that the respondents did not violate the disclosure provisions of §§1-210(a), 1-211(a), and 1-212(a), G.S., when they declined to disclose to the complainant a copy of such records identified in Appendix B.

Attorney/Client Privilege

33. The respondents further claim, in the alternative, that many of the in camera records are exempt from disclosure under the attorney/client privilege, a common law privilege within the meaning of §1-210(b)(10), G.S.

34. Section 1-210(b)(10), G.S., in relevant part, provides that disclosure shall not be required of "communications privileged by the attorney-client relationship." The applicability of the exemption contained in §1-210(b)(10), G.S., is governed by established Connecticut law defining the privilege. That law is well set forth in Maxwell v. Freedom of Info. Comm'n, 260 Conn. 143 (2002). In that case, the Supreme Court stated that §52-146r, G.S., which established a statutory privilege for communications between public agencies and their attorneys, merely codifies "the common-law attorney-client privilege as this court previously had defined it." Id. at 149.

35. Section 52-146r(a)(2), G.S., defines "confidential communications" as:

All oral and written communication transmitted in confidence
between a public official or employee of a public agency acting in

the performance of his or her duties or within the scope of his or her employment and a government attorney relating to legal advice sought by the public agency or a public official or employee of such public agency from that attorney, and all records prepared by the government attorney in furtherance of the rendition of such legal advice....

36. Our Supreme Court has stated that a four-part test must be applied to determine whether communications are privileged: “(1) the attorney must be acting in a professional capacity for the agency; (2) the communications must be made to the attorney by current employees or officials of the agency; (3) the communications must relate to the legal advice sought by the agency from the attorney; and (4) the communications must be made in confidence.” Lash v. Freedom of Info. Comm’n, 300 Conn. 511, 516 (2011) (“Lash”), citing Shew v. Freedom of Info. Comm’n, 245 Conn. 149, 159 (1998). “The burden of establishing the applicability of the privilege rests with the party invoking it.” Harrington v. Freedom of Info. Comm’n, 323 Conn. 1, 12 (2016). “If it is clear from the face of the records, extrinsic evidence is not required to prove the existence of the attorney-client privilege.” Lash, 300 Conn. at 516-17.

37. Moreover, “[i]n Connecticut, the attorney-client privilege protects both the confidential giving of professional advice by an attorney acting in the capacity of a legal advisor to those who can act on it, as well as the giving of information to the lawyer to enable counsel to give sound and informed advice.” PSE Consulting, Inc. v. Frank Mercede & Sons, Inc., 267 Conn. 279, 329 (2004).

38. The Supreme Court, however, has also recognized that “[n]ot every communication between attorney and client falls within the [attorney-client] privilege.” Harrington, 323 Conn. at 14 (quoting Ullmann v. State, 230 Conn. 698, 713 (1994)). In Harrington, the Court held that, when an attorney provides both legal and nonlegal professional advice, communications containing such advice will be privileged “if the non-legal aspects of the consultation are integral to the legal assistance given and the legal assistance is the primary purpose of the consultation....” Harrington at 17. Under such circumstances, “it is not enough for the party invoking the privilege to show that a communication to legal counsel relayed information that might become relevant to the future rendering of legal advice. Instead, the communication must also either explicitly or implicitly seek specific legal advice about that factual information.” (Citation omitted; internal quotation marks omitted.) Id. at 16. Moreover, when an attorney’s primary role is that of a nonlegal professional advisor, there must be “a clear basis to conclude that information was being conveyed to [her] for the purpose of having [her] act in the role of legal advisor or that [she] was providing a legal opinion. Extrinsic evidence may undoubtedly provide context for making such an assessment.” Id. at 23.

39. Moreover, it is well established that, generally, disclosure of an attorney-client privileged communication to a third party waives the privilege. See, e.g., Harp v. King, 266 Conn. 747, 767 (2003). However, “the presence of certain third parties...who are agents or

employees of an attorney or client, and who are necessary to the [legal] consultation, will not destroy the confidential nature of the communication.” Harrington, 323 Conn. at 25 (citations omitted).

40. Upon careful in camera inspection, it is found that the in camera records identified in Appendix C, affixed to this decision, are communications “between a public official or employee of a public agency acting in the performance of his or her duties or within the scope of his or her employment and a government attorney,” which “relate to legal advice” sought by the public agency client from the attorney, which were “transmitted in confidence” or were “records prepared by the government attorney in furtherance of the rendition of such legal advice,” within the meaning of §52-146r(a)(2), G.S.

41. Accordingly, it is concluded that the records identified in Appendix C are exempt from disclosure pursuant to §1-210(b)(10), G.S. It is therefore concluded that the respondents did not violate the disclosure provisions of §§1-210(a), 1-211(a), and 1-212(a), G.S., when they declined to disclose to the complainant a copy of such records identified in Appendix C.

Section 1-210(b)(4), G.S., Pending Litigation

42. The respondents also contend that certain records, which are not exempt from disclosure pursuant to any of the aforementioned statutes, are, in the alternative, exempt from disclosure pursuant to the pending litigation exemption in §1-210(b)(4), G.S.

43. Section 1-210(b)(4), G.S., provides that nothing in the FOI Act shall be construed to require the disclosure of “[r]ecords pertaining to strategy and negotiations with respect to pending claims or pending litigation to which the public agency is a party until such litigation or claim has been finally adjudicated or otherwise settled[.]”

44. The phrase “pending claim” as defined in §1-200(8), G.S., means “a written notice to an agency which sets forth a demand for legal relief or which asserts a legal right stating the intention to institute an action in an appropriate forum if such relief or right is not granted.”

45. The phrase “pending litigation” as defined in §1-200(9), G.S., means the following:

(A) a written notice to an agency which sets forth a demand for legal relief or which asserts a legal right stating the intention to institute an action before a court if such relief or right is not granted by the agency; (B) the service of a complaint against an agency returnable to a court which seeks to enforce or implement legal relief or a legal right; or (C) the agency’s consideration of action to enforce or implement legal relief or a legal right.

46. Our Supreme Court has determined, relying on Webster’s Third New International Dictionary, that “strategy” is defined as “the art of devising or employing plans or stratagems.”

City of Stamford v. Freedom of Info. Comm'n, 241 Conn. 310, 318 (1997). Further, the court stated that “negotiation” is defined as “the action or process of negotiating,” and “negotiate is variously defined as: to communicate or confer with another so as to arrive at the settlement of some matter: meet with another so as to arrive through discussion at some kind of agreement or compromise about something; to arrange for or bring about through conference and discussion: work out or arrive at or settle upon by meetings or agreements or compromises; and to influence successfully in a desired way by discussion and agreements or compromises.” (Internal quotations omitted.) Id.

47. The Supreme Court has also determined that “pending” claim or litigation includes claims or litigation “already in existence and in progress,” as well as imminent or threatened litigation not yet filed (see Bd. of Educ. v. Freedom of Info. Comm'n, 217 Conn. 153, 161 (1991) and that “finally adjudicated” means “completion of an appeal to the highest court” or “expiration of a party’s right to appeal” (see Planning and Zoning Comm’n of the Town of Monroe, et al. v. Freedom of Info. Comm’n, et al., 316 Conn. 1, 17-18 (2015)).

48. It is found that the respondents were a party to pending litigation within the meaning of §1-210(b)(4), G.S., during the following time periods:

(a) qui tam action: from June 12, 2015, when the relator filed the complaint in federal court, until October 1, 2020, when the matter was finally adjudicated through a stipulated judgment entered by the court, as described in paragraphs 3 through 6, above;

(b) state court action: from May 11, 2023, when Columbia Dental filed the complaint against the respondents, through the date of the Final Decision in this matter, as the matter remains pending as described in paragraph 8, above; and

(c) federal court action: from September 13, 2024, when the complainant filed the complaint against the respondents, through the date of the Final Decision in this matter, as the matter remains pending as described in paragraph 9, above.

49. It is found that, at the time of the complainant’s request on January 3, 2025, the respondents were not parties to pending litigation in the qui tam action, described in paragraphs 2 through 5 and 48(a), above, as such matter had been finally adjudicated approximately five years earlier.

50. It is further found that, at the time of the complainant’s request on January 3, 2025, the respondents were parties to pending litigation in two other matters: the state court action, described in paragraphs 8 and 48(b), above; and the federal court action, described in paragraphs 9 and 48(c), above.

51. On post-hearing brief, the respondents contend that the responsive records identified in Appendix D, affixed to this decision, contain information relating to “strategy” within the meaning of §1-210(b)(4), G.S., because the respondents may choose to utilize such records in their defense in the pending state and federal actions.

52. Upon careful in camera inspection, it is found that the responsive records created and maintained by the respondents in relation to the qui tam action do not, and could not, contain information relating to “strategy” or “negotiations” of the pending state and federal actions within the meaning of §1-210(b)(4), G.S. It is found that such records were created approximately three and four years prior to the commencement of the pending state and federal actions, respectively, and, therefore, could not possibly contain information that contemplated a “strategy” for litigation that would not commence for several years.

53. Therefore, it is found that the records claimed on the Index by the respondents as exempt from disclosure pursuant to §1-210(b)(4), G.S., are not “[r]ecords pertaining to strategy and negotiations with respect to pending claims or pending litigation to which the public agency is a party.”

54. Accordingly, it is concluded that such records, identified on Appendix D and for which no other exemptions were properly claimed in the alternative, are not permissively exempt from disclosure as contended by the respondents. It is further concluded that the respondents violated the disclosure provisions of §§1-210(a), 1-211(a), and 1-212(a), G.S., when they declined to disclose a copy of such records to the complainant pursuant to §1-210(b)(4), G.S.

Hearing Exhibits

55. The respondents also contend that certain in camera records, identified in Appendix E, affixed to this decision, are exempt from disclosure pursuant to various statutory exemptions claimed on the Index.

56. Upon careful in camera inspection, it is found that the in camera records identified in Appendix E were also proffered and accepted, in whole or in part, as exhibits that were admitted into evidence at the contested case hearings in the above-captioned matter. It is found that such exhibits were marked as Exhibits 8, 9, and 12.

57. It is further found that exhibits in contested case hearings before the Commission are public records within the meaning of §§1-200(5), 1-210(a), 1-211(a), and 1-212(a), G.S.

58. Upon further careful in camera inspection, it is found that page 9 of Exhibit 12 contains redactions. It is found that such redactions contain “names of, or any information concerning ... recipients of DSS assistance” within the meaning of §17b-90(b), G.S., that are mandatorily exempt from disclosure.

59. Section 17b-90(b), G.S., provides the following in relevant part:

No person shall, except for purposes directly connected with the administration of programs of the Department of Social Services and in accordance with the regulations of the commissioner... disclose ... any list of the names of, or any information concerning, persons applying for or receiving assistance from the Department of Social Services or persons participating in a program administered by said department, directly or indirectly derived from the records, papers, files or communications of the state or its subdivisions or agencies, or acquired in the course of the performance of official duties.

60. It is found that Connecticut participates in the federal Medicaid program and that the Department of Social Services is its administering agency.

61. Federal law directs states participating in the Medicaid program to safeguard, by way of a state statute, the use or disclosure of information pertaining to applicants and beneficiaries of Medicaid. See 42 C.F.R. §431.301 (“State plan requirements”). It is found that §17b-90, G.S., is Connecticut’s safeguarding statute for purposes of complying with federal Medicaid regulations.

62. Therefore, it is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., when they declined to disclose to the complainant a copy of the records identified in Appendix E (with redactions pursuant to §17b-90(b), G.S., where statutorily required¹².)

Court Filings

63. Upon careful in camera inspection, it is found that the responsive records identified in Appendix F, affixed to this decision, are copies of publicly available filings in the unsealed docket for the qui tam action.

64. Therefore, it is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., when they declined to disclose to the complainant a copy of the records identified in Appendix F, which are already publicly available.

Nonexempt Records

65. Upon careful in camera inspection, it is found that the responsive records identified in Appendix G, affixed to this decision, are not exempt pursuant to any of the above-mentioned statutory exemptions claimed by the respondents for the records identified in Appendices A through D. It is further found that the respondents did not claim any other exemptions in the alternative for the records identified in Appendix G.

¹² The Commission notes that the respondents properly claimed the mandatory exemption pursuant to §17b-90(b), G.S., for such responsive records throughout the Index.

66. Therefore, it is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., when they declined to disclose to the complainant a copy of the records identified in Appendix G.

Section 1-210(b)(13), G.S., Records of a False Claims Act Investigation

67. The respondents also contend, in the alternative, that the remainder of the in camera records, which are not identified in Appendices A through G, are also exempt from disclosure in their entirety pursuant to §1-210(b)(13), G.S., which section provides that nothing in the FOI Act shall be construed to require the disclosure of “[r]ecords of an investigation, including any complaint or the name of a person providing information under the provisions of section 4-61dd or sections 4-276 to 4-280 [the False Claims Act], inclusive.”

68. The Commission has found no case law, nor has the complainant provided any such judicial authority to the Commission, concerning the respondents’ ability to waive their authority to invoke the permissive exemption contained in §1-210(b)(13), G.S.

69. It is found that the respondents conducted a False Claims Act investigation against Columbia Dental jointly with the US DOJ. It is found that such investigation was prompted by the filing of a qui tam action under seal in federal court, as described in paragraphs 2 through 4, above.

70. Based upon careful in camera inspection, it is found that the remainder of the in camera records, identified on the Index but not listed in Appendices A through G of this decision, constitute “records of an investigation” conducted by the respondents within the meaning of §1-210(b)(13), G.S., and are therefore exempt from disclosure.

71. It is therefore concluded that the respondents did not violate the disclosure provisions of §§1-210(a) and 1-212(a), G.S., when they declined to provide a copy of such records, described in paragraph 70, to the complainant.

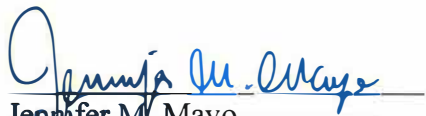
The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Forthwith, the respondents shall provide the complainant, free of charge, with copies of the records indicated in Appendices D, E, F, and G.

2. Henceforth, the respondents shall strictly comply with the disclosure provisions of §§1-210(a) and 1-212(a), G.S.¹³

¹³ Although the Commission found violations herein, it appreciates the care and detail the respondents dedicated to the compilation of in camera records and exemptions claimed on the Index.

Approved by Order of the Freedom of Information Commission at its regular meeting of January 28, 2026.



Jennifer M. Mayo
Acting Clerk of the Commission

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

LINDA WIHBEY, 483 Middle Turnpike West, Suite 309, Manchester, CT 06040

ATTORNEY GENERAL, STATE OF CONNECTICUT, OFFICE OF THE ATTORNEY GENERAL; AND STATE OF CONNECTICUT, OFFICE OF THE ATTORNEY GENERAL, c/o Assistant Attorney General Gregory K. O'Connell, Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106



Jennifer M. Mayo
Acting Clerk of the Commission

APPENDIX A

As indicated in paragraph 26 of the findings in Docket #FIC 2025-0079, the following in camera records are mandatorily exempt from disclosure pursuant to §4-276, G.S.:

IC-2025-0079-000023 through IC-2025-0079-000024	IC-2025-0079-000547
	IC-2025-0079-000754
IC-2025-0079-000027 through IC-2025-0079-000028	IC-2025-0079-000779
IC-2025-0079-000043 through IC-2025-0079-000049	IC-2025-0079-000794 through IC-2025-0079-000797
IC-2025-0079-000080 through IC-2025-0079-000084	IC-2025-0079-000954 through IC-2025-0079-000958
IC-2025-0079-000098 through IC-2025-0079-000103	IC-2025-0079-000961
IC-2025-0079-000114 through IC-2025-0079-000116	IC-2025-0079-001070 through IC-2025-0079-001073
IC-2025-0079-000207 through IC-2025-0079-000208	IC-2025-0079-001083
IC-2025-0079-000227	IC-2025-0079-001102 through IC-2025-0079-001105
IC-2025-0079-000236 through IC-2025-0079-000239	IC-2025-0079-001109
IC-2025-0079-000249 through IC-2025-0079-000254	IC-2025-0079-001112
IC-2025-0079-000354 through IC-2025-0079-000366	IC-2025-0079-001113 through IC-2025-0079-001114
IC-2025-0079-000376 through IC-2025-0079-000430	IC-2025-0079-001116
IC-2025-0079-000465	IC-2025-0079-001120
IC-2025-0079-000484	IC-2025-0079-001137 through IC-2025-0079-001142
IC-2025-0079-000488 through IC-2025-0079-000497	IC-2025-0079-001214 through IC-2025-0079-001219
IC-2025-0079-000513	IC-2025-0079-001276 through IC-2025-0079-001279
	IC-2025-0079-001291

IC-2025-0079-001130 through IC-2025-0079-001335	IC-2025-0079-002005 through IC-2025-0079-002006
IC-2025-0079-001349 through IC-2025-0079-001350	IC-2025-0079-002015 through IC-2025-0079-002017
IC-2025-0079-001386 through IC-2025-0079-001388	IC-2025-0079-002022
IC-2025-0079-001390	IC-2025-0079-002041 through IC-2025-0079-002043
IC-2025-0079-001436	IC-2025-0079-002061
IC-2025-0079-001531	IC-2025-0079-002072 through IC-2025-0079-002073
IC-2025-0079-001539 through IC-2025-0079-001541	IC-2025-0079-002097 through IC-2025-0079-002100
IC-2025-0079-001586	IC-2025-0079-002160
IC-2025-0079-001622	IC-2025-0079-002198
IC-2025-0079-001636 through IC-2025-0079-001637	IC-2025-0079-002215
IC-2025-0079-001644 through IC-2025-0079-001645	IC-2025-0079-002227 through IC-2025-0079-002231
IC-2025-0079-001647 through IC-2025-0079-001648	IC-2025-0079-002268
IC-2025-0079-001665 through IC-2025-0079-001688	IC-2025-0079-002376
IC-2025-0079-001692 through IC-2025-0079-001697	IC-2025-0079-002391 through IC-2025-0079-002392
IC-2025-0079-001700 through IC-2025-0079-001704	IC-2025-0079-002419 through IC-2025-0079-002420
IC-2025-0079-001816	IC-2025-0079-002422 through IC-2025-0079-002425
IC-2025-0079-001821	IC-2025-0079-002427 through IC-2025-0079-002430
IC-2025-0079-001891 through IC-2025-0079-001893	IC-2025-0079-002437 through IC-2025-0079-002445
IC-2025-0079-001956	IC-2025-0079-002522 through IC-2025-0079-002609
IC-2025-0079-001990	

IC-2025-0079-002621	IC-2025-0079-003423 through IC-2025-0079-003430
IC-2025-0079-002647	
IC-2025-0079-002705 through IC-2025-0079-002707	IC-2025-0079-003439 through IC-2025-0079-003445
IC-2025-0079-002909	IC-2025-0079-003520 through IC-2025-0079-003529
IC-2025-0079-002925 through IC-2025-0079-002930	IC-2025-0079-003531 through IC-2025-0079-003533
IC-2025-0079-002934 through IC-2025-0079-002936	IC-2025-0079-003538 through IC-2025-0079-003539
IC-2025-0079-002939 through IC-2025-0079-002940	IC-2025-0079-003551 through IC-2025-0079-003554
IC-2025-0079-003026	IC-2025-0079-003562 through IC-2025-0079-003568
IC-2025-0079-003078 through IC-2025-0079-003092	IC-2025-0079-003591 through IC-2025-0079-003593
IC-2025-0079-003096	IC-2025-0079-003715 through IC-2025-0079-003716
IC-2025-0079-003108 through IC-2025-0079-003114	IC-2025-0079-003726
IC-2025-0079-003176 through IC-2025-0079-003177	IC-2025-0079-003822 through IC-2025-0079-003828
IC-2025-0079-003186 through IC-2025-0079-003188	IC-2025-0079-003832 through IC-2025-0079-003834
IC-2025-0079-003237 through IC-2025-0079-003249	IC-2025-0079-003836
IC-2025-0079-003255 through IC-2025-0079-003261	IC-2025-0079-003852 through IC-2025-0079-003854
IC-2025-0079-003342	IC-2025-0079-003858
IC-2025-0079-003361 through IC-2025-0079-003363	IC-2025-0079-003878 through IC-2025-0079-003879
IC-2025-0079-003366	IC-2025-0079-003892 through IC-2025-0079-003895
IC-2025-0079-003399	IC-2025-0079-003960

IC-2025-0079-003964 through IC-2025-0079-003965

IC-2025-0079-004029

IC-2025-0079-004049 through IC-2025-0079-004054

IC-2025-0079-004089

IC-2025-0079-004110 through IC-2025-0079-004111

IC-2025-0079-004145

IC-2025-0079-004216 through IC-2025-0079-004239

IC-2025-0079-004269 through IC-2025-0079-004271

IC-2025-0079-004278 through IC-2025-0079-004281

IC-2025-0079-004294

IC-2025-0079-004306 through IC-2025-0079-004310

IC-2025-0079-004322 through IC-2025-0079-004323

IC-2025-0079-004330 through IC-2025-0079-004332

IC-2025-0079-004334 through IC-2025-0079-004336

IC-2025-0079-004343 through IC-2025-0079-004344

IC-2025-0079-004349 through IC-2025-0079-004352

IC-2025-0079-004372

IC-2025-0079-004408 through IC-2025-0079-004411

IC-2025-0079-004428 through IC-2025-0079-004431

IC-2025-0079-004433 through IC-2025-0079-004434

IC-2025-0079-004450 through IC-2025-0079-004451

IC-2025-0079-004473

IC-2025-0079-004494 through IC-2025-0079-004495

IC-2025-0079-004500 through IC-2025-0079-004501

IC-2025-0079-004504 through IC-2025-0079-004505

IC-2025-0079-004521

IC-2025-0079-004555

IC-2025-0079-004556 through IC-2025-0079-004561

IC-2025-0079-004565 through IC-2025-0079-004567

IC-2025-0079-004568 through IC-2025-0079-004574

IC-2025-0079-004581 through IC-2025-0079-004584

IC-2025-0079-004586 through IC-2025-0079-004589

IC-2025-0079-004605 through IC-2025-0079-004609

IC-2025-0079-004721 through IC-2025-0079-004723

IC-2025-0079-004733

IC-2025-0079-004880 through IC-2025-0079-004884

IC-2025-0079-004895 through IC-2025-0079-004898

IC-2025-0079-004918

IC-2025-0079-004918

IC-2025-0079-004938 through IC-2025-0079-004941

IC-2025-0079-004942 through IC-2025-0079-004948

IC-2025-0079-004858 through IC-2025-0079-004958

IC-2025-0079-004962 through IC-2025-0079-004965

IC-2025-0079-005024 through IC-2025-0079-005026

IC-2025-0079-005033

IC-2025-0079-005036 through IC-2025-0079-005038

IC-2025-0079-005039 through IC-2025-0079-005041

IC-2025-0079-005043 through IC-2025-0079-005045

IC-2025-0079-005091 through IC-2025-0079-005092

IC-2025-0079-005099 through IC-2025-0079-005100

IC-2025-0079-005161

IC-2025-0079-005212 through IC-2025-0079-005214

IC-2025-0079-005218 through IC-2025-0079-005221

IC-2025-0079-005251

IC-2025-0079-005293 through IC-2025-0079-005295

IC-2025-0079-005296

IC-2025-0079-005299 through IC-2025-0079-005304

IC-2025-0079-005308 through IC-2025-0079-005566

IC-2025-0079-005572 through IC-2025-0079-005655

IC-2025-0079-005704 through IC-2025-0079-005749

IC-2025-0079-005751 through IC-2025-0079-005754

IC-2025-0079-005775 through IC-2025-0079-005836

IC-2025-0079-006029 through IC-2025-0079-006034

IC-2025-0079-006060 through IC-2025-0079-006148

IC-2025-0079-006150 through IC-2025-0079-006151

IC-2025-0079-006158

IC-2025-0079-006163 through IC-2025-0079-006177

IC-2025-0079-006183

IC-2025-0079-006185 through IC-2025-0079-006204

IC-2025-0079-006215 through IC-2025-0079-006216

IC-2025-0079-006221 through IC-2025-0079-006222

IC-2025-0079-006269 through IC-2025-0079-006270

IC-2025-0079-006276 through IC-2025-0079-006278

IC-2025-0079-006281 through IC-2025-0079-006293

IC-2025-0079-006308 through IC-2025-0079-006322

IC-2025-0079-006330 through IC-2025-0079-006339

IC-2025-0079-006341 through IC-2025-0079-006532

APPENDIX B

As indicated in paragraph 32 of the findings in Docket #FIC 2025-0079, the following in camera records are exempt from disclosure pursuant to §1-210(b)(10), G.S., specifically the attorney work product privilege:

IC-2025-0079-000002 through IC-2025-0079-000004	IC-2025-0079-005098
IC-2025-0079-000006	IC-2025-0079-005222
IC-2025-0079-000232 through IC-2025-0079-000234	IC-2025-0079-005297 through IC-2025-0079-005298
IC-2025-0079-000311 through IC-2025-0079-000315	IC-2025-0079-005306 through IC-2025-0079-005307
IC-2025-0079-000963	IC-2025-0079-006178 through IC-2025-0079-006182
IC-2025-0079-001060 through IC-2025-0079-001062	IC-2025-0079-006184
IC-2025-0079-001090 through IC-2025-0079-001098	IC-2025-0079-006205 through IC-2025-0079-006214
IC-2025-0079-001324 through IC-2025-0079-001325	IC-2025-0079-006217 through IC-2025-0079-006220
IC-2025-0079-001924 through IC-2025-0079-001926	IC-2025-0079-006223 through IC-2025-0079-006224
IC-2025-0079-002090 through IC-2025-0079-002092	IC-2025-0079-006227 through IC-2025-0079-006235
IC-2025-0079-002232 through IC-2025-0079-002234	IC-2025-0079-006236 through IC-2025-0079-006268
IC-2025-0079-004065 through IC-2025-0079-004076	IC-2025-0079-006271 through IC-2025-0079-006275
IC-2025-0079-004909 through IC-2025-0079-004913	IC-2025-0079-006279 through IC-2025-0079-006280
IC-2025-0079-005035	IC-2025-0079-006323 through IC-2025-0079-006329

APPENDIX C

As indicated in paragraph 41 of the findings in Docket #FIC 2025-0079, the following in camera records are exempt from disclosure pursuant to §1-210(b)(10), G.S., specifically the attorney-client privilege:

IC-2025-0079-000001	IC-2025-0079-002432 through IC-2025-0079-002434
IC-2025-0079-000005	IC-2025-0079-002447
IC-2025-0079-001003 through IC-2025-0079-001004	IC-2025-0079-003119 through IC-2025-0079-003122
IC-2025-0079-001031 through IC-2025-0079-001033	IC-2025-0079-003333 through IC-2025-0079-003335
IC-2025-0079-001179 through IC-2025-0079-001180	IC-2025-0079-003540 through IC-2025-0079-003542
IC-2025-0079-001237 through IC-2025-0079-001239	IC-2025-0079-003546 through IC-2025-0079-003548
IC-2025-0079-001303	IC-2025-0079-004093 through IC-2025-0079-004094
IC-2025-0079-001574 through IC-2025-0079-001575	IC-2025-0079-004717 through IC-2025-0079-004718
IC-2025-0079-001638 through IC-2025-0079-001640	IC-2025-0079-004899 through IC-2025-0079-004900
IC-2025-0079-001714 through IC-2025-0079-001716	IC-2025-0079-004926 through IC-2025-0079-004929
IC-2025-0079-001835 through IC-2025-0079-001837	IC-2025-0079-004933 through IC-2025-0079-004935
IC-2025-0079-001951 through IC-2025-0079-001952	IC-2025-0079-004952 through IC-2025-0079-004954
IC-2025-0079-002023 through IC-2025-0079-002025	IC-2025-0079-004987 through IC-2025-0079-004991
IC-2025-0079-002055 through IC-2025-0079-002057	IC-2025-0079-005030 through IC-2025-0079-005031
IC-2025-0079-002113 through IC-2025-0079-002114	

IC-2025-0079-005155 through IC-2025-0079-005157	IC-2025-0079-000944 through IC-2025-0079-000948
IC-2025-0079-000316 through IC-2025-0079-000317	IC-2025-0079-000952 through IC-2025-0079-000953
IC-2025-0079-000335 through IC-2025-0079-000337	IC-2025-0079-000974 through IC-2025-0079-000975
IC-2025-0079-000341 through IC-2025-0079-000345	IC-2025-0079-001016 through IC-2025-0079-001020
IC-2025-0079-000467 through IC-2025-0079-000469	IC-2025-0079-001207 through IC-2025-0079-001211
IC-2025-0079-000475 through IC-2025-0079-000480	IC-2025-0079-001222 through IC-2025-0079-001226
IC-2025-0079-000561 through IC-2025-0079-000563	IC-2025-0079-001321 through IC-2025-0079-001323
IC-2025-0079-000568 through IC-2025-0079-000570	IC-2025-0079-001342 through IC-2025-0079-001346
IC-2025-0079-000592 through IC-2025-0079-000594	IC-2025-0079-001430 through IC-2025-0079-001435
IC-2025-0079-000659 through IC-2025-0079-000663	IC-2025-0079-001496 through IC-2025-0079-001499
IC-2025-0079-000746 through IC-2025-0079-000748	IC-2025-0079-001535 through IC-2025-0079-001537
IC-2025-0079-000749 through IC-2025-0079-000752	IC-2025-0079-001563 through IC-2025-0079-001565
IC-2025-0079-000757 through IC-2025-0079-000759	IC-2025-0079-001568 through IC-2025-0079-001573
IC-2025-0079-000770 through IC-2025-0079-000773	IC-2025-0079-001650 through IC-2025-0079-001651
IC-2025-0079-000921 through IC-2025-0079-000923	IC-2025-0079-001689 through IC-2025-0079-001691
IC-2025-0079-000930 through IC-2025-0079-000932	IC-2025-0079-001777 through IC-2025-0079-001780

IC-2025-0079-001824 through IC-2025-0079-001827

IC-2025-0079-002075 through IC-2025-0079-002079

IC-2025-0079-001840 through IC-2025-0079-001844

IC-2025-0079-002263 through IC-2025-0079-002266

IC-2025-0079-001856 through IC-2025-0079-001858

IC-2025-0079-003020 through IC-2025-0079-003024

IC-2025-0079-001963 through IC-2025-0079-001966

IC-2025-0079-005291 through IC-2025-0079-005292

IC-2025-0079-002009 through IC-2025-0079-002013

APPENDIX D

As indicated in paragraph 54 of the findings in Docket #FIC 2025-0079, the following in camera records are not exempt from disclosure pursuant to §1-210(b)(4), G.S., or any other statutory exemptions claimed on the Index in the alternative:

IC-2025-0079-00007

IC-2025-0079-000091

IC-2025-0079-000230

IC-2025-0079-000437

IC-2025-0079-000913

IC-2025-0079-000935

IC-2025-0079-000962, IC-2025-0079-00094 and IC-2025-0079-000965

IC-2025-0079-001313 through IC-2025-0079-001317

IC-2025-0079-002196

IC-2025-0079-002639

IC-2025-0079-003596

IC-2025-0079-003597

IC-2025-0079-003929

IC-2025-0079-004564

IC-2025-0079-005034

IC-2025-0079-005035

IC-2025-0079-005097

IC-2025-0079-005098

IC-2025-0079-005249

IC-2025-0079-006149

IC-2025-0079-006159

APPENDIX E

As indicated in paragraph 62 of the findings in Docket #FIC 2025-0079, the following in camera records are not exempt from disclosure, as they were contained within the exhibits filed in the instant matter:

IC-2025-0079-000131 through IC-2025-0079-000160	IC-2025-0079-001005 through IC-2025-0079-001006
IC-2025-0079-000197 through IC-2025-0079-000205	IC-2025-0079-001145 through IC-2025-0079-001171
IC-2025-0079-000206 (lines 1-5 and 17-18)	IC-2025-0079-001172 through IC-2025-0079-001174
IC-2025-0079-000257 through IC-2025-0079-000265	IC-2025-0079-001293 through IC-2025-0079-001301
IC-2025-0079-000266 (lines 1-5 and 17-18)	IC-2025-0079-001302 (lines 1-5 and 17-18)
IC-2025-0079-000267 through IC-2025-0079-00275	IC-2025-0079-001783 through IC-2025-0079-001809
IC-2025-0079-000276 (lines 1-5 and 17-18)	IC-2025-0079-001810 through IC-2025-0079-001812
IC-2025-0079-000294 through IC-2025-0079-000302	IC-2025-0079-002121 through IC-2025-0079-002150
IC-2025-0079-000303 (lines 1-5 and 17-18)	IC-2025-0079-002205 through IC-2025-0079-002206
IC-2025-0079-000319 through IC-2025-0079-000327	IC-2025-0079-002454 through IC-2025-0079-002483
IC-2025-0079-000328 (lines 1-5 and 17-18)	IC-2025-0079-002493 through IC-2025-0079-002519
IC-2025-0079-000701 through IC-2025-0079-000703	IC-2025-0079-002768 through IC-2025-0079-002769
IC-2025-0079-000707 through IC-2025-0079-000709	IC-2025-0079-002772 through IC-2025-0079-002798
IC-2025-0079-000710 through IC-2025-0079-000736	IC-2025-0079-002799 through IC-2025-0079-002801
IC-2025-0079-000853 through IC-2025-0079-000886	

IC-2025-0079-003128 through IC-2025-0079-003154

APPENDIX F

As indicated in paragraph 64 of the findings in Docket #FIC 2025-0079, the following in camera records are not exempt from disclosure, as they contain public court filings in the qui tam action:

IC-2025-0079-000333 through IC-2025-0079-000334

IC-2025-0079-000818 through IC-2025-0079-000820

IC-2025-0079-000821 through IC-2025-0079-000852

IC-2025-0079-001628 through IC-2025-0079-001630

IC-2025-0079-002304 through IC-2025-0079-002374

IC-2025-0079-002805 through IC-2025-0079-002875

IC-2025-0079-003449 through IC-2025-0079-003519

IC-2025-0079-004901 through IC-2025-0079-004902

APPENDIX G

As indicated in paragraph 66 of the findings in Docket #FIC 2025-0079, the following in camera records are not exempt from disclosure pursuant to any of the statutory exemptions claimed on the Index:

IC-2025-0079-000029

IC-2025-0079-000064

IC-2025-0079-000109

IC-2025-0079-000587 through IC-2025-0079-000588

IC-2025-0079-000595

IC-2025-0079-001186

IC-2025-0079-001401¹⁴

IC-2025-0079-001529

IC-2025-0079-001649

IC-2025-0079-001741

IC-2025-0079-001813

IC-2025-0079-001976

IC-2025-0079-001993

IC-2025-0079-002045 through IC-2025-0079-002047

IC-2025-0079-002080 through IC-2025-0079-002081

IC-2025-0079-002107 through IC-2025-0079-002108

IC-2025-0079-002250

IC-2025-0079-002711 through IC-2025-0079-002712

IC-2025-0079-003042 through IC-2025-0079-003042

IC-2025-0079-003158

IC-2025-0079-003872 through IC-2025-0079-003875

¹⁴ The respondents claimed an exemption for such page on the Index; however, the page was not included in their in camera review submission.

IC-2025-0079-004084 through IC-2025-0079-004086

IC-2025-0079-004282 through IC-2025-0079-004284

IC-2025-0079-004483

IC-2025-0079-004499

IC-2025-0079-004669 through IC-2025-0079-004671

IC-2025-0079-004734 through IC-2025-0079-004735