Thursday, March 5, 2015

Good Afternoon Members of the Labor and Employees Committee:

My name is Laura Lillian Best f/k/A Laura Lillian Dickerson. I am a public servant who has worked in several state agencies since 1989, beginning in the Judicial Branch as a court monitor, a paralegal specialist II in the former Division of Special Revenue and presently as the District Administrator in the 2nd District Workers Compensation Commission.

I am here today to provide testimony regarding the need for anti/workplace bullying legislation in the State of Connecticut, especially in the Judicial Branch. I am also here to here to testify on how I was personally targeted by individuals from the Judicial Branch and the Office of the Attorney General. As a result of my daughter, Habibah Abdul-Hakeem filing a 2010 civil law suit claiming harassment and discrimination against her judicial supervisors, Deputy Chief Clerk Cara Parkinson and, Deputy Clerk Corrine McCarthy at GA21 at the Norwich Superior Court, I became a target of retaliation by Defendant Parkinson and her representative Assistant Attorney General, Nancy A. Brouilett.

Both Parkinson and McCarthy are long time judicial employees who have a history of bullying their subordinates. In the attached June 13 2005 Complaint, Carole Ives v. State of Connecticut Judicial Branch, Complainant Ives claimed that Parkinson had subjected her to unequal treatment, harassment and retaliation, continued harassment in the form of constant criticism, excessive scrutiny and exclusions from meetings, charges similar to my daughter's complaint (see attachment) of May, 2010. Ives's Complaint concluded that Respondent's Managers Cara Parkinson and Corrine Bernardo a/k/a McCarty had discriminated against her because of her age.

It should be noted that when managers and supervisors like Defendants Parkinson and McCarthy are brought up on charges of harassment, discrimination and bullying in state agencies, they are represented by the Office of the Attorney General at the cost of the taxpayers. Repeated offenders of harassment, discrimination and bullying in the state agencies, become a major expense to the taxpayers, because they have no fear of having to spend money out of their pockets to represent their bad behavior. It's obvious that this is an expensive injustice for victims of hostile work environments which support the need for workplace bullying legislation that would specifically deal with this malignant behavior that tends to fall through the cracks with the present laws that exist.

On September 29, 2011, my office assistant, Chanise Belizaire and I were approached by Cara Parkinson at a local restaurant who attempted to intimidate me. Parkinson then contacted the local Norwich Police Department to register a complaint against me. I was subsequently approached by two Norwich police officers during lunch who asked if *"we had a dispute with the Lady from the court"* to which I responded *"I was lady from the Workers' Compensation Commission"* and explained that Parkinson was a Defendant in a lawsuit who should not be using her judicial position to summon the Norwich P.D. to retaliate against my daughter by making false allegations against her mother. I then contacted the Norwich PD's Chief Louis Fusaro to inform him of his officers who were disturbing my lunch. Chief Fusaro assured me

that Parkinson's complaint was being disregarded. As a result of Parkinson's bullying attack against me, I decided to move my pending divorce matter from the Norwich Superior Court to the Putnum Superior Court. I sent a change of venue application (indicating Parkinson's abuse of authority as the reason for the change of venue) and an Affidavit from my office assistant describing the incident that happened at the restaurant to Assistant Chief Clerk, David Gage who accommodated my request.

I subsequently discovered that my divorce documentation that had absolutely nothing to do with my daughter's civil lawsuit against Parkinson and McCarthy (see submitted documentation) was **FAXED** to AAG, Nancy Broulette from the office of the GA21. Upon receipt of my personal divorce documentation, AAG Broullett saw that they were **FAXED** to the my place of employment at the Workers' Compensation Commission to the attention of my immediate supervisor, Chairman John Mastropietro, in a memo from AAG Brouilett stating this documentation was ***"peripherally related to the federal lawsuit I am defending for Judicial employees."*** AAG Brouilett further informed my supervisor that ***"This document was also sent to Sen. Prague, so I wanted you to be aware of it."*** and also stated the ***"Due to Ms. Dickerson's WC claim, I have sent a copy to Phil Schulz too."*** My divorce documents were secured in the vault at GA21, they were sent to AAG Brouilett from a fax machine located in the GA21 office where Defendants Parkinson and McCarthy worked. AAG Brouillet attempted to cause personal harm and injury to the status of my employment at the Worker's Compensation Commission by sharing my personal divorce documentation and information about my contacting former Sen. Prague with my immediate supervisor because of my daughter's Complaint against these repeated offenders of Workplace Bullying. Fortunately, my supervisor did not cause me any grief other than his initial concern regarding this information he received. AAG's Brouilett's conduct as well as her client Parkinson's, were actions of retaliation (which is against the law). This is a prime example of the need to consider the pending legislation to end Workplace Bullying in the State of Connecticut.

The Defendants' and AAG's retaliation against my daughter for filing this lawsuit even went beyond the scope that I had described in the above statements. It is my opinion that there was complicity in the orchestration of my daughter's arrest for a pool accident that occurred in December of 2011 in which her nephew was injured. Habibah was arrested for this accident six (6) months after the event but was contacted by the Department of Children and Families and put on notice by them prior to her arrest for this accident. As we know, all DCF matters are confidential, but somehow, this incident became a line of questioning by AAG Brouilett in the federal deposition in my daughter's lawsuit against Parkinson and McCarthy, three months prior to her arrest in June of 2012. Parkinson' husband is a supervisor at the regional DCF office which handled this matter. For the record, these charges were dismissed against my daughter.

Unfortunately my daughter's civil matter was dismissed by U.S. District Judge Janet Bond Artherson saying that she had failed to establish a case of racial discrimination because she had not provided the court with information on how these supervisors treated others like her. However, in articles published in The Day and the Norwich Bulletin (see enclosed articles) in July of 2012 it was revealed that Defendant McCarthy was terminated for committing perjury in my daughter's federal appeal case against her and Parkinson in which she admitted she lied about Parkinson having knowledge about a petition that was circulated in the courthouse against

my daughter (which was an act of bullying). McCarthy committed perjury and has yet to be prosecuted for this federal violation.

My advocacy for addressing the bullying that takes place in agencies throughout this state brought me in contact with many other judicial victims of workplace bullying as well as other victims from agencies such as Connecticut Valley Hospital, the Department of Children and Families, just to name a few. This is why there is a need for legislation specifically addressing the bullying antics in the workplace that are usually filed under the state's discrimination laws that provide too many loopholes for perpetrators of this vicious act, specifically managers and supervisors who bully in the workplace.

Respectfully submitted,

Laura Lillian Best f/k/a Dickerson
3 Harbor View Lane Norwich, CT 06360
(860) 303.6287

Laura Lillian Best
District Administrator
2nd District Workers' Compensation Commission
55 Main Street, Suite 450
Norwich, CT 06360
860.823.3906

Bianca, Pam

From:	Laura Lillian Best <lilliandickerson@sbcglobal.net>
Sent:	Thursday, March 05, 2015 4:26 AM
To:	LABTestimony
Subject:	Documentation for Workplace Bullying Legislation in State Agencies
Attachments:	Carol Ives - Judicial Victim.pdf; Retaliation Documentation.pdf; CMSR Katz.pdf; The Day - Bulletin Perjury Documentation.pdf; The Complaint - Habibah Abdul-Hakeem v. Judicial Branch.pdf

To Whom It May Concern:

My name is Laura Lillian Best f/k/a Laura Lillian Dickerson. I have been a public servant in the State of Connecticut since 1989 and I am presently employed in the 2nd District Workers' Compensation Commission in Norwich. It is my desire to provide testimony for the support of adapting Workplace Bullying legislation in the State of Connecticut at the Labor and Employee Committee Public Hearing being held on Thursday, March 5, 2015 at 2:30. Following is the documentation for distribution among the committee members that I will be referencing in my testimony concerning my personal experiences of incidents of corruption and bullying in the Judicial Branch.

Please add my name to the list to offer testimony.

Laura Lillian Best
3 Harbor View Lane
Norwich, CT 06360
(860) 303.6287

Laura Lillian Best
District Administrator
2nd District Workers' Compensation Commission
55 Main Street, Suite 450
Norwich, CT 06360
(860) 823.3906

Laura Lillian

STATE OF CONNECTICUT

COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

21 GRAND STREET HARTFORD, CONNECTICUT 06106

OFFICE OF COMMISSION COUNSEL

Telephone Number: (860) 541-3423 Telecopier Number: (860) 246-5266

FACSIMILE TRANSMITTAL SHEET

TO: Laura Lillian Dickerson, District Administrator	FROM: Charles Perry, Paralegal Specialist
COMPANY: Worker's Compensation	DATE: 10/4/2010
FAX NUMBER: (860) 823-1725	TOTAL NO. OF PAGES INCLUDING COVER: 7
PHONE NUMBER:	SENDER'S TELEPHONE NUMBER: (860) 541-3423
	YOUR REFERENCE NUMBER:

Carol Ives v. State of CT, Judicial Dept.
CHRO #0540604

ORDINARY MAIL ☐ MESSENGER ☐ OVERNIGHT EXPRESS X THIS IS THE ONLY FORM

IF YOU NEED ANY ADDITIONAL HELP PLEASE LET ME KNOW.

Please notify us if you do not receive all pages. Thank you.

Affirmative Action/Equal Opportunity Employer

AMENDED COMPLAINT

****

Carol Ives,
Complainant

CHRO No.: 0540504
Date: June 13, 2005
as amended: 8/14/05

vs.

State of Connecticut Judicial Department,
Respondent

****

Comes now Complainant and amends the original complaint filed in this action on or about June 13, 2005; and in support of the amended complaint alleges and states as follows:

1. That complainant adopts each and every allegation contained in the original complaint unless specifically altered by expressed provisions to the contrary; and/or

2. Specifically, complainant adds the following new respondent(s) whose name(s) and address(s) are hereinafter set out; and/or

3. Complainant amends paragraph(s) and adds the following particulars:

   On June ~~30~~ 27, 28, 29, 30, 2005 Responded Suspended me without pay. I believe this latest action consitutes retaliation for my previous opposition to discriminatory treatment.

I allege respondent(s) violated the following statutes:

<u>46a-60(a)(4)</u>

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint and amended complaint, secure for me my rights as guaranteed to me under the above cited laws and secure for me any remedy to which I may be entitled.

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

Dated at Norwich, Connecticut this 8/16/05 day of _____, 2005.

Carole Ruis
(Complainant's signature)

Subscribed and sworn to before me this 16th day of August 2005

Notary Public/Commissioner
Of the Superior Court

AMY ANZALONE
NOTARY PUBLIC
MY COMMISSION EXPIRES NOV. 31, 20

My commission expires: _____

State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

CCHRO TO COMPLETE – DO NOT WRITE IN THIS BOX

Date Received: June 15, 2005 CASE NO: 0540504

My name is Carole Ives

and I reside at 167 East Hebron Turnpike, Lebanon, CT 06249

The respondent is State of Connecticut Judicial Branch

whose business address is 90 Washington Street, Hartford, CT 06106

I believe Respondent discriminated against me when it (check appropriate box and insert date of occurrence)

☐ terminated me on or about ☐ failed to hire me on or about
☒ failed to promote me on or about December 17, 005 ☐ suspended me
☐ placed me on probation on or about ☐ demoted me ☐ denied me a raise on or about
☐ warned me ☒ gave me a poor evaluation on or about: April 21, 2005
☐ paid me a different rate of pay on or about ☐ constructively discharged me on or about
☒ retaliated against me for opposing a discriminatory practice on or about ☐ discriminated against me in terms and conditions of employment on or about ☒ harassed me on or about: April 4, 2005 to May 18, 2005 ☐ sexually harassed me on or about ☐ denied me service(s) on or about
☐ other (identify) on or about

and I believe that my (check appropriate box and insert requested information for protected class basis)

☐ race (IDENTIFY): ☐ color (IDENTIFY):
☐ national origin (IDENTIFY): ☐ ancestry (IDENTIFY):
☐ marital status ☐ sex: ☐ male ☐ female
☐ sex: PREGNANCY ☐ physical disability (IDENTIFY):
☐ previously opposed, filed or assisted ☐ mental disorder (IDENTIFY):
☐ mental retardation ☐ religion (IDENTIFY):
☐ religious creed/creed (IDENTIFY): ☒ age: 53 Date Of Birth: 11/16/51
☐ familial status ☐ sexual orientation (IDENTIFY):
☐ learning disability (IDENTIFY): ☐ Alienage (IDENTIFY):
☐ lawful source of income

was in part a factor in this action. I believe that the respondent violated the following

CCHRO TO COMPLETE -- DO NOT WRITE IN THIS BOX

Connecticut General Statutes §§(as noted below):

☒46a-60(a)(1) ☒ 46a-60(a)(4) ☐ 46a-60(a)(6) ☐46a-60(a)(7)_____

☐46a-60(a)(8)_____ ☐46a-60(a)(9) ☐46a-60(a)(10) ☐46a-60(a)(11)

☐46a-63 ☐46a-64(a) ☐46a-66(a) ☐46a-70a ☒46a-71(a)_____

☐46a-80_____ ☐46a-81c_____ ☐46a-81d(a)_____

☐46a-81f_____ ☐46a-81g ☐46a-81h_____ ☐46a-81l_____

AND

☐Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C 2000e and the Civil Rights Act of 1991 (15 + employees)

☒Age Discrimination in Employment Act of 1967, 29 U.S.C. 621-634 (20+ employees)

☐ Equal Pay Act of 1964

☐ Americans With Disabilities Act, 42 U.S.C. 12101 et seq.

☐Section 504 of the Rehabilitation Act of 1973, as amended

☐Other:_____

☐as enforced through Conn. Gen. Stats. §46a-58(a) (if applicable)

*** (Use numbered short paragraphs for each specific allegation)

1. My name is Carole Ives and I reside at 157 East Hebron Turnpike, Lebanon, CT 06249 . .

2. The Respondent is State of Connecticut Judicial Branch whose business address is 90 Washington Street, Hartford, CT 06106

3. The Respondent is a State Agency and employs more than 15 people.

4. I began working for Respondent in June 2000 and am presently employed as a courtroom clerk at the Norwich Supervisor Court (1 Courthouse Square, Norwich, CT). My performance and attendance throughout the tenure of my employment has been good.

5. I am 53 years old. My date of birth is 11-16-51

6. On December 17, 2004, I was denied a promotion to Court Room Clerk II. Respondent's selected candidate was Kara Jean Venditto, similarly situated to me but younger 37. Venditto had just recently (September 2004) been promoted to Court Room Clerk I. I bean working with Repondent as a Court Room Clerk approximately a year and a half before Venditto, who is also a relative of Maria Kewer, one of Respondent's Human Resource representatives in Hartford.

7. Beginning on or about April 4, 2005 until May 18, 2005 Respondent's Chief Clerk Cara Parkinson has subjected me to unequal treatment, harassment and retaliation. On April 21

8. On April 4, 2005 after spending what I felt was an excessive amount of time on the cash registers processing fines I remarked, "I might as well just move my desk over to the register because I'm on there all the time anyway." Corrine Bernardo Respondent's Deputy Clerk heard the remark.

9. The following day I phoned in sick.

10. On April 8, 2005 Parkinson demanded a medical certificate. I declined to provide the medical certificate because I felt it was unwarranted. Others similarly situated to me except that they are younger have been out for medical reasons but Parkinson has not asked them to provide a medical certificate.

11. On April 8, 2005 Parkinson then issued me a written warning for my remarks of April 4, 2005 and my failure to provide a doctor's note as requested.

12. On April 13, 2005 I filed a grievance against Parkinson's unfair treatment of me.

13. On April 21, 2005 Parkinson gave me an unfavorable performance evaluation.

14. From April 21, 2005 until May 18, 2005 Parkinson and Bernardo subjected me to continued harassment in the form of constant criticism, excessive scrutiny, and excluded from meetings.

15. Since May 18, 2005 Parkinson has been out of work attending to her father who suffered a massive stroke. Respondent's harassment has dramatically abated since that time.

16. I believe that Respondent's Managers Cara Parkinson and Corrine Bernardo have been discriminating against me base on my age 53.

IMPORTANT: YOU MUST OBTAIN A NOTARIZATION OF YOUR COMPLAINT BEFORE YOU RETURN THIS FORM

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above cited laws and secure for me any remedy to which I may be entitled.

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

Dated at Norwich, Connecticut this 13th day of June 2005.

x Carole Ives
(Complainant's Signature)

Subscribed and sworn to before me this Thirteenth day of June 2005.

Janet P. Malinowski
Notary Public ~~or Commissioner of the Superior Court~~

My Commission Expires: 5-30-06

F103

Issued 4/94
Revised 1/1/96

Dear Commissioner Katz,

Following is an email that I sent to the governor this morning via his press department. I am personally bringing to your attention, this disturbing matter of the violation of CGS Secs. 17a-28; and 17a-101 that occurred on March 17, 1011 during a deposition in a federal civil rights action re racial discrimination (Abdul-Hakeem v. Parkinson and McCarthy).

Please consider this email an official complaint involving DCF confidential information being discussed in the line of questioning during this deposition by AAG Nancy Brouillett representing judicial defendant Cara Parkinson whose husband Kyle Parkinson is the Norwich DCF program manager.

The disclosure of DCF confidential information re my daughter, Habibah Abdul-Hakeem who is the plaintiff in the federal civil matter should have never been brought up in the line of questioning in the deposition in front of the judicial defendants in this action as it violates DCF Confidentiality Policy 31-8-5 and has also violates the law.

I realize the AAG had access to this type of information that is only to be used in matters regarding DCF litigation, however the deposition involved was for a civil matter and not a DCF matter. The question is who led AAG Brouillett to this illegal line of questioning regarding my daughter's involvement with DCF?

Please be advised that in addition to contacting the governor on this matter and other issues associated with it, this concern has also been brought to the attention of other agencies who are conducting investigations as well.

Please be further advised that my daughter has been emotionally devastated by the unfortunate circumstance regarding her DCF involvement that is being addressed in another venue, however, this confidential DCF information should have NEVER been disclosed in the cited federal matter in which there is a written transcript and video recording. Needless to say it is my intention to see that my concerns are appropriately addressed, and I am very hopeful that your effort in bringing this troubled agency into compliance can include your personal investigation of my complaint of a DCF Breach of Confidentiality in this matter.

Respectfully,

Laura Lillian Dickerson

People begin to die the moment they remain silent about the things that matter.
MlK

Begin forwarded message:

> **From:** Laura Lillian Dickerson <lilliandickerson@sbcglobal.net>
> **Date:** November 14, 2011 8:50:53 AM EST
> **To:** Laura Lillian Dickerson <LauraLillian.Dickerson@ct.gov>
> **Subject: Fwd: DCF Breach of Confidentiality Investigation - AAG Brouillet/Cara Parkinson**
>
> Laura Lillian Dickerson
>
> People begin to die the moment they remain silent about the things that matter. MlK
>
> Begin forwarded message:
>
> > **From:** Laura Lillian Dickerson <lilliandickerson@sbcglobal.net>
> > **Date:** November 14, 2011 6:39:10 AM EST
> > **To:** Honorable Governor Dannel Malloy <malloy.press@ct.gov>
> > **Cc:** "Attorney John R. Williams" <jrw@johnrwilliams.com>, "Barbara J. Quinn" <barbarajean.quinn@jud.ct.gov>, Attorney Martin Libbin <martin.libbin@jud.ct.gov>
> > **Subject: Fw: DCF Breach of Confidentiality Investigation - AAG Brouillet/Cara Parkinson**
> >
> > Dear Sir or Madam:
> >
> > I realize that this email address belongs to the Governor's press department, however the email address he has provided for the general public is not sufficient for bringing this message and the previous message I sent a few minutes ago to his

direct attention. My concerns involve several investigations that are presently taking place involving the Judicial Branch, Office of the Attorney General and the Department of Children and Families. I am employed by the State of Connecticut as the District Administrator for the 2nd District Workers' Compensation Commission in Norwich and am very familiar with state services having worked for the state for almost 20 years.

This matter involves corruption in the Norwich Superior Court (as well as other agencies) in which my personal and private divorce documents were illegally removed from the JD vault and then forwarded from the GA 21 fax machine to AAG Nancy Brouillett at the Office of the Attorney General who then forwarded them to my immediate supervisor, Chairman John Mastropietro of the Workers' Compensation Commission. AAG Brouillett justifies her sending this documentation (which included a change of venue which I submitted to the Norwich JD) to Chairman Mastropietor by stating that it was "peripherally related" to the federal law suit in which she is representing judicial defendants. My daughter, Habibah Abdul-Hakeem is the plaintiff in this matter and my personal and private divorce documentation should have never been dissimulated throughout the state of Connecticut.

Furthermore, this corruption also involves a breach of DCF confidentiality in AAG Brouillett's representation of these judicial defendants in this federal civil rights action for racial discrimination which is documented in a March 17, 2011 deposition. The line of questioning in this deposition breached DCF confidentiality as it involved information that has absolutely nothing to do with this civil matter that was never publicly documented prior to the date of the deposition. Norwich GA 21 Chief Deputy Clerk Cara Parkinson, (whom I suspect illegally forwarded my divorce documentation to AAG Brouillet) is a defendant in this civil action. Her husband Kyle Parkinson is the Norwich DCF Program Manager. The documented line of questioning in this deposition reveals DCF information concerning my daughter's involvement which should have never come up in AAG's Brouillett's line of questioning and I have requested that AAG Nancy Brouillett, Cara Parkinson and Kyle Parkinson's involvement

in this DCF Breach of Confidentiality be investigated by several state agencies. Therefore, it is important that these concerns regarding DCF confidentiality violations be brought to the immediate attention of both Governor Malloy as well as DCF Commissioner Katz, as I have supported the Governor's appointment of Commissioner Katz in his effort to clean up this troubled agency.

Lastly, the defendants in the federal civil matter for racial discrimination (Abdul-Hakeem v. Parkinson and McCarthy) have a career of workplace bullying in which they have been defendants in other civil/CHRO actions against them. It is disgusting that tax payers dollars continue to be utilized in representing these managers for their wanton and malicious actions that are outside the scope of their required duties as outlined in the Department of Administrative Services Management Manual. I'd like to know just how much money was spent on representing these two individuals during their careers in state services and I like to know why they have not been required to provide their own legal representation for their continuing wanton and malicious behavior as this is another area where governor could save money for the state.

In advance I thank the Governor for his immediate attention to the above-referenced concerns and hope to hear from him soon.

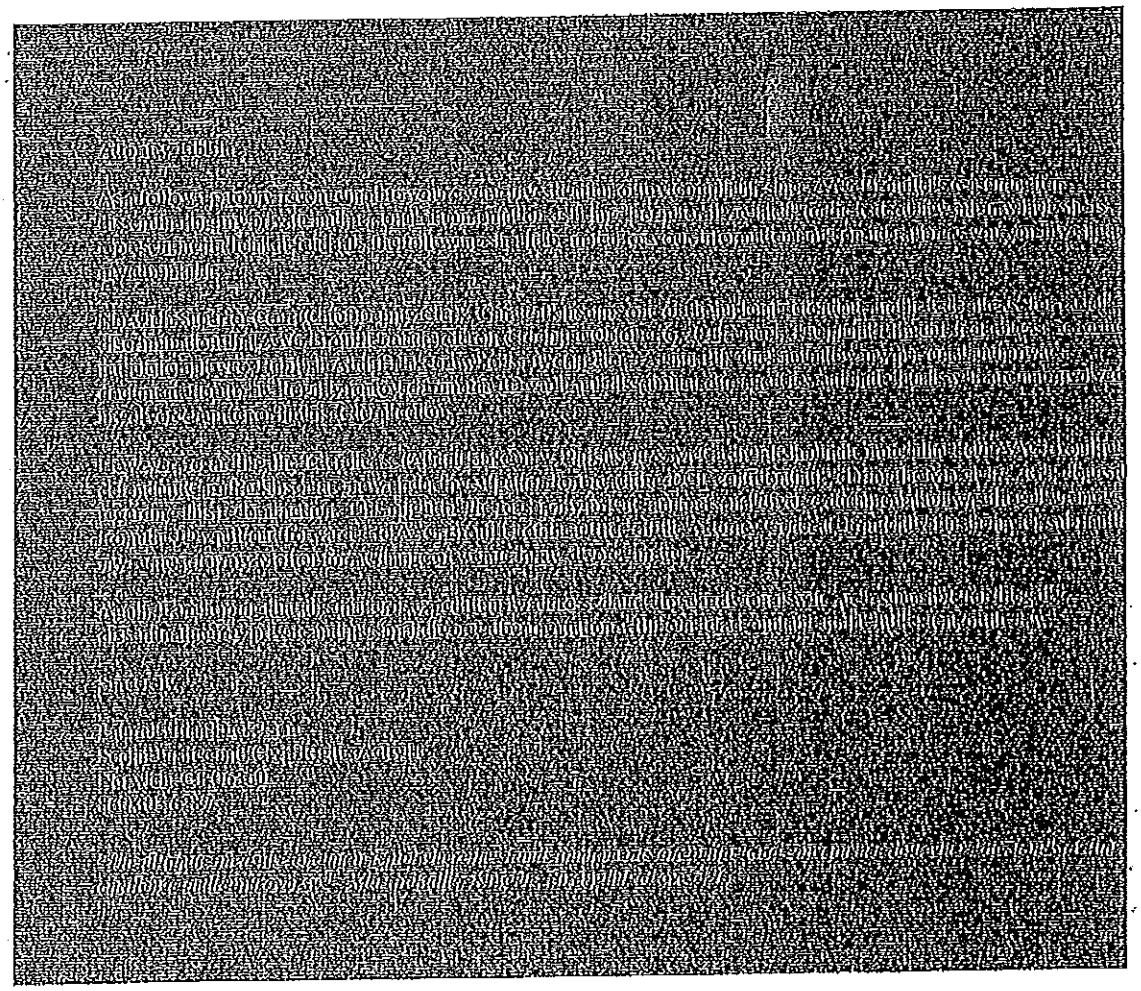
Respectfully,

Laura Lillian Dickerson
Social Justice and Civil Rights Activist
Norwich, CT 06360
860.303.6287

"The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy."

Martin Luther King Jr., Strength to Love, 1963

----- Forwarded Message ----
From: Laura Lillian Dickerson <lillianlickerson@sbcglobal.net>
To: Attorney Martin Libbin <martin.libbin@jud.ct.gov>; Barbara J. Quinn <barbarajean.quinn@jud.ct.gov>
Cc: Attorney John R. Williams <jrw@johnrwilliams.com>; Matthew Fitzsimmons <matthew.fitzsimmons@ct.gov>; Susan Kinsman <susan.kinsman@ct.gov>; Habibah Abdul-Hakeem <habibahabdulhakeem@yahoo.com>
Sent: Fri, October 28, 2011 7:45:16 AM
Subject: DCF Breach of Confidentiality Investigation - AAG Brouillet/Cara Parkinson



UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

HABIBAH ABDUL-HAKEEM	:	
VS.	:	CIVIL ACTION NO.
CARA PARKINSON and CORRINE McCARTHY	:	MAY 13, 2010

COMPLAINT

1. This is an action to redress the deprivation of rights secured to the plaintiff by the Constitution and laws of the United States and the State of Connecticut.

2. Jurisdiction of this court is invoked under the provisions of Sections 1331, 1343(3) and 1367(a) of Title 28 and Sections 1983 and 1988 of Title 42 of the United States Code.

3. The plaintiff is an adult citizen of the United States who resides in New London, Connecticut. At all times mentioned herein, she was employed by the Judiciel Branch of the State of Connecticut as an Office Clerk in the Superior Court at Norwich. She is an African-American female.

4. During all times mentioned in this action, the defendant Cara Parkinson was the Deputy Chief Clerk of the Connecticut Superior Court at

Norwich and the defendant Corrine McCarthy was the Deputy Clerk of the said court. As such, they were the plaintiff's supervisors. They are sued only in their individual capacities. They are Caucasian females.

5. During all times mentioned in this Complaint, the defendants were acting under color of law, that is, under color of the constitution, statutes, laws, rules, regulations, customs and usages of the State of Connecticut.

6. At all times mentioned in this Complaint, the defendants acted jointly and in concert with each other. Each defendant had the duty and the opportunity to protect the plaintiff from the unlawful actions of the other defendant but each defendant failed and refused to perform such duty, thereby proximately causing the injuries herein complained of.

7. The plaintiff was transferred from the New London courthouse to the Norwich courthouse in April 2008 and was transferred back to the New London courthouse in the fall of 2009 because of the wrongful actions hereinafter described.

8. From the beginning of her service at the Norwich courthouse, continuously through the years 2008 and 2009 while she was employed at that location, the defendants subjected the plaintiff to a severely hostile working environment based upon the plaintiff's race. Throughout this period of time, the defendants subjected the plaintiff to adverse employment actions to which

similarly situated Caucasian employees in the office were not subjected. Several examples of such disparate treatment are delineated below.

9. During the plaintiff's probationary period at the Norwich courthouse between April and October of 2008, when she was understandably reluctant to object to any inappropriate behavior by her superiors, defendant Parkinson made it a practice to touch the plaintiff inappropriately whenever she was in her vicinity. Caucasian employees similarly situated to the plaintiff were not subjected to such treatment.

10. Defendant McCarthy in the spring of 2009, in the presence of the plaintiff, habitually ridiculed the speech patterns of African-Americans who had dealings with the clerk's office, using such phrases as "Ebonics."

11. Defendant Parkinson disclosed plaintiff's confidential medical information to many other employees in the office in the spring of 2009, falsely stating that the plaintiff was abusing her FMLA rights. Caucasian employees similarly situated to the plaintiff were not subjected to such treatment.

12. On May 19, 2009, both defendants orally reprimanded the plaintiff for speaking privately with a male supervisor named David Gage and "docked" her half an hour's pay for having done so. At that time, defendant Parkinson shouted at the plaintiff: "David is not your supervisor! I am!" Caucasian employees similarly situated to the plaintiff were not subjected to such treatment.

13. On May 20, 2009, in writing, defendant Parkinson falsely and maliciously accused the plaintiff of "yelling at me" and of stating "bring it on, sister...." Caucasian employees similarly situated to the plaintiff were not subjected to such treatment.

14. Also on May 20, 2009, defendant Parkinson falsely and maliciously accused the plaintiff of telling her that "the devil will shame my soul." Caucasian employees similarly situated to the plaintiff were not subjected to such treatment.

15. On June 19, 2009, defendant McCarthy, with the knowledge and approval of the defendant Parkinson, circulated a petition within the Clerk's Office asking that the plaintiff be prohibited from working in that office. Caucasian employees similarly situated to the plaintiff have not been subjected to such treatment.

16. On June 19, 2009, defendant McCarthy, with the knowledge and approval of the defendant Parkinson, falsely and maliciously stated in writing to several individuals including Judges of the Superior Court that the plaintiff had stated that she "was going to take Cara down and that Cara should be afraid" and the plaintiff posed a threat of "work place violence...." Caucasian employees similarly situated to the plaintiff have not been subjected to such treatment.

17. As a result of the conduct of the defendants the plaintiff has suffered humiliation and degradation and actual or potential economic loss.

18. In the manner described above, the defendants have deprived the plaintiff of equal protection of the laws because of her race, in violation of the Fourteenth Amendment to the United States Constitution as enforced through Sections 1983 and 1988 of Title 42 of the United States Code.

WHEREFORE, the plaintiff claims judgment against the defendants and each of them, jointly and severally, for compensatory damages, punitive damages, attorney fees and costs.

THE PLAINTIFF

BY: _____

JOHN R. WILLIAMS (ct00215)
51 Elm Street
New Haven, CT 06510
203.562.9931
Fax: 203.776.9494
jrw@johnrwilliams.com
Her Attorney

Best, Laura Lillian

From:	Laura Lillian Best (lilliandickerson@sbcglobal.net)
Sent:	Wednesday, March 04, 2015 12:21 PM
To:	Best, Laura Lillian
Subject:	Fwd: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court
Attachments:	DICKERSON- ABDUL HAKEEM 10-6-11.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: Laura Lillian Dickerson <lilliandickerson@sbcglobal.net>
Date: October 28, 2011 at 9:08:40 AM EDT
To: "Barbara J. Quinn" <barbarajean.quinn@jud.ct.gov>
Subject: Fw: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

Your Honor,

I forgot to copy you on my response to Attorney Libbin's request for detailed information concerning my complaint.

Laura Lillian Dickerson
Social Justice and Civil Rights Activist
Norwich, CT 06360
860.303.6287

"The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy."

Martin Luther King Jr., Strength to Love, 1963

----- Forwarded Message ----
From: Laura Lillian Dickerson <lilliandickerson@sbcglobal.net>
To: "Libbin, Martin" <Martin.Libbin@jud.ct.gov>
Cc: Attorney John R. Williams <jrw@johnrwilliams.com>; Matthew Fitzsimmons <matthew.fitzsimmons@ct.gov>; Susan Kinsman <susan.kinsman@ct.gov>; George Jepsen <attorney.general@ct.gov>
Sent: Thu, October 27, 2011 9:16:34 PM
Subject: Re: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

Attorney Libbin:

In the attached PDF are copies of documentation from my divorce file (Dickerson v. Dickerson FA-11-41162415) that were submitted to Chief Clerk David Gage via hand delivery and via email in support of my request for Motion for Change of Venue for the following reason: "Change of Venue/Conflict of Interest re Deputy Chief Clerk Cara Parkinson's abuse of authority". The Motion was ruled on October 4, 2011 by Judges Shulger and Franziani authorizing my divorce matter to be moved from the Norwich Superior Court to the Danielson Superior Court.

On October 6, 2011, this Motion for Change of Venue document, along with 2 emails addressed to David Gage and an Affidavit, (all supporting documentation for the Change of Venue) were faxed from the GA 21 office via (860) 885. 0509 to AAG Nancy Brouillet, who then on October 6, 2011, forwarded them, via email to Sandra Cunningham, Personal Director of the Workers' Compensation Commission, for Chairman John Mastropietro's review and information. AAG Brouillet also indicates in the October 6, 2011 email that she also forwarded it to AAG Phil Schulz, of the AAG's Workers Comp and Labor Relations and also noted that these documents were forwarded to Sen Edith Prague. Please note that I am the District Administrator for the Second District Workers' Compensation Commission in Norwich and I am outraged that my personal and private documentation from my divorce file that was located in the Norwich Superior Court JD vault were removed and then sent to the AAG Nancy Brouillet and AAG Phil Schulz of the Office of the Attorney General and to Chairman John Mastropietro via Sandra Cunningham of the Workers' Compensation Commission, My divorce matter is personal and private and has nothing to do with these two state agencies. AAG Broullet's actions certainly violates the ethics statement of the Office of the Attorney General and her actions along with the actions of the individual from the GA21 who forwarded this private and personal documentation to AAG Brouillet are possibly in violation of C.G.S. Sec. 153a-155 - Tampering with or fabricating physical evidence in a pending case, etc. A Class D Felony.

Please note that AAG Brouillet and the above mentioned individuals are in possession of four (4) documents from my divorce file. All four documents are stamped with the GA21's fax number of 860.885.0509 and in the email addressed to David Gage (see attachment) there is a handwritten note "Atten: Linda F." I have researched and discovered that there is a Linda A. Flaherty who works at the Office of the Attorney General, perhaps for AAG Brouillet? Furthemore, AAG Brouillet's claim that my personal and private documentation is "peripherally related" to the federal lawsuit in which she is representing judicial defendants is outrageous, to say the least as this federal action has nothing to do with my personal and private divorce matter.

The bottom line is that a crime has been committed by someone from the GA21 office and by AAG Nancy Brouillet in that tampering with physical evidence of a pending matter has occurred.

Please be advised that I have brought these concerns to the attention of Attorney General Jepsen as well as members of his newly formed Privacy Task Force, Justice Paige Rogers and Governor Malloy.

Hopefully this matter concerning the dissimulation of my personal and private information throughout the State of Connecticut will be expeditiously investigated with those responsible for any violations in this matter to be held accountable for their actions to the full extent of the law.

Thanking you in advance for your attention in this very important matter,

Mrs. Laura Lillian Dickerson
860.823.3900 or 860.303.6287

P.S.: Supporting Information:

From: Brouillet, Nancy
Sent: Thursday, October 06, 2011 4:04 PM
To: Cunningham, Sandra
Subject: Lillian Dickerson - Abdul Hakeem federal lawsuit

I left a message for John because I received an affidavit that is peripherally related to the federal lawsuit I am defending for Judicial employees.

This document was also sent to Sen. Prague, so I wanted you to be aware of it.

Due to Ms. Dickerson's WC claim, I have sent a copy to Phil Schulz too.

How far you go in life depends on your being tender with the young, compassionate with the aged, sympathetic with the striving, and tolerant of those who are weaker than you --- because some day, you will be all of these.

George Washington Carver

Nancy A. Brouillet

Assistant Attorney General

Employment Rights Department

Office of the Attorney General

55 Elm Street

P.O. Box 120

Hartford, CT 06106

Phone: 860.808.5340

Fax: 860.808.5383

Email: Nancy.Brouillet@ct.gov

URL: http://ct.gov/ag/

Laura Lillian Dickerson
Social Justice and Civil Rights Activist
Norwich, CT 06360
860.303.6287

"The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy."

Martin Luther King Jr., Strength to Love, 1963

From: "Libbin, Martin" <Martin.Libbin@jud.ct.gov>
To: Lilliandickerson@sbcglobal.net
Sent: Thu, October 27, 2011 4:01:28 PM
Subject: RE: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

Dear Ms. Dickerson,

In order to investigate your complaint, please advise me exactly which document or documents it is that you allege were improperly shared. If the document is referenced by a docket entry number in your divorce file, please advise me of that number. Please be as specific as possible and if a document is not confidential or sealed, please provide me with a copy.

Thank you.

Martin R. Libbin
Deputy Director, Legal Services
Connecticut Judicial Branch
100 Washington Street
Hartford, CT 06106
Tel: (860) 706-5120
Fax: (860) 566-3449

Email: Martin.Libbin@jud.ct.gov

From: Quinn, Barbara Superior Court Judge
Sent: Monday, October 17, 2011 11:45 AM
To: Lilliandickerson@sbcglobal.net
Cc: Libbin, Martin
Subject: FW: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

Dear Ms. Dickerson:

As this matter is being addressed by our legal counsel, it has been turned over to him for review and response.

Very Truly Yours;

Judge Barbara M. Quinn

~~~~~~

Hon. Barbara M. Quinn
Chief Court Administrator
Supreme Court Building
231 Capitol Avenue
Hartford , CT 06106
Phone: 1-860-757-2100
Fax: 1-860-757-2130
Email: Barbara.Quinn@jud.ct.gov

~~~~~~

From: Quinn, Barbara Jean OVS
Sent: Monday, October 17, 2011 8:00 AM
To: Quinn, Barbara Superior Court Judge
Subject: FW: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

From: Laura Lillian Dickerson [mailto:lillilandickerson@sbcglobal.net]
Sent: Saturday, October 15, 2011 1:19 PM
To: Quinn, Barbara Jean OVS
Cc: Attorney John R. Williams; Attorney Michael Blanchard; Habibah Abdul-Hakeem; Matthew Fitzsimmons; Susan Kinsman
Subject: Violation of C.G.S. Section 153a -155 "Tampering or fabricating physical evidence/Illegal Dissemination of Private Divorce Documentation (Dickerson v. Dickerson) From GA 21 at Norwich Superior Court

[redacted]

At this time I am seeking your assistance in determining why documentation concerning my divorce and my workers compensation claims that are now in the possession of Assistant Attorney General Nancy Brouillet and Mr. Sidney Saxe are in the possession of Sandra Cunningham – Human Resource Director of the Workers Compensation Commission (WCC).

From the statements in the following email to Sandra Cunningham that she received and that she is particularly clear to the date of my signature and identification of employees – I do not know from whom did she receive this information. I will determine exactly who so in order.

As of 1:01 the documentation regarding my divorce matter was transferred from the Superior Court (GA 21st Judicial Circuit) to Attorney Williams and Judge Clark faxed at 8:09 am (850-885-0509) on Thursday October 6, 2011 – the approval of motion of Change of Venue and forwarded from my to Attorney Williams and Judge Clark faxed at 8:09 am, and the Order Granting and to Chief Clerk David Gape the Dickerson v. Dickerson divorce file was faxed at 8:14:12.

It appears some a breach of judicial protocol has taken place and the violation of CGS Section 53b-155 Tampering with Physical Evidence – A Class D felony has taken place in the GA 21st Office in the Norwich Superior Court. I am very assured that Chief Clerk David Gape has done everything possible to securely document and transfer the expressed to him when it was being compromised and that is why he made it possible to have my divorce matter transferred to another district.

Thanking you in advance for your anticipated assistance in addressing my concerns outlined in this email as they are of a very serious nature that compromises Attorney Chase T. Rogers' conduct as a judicial and employee in actions of the agency that was entrusted in our State of the Judiciary section April 13, 2011. Needless to say I will be forwarding these concerns to the attention of both Chief Justice Chase T. Rogers and Governor Dannel P. Malloy.

Following is a copy of the Friday October 7, 2011 email sent from AAG Nancy Brouillet to Sandra Cunningham – WCC human resources director of which the attached documentation concerning my family divorce matter was attached. Also following is the October 11, 2011 email from Sandra Cunningham forwarding the October 7, 2011 email from AAG Brouillet. It should be noted I am only in receipt of this email from Sandy Cunningham Tuesday October 11, 2011 at 8:57 am – after normal access. I attempted to read it. Also following is my email to Cynthia Mastrobattista only this concerning my private matter and his response to which I responded.

From: Cunningham, Sandra
Sent: Tuesday, October 11, 2011 7:57 AM
To: Dickerson, Laurel Ann
Subject: WCC v. Dickerson – Attached is the email you wanted

Here is the email from Nancy Brouillet.

Sandy

(860) 493-1918

From: Broullet, Nancy
Sent: Thursday, October 06, 2011 4:01 PM
To: Cunningham, Sandra
Subject: FW: Dickerson v. Abdul-Hakeem federal lawsuit

Fleh, a message for John because he received an affidavit that is purportedly related to the federal lawsuit filed against judicial employees.

This document was also sent to Sen. Prague so I wanted you to be aware of it.

Due to Ms. Dickerson's WC claim, I have sent a copy to Phil Schulz too.

Don't hesitate to call or email me if you have questions or need further assistance with this matter.

Thank you for your cooperation.

Nancy A. Broullet

Assistant Attorney General

Employment Rights Department

Office of the Attorney General

55 Elm Street

P.O. Box 120

Hartford, CT 06106

Phone: 860.808.5340

Fax: 860.808.5383

Email: Nancy.Broullet@ct.gov

URL: http://ct.gov/ag

CONFIDENTIALITY NOTICE: [illegible]

From: Broullet, Nancy
Sent: Thursday, October 06, 2011 4:01 PM
To: Cunningham, Sandra
Subject: FW: Dickerson v. Abdul-Hakeem federal lawsuit

Fleh, a message for John because he received an affidavit that is purportedly related to the federal lawsuit filed against judicial employees.

This document was also sent to Sen. Prague so I wanted you to be aware of it.

Due to Ms. Dickerson's WC claim, I have sent a copy to Phil Schulz too.

Don't hesitate to call or email me if you have questions or need further assistance with this matter.

Thank you for your cooperation.

Gregg Washington, Chair

X

Nancy A. Brouillet
Assistant Attorney General
Employment Rights Department
Office of the Attorney General
55 Elm Street
P.O. Box 120
Hartford, CT 06106
Phone: 860 808 5340
Fax: 860 808 5383
Email: Nancy.Brouillet@ct.gov
URL: http://ct.gov/ag/

CONFIDENTIAL INFORMATION: [illegible]

Re: Question: Privacy of Personally Sensitive, Civil/Non-Workers Compensation Matters

From: Dickerson, Laura Lillian, Laura.Lillian.Dickerson@ct.gov; Fitzsimmons, Matthew H., Matthew.Fitzsimmons@ct.gov; Kinsman, Susan
To: Susan.Kinsman@ct.gov
Cc:
Attachments: DICKERSON_ABDULLAKEEM_10-6-11.pdf (104 KB)

FYI. I have never received an email personally issued by Chairman Mastropietro in this matter. I am assuming the letter referring to the omit of this record day. I am asking (see below) if this is the case. He is still requesting a copy of the private affidavit contained in my divorce filed, which he already has a copy (see attachment).

Since AAG Brouillet already has and LEAK'd the private documentation under the auspices by Chairman Mastropietro as an attachment to her October 6, 2011 email to WCC personnel director, Sandra Cunningham, which she subsequently forwarded to me on October 11, 2011, I am still at a loss in understanding why as of October 12th the Chairman is still requesting this private documentation from me (as well as another employee Charise Belzare).

Nevertheless, as you can see from my email below, I have explained to him that this is a sensitively private, non-work related matter. Therefore, there is nothing further for me to discuss with him at this time.

I appreciate the privacy task force's effort in looking into this matter as Chairman Mastropietro's involvement with AAG Brouillet, in her representation of Judicial employee Carl Parkinson, a defendant in the civil rights racial discrimination federal suit of my daughter, (not mine) is very upsetting and is beginning to take a toll on my health. Chairman Mastropietro's persistence in obtaining a copy of this documentation from me, when he is already in possession of it and is

therefore already aware that this a non-work related personal matter gives the perception that my job is now being threatened.

Laura Lillian Dickerson
District Administrator
2nd District Workers Compensation Commission
55 Main Street, Suite 405
Norwich, CT 06360

From: Mastropietro, John
Sent: Friday, October 14, 2011 7:25 AM
To: Dickerson, Laura Lillian
Subject: RE: Question - Privacy of Personally Sensitive Civil/Non Workers' Compensation Matters

As I replied in my previous email to you, I am in Waterbury and I would be pleased to discuss it with you. I will be in Waterbury until around noon, after which I will be out of the office and not available until Monday in the Hartford office. John

From: Dickerson, Laura Lillian
Sent: Thursday, October 13, 2011 2:10 PM
To: Mastropietro, John
Subject: FW: Question - Privacy of Personally Sensitive Civil/Non Workers' Compensation Matters

Dear Chairman Mastropietro,

As a follow up to Tara Ashe's email sent to me on your behalf (see below) could you as Chairman of the Workers' Compensation Commission explain why you are requesting information regarding an affidavit for a private/personal dispute from Chanise Bolzan and myself.

I would appreciate that requests for personally sensitive information regarding my private affairs be solely directed to me. I would further appreciate that you do not involve agency employees in my personal/non work related affairs. I can be contacted at (860) 823-3206 or (860) 608-6287.

Respectfully,

Laura Lillian Dickerson
District Administrator
2nd District Workers' Compensation Commission
55 Main Street, Suite 450
Norwich, CT 06360

From: Ashe, Tara
Sent: Wednesday, October 12, 2011 2:38 PM
To: Dickerson, Laura Lillian
Subject: Question

The Chairman asked you a call from the Attorney General's office regarding an affidavit

signed by Clarise.

He has no knowledge of this and had me to follow up with Clarise for have a copy sent up to him so he could know what it is about.

I called Clarise Hardy and she doesn't have a copy and indicated that you may third would send it up on Tuesday.

It since I followed up with her and should you have a copy please let me know if you have or until please send up a copy.

Thanks,

Laura

Respectfully,

Laura Lillian Dickerson
Social Justice and Civil Rights Activist
Norwich, CT 06360
860-303-6287

"Our lives begin to end the day we become silent about things that matter."
Martin Luther King Jr.

Gage, David

From: Laura Lillian Dickerson (lilliandickerson@sbcglobal.net)
Sent: Wednesday, October 05, 2011 6:20 PM
To: Attorney John R. Williams; Attorney Michael Blanchard
Cc: Attorney Katrena Engstrom; Attorney Rose McLean; Gage, David; Edith Sen. Prague; Pam Toohey; Attorney Mark D. Wasielewski; DOrsi, Larry; Habibah Abdul-Hakeem
Subject: Cara Parkinson's Continuing Pattern of Practice of Abuse - Belizaire, Chanise Affadavit re September 29, 2011 Incident re False Reporting to Norwich Police Department
Attachments: Affidavit - Belizaire .pdf

As a follow up to the September 29th incident in which Cara Parkinson, Chief Deputy Clerk of the Norwich Superior Court, abused her judicial position, attached is the Affidavit of Chanise Belizaire who witnessed the incident that took place at the LaStalla Restaurant on that date.

Laura Lillian Dickerson
Social Justice and Civil Rights Activist
Norwich, CT 06360
860.303.6287

"Our lives begin to end the day we become silent about things that matter."
-- Martin Luther King Jr.

Attn: Linda F.

10/6/2011

MOTION FOR ORDERS BEFORE JUDGMENT (Pendente Lite) IN FAMILY CASES

JD-FM-176 Rev. 2-11
C.G.S. § 46b-56, P.B. § 25-24

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

COURT USE ONLY	
MFORPLC	Use this docket legend if the child custody box below is checked
MFORPL	Use this docket legend if the child custody box below is not checked

Instructions to person filling out this form:
1. Fill out this form and keep a copy for your records.
2. Mail or deliver a copy to all attorneys and self-represented parties of record in this case.
3. File the form with the court clerk's office.
4. Carefully read and follow the instructions on the court calendar when you receive it.

Judicial District of	At (Town)	Return date (Month, day, year)	Docket number
New London County	Norwich	06/07/2011	FA-11-4110241 S

Plaintiff's name (Last, first, middle initial)	Defendant's name (Last, first, middle initial)
Dickerson, William B., Sr.	Dickerson, Laura-Lillian
Plaintiff's address (Number, street, town, state, zip code)	Defendant's address (Number, street, town, state, zip code)
187 Laurel Hill Avenue, Norwich, CT 06360	3 Harbor View Lane, Cooke House, Norwich, CT 06360

The ☐ Plaintiff ☒ Defendant requests court orders concerning *(check all that apply)*:

- ☐ child custody
- ☐ child support
- ☐ child visitation *(parenting time)*
- ☐ alimony
- ☐ exclusive use of the family home
- ☐ appointment of an attorney for my child*(ren)* under 18
- ☐ genetic testing for paternity of child
- ☐ medical insurance/expenses
- ☒ other *(specify)* Change of Venue/Conflict of Interest re Deputy Chief Clerk Cara Parkinson's abuse of authority.

Certification

I certify that a copy of this document was mailed or delivered electronically or non-electronically to all attorneys and self-represented parties of record on 10/04/2011 and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Name and address of each party and attorney that copy was mailed or delivered to*

*If necessary, attach additional sheet or sheets with name and address which the copy was mailed or delivered to.

Signed (Individual attorney or self-represented party)	Print or type name of person signing
Laura Dickerson	Laura-Lillian Dickerson

Order - To Be Completed By The Court

The above motion having been heard, it is ordered that:

Matter transferred to Windham J.D.
Ok per Judge Shugrue Graziani

SUPERIOR COURT
NEW LONDON
JUDICIAL DISTRICT
NORWICH

By the Court	Signed (Judge/Assistant/Clerk)	Print name	Date signed
	2011 OCT -4 P 1:00	Schlager	10/4/11

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

107-00

AFFIDAVIT.

On Thursday, September 29, 2011, at approximately 1:00 p.m., I accompanied Laura Lillian Dickerson, to lunch at the LaStella Restaurant on Water Street in Norwich, CT. Mrs. Dickerson was talking on her cell phone while we were approaching the restaurant when I noticed a woman (who was later identified to me as Cara Parkinson, the deputy chief court clerk at Norwich Superior Court) standing with another woman just outside the restaurant who became very agitated as Mrs. Dickerson and I approached the door of the restaurant. I noticed Parkinson angrily speaking to this women and pointing at Mrs. Dickerson as she remained talking on her cell phone. I then suddenly heard Parkinson make a statement "Excuse me, excuse me" in the direction of Mrs. Dickerson which made me very confused as I was not certain to whom she was speaking. At that time Mrs. Dickerson noticed Parkinson while continuing her cell phone conversation and proceeded into the restaurant with me in search of a table to sit at.

While waiting for the waitress to prepare a front table for us, Parkinson and the unidentified woman came into the restaurant. I witnessed Parkinson directing agitating glares at Mrs. Dickerson of which Mrs. Dickerson ignored and continued with her phone conversation. I do not recall when Parkinson and the unidentified woman left the restaurant as Mrs. Dickerson continued with her cell phone conversation, and I decided not to give Parkinson any of my attention.

Approximately 20 minutes later, I noticed two police officers approaching the restaurant. When the officers came in they came to our table and asked if we had a dispute with *"the lady from the court"* who claimed that a Mrs. Dickerson called her a bitch? Mrs. Dickerson determining that *"the lady from the court"* was Cara Parkinson and explained to the officer that she was the *"lady from the Workers' Compensation Commission"* and that Cara Parkinson should not be using her judicial position to summon the Norwich P.D. to make false accusation about someone calling her names. Mrs. Dickerson explained that she was engaged on her cell phone when she noticed Parkinson and NEVER held any type of conversation with Parkinson, realizing that it's best not to engage with Parkinson. Mrs. Dickerson further explained to the police officers that Parkinson is a defendant in her daughter's federal civil rights law suit and that Parkinson at that was the only basis for Parkinson making these false accusations against her.

It is my testimony that Mrs. Dickerson did not call Parkinson a bitch and never engaged in a conversation with Cara Parkinson. It is also my observation and testimony is that Cara Parkinson went out of her way to agitate Mrs. Dickerson by attempting to engage Mrs. Dickerson in a conversation with her by directing the "Excuse me, excuse me" statements toward her to which Mrs. Dickerson did not acknowledge Parkinson or enter into to a verbal conversation with her.

SIGNATURE: Chanise M Belizaire Date: October 5, 2011
CHANISE BELIZAIRE

ACKNOWLEDGEMENT

STATE OF CONNECTICUT)
) ss: Norwich
COUNTY OF NEW LONDON)

Before me, David W. Schoolcraft, an Officer of the Court for said County and State, personally appeared CHANISE BELIZAIRE, who acknowledged that she did sign the foregoing instrument and that the same is her free act and deed.

In Testimony Whereof I have hereunto set my hand at 55 Main Street, Norwich, Connecticut, this 5th day of October, 2011.

Signature: _____
Attorney David W. Schoolcraft

Juris No.: 303590

theday

Court clerk terminated for falsehood in federal lawsuit

Published July 13, 2012 6:00PM Updated July 14, 2012 12:10AM

By Karen Florin (/apps/pbcs.dll/personalia?ID=k.florin)
Publication: theday.com

Corinne McCarthy, a longtime employee of the Judicial Branch who worked most recently as a deputy court clerk, was terminated on July 3 for knowingly falsifying a statement she gave in a federal discrimination lawsuit brought by one of her subordinates.

McCarthy admitted the falsehood during a June 29 disciplinary hearing, according to a termination letter signed by Joseph D. D'Alesio, executive director for the Judicial Branch's Court Operations Division. She was escorted from her most recent workplace, in the clerk's office at the juvenile court in Waterford, on July 3.

McCarthy, of Waterford, was hired as a data terminal operator in November 1993 and worked her way up to deputy clerk. Her annual salary was $76,478.

She said during a phone interview Friday that she is appealing her termination.

According to court documents, McCarthy lied about her supervisor, Deputy Chief Clerk Cara Parkinson's, knowledge of a "petition of concern" that McCarthy created and circulated in June 2009. She had created the petition after learning that employee Habibah Abdul-Hakeem, who she said was acting erratically and aggressively, was scheduled to return to work in the clerk's office at the Norwich courthouse following a leave of absence.

Abdul-Hakeem alleged in the federal lawsuit that McCarthy and Parkinson discriminated against her based on her race and created a hostile work environment. McCarthy and Parkinson are white. Abdul-Hakeem is black.

McCarthy, who as a state worker was represented by the attorney general's office, gave a statement that said Parkinson was unaware of the petition and had no role in its circulation.

McCarthy now claims Parkinson knew about the petition before it was circulated.

"The night before, she and I talked about it (the petition), and she said, 'You're in the union and I'm not, so you just do the petition on your own,'" McCarthy said Friday.

McCarthy said she didn't tell the truth because she feared retaliation from Parkinson, her longtime friend and supervisor with whom she'd had a falling out after she took leave and collected workers' compensation for an elbow injury.

U.S. District Judge Janet Bond Arterton dismissed the lawsuit in January, saying Abdul-Hakeem had failed to establish a case of racial discrimination because she had not provided the court with information on how the supervisors treated others like her.

Abdul-Hakeem has appealed.

McCarthy and Parkinson have been represented by separate lawyers from the state attorney general's office. McCarthy's attorneys recently withdrew from the case. She said Friday she has not yet retained an attorney.

Abdul-Hakeem's lawyer, John R. Williams of New Haven, said the appeal is progressing through the Second Circuit Court of Appeals. He said the case is bolstered because McCarthy's statement about the petition had been cited as support for Judge Arterton's dismissal of the case.

"She (McCarthy) committed perjury in court," Williams said.

The attorney general's office has "egg on their faces," Williams said, "but presumably they acted in good faith."

"I just think it makes it very awkward for them to continue to represent Parkinson," Williams said.

Parkinson, however, said she continues to be represented by the attorney general's office and that there is no claim against her "for anything at this point." The attorney general's office maintains that in circulating the petition, McCarthy acted without Parkinson's knowledge and permission.

"I maintain representation, and I will maintain representation throughout the appeal," Parkinson said Friday. "I am not under any investigation whatsoever. My affidavit speaks for itself."

According to the affidavit, Parkinson emailed Maria Kewer, personnel manager for the Court Operations division, when she learned McCarthy was circulating the petition.

David S. Gage, chief clerk for the New London Judicial District, said he transferred McCarthy to the juvenile courthouse in March and does not intend to fill her position in Norwich.

k.florin@theday.com (mailto:k.florin@theday.com)

Norwich court clerk fired for lie in harassment case

An admission that she lied under questioning in a recent federal lawsuit that ended with a decision in her favor has led to the firing of former Deputy Clerk Corinne McCarthy, a longtime employee at Norwich Superior Court who has worked for the state since 1993.

By GREG SMITH
Posted Jul. 14, 2012 at 12:01 AM
Updated Jul 14, 2012 at 2:03 PM

Norwich, Conn.

An admission that she lied under questioning in a recent federal lawsuit that ended with a decision in her favor has led to the firing of former Deputy Clerk Corinne McCarthy, a longtime employee at Norwich Superior Court who has worked for the state since 1993.

In a termination letter dated July 3, Joseph D. D'Alesio, executive director for Superior Court operation, wrote that McCarthy "knowingly falsified an affidavit" in a federal case filed by Habibah Abdul-Hakeem, a former Superior Court administrative clerk who worked in Norwich and filed claims of harassment and discrimination against McCarthy and McCarthy's direct supervisor, Deput Chief Clerk Cara Parkinson.

Reached at home Friday, McCarthy said she lied about Parkinson's knowledge of a petition McCarthy started circulating among employees at Norwich Superior Court asking that Abdul-Hakeem be prohibited from working at the office. McCarthy said it was during a time of friction between Abdul-Hakeem and others. The petition was halted at the request of supervisors, she said and was not a major factor in the suit.

"I lied when I was asked if Cara knew about the petition," McCarthy said. "I was in fear of retaliation by Cara."

McCarthy said she did not lie when questioned by investigators with the Judicial Branch.

Federal lawsuit

The affidavit in question was submitted to U.S. District Court on May 20, 2011, as part of a motion for summary judgment. A federal judge in New Haven in January rejected Abdul-Hakeem's claims, making a summary judgment in favor of McCarthy and Parkinson.

An appeal was filed immediately by New Haven attorney John R. Williams, who could not be reached Friday for comment on the latest developments.

Because of her firing, McCarthy is no longer represented by the attorney general's office. Parkinson however, said Friday she is not part of any ongoing investigation and maintained she never did anything wrong.

"I continue to be represented by the attorney general's office and will continue to be through the appeal," Parkinson said.

Among other claims, Abdul-Hakeem had alleged a pattern of "disparate treatment in comparison to the Caucasians employed at the office, because of her race," according to paperwork filed as part o the appeal. She alleged she was subjected to a "prolonged pattern of severe harassment" and "coerced into requesting a transfer to another courthouse to escape the defendants' hostility," according to the suit.

Abdul-Hakeem worked for Judicial between 2005 and 2011, but no longer works for the Judicial Branch.

Transferred in March

In March, McCarthy was transferred from Norwich Superior Court to the Juvenile Court in Waterford. McCarthy said there was ongoing friction in the office.

"Corinne was transferred for operational reasons after I determined that certain personality conflicts in this office were not beneficial for its smooth operation," Chief Clerk David Gage said.

Prev 1 2 Next

Federal lawsuit

The affidavit in question was submitted to U.S. District Court on May 20, 2011, as part of a motion for summary judgment. A federal judge in New Haven in January rejected Abdul-Hakeem's claims, making a summary judgment in favor of McCarthy and Parkinson.

An appeal was filed immediately by New Haven attorney John R. Williams, who could not be reached Friday for comment on the latest developments.

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"I continue to be represented by the attorney general's office and will continue to be through the appeal," Parkinson said.

Among other claims, Abdul-Hakeem had alleged a pattern of "disparate treatment in comparison to the Caucasians employed at the office, because of her race," according to paperwork filed as part o the appeal. She alleged she was subjected to a "prolonged pattern of severe harassment" and "coerced into requesting a transfer to another courthouse to escape the defendants' hostility," according to the suit.

Abdul-Hakeem worked for Judicial between 2005 and 2011, but no longer works for the Judicial Branch.

Transferred in March

In March, McCarthy was transferred from Norwich Superior Court to the Juvenile Court in Waterford. McCarthy said there was ongoing friction in the office.

"Corinne was transferred for operational reasons after I determined that certain personality conflicts in this office were not beneficial for its smooth operation," Chief Clerk David Gage said.

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