



STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001

VIA EMAIL ONLY

June 14, 2024

Harmeet K. Dhillon
Chief Executive Officer
Center for American Liberty
1311 S. Main Street, Suite 207
Mt. Airy, MD 21771

Dear Attorney Dhillon:

I write in response to your May 29, 2024, letter on behalf of Melinda Antonucci and Casey Mathieu to Vermont Department for Children and Families Commissioner Chris Winters.

To begin, I note that your letter is framed as a complaint of discrimination pursuant to the Department's Nondiscrimination Policy/Grievance Policy. Pursuant to that policy, your complaint has been referred to Department Director of Race, Gender, Equity, and Accessibility Rachel Edens. This internal complaint will be processed in the ordinary course, as described in the Department's policy.

As you may be aware, senior Department officials, including Commissioner Winters, were also recently named as defendants in a complaint alleging a similar challenge to Department policy in *Wuoti v. Winters*, 2:24-cv-614 (D. Vt.). Due in part to that litigation, I cannot comment in detail on the legal assertions in your letter at this time. The Department's position on the issues you raise will likely be made clear in the course of its filings in *Wuoti*, which is currently pending in the United States District Court for the District of Vermont.

As described in your letter, Ms. Antonucci and Mr. Mathieu have not received a formal notice indicating their license has been revoked. I would urge you to permit the administrative process, including your new complaint, to run its course. This will give the Department a full opportunity to consider the issues you've raised and ensure any action is taken only on the basis of a final agency decision.

Please direct any future communication regarding this matter to Solicitor General Jonathan Rose (jonathan.rose@vermont.gov), Deputy Solicitor General Ryan Kane (ryan.kane@vermont.gov), and myself (patrick.gaudet@vermont.gov).

Best,

A handwritten signature in blue ink that reads "Patrick Gaudet". The signature is written in a cursive, flowing style.

Patrick Gaudet
Assistant Attorney General

Cc: Jonathan Rose
Ryan Kane
Josh Dixon
Robert Kaplan