

DOCKET NO. LLI-CV-21-5014019-S	::	SUPERIOR COURT
	::	
JON A. GOODWIN	::	J.D. OF LITCHFIELD
	::	
V.	::	AT TORRINGTON
	::	
RAYMOND J. MILOT, JR.	::	JUNE 30, 2026

MOTION TO QUASH OR IN THE ALTERNATIVE PROTECTIVE ORDER

Pursuant to Connecticut General Statutes § 17a-28, and the authority of *Giesing v. Blefeld*, 2001 Conn. Super. LEXIS 56 (Conn. Super. Ct. Jan. 4, 2021), see also *Abreu v. Leone*, 120 Conn. App. 390 (2010) (records maintained by the Department of Children and Families, including testimony relating thereto, shall be confidential and shall not be disclosed without the consent of the person who is the subject of the records), the Commissioner of the Department of Children and Families, Susan I. Hamilton, MSW, JD, hereby moves to quash the subpoena served on the Custodian of Records of the Department of Children and Families (DCF) in connection with the above-cited matter. The subpoena, a copy of which is attached, (Exhibit A), commands the Custodian of DCF's Records to produce the person(s) most knowledgeable to appear and testify at the Torrington City Hall on July 8, 2026, at 1:00 p.m. and to produce documents from the period from October 1, 2018 to December 31, 2022 related to any DCF involvement with Jon Goodwin. (Exhibit A)

Accordingly, Susan I. Hamilton, MSW, JD, Commissioner of DCF, moves to quash the subpoena for the below reasons.

A. Confidentiality.

1. Pursuant to General Statutes § 17a-28, the DCF Commissioner is prohibited from producing, in whole or in part, the documents identified in the attached subpoena. Section 17a-28 (b) states that, “records maintained by the department shall be confidential and shall not be disclosed, unless the department receives written consent from the person [who is the subject of the records],” except as provided in certain other provisions of the statute that are inapplicable to the instant matter.

2. Upon information and belief, the Commissioner does not have the consent of the individuals named in the records requested by the plaintiff and she would be subjected to a fine or imprisonment for any unauthorized disclosure. Thus, absent an order of the court allowing disclosure of these records, disclosure could place the witness in jeopardy of criminal and/or civil liability.

3. General Statutes § 17a-28 broadly mandates that DCF records shall not be disclosed in recognition of the strong privacy interests of children and families receiving services from or under investigation by DCF. To that end, the statute broadly defines “records” as follows:

information created or obtained in connection with the department's child protection activities or activities related to a child while in the care or custody of the department, including information in the registry of reports to be maintained by the commissioner pursuant to section 17a-101k

4. In turn “Disclose” means: “(A) to provide an oral summary of records maintained by the department to an individual, agency, corporation or organization,

or (B) to allow an individual, agency, corporation or organization to review or obtain copies of such records in whole, part or summary form.”

5. General Statutes § 17a-28 constitutes a broad legislative declaration of confidentiality that has been recognized in both civil and criminal proceedings. *State v. Kulmac*, 230 Conn. 43, 57 (1994). In the context of criminal cases, where the constitutional right to confrontation is implicated, our courts will conduct an in-camera review of DCF records and, only under narrow circumstances, will order the release of such records. See *State v. Leduc*, 40 Conn. App. 233 (1996) (General Statutes § 17a-28 encompasses a broad legislative declaration of confidentiality that may yield only to fundamental constitutional rights).

6. In the civil context, where constitutional rights are not implicated, the confidentiality created by General Statutes § 17a-28 is absolute and may not be abrogated unless one of the statutory requirements allowing for the disclosure of DCF records is strictly met. See *Giesing v. Blefeld*, 2001 Conn. Super. LEXIS 56 (Conn. Super. Ct. Jan. 4, 2021).

7. In the civil context, General Statutes 17a-28 has been strictly construed to limit disclosure in view of the strong public policy favoring the confidentiality of DCF records. See *Carroll v. Casey Family Services*, 2002 Conn. Super. LEXIS 1943 (Conn. Super. Ct. June 10, 2002) (plaintiff not entitled to records of private agency providing services to DCF-involved child); *Bridgeman v. Ragaglia*, 47 Conn. Supp. 273 (1999) (litigants not entitled to privileged DCF records that they claimed were necessary to prosecute civil litigation).

8. In *Abreu v. Leone*, 120 Conn. App. 390 (2010), the Connecticut Appellate Court emphatically re-emphasized that the testimonial disclosure of information created or obtained in connection with DCF's child protection activities is prohibited except in conformity with General Statutes § 17a-28.

9. Maintaining the confidentiality of information relating to children and families involved with DCF is consistent with the strong legislative policy set forth in General Statutes § 17a-101 (a), "[t]o protect children whose health and welfare may be adversely affected through injury and neglect . . . [and] to provide a temporary or permanent nurturing and safe environment when necessary."

B. The Subpoena is Unreasonable and Oppressive.

1. Practice Book § 13-28A (f) provides in relevant part: "The court may, upon motion made promptly, and, in any event, at or before the time for compliance specified in a subpoena authorized by subsections (a) or (b) of this section, (1) quash or modify the subpoena if it is *unreasonable and oppressive* or if it seeks the production of materials not subject to production under the provisions of subsection (c) of this section" See also *Markowitz v. Villa*, Superior Court, judicial district of New Haven, Docket No. CV-16-6060963-S (January 6, 2017, *Wilson, J.*). "[T]he test in determining whether the court should grant the witness' motion to quash is whether the subpoena is 'unreasonable and oppressive.' The court must also determine whether the information sought is outside the scope of § 13-2." *Id.* See e.g., *Salatto v. Hospital of St. Raphael*, Superior Court, judicial district of New Haven, Docket No. CV-09-5032170-S (October 4, 2010, *Lager, J.*)

(“to the extent the subpoena demands the production of documents already sought in the Request for Production, it is deemed burdensome and oppressive and is quashed”); *Clark v. Quehl*, Superior Court, judicial district of Meriden, Docket No. FA-98-0263254-S (September 19, 2013, *Shluger, J.*) (granting in part and denying in part motion to quash overly broad subpoena); *Redding Life Care, LLC v. Town of Redding*, Superior Court, judicial district of New Britain, Docket No. CV-13-6021904-S (April 7, 2021, *Klau, J.*) (finding “discovery being sought is oppressive and unduly burdensome”).

2. Compliance here with the subpoena would be unreasonable and oppressive as it would place an unreasonable burden on DCF to identify, designate, and produce potentially multiple witnesses.

3. Further, the subpoena demands the production of documents already provided by DCF to the plaintiff.

4. On February 8, 2022, the Court (*Lynch, J.*) issued an order in connection with the above-cited matter, a copy of which is attached, (Exhibit B), where it limited the plaintiff’s deposition of DCF’s record keeper and access to DCF records to those only pertaining to the plaintiff. (Exhibit B)

5. On at least two occasions, May 15, 2020 and December 12, 2022, DCF provided the plaintiff with DCF records pertaining to the plaintiff.

WHEREFORE, Susan I. Hamilton, MSW, JD, Commissioner of the Department of Children and Families, prays that the Court quash the subpoena that is the subject of this motion for the reasons stated herein or in the alternative that the Court issue a Protective Order.

Respectfully,

SUSAN I. HAMILTON, MSW, JD
COMMISSIONER
DEPT OF CHILDREN AND FAMILIES

BY: WILLIAM TONG
ATTORNEY GENERAL

Ciarra Minacci-
Morey

 Digitally signed by Ciarra
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Date: 2026.06.30 16:34:05 -04'00'

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JON A. GOODWIN	::	J.D. OF LITCHFIELD
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V.	::	AT TORRINGTON
	::	
RAYMOND J. MILOT, JR.	::	JUNE 30, 2026

ORDER

The foregoing motion, having been heard, it is hereby **ORDERED:**
 GRANTED / DENIED.

BY THE COURT

 Judge/Clerk of the Court

DATE: ____/____/____

CERTIFICATION

This is to certify that, pursuant to Practice Book § 4-4, the foregoing was filed electronically with the court on the date hereof and, pursuant to Practice Book §§ 10-12 through 10-17, a copy hereof was delivered electronically to all attorneys and self-represented parties of record, as follows:

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Assistant Attorney General

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
 : J.D. OF LITCHFIELD
 JON A. GOODWIN : AT TORRINGTON
Plaintiff :
 v. :
 :
 RAYMOND J. MILOT, JUNIOR : JUNE 16, 2026
Defendant :

SUBPOENA DUCES TECUM

To: Custodian of Records
 Connecticut Department of Children and Families
 Legal Division, 505 Hudson Street
 Hartford, Connecticut 06106

A TRUE COPY
 ATTEST:

ALEX J. RODRIGUEZ
 STATE MARSHAL/INDIFFERENT PERSON
 HARTFORD COUNTY

BY AUTHORITY OF THE STATE OF CONNECTICUT:

Pursuant to Connecticut General Statutes §§ 52-148e and 52-148n and the Connecticut Practice Book, **YOU ARE HEREBY COMMANDED** to designate and produce for deposition the person or persons most knowledgeable regarding the records, intake, investigation, assessment, sources, receipt, custody, and disposition of materials described herein concerning Jon Goodwin, and to appear and testify at:

Torrington City Hall
 140 Main Street
 Torrington, Connecticut 06790

On July 8, 2026, at 1:00 p.m., and to bring with you and produce for inspection and copying the documents described herein.

DATE LIMITATION

Unless otherwise specified, this subpoena is limited to documents, electronically stored information, communications, records, metadata, and matters for examination concerning the period from October 1, 2018, through December 31, 2022.

Any request seeking records sufficient to identify the source, authorship, transmission, receipt, dissemination, preservation, chain of custody, or metadata of a responsive document shall include records created outside this period to the extent necessary to identify the origin, authenticity, custody, or disposition of a responsive document created, received, maintained, or used during that period.

DOCUMENTS TO BE PRODUCED

All records, documents, electronically stored information, photographs, videos, audio recordings, reports, communications, notes, memoranda, intake records, investigation records, and other materials concerning Jon Goodwin and/or any allegations relating to Jon Goodwin arising from incidents involving Noah Milot, Hannah Milot, Cameron Milot, Christine Milot (*nee* Jowdy), and Raymond Milot.

The requested materials shall include, but are not limited to:

1. All records reflecting the opening, initiation, assignment, transfer, suspension, closure, or disposition of any DCF investigation, assessment, intake, referral, or inquiry concerning Jon Goodwin.
2. All records identifying:
 - a. the date and time any investigation, assessment, intake, referral, or inquiry concerning Jon Goodwin was opened;
 - b. the date and time any such matter was closed;
 - c. the identity of the DCF employee assigned to the matter.
3. All statements, written or oral, attributed to Jon Goodwin, including summaries, transcripts, notes, recordings, interview notes, witness statements, or investigative summaries referencing statements allegedly made by Jon Goodwin.
4. All statements made regarding Jon Goodwin by any person, including but not limited to Raymond Milot, Christine Jowdy, Greg Jones, Noah Milot, Hannah Milot, or any other witness.
5. All documents, photographs, videos, audio recordings, screenshots, text messages, emails, social media communications, and electronically stored information provided to DCF concerning Jon Goodwin.
6. All records identifying the source of any document, photograph, video, audio recording, screenshot, text message, email, or electronically stored information provided to DCF concerning Jon Goodwin, including:
 - a. the identity of the person providing the material;
 - b. the date and time the material was received;
 - c. the method by which it was received.
7. All communications between DCF and Raymond Milot relating to Jon Goodwin.
8. All communications between DCF and Christine Jowdy relating to Jon Goodwin.
9. All communications between DCF and any law enforcement agency relating to Jon Goodwin.
10. Any and all videos, photographs, reports, investigative notes, witness statements, or other materials relating to incidents occurring on or about:
 - a. October 5, 2019;
 - b. October 8, 2019;
 - c. November 1, 2019;
 - d. November 3, 2019;
 - e. November 16, 2019; and
 - f. March 21, 2020.

11. Any and all records relating to the November 4, 2019, report regarding incidents on November 1, 2026 or November 3, 2026 in which Raymond Milot advised DCF that:
 - a. police responded to the residence;
 - b. Hannah recorded the incident;
 - c. Noah Milot was restrained;
 - d. videos would be provided to DCF; and
 - e. Raymond Milot intended to forward materials relating to litigation involving Jon Goodwin.
12. Any records reflecting DCF's consideration, evaluation, reliance upon, or review of videos allegedly depicting restraints of Noah Milot.
13. Any records reflecting DCF's findings, conclusions, determinations, risk assessments, recommendations, or actions concerning allegations involving Jon Goodwin.

This request includes all electronically stored information and metadata sufficient to identify dates, times, senders, recipients, creators, and custodians of responsive materials.

MATTERS FOR EXAMINATION

The designated witness or witnesses shall be prepared to testify regarding:

1. The opening, assignment, transfer, and closure of any DCF intake, investigation, assessment, referral, or inquiry concerning Jon Goodwin, including the dates thereof and the personnel assigned.
2. The identity of each person who provided to DCF any document, photograph, video, audio recording, screenshot, text message, email, or other electronically stored information concerning Jon Goodwin, and the date and manner of receipt.
3. The substance and source of any statement attributed to, or made regarding, Jon Goodwin.
4. The November 4, 2019, report by Raymond Milot, including any videos or materials he provided or offered to provide and any reference to litigation involving Jon Goodwin.
5. DCF's consideration, evaluation, or reliance upon any video allegedly depicting a restraint of Noah Milot.
6. DCF's findings, determinations, risk assessments, and dispositions concerning allegations involving Jon Goodwin.
7. The chain of custody of any materials provided to DCF concerning Jon Goodwin.
8. The existence, location, preservation, collection, and production of metadata and electronically stored information responsive to this subpoena.

DEFINITIONS

The term "record" includes any writing, document, electronically stored information ("ESI"), email, text message, memorandum, note, report, photograph, video, metadata, database entry, audit log, or other stored information, regardless of form.

The term "metadata" means data describing the history, tracking, management, transmission, authorship, creation, modification, access, storage, or use of an electronic file or document.

INSTRUCTIONS

The Department shall designate and produce the person or persons most knowledgeable concerning the matters identified in this subpoena. If no single individual possesses sufficient knowledge, the Department shall designate multiple witnesses whose collective knowledge is sufficient, including, if necessary, a records custodian, information technology employee, or systems administrator knowledgeable regarding the creation, storage, maintenance, transmission, preservation, retrieval, or metadata of responsive materials.

To the extent any responsive material exists in electronic form, it shall be produced in native format with metadata intact.

If any responsive record has been lost, destroyed, deleted, removed, or cannot be located, the witness shall identify the record and describe the circumstances of its loss, destruction, deletion, or unavailability, including the identity of any person with knowledge thereof.

If any responsive document is withheld pursuant to a claim of privilege or statutory protection, the witness shall identify the document, its date, author, and recipient, and state the basis for withholding it.

The records sought are understood to be confidential under Connecticut General Statutes § 17a-28 and related law. This subpoena is issued and is to be complied with pursuant to, and subject to, any order of the Court governing disclosure, including in camera review as the Court may direct; nothing herein requires disclosure in violation of § 17a-28.

Dated at New Haven, Connecticut this 16th day of June, 2026.

BY ORDER OF THE SUPERIOR COURT

By: _____

Commissioner of the Superior Court
John R. Williams, Esq.
Juris No. 067962

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A TRUE COPY
ATTEST

ALEX J. RODRIGUEZ
STATE MARSHAL/INDIFFERENT PERSON
HARTFORD COUNTY

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing subpoena duces tecum was served upon the Connecticut Department of Children and Families, and that a copy was served upon all counsel of record and self-represented parties of record, in the manner permitted by law on this ____ day of _____, 2026.

Print Name:

DOCKET NO: LLICV215014019S

SUPERIOR COURT

ORDER 439606

GOODWIN, JON A.

V.

MILOT JUNIOR, RAYMOND J. Et Al

JUDICIAL DISTRICT OF LITCHFIELD
AT TORRINGTON

2/8/2022



ORDER

ORDER REGARDING:
01/19/2022 117.00 MOTION FOR ORDER

The foregoing, having been considered by the Court, is hereby:

ORDER:

Granted in part and denied in part.

The plaintiff may conduct depositions of Dr. Khalil and Iurato. The questions shall be limited to any reports made about the plaintiff, the reason(s) why said reports were made and/or the information contained in the affidavits or attachments they submitted in support of their motions to dismiss.

However, plaintiff has failed to make any showing or argument even suggesting that under Connecticut General statutes 46b-124, he should have access to juvenile records. Accordingly, his request for the deposition of the keeper of records for the juvenile court is denied.

The plaintiff may take the deposition of the keeper of records for DCF but may only access records pertaining to the plaintiff in accordance with Connecticut General Statutes section 17a-28(g)(1). The plaintiff may not compel from DCF, any other DCF records.

This discovery shall be completed with 45 days of the issuance of this order.

Judicial Notice (JDNO) was sent regarding this order.

439606

Judge: ANN E LYNCH

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.