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February 14, 2025

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To: Robert F. Kennedy Jr., Secretary
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To: The Honorable Aaron Bean
The Honorable Pete Sessions
The Honorable Blake Moore
Co-Chairs, DOGE Congressional Caucus
United States House of Representatives
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Via: doge@mail.house.gov

To: Mr. Elon Musk
Via: doge@mail.house.gov



Rabbi Jacob Bellinsky surrounded by his eight beloved children in happier times. Once a close-knit Jewish family guided by their father's loving care and religious leadership for nearly 30 years, they have been systematically torn apart by Colorado's Title IV-D child support enforcement system. Today, the youngest children have been denied all contact with their father for over 4 years - a devastating separation orchestrated through void orders, denial of due process, retaliation, jurisdictional and other rights violations fueled by Title IV-D that have shattered sacred family bonds and religious traditions and obliterated his family and their rights.

Subject: Urgent Reform Needed: Title IV-D Child Support Enforcement Program
Systematically Destroying American Families - Documented Evidence of
Corruption and Constitutional Violations in Colorado

Dear Mr. President, Sec. Kennedy, DOGE Caucus Reps. Bean, Sessions, Moore, and Mr. Musk:

I write to expose one of the most abused and destructive federal programs in American history - Title IV-D of the Social Security Act (Child Support Enforcement Program). As documented in my December 19, 2024 [Multi-Jurisdictional Verified Complaint](#) and December 23, 2024 [HHS OIG complaint](#), along with seven detailed [Criminal Complaints](#) filed since April 2022 that have been disregarded and remain unacted upon, this program's perverse incentive structure systematically destroys American families while wasting billions in taxpayer dollars. This massively corrupted system has created an entire industry profiting from the systematic destruction of American families, epitomizing how the deep state bureaucracy enriches itself by undermining the very foundation of our society - the family unit.

As an Orthodox Rabbi and loving father of eight children, I have experienced firsthand the devastating human toll of this corrupt system. Through my own family's ordeal and subsequent advocacy work, I have encountered countless other parents across America who have lost meaningful contact with their children due to the perverse financial incentives created by Title IV-D funding mechanisms.

My family's treatment in Colorado provides stark evidence of how this program has spawned an entire industry that profits from the systematic separation of children from fit, loving parents. The child support enforcement system has evolved into a concerning model of how federal funding streams can be misused to generate revenue through family destruction rather than family preservation. This pattern extends beyond Title IV-D into related programs like VAWA, child protective services, and probate guardianships - each creating financial motivations that often work against children's best interests while enriching various rogue state actors and private parties involved in family court proceedings.

The Human Cost of a Corrupt System

For six consecutive years following my divorce in 2015, I served as the primary caregiver, full-time income earner, and school-time parent to my children in Black Hawk, Colorado, maintaining a stable and loving home where they once thrived. Today, through the coordinated actions of rogue state actors motivated by Title IV-D funding incentives and radical liberal ideology, my minor children have been unlawfully separated, denied contact with their loving Father, and relocated to Florida through massive frauds upon the court and in the complete absence of all jurisdiction, while I have been:

1. Systematically stripped of my fundamental parental rights
2. Rendered homeless through escalating and calculated financial abuse and destruction
3. Deprived of my decades long professional career
4. Separated from my beloved children during critical developmental years
5. Subjected to religious discrimination targeting my Orthodox Jewish practices
6. Retaliated against for exposing systemic corruption
7. Subjected to unlawful seizures totaling over \$60,000 including:
 - \$27,941.54 taken from my home sale proceeds
 - \$20,911.70 in unlawful wage garnishments
 - \$6,456.70 seized from severance after orchestrated job loss
 - \$2,500 bank levy stripping basic survival resources
 - Additional levies and unemployment intercepts

Most egregiously, rogue state actors continue to pursue collection of alleged arrears exceeding \$90,000 through these same void orders - despite knowing they lack all jurisdiction and authority. This baseless claim hangs over me like a sword while I have been unable to work in my professional field for over 30 months due to their relentless state-sponsored attacks.

The calculated nature of this financial destruction reveals how Title IV-D incentives drive systematic abuse - rogue state actors are rewarded for maximizing collections and manufacturing arrears regardless of validity or human cost. They have weaponized void orders to not only separate me from my children but to systematically destroy my ability to provide for them, all while cynically labeling me a "deadbeat" to justify continued federal funding. This perverse system enriches bureaucrats while devastating families.

Religious Discrimination and Systemic Corruption in Colorado

As an Orthodox Rabbi, I have watched in horror, powerless to stop the corrupt actors and freight train as Colorado's Title IV-D system and its agents have shown complete disregard for our religious practices and family values. Despite my role as both spiritual leader and father, rogue state actors have:

- Interfered with religious education and observances
- Prevented participation in critical religious milestones
- Dismissed the importance of Jewish holidays and traditions
- Systematically undermined my religious authority as a Rabbi

For five years, I have desperately sought help from every available channel while Colorado's corrupt system has continued its assault on my family:

- Filed seven detailed Criminal Complaints since April 2022
- Submitted formal complaints to state and federal agencies
- Provided extensive documentation of systematic violations
- Requested investigations at every level of government

Yet to date, there has been nothing but deafening silence across all levels of Colorado's government:

- Willful blindness by local and state law enforcement despite clear evidence
- Total abdication of duties by Colorado's Attorney General and Governor
- Systematic denials of district, appellate and supreme courts to intervene
- Disregard by state lawmakers despite formal notifications
- Coordinated inaction up the entire chain of command across all three branches of Colorado government

This wall of silence reveals how deeply entrenched the Title IV-D funding mechanisms have become within Colorado's institutions, creating a system where state oversight bodies and government officials at every level appear incentivized to maintain the status quo rather than address clear constitutional violations. The complete lack of response from any state authority, despite extensive documentation and formal complaints, suggests a troubling pattern where federal funding streams have compromised the very state institutions meant to protect families and constitutional rights.

The state's Title IV-D system operates as a self-perpetuating bureaucracy that actively undermines the foundational unit of American society - the family itself. The systematic nature

of this corruption is starkly illustrated through my family's ordeal, which demonstrates how this program:

- Incentivizes the destruction of traditional family structures
- Rewards agencies for separating children from fit parents
- Values federal funding over family preservation
- Creates generational trauma through forced separation
- Systematically discriminates against religious values

The Deep State's Assault on American Families

What happened to my family is not an isolated incident but rather emblematic of how Title IV-D has created an empire of corruption that:

- Generates billions in revenue through family destruction
- Maintains an army of bureaucrats dependent on broken homes
- Expands government control over private family matters
- Systematically undermines parental authority
- Destroys the social fabric of our nation

The Corrupt Funding Engine Destroying American Families

My family's devastation at the hands of Colorado's Title IV-D system illuminates the fundamental flaws in this program's design. The corrupt funding engine that destroyed my family operates through sophisticated mechanisms that systematically incentivize family destruction for profit. The program's funding structure rewards states for:

- Manufacturing "absent parent" cases by reducing parents to visitors
- Hitting collection targets regardless of family impact
- Creating welfare dependency for double funding credit
- Maintaining conflict rather than encouraging cooperation

The financial motivation is driven by specific performance metrics requiring states to:

- Achieve 80% "success rates" to receive full funding
- Maintain case volumes to justify staff positions
- Generate sufficient collections to avoid penalties
- Create more cases rather than support co-parenting

This corrupt business model has created a self-perpetuating bureaucracy that profits from broken families through:

1. Dedicated Court Staff

- Positions funded directly by Title IV-D
- Jobs dependent on maintaining high caseloads
- Pressure to create more "absent parent" cases
- Incentives to minimize cooperative solutions

2. Performance Metrics That Reward Destruction
 - Success measured by number of orders established
 - Funding based on collection amounts
 - Double credit for welfare-related cases
 - No consideration of family wellbeing or parent-child bonds
3. Systematic Manufacturing of Cases
 - Converting co-parents into "visitors"
 - Pushing families toward welfare dependency
 - Maintaining artificial conflicts
 - Preventing cooperative arrangements
4. Quantity Over Quality Funding Model
 - Rewards volume of cases over family outcomes
 - Incentivizes maximum conflict over cooperation
 - Values collections over children's interests
 - Prioritizes money flow over family preservation

My Personal Example of Systemic Corruption

My case provides stark evidence of how Title IV-D has created a self-perpetuating bureaucracy that profits from family destruction. What began with unlawful processing of "known-void" maintenance (alimony) orders through the child support collection system has escalated into coordinated state action that:

1. Stripped me of fundamental parental rights to maximize federal funding through:
 - Systematic separation from my children
 - Unlawful relocation to Florida without jurisdiction
 - Manufacturing an "absent parent" case for funding
 - Converting my co-parent status to alleged "visitor" under contact denial
2. Orchestrated financial destruction through layered collections:
 - \$27,941.54 seized from home sale proceeds
 - \$20,911.70 in unlawful garnishments
 - \$6,456.70 in severance after orchestrated job loss
 - \$2,500 bank levy stripping survival resources
 - Additional levies and unemployment intercepts
3. Created artificial welfare eligibility by:
 - Destroying my 13-year professional career
 - Rendering me homeless through systematic seizures
 - Manufacturing poverty through excessive obligations
 - Generating a welfare case for double funding credit

The system's corrupt incentive structure is evident in my case, where despite being rendered unemployed for over 30 months through their coordinated actions, rogue state actors continue pursuing collection of over \$90,000 in manufactured arrears through void orders - knowingly without jurisdiction or authority. This demonstrates how Title IV-D funding mechanisms actively work to destroy parents' ability to provide for their children while simultaneously declaring them 'deadbeats' to justify further federal funding.

The Deep State Web of Corruption

The financial motivation has created an empire of corruption. In fiscal year 2024 alone:

- \$34.8 billion collected
- \$7.3 billion in administrative costs
- 13.2 million cases processed
- 95% involving non-welfare families

Title IV-D incentivizes and funds a network of rogue state actors who profit from broken families:

Family Courts:

- Process "known-void" orders for federal funding
- Systematically deny due process rights and protections
- Enable unlawful child relocation for profit absent authority
- Manufacture artificially-inflated arrears through fraudulent cases
- Retaliate against those who expose corruption
- Block all meaningful paths to judicial review

Child Support Agencies:

- Maintain invalid cases for revenue generation
- Execute aggressive collections absent jurisdiction
- Coordinate interstate schemes to maximize funding
- Separate parents and children for profit
- Process known-void orders through federal systems
- Target whistleblowers who challenge corruption

Law Enforcement:

- Criminalize both poverty and parental devotion through systematic prosecution of parents who attempt to maintain bonds with their children
- Execute "known-false" arrests and "known-void" arrest warrants against parents trying to protect their children from harm
- Refuse to investigate documented child abuse and domestic violence when perpetrated by parties and rogue state actors benefiting from Title IV-D funding
- Weaponize law enforcement resources against protective parents through license suspensions and property seizures without valid cause
- Coordinate interstate actions to separate children from fit parents
- Transform fundamental parental rights into criminal acts through "known-void" void orders and "known-false" protection order schemes

- Aid in the systematic destruction of parent-child bonds through criminal prosecution of basic parental duties

Each player in this corrupt system is incentivized to maximize collections and expand control while disregarding fundamental rights.

Making America Great Again Starts With Families

The path to restoring American greatness begins with dismantling this corrupted Title IV-D system that has:

1. Created a massive bureaucracy profiting from broken homes through:
 - Staff positions dependent on case volume
 - Funding tied to maximizing conflict
 - Penalties for insufficient collections
 - Rewards for creating welfare cases
2. Incentivized the destruction of fatherhood by:
 - Converting parents to visitors
 - Manufacturing absent parent cases
 - Preventing cooperative parenting
 - Rewarding family separation
3. Enabled systematic rights violations through:
 - Performance metrics ignoring family wellbeing
 - Success measured by collections not outcomes
 - Volume-based funding requirements
 - Profit from maximum conflict
4. Wasted billions in taxpayer dollars on:
 - Administrative bureaucracy
 - Enforcement mechanisms
 - Interstate coordination
 - System expansion
5. Devastated generations of children through:
 - Forced separation from parents
 - Manufactured family conflict
 - Artificial welfare dependency
 - Systematic trauma

This corruption has:

- Destroyed the family structure of our nation
- Created millions of fatherless children
- Enriched bureaucrats and lawyers
- Expanded government control
- Undermined American values

Intersection of VAWA and Title IV-D Funding Streams

The destructive impact of Title IV-D is amplified by its intersection with other federal funding programs like the Violence Against Women Act (VAWA), which together create a web of perverse incentives that systematically destroy families. Public records reveal Colorado's escalating VAWA grant funding over the past three fiscal year cycles:

- 2019-2020: \$3,751,210 in total VAWA grants
- 2021-2022: \$3,666,867 in total VAWA grants
- 2023-2024: \$4,895,029 in total VAWA grants, representing a 30% increase over 2019 levels

These millions in federal funds flow to:

- State judicial departments
- District attorney offices
- Local domestic violence programs
- Court-mandated evaluation providers, and
- Training programs, including for judicial staff, judges, and law enforcement who then help perpetuate the cycle of false allegations while ignoring their oaths of office

This creates a self-perpetuating bureaucracy dependent on maintaining high numbers of protection orders, DV charges, and "deadbeat" parents to justify continued federal dollars. Evidence suggests states like Colorado systematically inflate their statistics to maximize federal funding beyond what proper accounting would justify. The systematic weaponization of these funds is evident in my case, where a simple text message to "**Have [daughter] call me**" was criminally prosecuted as a protection order violation (for a "known-void" protection order acquired by fraud and perjury with no due process and in violation of my religious observance of the Jewish holidays), with the district attorney aggressively pursuing after-the-fact domestic violence classification to impose*:

- Two years of supervised probation
- Mandatory domestic violence/psychological evaluations
- Required drug testing
- Mandatory domestic violence classes
- Bi-weekly probation meetings

*All programs that receive federal funding through VAWA and related grants

The systematic lack of legal remedies for parents trapped in this corrupt system is exemplified by my relentless yet futile efforts to seek protection and redress through every available channel:

- Multiple formal complaints to state and federal authorities
- Three federal lawsuits challenging constitutional violations
- Multiple appeals to the 10th Circuit Court of Appeals
- Six cases before the Colorado Supreme Court
- Criminal complaints to US Department of Justice
- Whistleblower complaints to Congressional oversight committees

Yet at every turn, those tasked with oversight have abdicated their duties, demonstrating how deeply entrenched this corruption has become. Even federal courts, which should provide independent review of constitutional violations, have systematically denied meaningful access to redress and justice for years - revealing how Title IV-D's influence extends beyond state institutions to compromise federal remedies as well, including by rogue federal judges!

When combined with Title IV-D incentives that reward states and counties for maximizing child support obligations and collections, these programs create a perfect storm that actively works to destroy families while enriching the bureaucracy. Courts face increasing pressure to issue protection orders and support judgments that separate fathers from children, as false allegations become a powerful tool to simultaneously trigger VAWA funding and establish grounds for Title IV-D collections. This systematic misuse of federal programs represents one of the most corrupt and destructive schemes in American history - an unreported scandal where interlocking funding streams create perverse incentives that prioritize family destruction over preservation. Long-term reform must include elimination of both VAWA and Title IV-D mechanisms that reward state actors through this self-perpetuating cycle of false allegations, criminalization, and collections.

Strategic Reform and Immediate Action Required

Historical evidence and emerging consensus suggest that Title IV-D child support enforcement has created far more societal damage than the problems it purported to solve. While a small percentage of parents might avoid financial responsibilities without enforcement mechanisms, research and experience demonstrate that the vast majority of divorced parents would continue supporting their children if not systematically impoverished by a system that profits from family destruction. Many parents now labeled as 'deadbeats' are actually victims of manufactured arrears and calculated financial devastation orchestrated by those exploiting Title IV-D for profit. While the complete dismantling of Title IV-D may be the ultimate goal, immediate strategic reforms are essential to stop the ongoing destruction of American families:

1. Implement Emergency Oversight Measures
 - Create an independent oversight board with parent representation
 - Require transparent reporting of all Title IV-D incentive payments
 - Mandate judicial disclosure of Title IV-D funding influences
 - Institute criminal penalties for processing void orders
 - Establish civil rights compliance audits with real consequences
2. Enact Funding Reform
 - Restructure incentives to reward family preservation
 - Create penalties for rights violations and jurisdictional overreach
 - Require proof of valid jurisdiction before federal funding
 - Link funding to positive family outcomes rather than collections
 - Implement clawback provisions for unlawful collections
3. Protect Constitutional Rights
 - Mandate due process before any enforcement action

- Require clear and convincing evidence for custody changes
- Protect religious freedom and parental rights
- Institute automatic stays during jurisdictional challenges
- Create federal cause of action for Title IV-D violations

Urgent Action Needed in Colorado

My family's case provides compelling grounds for immediate federal intervention in Colorado; here are few suggestions:

1. Withhold Federal Funding until:
 - All void orders are vacated
 - Unlawfully seized funds are returned and compensation provided
 - Minor children are restored to their Father's primary care
 - Religious rights are protected
 - Due process violations are remedied
2. Launch Federal Investigation Into:
 - Systematic processing of void orders
 - Coordinated rights violations
 - Religious discrimination
 - Interstate child trafficking under color of law
 - Misuse of federal resources
3. Mandate Specific Reforms:
 - Independent review of all Title IV-D cases
 - Restoration of unlawfully separated families
 - Return of illegally seized assets
 - Compensation for career destruction
 - Criminal referrals for rights violations

My family's suffering must end now. Through my extensive documentation and formal complaints, I stand ready to:

- Provide detailed testimony
- Share comprehensive evidence
- Demonstrate systematic violations
- Guide specific reforms
- Help restore other destroyed families

Each day of inaction:

- Further traumatizes children
- Compounds constitutional violations
- Enables continued corruption
- Wastes more taxpayer dollars
- Destroys more American families

I urge you to take immediate action to reform this destructive system, starting with intervention in Colorado to restore my family and right these egregious wrongs. The future of countless American families hangs in the balance. My family's extensively documented case provides a clear model for the comprehensive Title IV-D reforms needed nationwide - from the initial unlawful processing of "known-void" orders through federal mechanisms to the systematic retaliation against those who expose corruption. The evidence is clear, the constitutional violations are proven, and the human toll is devastating

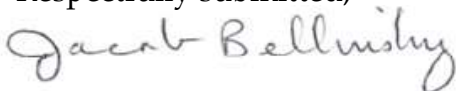
President Trump, as our nation's chief executive and law enforcement officer together with officials like Attorney General Pam Bondi, your DOJ possesses the authority to investigate, and the power to enact real change, and I pray through your authority you will direct federal intervention in this crisis destroying American families.

Secretary Kennedy, your commitment to exposing pharmaceutical industry corruption positions you perfectly to tackle this equally devastating racket within HHS - where Title IV-D funding streams create perverse incentives that destroy rather than support families.

Representatives Bean, Sessions, and Moore - your DOGE Congressional Caucus's dedication to government efficiency makes you natural allies in dismantling this bureaucratic empire that wastes billions while decimating families. And **Mr. Musk**, your influential voice and proven record of challenging entrenched corruption will certainly expose what may be the most devastating yet unreported scandal of our time.

I stand ready to provide any additional documentation needed to support immediate federal intervention. The time for action is now - before more American families are destroyed by this corrupt system.

Respectfully submitted,



Rabbi Jacob Bellinsky
Crime Victim/Witness/Whistleblower
American Association of Non-Lawyers (AANL) Member
Parent-Attorney-Whistleblower-Network (PAWN) Member

cc: [see certificate of electronic service below]

bcc:

Attachments:

1. December 19, 2024 Multi-Jurisdictional Verified Complaint
2. December 23, 2024 HHS OIG Online Complaint
3. Supporting Criminal Complaints attached by link:
<https://drive.google.com/file/d/117fy9Tj64oyQAogLA1DIYmFpvvbrNtwZ/view>

CERTIFICATE OF ELECTRONIC SERVICE

I, Rabbi Jacob Bellinsky, hereby certify that on February 14, 2025, I served the foregoing Letter: Urgent Reform Needed: Title IV-D Child Support Enforcement Program Systematically Destroying American Families – Documented Evidence of Corruption and Constitutional Violations in Colorado with attachments upon the addressees listed upon and copied to the following:

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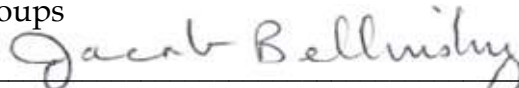
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Bcc: Interested/concerned citizens and groups



By Rabbi Jacob Bellinsky: Father (Victim/Witness/Whistleblower)

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December 19, 2024

USDOJ / OIG / HHS / CDHS / CIVIL RIGHTS / CSS / COAG

VERIFIED COMPLAINT

REQUEST FOR INVESTIGATIONS AND WHISTLEBLOWER/CRIME VICTIM PROTECTIONS

Systematic Pattern of Retaliation Through Federal Program Misuse and
Coordinated State Action in Violation of Title VI and Related State and Federal Laws

To:

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Primary Enforcement & Investigation Authority

To: MERRICK GARLAND, Attorney General

As the nation's chief law enforcement officer, you have the authority and obligation to investigate systematic violations of federal law, particularly regarding civil rights violations and misuse of federal funds. Your office's intervention is required where state actors have engaged in a pattern of constitutional violations through coordinated enforcement actions.

To: MICHAEL E. HOROWITZ, Inspector General

Your office's jurisdiction includes investigating civil rights violations and misconduct involving DOJ programs. The systematic pattern of constitutional violations alleged requires review under your independent oversight authority.

To: NICOLE ARGENTIERI, Acting Assistant Attorney General, Criminal Division

The Criminal Division's Public Integrity Section has jurisdiction over corruption and fraud involving government programs. The alleged misuse of federal funds and grant fraud falls within your prosecutorial authority.

To: TANGULER GRAY, Commissioner

Your office oversees federal Title IV-D programs and has direct authority to investigate misuse of federal child support enforcement funds. Under 42 U.S.C. § 652, you have the obligation to ensure program integrity and take action against systematic violations of federal requirements.

Oversight & Investigation

To: CHRISTI A. GRIMM, Inspector General

Your office has independent oversight authority to investigate fraud, waste and abuse in HHS programs including Title IV-D. Under the Inspector General Act, you have specific powers to examine misuse of federal funds and make criminal referrals.

To: LARRY DESBIEN, Director, Division of Child Support Services

As the state director responsible for child support enforcement, you have direct authority over program operations and an obligation to ensure compliance with federal requirements. Your office must address systematic violations.

To: MICHELLE BARNES, Executive Director, Colorado Department of Human Services

As head of the state agency administering these programs, you have direct supervisory authority and responsibility to ensure compliance with federal and state requirements. Systematic violations require your immediate attention and corrective action.

To: KERRI HUNTER, State Auditor, Office of the State Auditor

As Colorado State Auditor, you have direct authority under C.R.S. § 2-3-103 to examine and investigate fraud and abuse in state programs receiving federal funds. Your office's intervention is required where state agencies are systematically misusing federal grant monies and engaging in financial improprieties through established government programs.

To: AUBREY ELENIS, Director, Colorado Civil Rights Division

As Director of the Civil Rights Division, you have specific authority under C.R.S. § 24-34-302 to investigate systematic discrimination and retaliation occurring through state agencies. Your office's intervention is required where state actors engage in coordinated patterns of civil rights violations and retaliatory enforcement actions under color of state law.

To: PHILIP WEISER, Attorney General /JANET DRAKE, Deputy Attorney General
As Colorado's chief legal officers, you have authority to investigate criminal violations of state law and ensure proper use of federal funds by state agencies. Your office must address fraud, systematic rights violations, corruption, and pattern and practice crimes occurring under color of state law.

The following index is a useful guide to the sections that follow herein:

I. OVERVIEW AND SCOPE	2
II. SPECIFIC ALLEGATIONS AND AUTHORITY FOR ACTION.....	4
III. BACKGROUND AND PROTECTED ACTIVITIES.....	6
IV. PATTERN OF RETALIATORY RESPONSE & ADMIN REVIEW FAILURES	7
V. PATTERN OF SYSTEMATIC RETALIATION THROUGH STATE ACTION	9
VI. SYSTEMATIC GRANT FRAUD AND MISUSE OF FEDERAL FUNDS	11
VII. CONSTITUTIONAL VIOLATIONS IN FED GRANT IMPLEMENTATION.....	14
VIII. AGENCY DUTIES AND MANDATORY INVESTIGATIONS	15
IX. SYSTEMATIC VIOLATION OF VICTIM AND WHISTLEBLOWER RIGHTS ..	17
X. REQUIRED RELIEF AND SYSTEMIC REFORMS.....	19
XI. DOCUMENTATION OF DAMAGES AND ONGOING HARM.....	21
XII. CONCLUSION.....	23
CERTIFICATE OF ELECTRONIC SERVICE	25

To: All Public Officials

I. OVERVIEW AND SCOPE

I write to you all today to document an extensive pattern of retaliation being perpetrated through Colorado state agencies and federal programs in direct response to my protected activities exposing grant fraud and constitutional violations. This retaliation began immediately after I filed formal complaints documenting systematic misuse of Title IV-D funds and continues to escalate through coordinated state action despite clear notice to all relevant authorities.

Please note that to date, in addition to notices and complaints filed with various government agencies, I have drafted and submitted seven formal State and Federal Criminal Complaints ("CCs") to relevant judicial, executive, legislative, and law enforcement authorities documenting systematic rights violations, reporting hundreds of felony crimes, and invoking my status as a crime victim, witness, and whistleblower:

1. [04/13/22 Combined State & Federal Criminal Complaints #1](#) ("CC#1")[1st JD (2015DR7)]
2. [11/29/22 Combined State & Federal Criminal Complaints #2](#) ("CC#2")[1st & 18th JDs]
3. [12/05/22 Supplemental Criminal Complaint #1 To CC#2](#) ("CC#2-Supp#1")[18th JD]
4. [02/10/23 Supplemental Criminal Complaint #2 To CC#2](#) ("CC#2-Supp#2")[18th JD]
5. [04/03/23 Supplemental Criminal Complaint #3 To CC#2](#) ("CC#2-Supp#3")[18th JD]
[under construction] Supplemental Criminal Complaint #1 to CC#1 ("CC#1-Supp#1")[1st JD]
6. [10/20/23 Supplemental Criminal Complaint #2 to CC#1](#) ("CC#1-Supp#2")[1st JD]
7. [02/05/24 Supplemental Criminal Complaint #3 to CC#1](#) ("CC#1-Supp#3")[1st JD]
[under construction] Supplemental Criminal Complaint #4 to CC#1 ("CC#1-Supp#4")[1st JD]
[under construction] Supplemental Criminal Complaint #5 to CC#1 ("CC#1-Supp#5")[1st JD]

Three of my formal CCs are in process or under construction (see above). One of the three, specifically and more comprehensively, addresses ongoing retaliation through state mechanisms and systematic misuse of child support enforcement programs. The current multi-jurisdictional "Verified Complaint" herein – largely brought under Title VI and other state and federal laws – is separate from but related to said CCs in process and focuses specifically on the pattern of retaliation through federal program misuse that requires immediate federal intervention.

In addition to documenting systematic violations of federal law and fraudulent use of Title IV-D funds, evidence is attached proving an ongoing pattern and practice of constitutional violations being perpetrated through Colorado state agencies.

The violations detailed herein trigger mandatory investigation requirements under multiple federal statutes and regulations.

As detailed in my April 10, 2023 "Offer Refused/Notice and Demand" to Elbert County DHS (See Attachment 1, Exhibit A) and subsequent documents and communications with relevant government agencies, state actors have continued to weaponize federal child support enforcement programs to retaliate against my protected civil rights activities through:

1. Processing maintenance payments through Title IV-D mechanisms without valid support orders;
2. Maintaining invalid FSR Case #14414221 and Title IV-D Case #20-903335-44-4A after explicit notice of void status;
3. Executing a calculated series of escalating seizures and collections:

Initial Phase (2021-2022):

- Monthly maintenance garnishments of \$1,469.00 (Oct 2021-July 2022)
- Monthly withholdings increased to \$3,228.35 (Aug 2022-July 2023)
- Two unlawful "garnishment" payments of \$3,228.35 from final severance (Late 2022) following termination by my employer of my professional employment of 13 years

Escalation Phase (2023):

- Further extortions totaling \$1,480.00 from unemployment payments (50% each payment)
 - \$2,500.00 bank account lien/levy (May-June 2023)
 - \$27,941.54 seized from home sale (December 2023)
 - Suspicious duplicate FSR payment entry of \$27,941.54 (January 2024)
 - Unknown offset payment of \$397.98 (February 2024)
4. Despite my December 5, 2024 request for Administrative Review (See Attachment 1, pgs. 2-4) documenting these unlawful collections and void orders, Elbert County DHS:
 - Failed once again to investigate fraud and ignored my two "grounds" for dispute
 - Failed once again to address jurisdictional defects and challenges
 - Ignored once again evidence of void orders
 - Conducted incomplete financial analysis of alleged fraudulent invalid arrears
 - Further demonstrated a pattern of willful blindness and disregard for rights

II. SPECIFIC ALLEGATIONS AND AUTHORITY FOR ACTION

The systematic violations documented herein trigger concurrent jurisdiction and mandatory investigation requirements across multiple federal and state agencies:

DEPARTMENT OF JUSTICE (Attorney General MERRICK GARLAND et al)

The systematic constitutional violations documented herein require DOJ intervention under:

- 18 U.S.C. § 242 (Deprivation of Rights Under Color of Law)
- 18 U.S.C. § 241 (Conspiracy Against Rights)
- 18 U.S.C. § 1513 (Retaliating against a witness)
- 18 U.S.C. § 666 (Theft concerning programs receiving federal funds)
- 42 U.S.C. § 1983 (Civil Rights Violations)
- 42 U.S.C. § 14141 (Pattern or practice investigations)
- 28 C.F.R. § 42.107(e) (Title VI anti-retaliation provisions)

The pattern of coordinated state action to deprive constitutional rights through void orders and unlawful enforcement warrants immediate investigation by the Civil Rights Division.

OFFICE OF CHILD SUPPORT ENFORCEMENT (Commissioner TANGULER GRAY et al)

Under 42 U.S.C. § 652, your office has direct authority and obligation to investigate:

- Invalid Title IV-D case maintenance
- Unlawful use of federal enforcement mechanisms
- Program integrity violations under 45 C.F.R. § 303.2
- State plan compliance under 42 U.S.C. § 654(12)
- Enforcement practices under 45 C.F.R. § 303.6
- Misuse of federal funds

Additional mandatory oversight includes:

- Guidelines compliance (45 C.F.R. § 302.56)
- Program integrity requirements (45 C.F.R. § 303.2)
- State plan requirements (42 U.S.C. § 654(12))

The documented processing of void orders through federal systems requires immediate corrective action.

HHS OFFICE OF INSPECTOR GENERAL (Inspector General CHRISTI A. GRIMM et al)

Your independent oversight authority under the IG Act requires investigation of:

- Fraud in federally funded programs (31 U.S.C. § 3729-3733)
- Criminal acts involving federal programs (42 U.S.C. § 1320a-7b)
- Misuse of Title IV-D funds
- Program integrity violations
- Systematic fraud and abuse (5 U.S.C. App. 3 § 4(a)(1))

The systematic nature of these violations warrants a comprehensive audit and investigation.

COLORADO OFFICE OF THE STATE AUDITOR (State Auditor KERRI HUNTER)

Your statutory authority under C.R.S. § 2-3-103 requires investigation of:

- Misuse of federal grant funds by state agencies
- State program compliance violations
- Financial irregularities in program operations

Additional authority includes:

- Examination of financial affairs (C.R.S. § 2-3-101(3)(a))
- Performance audit authority (C.R.S. § 2-3-107)
- Federal fund oversight (C.R.S. § 2-3-120)
- Fraud schemes involving public funds

The systematic misuse of Title IV-D funds through state agencies warrants a comprehensive state audit and investigation into fiscal improprieties.

COLORADO CIVIL RIGHTS DIVISION (Director AUBREY ELENIS)

Your authority under C.R.S. § 24-34-302 requires investigation of:

- Discrimination in administration of state programs
- Retaliation against protected activities
- Pattern or practice violations by state agencies
- Civil rights violations under state law

Additional jurisdiction includes:

- Investigation procedures (C.R.S. § 24-34-306)
- Relief authorization (C.R.S. § 24-34-405)
- Protection of legal activities (C.R.S. § 24-34-402.5)

The documented pattern of retaliatory enforcement actions and civil rights violations through state agencies requires immediate investigation under state civil rights laws.

COLORADO OFFICE OF THE ATTORNEY GENERAL (AG WEISER/DAG DRAKE)

Under Colorado law, state AG Weiser has specific statutory duties relevant to this matter:

- Prosecution authority (C.R.S. § 24-31-101(1)(a))
- Public corruption investigations (C.R.S. § 24-31-107)
- Consumer protection (C.R.S. § 24-31-101(1)(i))
- Criminal prosecution (C.R.S. § 24-31-101(1)(b))
- Agency records access (C.R.S. § 24-31-104)
- Pattern of fraud investigations (C.R.S. § 24-31-108)
- Public assistance fraud (C.R.S. § 26-1-127)

These statutory obligations create an affirmative duty to investigate systematic misuse of federal programs and coordinated retaliation through state agencies.

In addition, the unacted upon and extensively reported pattern of violations triggers concurrent jurisdiction requiring coordinated investigation by federal and state authorities to address:

1. Misuse of federal and state resources
2. Violations of federal and state civil rights laws
3. Program integrity violations at multiple levels
4. Systematic retaliation through state mechanisms
5. Need for comprehensive corrective action

Each agency's distinct investigative authority combines to enable thorough examination of:

- Federal grant fraud aspects (HHS OIG)
- Constitutional violations (DOJ)
- State fiscal improprieties (State Auditor)
- Civil rights violations (State Civil Rights Division)
- Fraud, corruption, crimes, civil rights violations (State Attorney General)

The interconnected nature of these violations requires coordinated investigation by all relevant authorities to ensure comprehensive review and appropriate remedial action.

The narrative that follows demonstrates how state actors have weaponized federal child support enforcement mechanisms to retaliate against protected civil rights activities, causing severe financial and familial harm while creating specific dangers through their enforcement actions. As detailed herein, this retaliation violates Title VI's prohibition on retaliation, multiple federal criminal statutes, and state law.

As evidenced in the attached documentation, state actors have:

1. Processed maintenance payments through Title IV-D mechanisms without valid support orders (See Attachment 1, Exhibit C: March 21, 2022 "Notice & Demand" to Director DESBIEN)
2. Maintained invalid Title IV-D cases after receiving formal notice (See Attachment 1, Exhibit A: April 10, 2023 "Notice & Demand")
3. Used federal enforcement mechanisms to collect void debts
4. Engaged in retaliatory enforcement actions following protected complaints
5. Deprived individuals of constitutional rights under color of law

III. BACKGROUND AND PROTECTED ACTIVITIES

The retaliation documented herein stems from my efforts to expose systematic misuse of federal Title IV-D funds and constitutional violations by Colorado state agencies. On March 21, 2022, I provided formal notice to Child Support Services Director DESBIEN (See Attachment 1, Exhibit C; also cc'd to Commissioner GRAY requesting an investigation) documenting how state actors were unlawfully:

- Processing maintenance through FSR without valid child support orders
- Using federal mechanisms to collect known-void debts
- Violating basic program requirements under C.R.S. § 26-13-114(1)

This notice and request for investigation detailed how maintenance payments were being unlawfully processed through the Family Support Registry (FSR) without valid support orders, in direct violation of federal program requirements.

Rather than investigating these violations as required by law, state actors responded by escalating their unlawful collections through a calculated series of retaliatory enforcement actions:

A. Initial Maintenance Collection Phase (2021-2022):

- September 14, 2021: Attorney HART filed a void Income Withholding Order (See Attachment 2, pgs. 7-12) to collect maintenance through FSR, even though no child support or collection of support order existed
- October 29, 2021: First unlawful garnishment of \$1,469.00 from earnings
- Monthly garnishments continued through July 2022 totaling \$20,911.70
- August 2022: Monthly withholdings increased to \$3,228.35 after void support order entered
- Late 2022: Two final unlawful garnishments of \$3,228.35 each stolen from employer severance
- Total unlawful garnishments and withholdings: \$27,599.40

B. Title IV-D Case Establishment Phase (2022-2023):

- Despite March 21, 2022 Notice, DESBIEN maintained void FSR case #14414221
- BRANDI SNELLING and DARCY BOLDING established void Title IV-D case #20-903335-44-4A
- HART orchestrated void child support order to legitimize prior unlawful collections
- Further extortions of \$1,480.00 from unemployment payments (50% each payment)
- May 2023: \$2,500.00 seized through void bank account levy

C. Escalated Property Seizure Phase (2023-2024):

- December 2023: \$27,941.54 seized from home sale proceeds through void liens
- January 2024: Duplicate FSR payment entry of \$27,941.54
- February 2024: Unknown offset payment of \$397.98
- Cumulative unlawful garnishments, levies, and collections total in excess of \$60,000.00 to date.

The systematic nature of this retaliation prompted me to file Criminal Complaint #1 (CC#1) on April 13, 2022, documenting the coordinated pattern of violations. Under Title VI legal framework, both my March 21, 2022 and April 13, 2023 notices and complaints constitute protected activities opposing discrimination and unlawful conduct. As the Supreme Court recognized in *Jackson v. Birmingham Bd. of Educ.*, 544 U.S. 167, 173-74 (2005): "Retaliation for engaging in protected activity is another form of intentional discrimination."

IV. PATTERN OF RETALIATORY RESPONSE & ADMINISTRATIVE REVIEW FAILURES

A. Escalating Pattern of Retaliation

The retaliation began immediately after my protected activities and has followed a systematic pattern of escalation. State actors not only continued processing void orders through federal systems but expanded their use of enforcement mechanisms to inflict maximum financial harm. This pattern demonstrates the precise type of retaliatory conduct that Title VI prohibits - adverse actions taken because an individual has "complained of discrimination or participated in discrimination complaints." See Title VI Legal Manual, Section VIII(A).

B. Administrative Review Evasion

On April 10, 2023, I submitted an OFFER REFUSED & DEMAND FOR DISMISSAL OF CASE# 20-903335-44-4A / FSR No. 14 41 42 21 to Elbert County DHS (See Attachment 1, Exhibit A), specifically challenging:

1. The void status of all underlying orders
2. The lack of valid jurisdiction for enforcement
3. The unlawful nature of all collections
4. My non-responsibility for void obligations

Despite providing extensive documentation prior to and including for the purposes of the December 5, 2024 Administrative Review (See Attachment 3), Elbert County DHS CSS:

1. Failed to address jurisdictional challenges
2. Ignored evidence proving orders void
3. Conducted incomplete financial analysis omitting documentation from:
 - Multiple unlawful garnishments and employment withholdings
 - Unemployment payment seizures
 - Bank account levy amounts
 - Home sale proceeds seizure
4. Demonstrated willful blindness to systematic violations

C. Coordinated Agency Response

As documented in Criminal Complaint #2 and its supplements, state actors coordinated their retaliatory response across agencies:

1. Attorney HART and GALÁN obtained void protection orders through fraud after being named in CC#1
2. Law enforcement agencies coordinated to effect false arrest and imprisonment based on these void orders
3. Administrative agencies:
 - Suspended driver's license
 - Reported invalid debts to credit bureaus
 - Continued processing void orders through federal systems
 - Established and maintained void Title IV-D case
 - Executed void property liens and seizures
4. Child Support Services:
 - Ignored formal notices of void status
 - Continued unlawful collections
 - Failed to investigate program violations
 - Refused to correct records or provide relief

This coordinated pattern fits squarely within Title VI's definition of prohibited retaliation as "a deliberate action used to send a clear message that complaining is unwelcome and risky." See Title VI Legal Manual, Section VIII(A).

Prime examples of this retaliatory pattern demonstrate its calculated escalation:

1. Initial Retaliatory Response (Late 2022) After learning they were named in CC#1, attorney ANDREW NEWTON HART and RACHEL ZINNA GALÁN obtained void protection orders through fraud, which were then weaponized to justify criminal charges and property seizures. Two final unlawful "garnishment" payments of \$3,228.35 each were seized from Father's severance pay through these void orders.
2. Unemployment Benefits Seizures (2023) Following my loss of employment due to the relentless state-sponsored "crime sprees," state actors extorted \$1,480.00 through 50% withholdings from each unemployment payment despite lacking valid jurisdiction.
3. Bank Account Levy (May-June 2023) State actors seized \$2,500.00 through a void bank account levy, depleting funds earmarked for mortgage payments.
4. Home Sale Seizure (December 2023-February 2024) Most egregiously, state actors seized \$27,941.54 from the forced sale of my home through void liens, despite clear notice of their void status. This seizure was compounded by:
 - A duplicate FSR payment entry of \$27,941.54 in January 2024
 - An unexplained offset payment of \$397.98 in February 2024 All processed through federal mechanisms without valid orders or jurisdiction.

The temporal proximity between my protected activities and these escalating enforcement actions provides compelling evidence of retaliatory intent. As documented in CC#2 and its supplements, state actors coordinated their response across multiple fronts:

1. Legal System Manipulation
 - HART and GALÁN obtained void protection orders through fraud
 - Used void orders to justify criminal charges and property seizures
 - Orchestrated false arrest and imprisonment
2. Administrative Enforcement
 - Suspended driver's license
 - Reported invalid debts to credit bureaus
 - Continued processing void orders through federal systems
 - Maintained void Title IV-D case despite notice
 - Executed void property liens and seizures

This coordinated pattern fits squarely within Title VI's definition of prohibited retaliation as "a deliberate action used to send a clear message that complaining is unwelcome and risky." See Title VI Legal Manual, Section VIII(A) (quoting Ivan E. Bodensteiner, *The Risk of Complaining - Retaliation*, 38 J.C. & U.L. 1, 1 (2011)).

V. PATTERN OF SYSTEMATIC RETALIATION THROUGH STATE ACTION

The retaliation documented in this complaint demonstrates a coordinated pattern designed to punish protected activities through state action. As the Supreme Court explained in *Burlington Northern & Santa Fe Railway Co. v. White*, 548 U.S. 53, 68 (2006), retaliation claims require evidence of actions that "could well dissuade a reasonable person from making or supporting a charge of discrimination." The adverse actions taken by state actors here far exceed this threshold.

A. Misuse of Federal Child Support Enforcement Mechanisms

Following submission of my March 21, 2022 "Notice & Demand" documenting program violations, state actors not only continued but escalated their misuse of federal mechanisms in direct retaliation. Under C.R.S. § 26-1-127(1):

"Any person who obtains or any person who willfully aids or abets another to obtain public assistance or vendor payments...to which the person is not entitled...by means of a willfully false statement or representation, or by impersonation, or by any other fraudulent device, commits the crime of theft."

Despite this clear prohibition, state actors:

1. Processed maintenance payments through the Family Support Registry without valid support orders, in violation of C.R.S. § 26-13-114(1) which only authorizes FSR processing when "the court orders payments for such obligations to be paid through the family support registry". Key violations include:
 - September 2021: Void IWO filed by HART
 - October 2021-July 2022: Monthly maintenance garnishments of \$1,469.00
 - August 2022: Increased to \$3,228.35 after void support order entered unlawfully
 - Late 2022: Two final unlawful garnishments of \$3,228.35 each from employer severance
2. Maintained invalid Title IV-D case #20-903335-44-4A after receiving explicit notice that all underlying orders were rendered void by operation of law, violating federal program integrity requirements under 45 C.F.R. § 303.2. This included:
 - Ignoring March 21, 2022 "Notice & Demand" to Director DESBIEN
 - Processing known-void orders through federal systems
 - Refusing to investigate program violations
 - Maintaining void case despite clear notice
3. Executed a calculated series of seizures and collections without valid orders or jurisdiction:
 - \$1,480.00 from unemployment benefits (2023)
 - \$2,500.00 bank account levy (May-June 2023)
 - \$27,941.54 from home sale proceeds (December 2023)
 - Duplicate FSR entry of \$27,941.54 (January 2024)
 - Unknown offset of \$397.98 (February 2024)

As the Fourth Circuit explained in *Peters v. Jenney*, 327 F.3d 307, 320 (4th Cir. 2003), a retaliation claim requires showing protected activity, adverse action, and causation. The temporal proximity between my protected notices and the escalating seizures provides compelling evidence of retaliatory intent. See *Loudermilk v. Best Pallet Co.*, 636 F.3d 312, 315 (7th Cir. 2011) (finding that adverse action "so close on the heels of protected act" supports inference of causation).

B. Coordinated Pattern Across State Agencies

The retaliation extended beyond mere financial harm to encompass coordinated action across multiple state agencies. As documented in Criminal Complaint #2 and its supplements, immediately after learning they were named in CC#1:

1. Legal System Manipulation

- Attorney HART and GALÁN obtained void protection orders through fraud, violating established precedent that "Fraud vitiates the most solemn contracts, documents, and even judgments." *U.S. v. Throckmorton*, 98 U.S. 61, 64 (1878)
- These void orders were used to justify criminal charges and property seizures despite clear Supreme Court precedent that orders entered without jurisdiction are "not voidable, but simply void." *Elliott v. Piersol*, 26 U.S. 328, 340 (1828)
- Law enforcement agencies coordinated to effect my false arrest and imprisonment on January 16, 2023, as detailed in CC#2-Supp#2

2. Administrative Enforcement Actions

- Driver's license suspension without valid authority
- Credit bureau reporting of invalid debts
- Continued processing of void orders through federal systems
- Administrative Review obstruction, as evidenced by:
 - Refusal to address jurisdictional challenges
 - Willful blindness to void status of orders
 - Incomplete financial accounting
 - Continued enforcement despite notice

3. Child Support Services Violations

- Maintained void FSR case #14414221 despite notice
- Established invalid Title IV-D case #20-903335-44-4A
- Executed void liens and property seizures
- Failed to investigate documented program violations
- Refused to correct records or provide administrative relief

This systematic pattern demonstrates precisely the type of coordinated retaliation that Title VI prohibits. As the Supreme Court explained in *Jackson v. Birmingham Board of Education*, 544 U.S. 167, 173-74 (2005): "Retaliation is, by definition, an intentional act. It is a form of discrimination because the complainant is being subjected to differential treatment." The evidence shows state actors deliberately used their authority over federal programs to punish protected civil rights activities through a calculated series of adverse actions.

VI. SYSTEMATIC GRANT FRAUD AND MISUSE OF FEDERAL FUNDS

Federal grantees must comply with constitutional requirements under 2 CFR § 200.300, which mandates that agencies "carry out all applicable regulations...including Constitutional rights." Instead, state actors have weaponized federal grant programs to perpetrate retaliatory enforcement while systematically violating fundamental rights. As detailed below, this pattern demonstrates deliberate misuse of federal funds through coordinated state action.

A. Title IV-D Program Violations

This systematic pattern of fraud directly violates federal program requirements under 45 C.F.R. § 303.2 and constitutes theft of public funds under both 18 U.S.C. § 666 and C.R.S. § 26-1-127. The state actors' continued processing of fraudulent claims after notice demonstrates both complicity in the scheme and criminal violations under 42 U.S.C. § 1320a-7b. State actors have deliberately violated these requirements by:

1. Processing Void Orders Through Federal Systems In September 2021, HART filed a known-void Income Withholding Order to unlawfully collect maintenance through the Family Support Registry (FSR case #14414221) despite no valid child support order existing. This deliberate misuse of federal mechanisms violated C.R.S. § 26-13-114(1), which only authorizes FSR processing when "the court orders payments for such obligations to be paid through the family support registry." [Source: March 21, 2022 Notice to Director DESBIEN]

Despite explicit notice of the void status, DESBIEN and state actors continued processing void orders through federal systems from October 2021 through approximately January 2024, resulting in unlawful collections in excess of \$60,000 through:

- Monthly maintenance garnishments (\$1,469 × 10 months)
- Increased invalid monthly withholdings to \$3,228.35
- Two final severance garnishments (\$3,228.35 × 2)
- Unemployment benefit seizures (\$1,480.00)
- Bank account levy (\$2,500.00)
- Home sale proceeds (\$27,941.54)
- Suspicious duplicate FSR entry (\$27,941.54)
- Unknown offset (\$397.98)

B. Pattern of Unlawful Collections Through Federal Programs

The unlawful collections scheme expanded systematically after notice, demonstrating state actors' intent to misuse federal funds for retaliation: three distinct phases:

Initial Maintenance Collection Phase (2021-2022):

- Monthly maintenance garnishments totaling \$20,911.70 (Oct 2021-July 2022)
- Two final unlawful garnishments of \$3,228.35 each from severance
- Total unlawful garnishments and withholdings: \$27,599.40

Title IV-D Case Establishment Phase (2022-2023):

- Further extortions of \$1,480.00 from unemployment payments
- Bank account levy seizure of \$2,500.00 (May 2023)

Escalated Property Seizure Phase (2023-2024):

- Home sale proceeds seizure of \$27,941.54 (December 2023)
- Duplicate FSR payment entry of \$27,941.54 (January 2024)
- Unknown offset payment of \$397.98 (February 2024)

C. GALAN's Fraudulent Maintenance Collection While in Common Law Marriage

The fraud extends beyond misuse of federal mechanisms to include GALAN's fraudulent collection of maintenance payments while engaged in an undisclosed common law marriage relationship with LAZAR. From 2015-2024, GALAN, through HART's orchestration and with DESBIEN's, SNELLING's and BOLDING's complicity, obtained maintenance and child support payments while:

1. Cohabiting with STEVEN JAMES LAZAR since 2015 at his residence at 35661 Whispering Pine Place, Elizabeth, CO 80107
2. Engaged in relationship meeting Colorado's common law marriage criteria:
 - Cohabitation and shared household since 2015
 - Mutual agreement/intent to be married
 - Public holding out as committed couple
 - Sharing of finances, property and living expenses
[Source: Documentation in CC#1; See also all evidence hyper-linked and associated with the "Child Support Racket Crime Sprees - Brief Background and Chronology" (hard copies of all documentary evidence available upon request)]
3. Deliberately concealing from courts and agencies:
 - Improved financial circumstances through shared household
 - Combined resources with LAZAR
 - Reduced living expenses through cohabitation
 - LAZAR's financial support and contributions
4. Using false financial representations to maintain void support orders by:
 - Omitting LAZAR's household contributions
 - Misrepresenting actual living arrangements
 - Concealing shared expenses and resources
 - Claiming financial need despite improved circumstances

This systematic pattern of fraud allowed GALAN, through HART's direction and state actors' complicity, to unlawfully obtain tens of thousands of dollars processed through federal Title IV-D mechanisms despite having no valid entitlement to such support. The deliberate nature of this fraud is evidenced by:

- GALAN's sworn financial statements omitting material facts about her living situation and resources
- HART's knowing facilitation of these misrepresentations to courts and agencies
- State actors' continued processing of claims after receiving notice of the fraud
- Refusal to investigate or correct records despite clear evidence of misrepresentation

This pattern directly violates program requirements under 45 C.F.R. § 303.2 and constitutes theft through deliberate misuse of federal mechanisms. The state actors' complicity in processing these fraudulent claims after notice demonstrates both knowledge of and participation in the scheme to misuse federal grant funds in violation of 2 CFR § 200.300.

VII. CONSTITUTIONAL VIOLATIONS IN FEDERAL GRANT IMPLEMENTATION

A. Due Process Violations Through State Action

Federal grant recipients must comply with constitutional requirements per 2 CFR § 200.300. As the Supreme Court established in *Valley v. Northern Fire & Marine Insurance Co.*, 254 U.S. 348, 41 S. Ct. 116 (1920): "Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act beyond that authority, and certainly in contravention of it, their judgments and orders are regarded as nullities." The state actors here systematically violated these principles by:

1. Continuing to enforce known-void orders after receiving explicit notice, violating the bedrock principle that "[a] judgment entered in violation of due process is void." *E.B. Jones Construction Co. v. City & County of Denver*, 717 P.2d 1009, 1013 (Colo.App.1986);
2. Processing void orders through federal systems despite clear precedent that "judgments entered where court lacked either subject matter or personal jurisdiction, or that were otherwise entered in violation of due process of law, must be set aside." *Orner v. Shalala*, 30 F.3d 1307 (10th Cir. 1994);
3. Denying hearings on jurisdictional challenges in direct violation of due process requirements articulated in *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

B. Equal Protection Violations Through Discriminatory Enforcement

As established in *Yick Wo v. Hopkins*, 118 U.S. 356, 373-74 (1886), selective enforcement of facially neutral laws can violate equal protection when motivated by improper purposes. The evidence shows state actors have:

1. Selectively used federal enforcement mechanisms against protected activities
2. Applied program requirements discriminatorily by:
 - Processing void orders only after civil rights complaints
 - Ignoring clear evidence of fraud while expediting collections
 - Refusing to investigate documented violations
 - Denying administrative review protections
3. Engaged in retaliatory enforcement pattern following:
 - Filing of criminal complaints
 - Submission of program violation notices
 - Requests for administrative review
 - Appeals of void orders

This systematic pattern demonstrates deliberate misuse of federal programs to punish protected activities through coordinated state action in violation of basic constitutional requirements.

C. Pattern of Systematic Withholdings and Fraudulent Collections

As established in *Peters v. Jenney*, 327 F.3d 307, 320 (4th Cir. 2003), retaliation claims require evidence of protected activity, adverse action, and causation. The systematic withholdings documented here demonstrate a calculated pattern of adverse actions taken in direct response to protected activities.

The unlawful collection scheme began in September 2021 when HART filed a void Income Withholding Order (IWO) to process maintenance payments through the Family Support Registry (FSR case #14414221) despite no valid child support order existing. From October 2021 through the present, a series of increasingly aggressive collection actions have stripped away fundamental property rights while inflicting severe economic harm:

October 2021 - July 2022: Monthly garnishments of \$1,469.00 for maintenance were unlawfully processed through FSR without valid orders, in direct violation of C.R.S. § 26-13-114(1) which only authorizes FSR processing when "the court orders payments for such obligations to be paid through the family support registry."

August 2022 - July 2023: Following entry of the known-void child support order, monthly withholdings increased to \$3,228.35 (\$1,759.35 support + \$1,469 maintenance), culminating in unlawful collections in upwards of \$30,000.00.

Most egregiously, when Father's 13-year professional career was terminated in August 2023 due to the relentless state-sponsored "crime sprees," HART orchestrated the unlawful seizure of his final compensation. Despite the Colorado Department of Labor and Employment's explicit determination that these severance payments did not constitute employment earnings, state actors processed two final unlawful "garnishment" payments of \$3,228.35 through FSR. These actions directly violated fundamental requirements that "agencies shall implement statutory and national policy requirements." 2 CFR § 200.300(a).

The scheme reached new heights in December 2023 with the \$27,941.54 seizure from Father's home sale proceeds, followed by a duplicate FSR payment entry of \$27,941.54 in January 2024, and an unexplained offset payment of \$397.98 in February 2024. This pattern of escalating seizures demonstrates precisely the type of retaliation that federal law prohibits.

VIII. AGENCY DUTIES AND MANDATORY INVESTIGATIONS

The systematic retaliation documented herein triggers mandatory investigation and enforcement obligations across multiple federal agencies. As the Supreme Court explained in *CBOCS West, Inc. v. Humphries*, 553 U.S. 442, 451 (2008), retaliation against those who oppose discrimination requires federal intervention because "such retaliatory conduct threatens to frustrate Congress' purpose in enacting federal civil rights laws."

A. Department of Justice Obligations

The Department's Title VI regulations explicitly prohibit retaliation against those who engage in protected activities. Under 28 C.F.R. § 42.107(e):

"No recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by [Title VI], or because he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under this subpart."

This broad protection reflects Congress's understanding that "if retaliation were not prohibited, [the] enforcement scheme would unravel." *Jackson v. Birmingham Board of Education*, 544 U.S. 167, 180 (2005). The evidence here requires investigation of:

1. Criminal Civil Rights Violations

The coordinated pattern of retaliation through state action violates multiple federal criminal statutes:

- Deprivation of rights under color of law (18 U.S.C. § 242) through systematic enforcement of void orders;
- Conspiracy against rights (18 U.S.C. § 241) via coordinated action across agencies;
- Retaliation against witness (18 U.S.C. § 1513) following protected civil rights complaints.

As the Supreme Court emphasized in *United States v. Price*, 383 U.S. 787, 794 (1966), these statutes must be read against the backdrop that "rights under the Fourteenth Amendment are protected by it from state action, however carried out." The evidence shows state actors deliberately used their authority to punish protected activities through a calculated series of enforcement actions.

The Department's authority to investigate patterns of constitutional violations extends beyond individual incidents to systematic practices under 42 U.S.C. § 14141. The retaliation evidenced here also constitutes witness intimidation prohibited by 18 U.S.C. § 1513.

2. Pattern or Practice Investigation

As established in *CBOCS West, Inc. v. Humphries*, 553 U.S. 442, 451 (2008), systematic retaliation constitutes discrimination requiring federal intervention. Namely, the systematic nature of retaliation here requires broader investigation under 42 U.S.C. § 14141. As documented in Criminal Complaints #1 and #2, state actors engaged in:

- Coordinated enforcement of void orders across agencies;
- Systematic misuse of federal mechanisms for retaliation;
- Widespread deprivation of constitutional rights.

B. Health & Human Services Oversight Requirements

The Office of Child Support Enforcement maintains comprehensive oversight responsibilities under federal law. As the Supreme Court explained in *Cannon v. University of Chicago*, 441 U.S. 677, 704 (1979), federal agencies must ensure that recipients of federal funds comply with statutory and constitutional requirements.

1. Program Integrity Investigation

Under 45 C.F.R. § 303.2, state IV-D agencies must maintain procedures ensuring program integrity. The evidence here triggers mandatory investigation of:

a) Void Order Processing

The systematic processing of void orders through federal systems violates basic program requirements. As documented in the March 21, 2022 Notice to Director DESBIEN:

- Maintenance payments processed without valid support orders;
- Federal mechanisms used to enforce void judgments;
- Program funds expended without jurisdiction.

b) Federal Mechanism Misuse

State actors deliberately misused federal enforcement tools for retaliation, as evidenced by:

- Tax intercepts without valid orders totaling over \$60,000 through phased collection efforts including:
 - Initial maintenance garnishments (\$20,911.70)
 - Severance seizures (\$6,456.70)
 - Unemployment payment intercepts (\$1,480.00)
 - Bank levy (\$2,500.00)
 - Home sale proceeds (\$27,941.54)
 - Duplicate FSR entry (\$27,941.54)
 - Unexplained offset (\$397.98)
- Credit reporting of void judgments through interstate systems
- Interstate enforcement of void liens despite notice

2. Systemic Corrections

Under *Davis v. Monroe County Board of Education*, 526 U.S. 629, 644 (1999), federal agencies must respond adequately when recipients engage in misconduct. Required corrections include:

a) Program Controls

- Implementation of order verification procedures;
- Jurisdictional review requirements;
- Constitutional compliance safeguards.

b) Anti-Retaliation Measures

- Protection of complainant confidentiality;
- Investigation protocols for retaliation;
- Enforcement procedures against retaliatory conduct.

IX. SYSTEMATIC VIOLATION OF VICTIM AND WHISTLEBLOWER RIGHTS

The coordinated retaliation documented herein strikes at the heart of federal victim protection and whistleblower laws. Congress enacted the Crime Victims' Rights Act (CVRA) to ensure that victims are "treated with fairness and with respect for [their] dignity and privacy." 18 U.S.C. § 3771(a)(8). The Act guarantees victims' rights to be "reasonably protected from the accused" and to be heard at proceedings involving their rights. 18 U.S.C. § 3771(a)(1), (4). State actors have systematically violated these protections through:

First, denial of protection despite clear evidence of ongoing retaliation. The CVRA mandates that victims have the "right to proceedings free from unreasonable delay." 18 U.S.C. § 3771(a)(7). Yet state actors continue enforcing known-void orders while refusing to investigate documented crimes.

Second, exclusion from proceedings affecting victim rights. Despite the Act's guarantee that victims be "treated with fairness," state actors have:

- Denied hearing rights on jurisdictional challenges
- Refused to consider victim impact evidence in administrative review
- Systematically excluded Father from participation in proceedings directly affecting his interests
- Ignored documented evidence of unlawful collections exceeding \$60,000

Third, failure to provide mandated victim services. The Act requires that victims be "informed in a timely manner of any plea bargain or deferred prosecution agreement." 18 U.S.C. § 3771(a)(9). Instead, state actors have actively worked to obstruct Father's access to victim services while enabling further victimization through their enforcement actions.

These violations trigger concurrent whistleblower protections under 31 U.S.C. § 3729-3733 (False Claims Act) and C.R.S. § 24-34-402.5 (protection of legal activities).

As the Supreme Court held in *CBOCS West, Inc. v. Humphries*, 553 U.S. 442, 451 (2008), retaliation against those who oppose discrimination requires federal intervention because "such retaliatory conduct threatens to frustrate Congress' purpose in enacting federal civil rights laws." The systematic retaliation here directly violates 2 CFR § 200.300(a)'s mandate that agencies "carry out all applicable regulations...including Constitutional rights."

This pattern demonstrates precisely why Congress enacted whistleblower protections for those who expose misuse of federal funds. Father's protected activities in reporting grant fraud and constitutional violations fall squarely within the False Claims Act's anti-retaliation provisions. See 31 U.S.C. § 3730(h). Rather than investigate these violations, state actors have weaponized federal mechanisms to punish protected whistleblowing activity through:

1. Administrative Review Obstruction

- Failure to address jurisdictional challenges in December 5, 2024 review
- Incomplete accounting of unlawful collections
- Refusal to investigate program violations
- Continued processing of void orders despite notice

2. Escalating Financial Retaliation

- Seizure of unemployment benefits
- Bank account levy
- Property liens leading to \$27,941.54 home sale seizure
- Duplicate FSR entries
- Unexplained offsets

3. Systematic Records Manipulation

- Maintaining invalid Title IV-D case
- Processing void orders through federal systems
- Credit reporting of invalid debts
- Driver's license suspension without jurisdiction

X. REQUIRED RELIEF AND SYSTEMIC REFORMS

A. Constitutional Framework for Relief

The Supreme Court has established that constitutional violations require remedies "tailored to cure the condition that offends the Constitution." *Milliken v. Bradley*, 433 U.S. 267, 280 (1977). As the Court explained in *Burlington Northern & Santa Fe Railway Co. v. White*, 548 U.S. 53, 72-73 (2006), relief must be sufficient to:

1. Remedy past violations;
2. Prevent future retaliation;
3. Deter similar misconduct.

B. Immediate Corrective Actions Required

1. Financial Relief and Restoration

Basic principles of restitution require:

a) Return of Unlawfully Seized Funds

- \$27,941.54 taken from home sale proceeds
- \$20,911.70 in maintenance garnishments
- \$6,456.70 in severance seizures
- \$1,480.00 from unemployment benefits
- \$2,500.00 bank account levy
- Duplicate FSR entry of \$27,941.54
- Unknown offset payment of \$397.98

b) Release of Void Liens

As established in *Elliott v. Piersol*, 26 U.S. 328, 340 (1828), judgments entered without jurisdiction are "not voidable, but simply void." This requires:

- Removal of all FSR/Title IV-D liens;
- Correction of records;
- Release of garnishment orders.

2. Status Corrections

Under *Bell v. Burson*, 402 U.S. 535, 539 (1971), the state cannot continue deprivations based on void proceedings:

a) License Reinstatement

- Immediate restoration of driving privileges;
- Removal of suspension records;
- Prevention of future suspensions without valid orders.

b) Credit Reporting

- Removal of invalid debt reports;
- Correction of credit histories;
- Notice to credit reporting agencies.

C. Systemic Reforms

As established in *Thompson v. North American Stainless*, 562 U.S. 170, 177 (2011), agencies must implement reforms protecting those within the "zone of interests" from future retaliation. The Supreme Court has emphasized that systemic violations require systemic remedies. See *Swann v. Charlotte-Mecklenburg Board of Education*, 402 U.S. 1, 15-16 (1971).

1. Program Integrity Measures

Federal regulations mandate that grant recipients maintain procedures ensuring program integrity. See 45 C.F.R. § 303.2. Required reforms include:

a) Verification Procedures

- Mandatory jurisdictional review protocols before processing any Title IV-D case
- Multi-level order validity confirmation requirements including:
 - Independent legal review of underlying orders
 - Verification of court jurisdiction
 - Confirmation of proper service and notice
 - Review of any jurisdictional challenges
- Documentation of legal authority.
 - Clear chain of jurisdiction
 - Valid court orders
 - Proper service verification
 - Response to jurisdictional challenges
- Implementation of automatic holds when:
 - Jurisdiction is challenged
 - Orders are contested as void
 - Due process violations are alleged

b) Constitutional Compliance Training

State actors must be trained on:

- Due process requirements including:
 - Notice and opportunity to be heard
 - Right to challenge jurisdiction
 - Right to appeal void orders
 - Protection of fundamental rights
- Void order principles including:
 - Effects of fraud upon the court
 - Jurisdictional requirements

- Automatic voiding operations
- Processing of void order claims
- Anti-retaliation protections including:
 - Recognition of protected activities
 - Proper handling of complaints
 - Prohibition on adverse actions
 - Whistleblower protections
 - Crime Victim Rights protections

2. Anti-Retaliation Protections

Under 28 C.F.R. § 42.107(e) and Title VI requirements, recipients must implement specific protections:

a) Confidentiality Requirements

- Protection of complainant identities
- Secure handling of complaints
- Limited disclosure protocols

b) Investigation Procedures

- Prompt review of retaliation allegations
- Documentation requirements
- Corrective action protocols

XI. DOCUMENTATION OF DAMAGES AND ONGOING HARM

A. Legal Framework for Damages

The Supreme Court has established that retaliation damages encompass "any actions that might have 'dissuaded a reasonable worker from making or supporting a charge of discrimination.'" *Burlington Northern & Santa Fe Railway Co. v. White*, 548 U.S. 53, 68 (2006) (citation omitted). This broad standard recognizes that retaliation can manifest through various forms of harm:

1. Direct Financial Losses

The documented financial harm demonstrates systematic deprivation through coordinated state action:

a) Unlawful Seizures

- December 2023: \$27,941.54 seized from home sale proceeds
- Initial maintenance garnishments (\$20,911.70)
- Severance seizures (\$6,456.70)
- Unemployment benefit intercepts (\$1,480.00)
- Bank levy (\$2,500.00)
- Duplicate FSR entry (\$27,941.54)
- Unknown offset (\$397.98)

[Source: Child Support Racket Crime Sprees Chronology]

b) Consequential Damages

As established in *Robinson v. Shell Oil Co.*, 519 U.S. 337, 346 (1997), retaliation damages extend to future economic losses from:

- Lost employment opportunities due to credit damage
- Housing barriers created by void liens
- Legal costs defending against void orders
- Professional reputation damage

[Source: CC#2-Supp#2, pp.24-26]

2. Constitutional Injuries

The Supreme Court has consistently held that constitutional violations cause irreparable injury requiring immediate remedy. *Elrod v. Burns*, 427 U.S. 347, 373 (1976). The systematic constitutional violations here include:

a) Family Separation Injuries

As the Court emphasized in *Troxel v. Granville*, 530 U.S. 57, 65 (2000), "the interest of parents in the care, custody, and control of their children...is perhaps the oldest of the fundamental liberty interests." State actors have violated these rights through:

1. Parental Rights Deprivations

- Enforcement of void custody restrictions without jurisdiction
- Prevention of contact through void protection orders
- Exclusion from educational participation and decisions
- Denial of access to medical and school records

[Source: CC#2, pp.16-19]

2. Parent-Child Bond Disruption

- Forced separation through void order enforcement
- Psychological harm from systematic alienation
- Interference with developmental relationships
- Emotional trauma to both parent and children

[Source: CC#1, pp.15-18]

3. Educational Access Barriers

- Prevention of participation in children's education
- Denial of access to academic information
- Exclusion from school events and activities
- Inability to support children's learning

[Source: CC#2-Supp#2, pp.16-20]

b) Civil Rights Violations

The pattern of civil rights violations constitutes systematic constitutional deprivation requiring federal intervention under *Monroe v. Pape*, 365 U.S. 167, 183 (1961):

1. Due Process Violations

- Continued enforcement of known-void orders
- Denial of hearing rights on jurisdictional challenges
- Property seizures without valid legal authority
- Refusal to acknowledge void status of orders

[Source: AFFIDAVIT #001, February 2024]

2. Equal Protection Violations

- Discriminatory enforcement based on protected activity
- Selective use of federal mechanisms for retaliation
- Pattern of treating complaints differently
- Refusal to investigate reported violations

[Source: CC#2-Supp#1, pp.3-4]

3. First Amendment Retaliation

- Punishment for protected civil rights complaints
- Interference with parent-child association rights
- Use of void orders to chill protected speech
- Retaliation for exposure of violations

[Source: Criminal Complaints and Supplements]

B. Ongoing Nature of Constitutional Harm

The continuing constitutional violations require continuing remedies under *Friends of the Earth, Inc. v. Laidlaw Environmental Services*, 528 U.S. 167, 184 (2000). The evidence demonstrates:

1. Escalating Pattern

- Expanding enforcement of void orders
- Increasing financial seizures
- Broadening misuse of federal mechanisms

2. Compounding Effects

- Deteriorating parent-child relationships
- Accumulating economic damages
- Mounting legal consequences
- Deepening emotional trauma

XII. CONCLUSION

The systematic retaliation documented herein strikes at the heart of constitutional protections and federal civil rights enforcement. As the Supreme Court emphasized in *Jackson v. Birmingham Board of Education*, 544 U.S. 167, 180 (2005), "if retaliation were not prohibited, [the] enforcement scheme would unravel." The evidence demonstrates a coordinated pattern of constitutional violations carried out through deliberate misuse of federal programs.

State actors have weaponized federal child support enforcement mechanisms to retaliate against protected civil rights activities, causing severe financial harm while systematically violating fundamental constitutional rights. Despite clear notice that all underlying orders are undisputedly

void by operation of law, they continue to expand enforcement actions in direct violation of Supreme Court precedent establishing that orders entered without jurisdiction are "not voidable, but simply void." *Elliott v. Piersol*, 26 U.S. 328, 340 (1828).

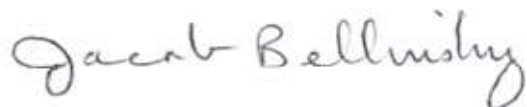
The ongoing nature of these violations requires immediate federal intervention to:

1. Stop systematic constitutional violations;
2. Return unlawfully seized funds exceeding \$60,000.00;
3. Implement comprehensive reforms;
4. Hold responsible parties accountable;
5. Prevent future retaliation.

Each day these violations continue causes further irreparable harm to constitutionally protected parent-child relationships. The federal government's duty to enforce civil rights laws and protect constitutional rights demands swift action to remedy these systematic violations and prevent their recurrence.

I declare under constitutional penalty of perjury that the foregoing is true and correct.

Dated: November 20, 2024



Rabbi Jacob Bellinsky, Father (Victim/Witness/Whistleblower)

Attachment 1

- Oct. 29, 2024 Request for Investigation to TANGULER GRAY, Commissioner
- Oct. 29, 2024 Notices & Administrative Review to ELBERT COUNTY DHS - CSS Unit
- April 10, 2023 Notice & Demand to SARAH FOX CSEP Specialist (Exhibit A)
- Dec. 14, 2023 Final Notice & Demand ELBERT COUNTY DHS - CSS Unit et al & DESBIEN
- March 21, 2022 Notice & Demand to Colorado FSR/DHS via Director DESBIEN
- Child Support Racket Crime Sprees - Brief Background and Chronology
- All Decisions In First Judicial Case #2015DR7 Are Void/On Void Orders (Exhibit E)

Attachment 2

- Dec. 5, 2024 Notice Of Void Liens & Demand For Release Of Liens to ELBERT COUNTY DHS - CSS Unit et al & DESBIEN
- April 10, 2023 Notice & Demand to SARAH FOX CSEP Specialist
- March 21, 2022 Notice & Demand to Colorado FSR/DHS via Director DESBIEN
- Sept. 13, 2021 Attorney HART's Incoming Withholding
- All Decisions In First Judicial Case #2015DR7 Are Void/On Void Orders
- April 26, 2023 Letter from IV-D Administrator BRANDI SNELLING + Attachments (Liens)

Attachment 3

- Dec. 5, 2024 Administrative Review Results package from IV-D Administrator SNELLING

CERTIFICATE OF ELECTRONIC SERVICE

I, Rabbi Jacob Bellinsky, hereby certify that on December 19, 2024, I served the foregoing USDOJ/OIG/HHS/CDHS/CIVIL RIGHTS/CSS/COAG VERIFIED COMPLAINT: REQUEST FOR INVESTIGATIONS AND WHISTLEBLOWER/CRIME VICTIM PROTECTIONS upon the addressees listed upon and copied to the following:

JARED POLIS, Governor
Office of the Colorado Governor
State Capitol Bldg., Room 136
Denver, CO 80203
Via: governorpolis@state.co.us

STEVEN VASCONCELLOS, SCA
Office of the State Court Administrator
1300 Broadway, Suite 1200
Denver, CO 80203
Via: steven.vasconcellos@judicial.state.co.us

STEPHEN FENBERG, President of the Senate
Colorado General Assembly
200 East Colfax Ave.
Denver, CO 80203
Via: stephen.fenberg.senate@state.co.us

JULIE MCCLUSKIE, Speaker of the House Colorado
General Assembly
200 E. Colfax, RM 307
Denver, CO 80203
Via: julie.mccluskie.house@coleg.gov

MONICA MARQUEZ, Chief Justice
Executive, Colorado Judicial Branch
2 East 14th Avenue
Denver, CO 80203
Via: monica.marquez@judicial.state.co.us

MATT KIRSCH, Acting U.S. Attorney
U.S. Attorney for the District of Colorado
1801 California Street, Suite 1600
Denver, CO 80202
Via: c/o USACO.PublicAffairs@usdoj.gov

Colorado General Assembly, House and Senate Judiciary Committee members:
comments.ga@coleg.gov; julie.gonzales.senate@coleg.gov; dylan.roberts.senate@coleg.gov;
bob.gardner.senate@coleg.gov; Bo.Pogue@coleg.gov; dafna.michaelson.jenet.senate@coleg.gov;
marc.snyder.house@coleg.gov; kevin.vanwinkle.senate@coleg.gov; mike.weissman.house@coleg.gov;
ryan.armagost.house@coleg.gov; leslie.herod.house@coleg.gov; matthew.soper.house@coleg.gov;
jennifer.bacon.house@coleg.gov; gabe.evans.house@coleg.gov; javier.mabrey.house@coleg.gov;
steven.woodrow.house@coleg.gov; judy.amabile.house@coleg.gov; lorena.garcia.house@coleg.gov

FEDERAL/STATE OFFICES & OFFICIAL EMAILS

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Brian.Nieves@mail.house.gov; michael.curcio@mail.house.gov; ken.degraaf.house@coleg.gov;
constituentservicesco@gmail.com; Shalanda.D.Young@omb.eop.gov; russell.vought@mail.house.gov;
jennifer.ward@hq.dhs.gov jmatis@oge.gov; dachrist@oge.gov; SWilliam@oge.gov;
David.Hyams@hhs.gov; jeff.hild@acf.hhs.gov; carla.lewis@oig.hhs.gov; david.horn@hhs.gov;
teresa.miranda@hhs.gov; joseph.pika@hhs.gov; Arlene.Ryan@oig.hhs.gov; Brenda.Tierney@oig.hhs.gov;
Curt.Muller@oig.hhs.gov; Ethics.FinancialDisclosure@hhs.gov; Tara.McGrath@usdoj.gov;
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CommissionerCrenshaw@sec.gov; CommissionerUyeda@sec.gov; CommissionerLizarraga@sec.gov; serranod@sec.gov; lisa.molyneux@mail.house.gov; fraud@gao.gov; ethics@usccr.gov; Integrity-Complaint@cigie.gov; ethicsadvice@cigie.gov; ICIGHotline@dni.gov; gco1@doc.gov; jlatoff@doc.gov; public.affairs@fbi.gov; criminal.division@usdoj.gov; usaco.publicaffairs@usdoj.gov; tonya.talley2@usdoj.gov; oig.whistleblower.ombudsperson.program@usdoj.gov; carin.miles@usdoj.gov; Doug.Lamborn05@mail.house.gov; dale.anderson@mail.house.gov; Will.Sacripanti@mail.house.gov; Joe.Neguse@mail.house.gov; lisa.bianco@mail.house.gov; casework@hickenlooper.senate.gov; Diana_Rodriguez@hickenlooper.senate.gov; Michael_Bennet@bennet.senate.gov; matt.gaetz@mail.house.gov; Lawrence.Atkinson@usdoj.gov; complaints@coag.gov; ag@coag.gov; governorpoli@state.co.us; danielle.oliveto@state.co.us; alec.garnett.house@state.co.us; phil.weiser@coag.gov; steven.vasconcellos@judicial.state.co.us; stephen.fenberg.senate@coleg.gov; julie.mccluskie.house@coleg.gov; judy.amabile.house@coleg.gov; aide@judyamabile.com; dylan.roberts.senate@coleg.gov; mark.baisley.senate@coleg.gov; jeff.bridges.senate@coleg.gov; janet.buckner.senate@coleg.gov; james.coleman.senate@coleg.gov; lisa.cutter.senate@coleg.gov; jessie.danielson.senate@coleg.gov; tony.exum.senate@coleg.gov; rhonda.fields.senate@coleg.gov; bob.gardner.senate@coleg.gov; joann.ginal.senate@coleg.gov; julie.gonzales.senate@coleg.gov; chris.hansen.senate@coleg.gov; sonya.jaquez.lewis.senate@coleg.gov; janicerichsd7@gmail.com; kevin.priola.senate@coleg.gov; barbara.kirkmeyer.senate@coleg.gov; chris.kolker.senate@coleg.gov; rod.pelton.senate@coleg.gov; larry.liston.senate@coleg.gov; paul.lundeen.senate@coleg.gov; janice.marchman.senate@coleg.gov; kyle.mullica.senate@coleg.gov; byron.pelton.senate@coleg.gov; robert.rodriguez.senate@coleg.gov; cleave.simpson.senate@coleg.gov; SenatorSmallwood@gmail.com; tom.sullivan.senate@coleg.gov; kevin.vanwinkle.senate@coleg.gov; perry.will.senate@coleg.gov; faith.winter.senate@coleg.gov; senatorrachelz@gmail.com; meg.froelich.house@coleg.gov; repfroelichhd3@gmail.com; aidehd3@gmail.com; gabe.evans.house@coleg.gov; monica.duran.house@coleg.gov; nick.hinrichsen.senate@coleg.gov; tammy.story.senate@coleg.gov; Bo.Pogue@coleg.gov; dafna.michaelson.jenet.senate@coleg.gov; mike.weissman.house@coleg.gov; ryan.armagost.house@coleg.gov; leslie.herod.house@coleg.gov; matthew.soper.house@coleg.gov; jennifer.bacon.house@coleg.gov; javier.mabrey.house@coleg.gov; steven.woodrow.house@coleg.gov; lorena.garcia.house@coleg.gov; marc.snyder.house@coleg.gov; brittany.pettersen.senate@state.co.us; monica.marquez@judicial.state.co.us; j.yates@csc.state.co.us; supremeclerk@judicial.state.co.us; gregg.slater@state.co.us; Karen.Yacuzzo@judicial.state.co.us; Jeremy.Botkins@judicial.state.co.us; kelley.oleary@judicial.state.co.us; terri.morrison@judicial.state.co.us; julie.busby@judicial.state.co.us; william.hood@judicial.state.co.us; marques.ivey@judicial.state.co.us; karen.hubler@judicial.state.co.us; polly.brock@judicial.state.co.us; kenneth.plotz@judicial.state.co.us; katharine.brown@coag.gov; katie.mclaughlin@coag.gov; kelly.kissell@state.co.us; sara.delfin@state.co.us; hazel.heckers@state.co.us; ralph.gagliardi@state.co.us; cbi-humantrafficking@state.co.us; kim.branham@state.co.us; maria.trujillo@state.co.us; kate.horn-murphy@state.co.us; annemarie.harper@state.co.us; patricia.billinger@state.co.us; cdps_chtc_info@state.co.us; christopher.zenisek@judicial.state.co.us; brian.boatright@judicial.state.co.us; rebecca.moss@judicial.state.co.us; anne.mangiardi@judicial.state.co.us; maria.berkenkotter@judicial.state.co.us; richard.gabriel@judicial.state.co.us; seniorjudgeprogram@judicial.state.co.us; sara.rannetsberger@judicial.state.co.us; alison.ruggiero@judicial.state.co.us; judicialconduct@jd.state.co.us; svillafuerte@coloradocpo.org; jsteffen@coloradocpo.org; cdhs_clientservices@state.co.us

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jrogerson@esdk12.org; esdboardmembers@esdk12.org;
shollingsworth@gilpincounty.org; sberumen@gilpincounty.org; mmornis@gilpincounty.org;

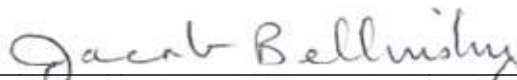
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NONPROFIT ORGANIZATIONS, ADVOCATES, & OTHER CONTACTS

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nevetzedekcourt@gmail.com; info@fclu.org; info@rmvictimlaw.org; mountainstates@adl.org;
info@endtodv.org; usc.enforcement@gmail.com; COJudicialWatch@gmail.com;
mail@judgewatch.org; Debbie.car@considerationnonprofit.org

Bcc:



By Rabbi Jacob Bellinsky: Father (Victim/Witness/Whistleblower)



U.S. Department of Health and Human Services

Office of Inspector General

Requesting information about your complaint

Every report we receive is important, however, not every submission results in an investigation.

Once submitted, we will review your complaint for relevance and completeness. If you have identified yourself, a reviewing official may contact you for further information. It is important to note that you might not be contacted by an investigator but that does not mean your complaint is not being investigated. Due to the high volume of complaints we receive, it is not possible to contact every complainant. The Hotline will not be able to confirm receipt of your complaint or respond to any inquiries about action taken on your complaint.

You may request information about your complaint through the OIG Freedom of Information Act officer (<https://oig.hhs.gov/foia>). Remember to phrase your request in terms of a search for records pertinent to your complaint, not status. You should wait at least six months before filing such a request.

Your complaint summary

Before you submit, make sure you check your information and save or print a copy for your records.

Allegation details

Allegation type

Federal Child Support Complaint

Does this person currently owe more than \$5,000?

No

Does this person reside in a different state/country than the child?

Yes, Colorado

Is there a valid court order?

No

Is there an assigned state/local/tribal case worker?

Yes

Case worker full name

BRANDI SNELLING

Case worker phone

303-621-3203

Case worker email

brandi.snelling@state.co.us

Age of children

Child 1

13

Child 2

15

Child 3

17

Child 4

19

Child 5

21

Complaint history

Previously reported

Yes

Previously reported to

Management

Date previously reported

3/21/2022

Subject information

Subject

Full name

ANDREW NEWTON HART

Alias/Nickname

Andi hart

Date of birth

9/2/1980

Physical description

-

Relationship to subject

Other: Opposing Counsel Representing Ex-Spouse

Contact details

Home phone

-

Cell phone

-

Work phone

303-985-8787

Personal email

-

Work email

hart@rhfamlaw.com

Home address

15421 West 50th Avenue
Golden, CO 80403

Employer information

Job title

Attorney

Employer

Radeff & Hart, P.C.

Employer address

350 Indiana Street, Suite 200
Golden, CO 80401

Employer phone

303-985-8787

Witness information

Witness 1

Name

Carolyn MacCloud

Alias/Nickname

-

Date of birth

-

Contact details

Home phone

-

Cell phone

303-564-6494

Work phone

-

Personal email

carolynmac.70@gmail.com

Work email

-

Home address

PO Box 55
Firestone, CO 80520

Employment information

Job title

-

Employer

-

Address

-

Employer phone

-

Witness 2

Name

Chaim Bellinsky

Alias/Nickname

-

Date of birth

-

Contact details

Home phone

-

Cell phone

303-875-5307

Work phone

-

Personal email

chaimbellinsky@gmail.com

Work email

-

Home address

412 South Lowell Blvd.
Denver, CO 80219

Employment information

Job title

-

Employer

-

Address

-

Employer phone

-

Witness 3

Name

Lauren Yoked

Alias/Nickname

-

Date of birth

-

Contact details

Home phone

-

Cell phone

-

Work phone

201-331-0070

Personal email

-

Work email

lauren@leket.us

Home address

-

Employment information

Job title

Executive Director

Employer

American Friends of Leket Israel

Address

P.O. Box 2090
Teaneck, NJ 07666

Employer phone

201-331-0070

Witness 4

Name

Larry Desbien

Alias/Nickname

-

Date of birth

-

Contact details

Home phone

-

Cell phone

-

Work phone

-

Personal email

-

Work email

larry.desbien@state.co.us

Home address

-

Employment information

Job title

CSS Director

Employer

Colorado DHS

Address

1575 Sherman Street, 5th Floor
Denver, CO 80203

Employer phone

-

Witness 5

Name

Tanguler Gray

Alias/Nickname

-

Date of birth

-

Contact details

Home phone

-

Cell phone

-

Work phone

-

Personal email

-

Work email

tanguler.gray@hhs.gov

Home address

-

Employment information

Job title

Commissioner

Employer

Office of Child Support Enforcement (OCSE)

Address

U.S. Department of Health and Human Services, 330 C Street
SW
Washington D.C., DC 20201

Employer phone

-

Your narrative

Your description of events

I am writing to request an urgent investigation into systematic misuse of Title IV-D federal funds and violations of federal program requirements by the Colorado Division of Child Support Services (DCSS) and Elbert County Department of Human Services. As detailed in my December 19, 2024 Multi-Jurisdictional Verified Complaint (attached with all exhibits), through extensive documentation and undisputed evidence, I have proven that all underlying orders in this case are void by operation of law. Despite this proven void status, attorney Andrew Newton Hart has orchestrated a fraudulent scheme not only to violate my rights and deprive me of my parenthood but has also been proven to have used federal mechanisms to unlawfully collect maintenance and child support payments while concealing evidence that clearly invalidate these void debt collections.

Currently, my three youngest minor children have been unlawfully relocated to Florida by their mother and her husband Mr. Lazar, despite the void status of all underlying orders and absence of valid jurisdiction. The two oldest of the five children named in Hart's void support calculations - Sara (age 19) and Yisroel (age 21) - have been living independently in Colorado for years and continue to do so. Despite these

facts, Hart continues to pursue collection of void support obligations through federal mechanisms as though all five children were still minors in their mother's primary care. Most egregiously, Hart engineered an order in August 2022 - months after unlawfully initiating collections through federal mechanisms - that was void ab initio and an obvious attempt to retroactively justify his prior improper use of Title IV-D resources. Even if this order had been valid (which it conclusively is not, as proven through extensive evidence and operation of law), it was grossly inflated and improperly included support calculations for my oldest son of the five listed on the void support order who was already emancipated and living on his own in Colorado. The fact that Hart continues to pursue collection of these known-void obligations through federal mechanisms, even this son is now 21 years old and the other daughter is 19, further demonstrates the fraudulent nature of this scheme. Since March 2022, I have provided formal notice to state and federal officials that Colorado DCSS is processing maintenance payments through Title IV-D mechanisms without valid support orders, maintaining invalid cases after receiving explicit notice of their void status, and executing an escalating pattern of unlawful collections totaling over \$60,000 just in recent invalid collections. The evidence conclusively proves the orders are void by operation of law, yet Hart continues to be the primary architect of these fraudulent actions, filing void Income Withholding Orders and orchestrating improper federal collections despite clear evidence and notice that all underlying orders lack jurisdiction. Independent witness Carolyn MacCloud, who attended multiple hearings and provided a sworn affidavit, can verify attorney Hart's misconduct and document the systematic fraud, including his orchestration of retroactive void orders and concealment of facts that would invalidate these void debt collections. My oldest son Chaim Bellinsky can provide firsthand testimony regarding the fraudulent nature of these proceedings, including the invalid inclusion of emancipated children in support calculations and his Mother's marriage since 2015.

Hart's pattern of unlawful collections has included:

- Monthly maintenance garnishments processed through the Family Support Registry without valid orders
- Unemployment benefit interceptions
- Bank account levies
- Property liens
- Seizure of \$27,941.54 from a home sale

All of these actions were executed without valid jurisdiction or authority, as conclusively proven through evidence and

operation of law. Even after an Administrative Review in December 2024 documented these improper collections and the void status of the underlying orders, Hart has continued to pursue enforcement through federal mechanisms. Multiple officials can verify these violations, including:

- CSS Director Larry Desbien who received formal notice in March 2022
- IV-D Administrator Brandi Snelling who conducted the Administrative Review
- OCSE Commissioner Tangler Gray who was copied on notices

The evidence demonstrates Hart's calculated misuse of federal programs to collect on orders proven void by operation of law. I have attached comprehensive documentation including: December 19, 2024 Multi-Jurisdictional Verified Complaint with all attachments documenting systematic violations of Title VI and related federal laws Seven formal Criminal Complaints filed between April 2022 and February 2024 detailing patterns of fraud and misconduct March 21, 2022 Notice & Demand to CSS Director Desbien regarding unlawful use of FSR April 10, 2023 Notice & Demand to Elbert County DHS December 5, 2023 Notice of Void Liens & Demand for Release December 14, 2023 Final Notice of Void Liens & Demand to Correct Records October 29, 2024 Request for Investigation to OCSE Commissioner Gray December 5, 2024 Administrative Review Results documenting improper collections Supporting affidavits from independent witnesses Comprehensive documentation of systematic program violations I request a comprehensive investigation of:- Hart's orchestration of Title IV-D fund misuse-His fraudulent creation of retroactive void orders to justify improper collections-His continued enforcement of support obligations for emancipated children-His deliberate concealment of facts proving orders void-His retaliatory use of federal enforcement mechanisms This represents an urgent matter requiring immediate intervention as my family continues to suffer irreparable harm through these unlawful actions perpetrated under color of law using federal resources. The void status of all orders has been conclusively proven through the extensive documentation provided, making any continued collection efforts not just improper but criminal. The attached Multi-Jurisdictional Verified Complaint and supporting Criminal Complaints provide exhaustive evidence of systematic violations requiring coordinated federal investigation and enforcement action.

Attached files

2024-12-19 Verified Complaint - Title VI Multi-Jurisdiction.pdf, Attachment 1 - 2024-10-29 OCSE Request for Investigation + Attachments.pdf, Attachment 3 - BellinskyARTSReview.pdf, Attachment 2 - 2023-12-05 Notice & Demand Re Void Liens.pdf, EXHIBIT B - 2022-11-29 Criminal Complaints #2-min.pdf, EXHIBIT C - 2022-12-05 - CC2-Supp 1-min.pdf, EXHIBIT A - 2022-04-13 Criminal Complaints #1-min.pdf, EXHIBIT D - 2023-02-10 - CC2-Supp2-min.pdf, EXHIBIT E - 2023-04-03 - CC2-Supp3-min.pdf, II.ii. 2024-02-05 - CC1-Supp2 + Exhibit Supplement.pdf, II.iii. 2024-02-05 - CC1-Supp3 + Exhibits A-C.pdf, 2024-06-27 MASTER-Brief & Detailed Backgrounds.pdf, 2024-06-27 House Judiciary Whistleblower Committee.pdf

Evidence description

Additional evidence and documentation is available upon request.

Your information

Your consent to disclose

No restrictions. Confidentiality and anonymity is not requested. If necessary, you may contact me for additional information and there are no restrictions on the release of my contact information.

Name

Rabbi Jacob Bellinsky

Date of birth

1/3/1974

Medicare number

-

Medicaid number

-

Social Security Number (SSN)

-

Your contact details

Home phone

303-883-7706

Cell phone

720-695-1900

Work phone

-

Personal email

jbellinsky@gmail.com

Work email

-

Your home address

7661 McLaughlin Road, #283
Falcon, CO 80831

Your employment information

Email address

Make sure the email address you enter is the one you wish to receive the complaint submission confirmation. Please update the email address if you wish to receive it at a different address.

jbellinsky@gmail.com

ATTACHMENT 3

to

February 14, 2025 - Letter: Urgent Reform Needed: Title IV-D Child Support Enforcement Program Systematically Destroying American Families - Documented Evidence of Corruption and Constitutional Violations in Colorado

<https://drive.google.com/file/d/117fy9Tj64oyQAOgLA1DIYmFpvvbrNtwZ/view>

CRIMINAL COMPLAINTS		
No.	Date	
1	04/13/22	Combined State & Federal Criminal Complaints #1 ("CC#1")[1 st Judicial District (2015DR7)] https://drive.google.com/file/d/1Zs-K2M1DTrSgc1VkfxARPEhhzKfqV2At/view
2	11/29/22	Combined State & Federal Criminal Complaints #2 ("CC#2")[1 st & 18 th JDs] https://drive.google.com/file/d/1wRZWgjyljBtjDxn2khH7YMiDDoDo3j27/view
3	12/05/22	Supplemental Criminal Complaint #1 To CC#2 ("CC#2-Supp#1")[18 th JD] https://drive.google.com/file/d/1vRUh9-yVKozrzYrEP-kCDdBHRr19W9rw/view
4	02/10/23	Supplemental Criminal Complaint #2 To CC#2 ("CC#2-Supp#2")[18 th JD] https://drive.google.com/file/d/1vlvfyqinFS_HizZL8i3pz8gLvKj14jL9/view
5	04/03/23	Supplemental Criminal Complaint #3 To CC#2 ("CC#2-Supp#3")[18 th JD] https://drive.google.com/file/d/1-JT0Q7nld0VY-GIBWKfVq4QqlFEpGK4k/view
6	10/20/23	Supplemental Criminal Complaint #2 to CC#1 ("CC#1-Supp#2")[1 st JD] https://drive.google.com/file/d/1O-jwfRueqhnYeq6M1WbtuQwwLetiQ_VO/view
7	02/05/24	Supplemental Criminal Complaint #3 to CC#1 ("CC#1-Supp#3")[1 st JD] https://drive.google.com/file/d/1ro8MWrZGOwSlvjUsdmW3GukFdOkO0WWT/view