

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA

JOHN GREGORY LAMBROS,

Plaintiff,

Vs.

CIVIL ACTION NO. 19-CV-1929 (TSC)

DEMAND FOR TRIAL BY JURY

Removed from: Superior Court of the
District of Columbia, Case NO.
2017-CA-000929-B. Judge: Florence Pan.

FEDERATIVE REPUBLIC OF BRAZIL;

STATE OF RIO DE JANEIRO OF THE
FEDERATIVE REPUBLIC OF BRAZIL;

Defendant's (Severally
And Jointly Liable).

Honorable Judge Chutkan.

AFFIDAVIT FORM

**PLAINTIFF LAMBROS REQUESTS COURT "ORDER" TO ATTEND
ALL PRETRIAL, SETTLEMENT, OR STATUS CONFERENCES BY TELEPHONE
OR AUDIO-VIDEO CONNECTION. PLAINTIFF IS PROCEEDING PRO SE
AND FORMA PAUPERIS AND IS ON FEDERAL SUPERVISED RELEASE.**

COMES NOW, Plaintiff JOHN GREGORY LAMBROS (Hereinafter "MOVANT"), Pro Se, and requests this Honorable Court to allow him to attend all pretrial, settlement, or status conferences by telephone or audio-video connection. Plaintiff is proceeding Pro Se and under strict Federal Supervised Release Restriction on travel outside the State of Minnesota.

In support of this request, I state the following as true and correct pursuant to Title 28 USC 1746.

FACTS:

1. Plaintiff Lambros was released from the Federal Halfway House under the supervision of the U.S.

Bureau of Prison on July 29, 2018 and is currently unemployed and under medical care. Movant is sixty-eight (69) years of age.

2. MEDICAL CONDITION INFORMATION: On September 4, 2019, Movant Lambros became eligible for the Elderly Waiver (EW) program that fund home and community-based services (HCBS) for people 65 years old and older who require the level of care provided in a nursing home, but choose to live in the community. Services include homemaking, meals, health alert, and Metro Mobility bus pass. **See, EXHIBIT A.**

3. Plaintiff Lambros is under the strict supervision of the U.S. Probation and Pretrial Services for the District of Minnesota.

STATEMENT OF LAW:

4. **TITLE 42 USC 1997e(f):** Plaintiff Lambros believes this statute may be considered, as it provides federal prisoners actions be “conducted by telephone, video conference, or other telecommunications technology without removing the prisoner from the facility in which the prisoner is confined.” Also, “the court shall allow counsel to participate by telephone, video conference, or other communications technology in any hearing held at the facility.”

CONCLUSION:

10. Plaintiff Lambros requests this Court to allow him to attend all pretrial, settlement, or status conferences by telephone or audio-video connection.

11. I JOHN GREGORY LAMBROS states the above information is true and correct under the penalty of perjury, as per Title 28 USC 1746.

EXECUTED ON: October 4, 2019.


John Gregory Lambros, Pro Se

www.Lambros.Name

LONG-TERM SERVICES AND SUPPORTS

Notice of Action (Assessments and Reassessments)

You are receiving this form because you recently had an assessment or reassessment.

DATE 9/26/2019

Information

You

NAME John Lambros	PMI 05508225	PHONE NUMBER [REDACTED]
ADDRESS [REDACTED]	CITY Saint Paul	STATE MN
		ZIP CODE 55104

Your representative

NAME			
ADDRESS	CITY	STATE	ZIP CODE

Your lead agency

AGENCY NAME Ramsey County	AGENCY REPRESENTATIVE Farhia Keynan	PHONE NUMBER 651-266-4587
ADDRESS 160 E Kellogg Blvd, suite 6200	CITY St. Paul	STATE MN
		ZIP CODE 55101

Programs and services available to you

After your assessment/reassessment for services, we determined the following programs and services are available to you.

X You are eligible and have opened to Elderly Waiver program as of 09/04/19/19. Recommended services include case management, homemaking, Meals, health alert, and Metro Mobility bus pass. You will be assigned a caseworker soon. Attached is your assessment information and service plan. Sections below also include a list of programs that you are not eligible for. *X*

Notice of action about denial, termination or reduction of services

After your assessment/reassessment for services, we determined that the following programs and services are either not available to you or will be changed. This is the action being taken.

- No change to your current programs or services
- Reduction in services or budget
- Termination
- Denial of services

EFFECTIVE DATE

EXHIBIT A.