

DOCKET NO.: FST-CV22-6056249-S	:	SUPERIOR COURT
	:	
KEIRA SPILLANE, ET AL.	:	J.D. OF STAMFORD / NORWALK
	:	
v.	:	AT STAMFORD
	:	
NED LAMONT, ET AL.	:	AUGUST 11, 2026

RESPONSE TO MOTION TO DISMISS

The plaintiff respectfully submits the following in response to the defendant's Motion to Dismiss.

I. INTRODUCTION

This case is a cautionary tale of the dangers of one-party rule with no checks and balances. Our state government has been dominated by the Democrat party for many years now – and that dominance has increased in recent years due to an electorate, in large part blinded by hatred for the current and past US President, who are bafflingly unwilling to vote in a way that might remedy this most dangerous single-party supremacy. The perils of such dominance are exacerbated in this case by the fact that the party in power is, for all intents and purposes, in the pockets of the so-called Deep State in general and Big Pharma in particular.

In short, the defendants and their Democrat cohorts throughout our government have used their overwhelming power in the most despicable manner imaginable by enacting a new law that is designed solely to defeat this lawsuit.

II. FACTUAL BACKGROUND

In 2021, the defendants and their minions in a Democrat-controlled legislature that is led by House Speaker Matt Ritter - with the coordinated assistance of Attorney General William Tong - successfully removed Connecticut parents' religious right to refuse some or all school vaccines. To be sure, Speaker Ritter appears to have been the *number one driving force* of both the original bill that removed the Religious Exemption (<https://ctmirror.org/2019/03/13/lawmakers-call-for-end-to-religious-exemption-on-vaccines/>) and this year's preposterous law to defeat the within action (<https://ctmirror.org/2026/04/21/lamont-ct-vaccine-bill-hb-5044-draws-heated-debate/>). Plaintiffs are left to wonder whether Ritter's professional affiliations with the Pharmaceutical Industry along with the fact that his father, Thomas Ritter, was once a lobbyist for a vaccine-maker, played a role in his obsession to remove parent's religious freedom in this way.

For instance, it is public record that the law firm that appears to be partly owned by House Speaker Ritter, *Shipman and Goodwin*, has represented vaccine maker Boehringer Ingelheim many times over. Additionally, we know that Speaker Ritter's firm represents dozens and dozens of other pharmaceutical companies as well, including at least one other vaccine maker.

<https://www.shipmangoodwin.com/a/web/2dKELRZvmmtpMtBZmVuMv9/Xbwke/DormerBioPharmaNewHaven070220.pdf>. Considering: (a) the enormous efforts that went into removing the Religious Exemption; (b) the remarkable legislation they just passed solely to defeat the within lawsuit; and (c) that, at the time the Religious Exemption was removed in 2021, Connecticut had among the highest vaccination rates in the nation, logic dictates that there are likely some ulterior motives at play. When governments create solutions to

non-existent problems – and particularly when they go to unprecedented lengths to do so – there is usually an underlying, hidden reason.

Additionally, at the time of the removal of the exemption, Defendant Lamont's Attorney General, William Tong, publicly expressed confidence the Public Act removing the Religious Exemption would pass the strict scrutiny required by Connecticut's Religious Freedom Restoration Act, in C.G.S. s. 52-571b. https://portal.ct.gov/-/media/ag/opinions/2019/2019-01_religious-exemption.pdf?rev=6217d22a666a4ab6aaf0d9075398122c (“The legislature could reasonably determine that the requirements of Section 52-571b [of surviving strict scrutiny review] were satisfied in this situation.”).

However, as the case progressed and the Plaintiff's primary claim - that the removal of the Exemption could not survive the strict scrutiny review mandated by C.G.S. s52-571b – survived all legal maneuvers available to the Defendants through the courts and the case was heading toward trial, the Defendants and the rest of the state's Democrat machine panicked. And rather than let their disgraceful removal of the Religious Exemption stand the test of Connecticut's 1993 Religious Freedom Restoration Act – ***not unironically a law that was ushered in by the Connecticut Legislature when it was led by the current House Speaker's father, Thomas Ritter*** - they took the most cowardly road possible and, quite literally, changed the rules in the middle of the proverbial game. They passed a law that essentially says to the people of the state of Connecticut that they can still exercise their religious freedom – except when it comes to what goes into their children's bloodstreams.

In sum, the party of “my body, my choice” took political cowardice and hypocrisy to levels never before seen, and they carved out this “bodily autonomy” exception to religious freedom.

III. **ARGUMENT**

“[A] Constitution of Government once changed from Freedom, can never be restored. Liberty once lost is lost forever.” *Letter from John Adams to his wife, Abigail*.
<https://www.masshist.org/digitaladams/archive/doc?id=L17750707ja>.

Defendants come before this Court seeking dismissal under circumstances that should trouble anyone who believes in judicial review and the separation of powers. For years, the State (including Attorney General William Tong) loudly and repeatedly proclaimed that its elimination of Connecticut’s religious exemption was lawful, constitutional, and perfectly capable of surviving judicial scrutiny. That confidence apparently lasted only as long as Plaintiffs’ claim under Connecticut’s Religious Freedom Restoration Act survived dismissal. Rather than follow through on their collective words and vindicate their conduct by defeating that claim in court, at trial and on its merits, the Defendants and their cohorts did something morally indefensible: they rigged the game by changing the law.

The audacity of the Defendants and their comrades is difficult to overstate. Defendants engaged in a pattern of arbitrary, retaliatory, and bad-faith conduct. After years of litigation, after forcing Connecticut families to expend extraordinary time and resources fighting their own government, and after insisting that the challenged legislation needed no rescue from the General Assembly, the State procured precisely that rescue.

The legislature carved the challenged Religious Exemption removal out of the very religious-freedom statute under which Plaintiffs' surviving claim proceeded, and Defendants now stride back into this Court pointing to that legislative escape hatch as though it were a judicial vindication. It is nothing of the sort. Defendants did not defeat Plaintiffs' RFRA claim. They fled from it. They changed the rules while the contest was underway. ***The Defendants and their lawmaking minions made a mockery of the very law that current House Speaker Matt Ritter's father, former Speaker Thomas Ritter, shepherded into law in 1993***, which made Connecticut the first of 22 states to pass a Religious Freedom Restoration Act.

There is no courage in what Defendants have done here. There is no triumph in watching the most powerful political actors in Connecticut place the full weight of the government boot upon the necks of families, force those families to fight for years merely to obtain judicial review, and then - when victory is in sight - press the boot down one final time by changing the law. That is not the majesty of the government. It is precisely this type of abuse of government, trampling on individual liberties, that our state and federal constitutions were designed to prevent.

It is just this sort of desecration religious freedom and bodily autonomy by an overpowerful government about which our founding fathers were so fearful. It is quite possible that Thomas Jefferson – who once wrote: “*The tree of liberty must be refreshed from time to time with the blood of patriots and tyrants*” - is looking down on we the people of the United States with baited breath to see what comes of such abuse of power.

Every citizen of the state of Connecticut should be embarrassed to call Defendant Lamont: “Governor;” William Tong: “Attorney General;” and Matthew Ritter: “Speaker of

the House.” Words such as “pathetic,” “shameful,” and/or “despicable,” are not nearly sufficient to describe the charade perpetrated by the Defendants and their cohorts herein.

IV. CONCLUSION

For the foregoing reasons, the Plaintiffs, through counsel, rest in this time-honored comfort: *sic semper tyrannis*.

Respectfully submitted,

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CERTIFICATION OF SERVICE

This certifies that on August 11, in the year of our Lord 2026, a copy of the foregoing Motion was sent electronically as follows:

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