



MR-CT-003-001

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RICHARD MESSIER, by his guardian, :
Thomas Nerney, :
: :
THOMAS MALONEY, by his guardian :
and sister, Kate Clinton, :
: :
CAROLE ANN CARR, by her guardian, :
Ted Bergeron, :
: :
LEON HORTON, by his mother and :
guardian, Emma Debiase, :
: :
RAYMOND MITCHELL, by his guardian, :
Frank Wargo, :
: :
LEONARD HAVERSAT, by his guardian, :
Mary Tracy, :
: :
GREGORY KABBAL, by his guardian, :
Jane Williams, :
: :
: :
PEOPLE FIRST OF CONNECTICUT, INC., :
: :
ARC/CONNECTICUT, INC., :
: :
WESTERN CONNECTICUT ASSOCIATION :
FOR HUMAN RIGHTS, :
: :
Plaintiffs, :
: :
v. :
: :
SOUTHBURY TRAINING SCHOOL, :
:

TONI RICHARDSON, Commissioner,
Connecticut Department of
Mental Retardation,

THOMAS HOWLEY, Director,
Southbury Training School,

PATRICIA GIARDI, Commissioner,
Connecticut Department of
Social Services,

SUSAN S. ADDISS, Commissioner,
Connecticut Department of Public
Health and Addiction Services,

Defendants,

October 5, 1994

COMPLAINT

I. JURISDICTION:

1. This action seeks injunctive relief to redress the deprivation under color of state law of rights secured to the plaintiffs by the Fourteenth Amendment to the United States Constitution, and federal laws, in particular the Americans with Disabilities Act, 42 U.S.C. § 12132, the Rehabilitation Act, 29 U.S.C. § 794, and the Social Security Act, 42 U.S.C. § 1396a. The amount in controversy exceeds \$50,000 exclusive of interest and costs.

2. The jurisdiction of this court is invoked under 28 U.S.C. §§ 1331, 1343, 2201, 2202 and 42 U.S.C. §§ 1983 and 1988.

3. Money damages are inadequate and plaintiffs have been suffering and will continue to suffer irreparable harm from defendants' actions, policies and procedures and from violations of the laws complained of herein. Accordingly, injunctive relief is necessary.

II. PARTIES:

A. Plaintiffs:

Richard Messier

4. Richard Messier is a fifty year-old man with retardation who lives in Cottage 32 on the grounds of STS. Richard has no family. He brings this lawsuit by and through his guardian, Thomas Nerney.

5. Richard was placed at STS in 1965 essentially because he was homeless. Since then he has been transferred to at least four different buildings on the STS grounds.

6. Since his placement at STS Richard has been injured on numerous occasions due to the unsafe environment and lack of meaningful habilitation or training. He has also had his teeth removed for reasons that are not apparent from his record.

7. It has long been the professional judgment of Richard's planning team that he should be transferred to the community with appropriate supervision and support services to protect him from harm and to provide a decent and humane living environment.

8. Richard has remained at STS for nearly thirty years, however, because the state defendants have failed to redirect the substantial public resources spent to confine him at STS so as to permit him to move to a community home with the supervision and programming necessary to respond to his individual needs.

Thomas Maloney

9. Thomas Maloney is a thirty-nine year-old man who lives in Cottage 27 on the grounds of Southbury Training School ("STS"). Thomas brings this suit by and through his sister and guardian, Kate Clinton.

10. Thomas was placed at STS on January 14, 1980. Since then he has been transferred to several different buildings on the grounds of STS.

11. Thomas has been injured on numerous occasions at STS due to assaults from other residents and/or staff. The defendants' failure to provide a humane and safe living environment and

appropriate programming threatens Thomas' health, physical well-being and safety.

12. It has long been the judgment of Thomas' interdisciplinary team that he should be transferred to the community to protect him from harm and to provide a humane living environment. He has remained at STS for fourteen years, however, because the defendants have failed to redirect public funds used to confine him at STS so that an individualized community living arrangement could be developed.

Carole Ann Carr

13. Carole Ann Carr is a forty-nine year-old adult with retardation who lives in Cottage 18 on the grounds of STS. Carole Ann brings this suit by her guardian, Theodore Bergeron. Her family is not involved in her life.

14. Carole Ann was placed at STS on March 3, 1959. Since then she has been transferred to at least four different buildings on the grounds of STS.

15. Carole Ann has sustained many injuries during her thirty-five years at STS. The defendants' failure to provide a humane and safe environment and appropriate programming threatens Carole Ann's

health, physical well-being and safety.

16. It has long been the professional judgment of Carole Ann's professional team that she should be transferred to the community with appropriate individualized supervision and support services to protect her from harm and to provide a decent and humane living environment. She has remained at STS for thirty-five years, however, because the state defendants have failed to redirect the substantial state and federal money spent to confine her in Cottage 18 so that the supervision and programming necessary to respond to her individualized needs could be provided in the community.

Leon Horton

17. Leon Horton is a forty-three year-old former resident of Southbury Training School. Leon brings this suit by his mother and guardian, Emma Debiase.

18. Leon was committed to STS at age ten in January 1961 because the state failed to make available the family support services, including behavior modification programs and community living alternatives, necessary to keep him at home, or as close to home as possible.

19. Leon was transferred to many different buildings at STS. He has been injured on numerous occasions due primarily to the failure of the defendants to develop and provide appropriate programs and services to treat his serious self-injurious behaviors. This failure to treat Mr. Horton continued until in March, 1994 when STS discharged him to a Danbury apartment with minimal support and supervision. The failure to attend to his individual support needs lead to his confinement on at least one occasion to Fairfield Hills Hospital.

20. The defendants' failure to provide necessary individualized support services for the plaintiff continues to place Mr. Horton at risk of continued injury and harm and readmission to STS.

Raymond Mitchell

21. Raymond Mitchell is a fifty-four year-old man with retardation who lives at 22 Colony Court on the grounds of STS. Raymond brings this lawsuit through his guardian and next friend, Frank Wargo.

22. Raymond was placed at STS on April 16, 1959. Since then he has been transferred to some fourteen different wards on the

grounds at STS.

23. It has long been the professional judgment of Richard's planning team that he should be transferred to the community with appropriate supervision and support services to protect him from harm and to provide a decent and humane living environment.

24. Richard has remained at STS for nearly thirty-five years, however, because the defendants have failed to redirect the substantial public funds spent to confine him at STS so that he can move to a community home with supervision and programming designed to meet his individual needs.

Leonard Haversat

25. Leonard Haversat is forty-three years old and has lived at STS since July 13, 1965. Leon brings this suit by and through his guardian, Mary Tracy.

26. Leonard was placed at STS on July 13, 1965. During the years that followed he was then transferred to several different buildings at STS and to Fairfield Hills Hospital on several occasions.

27. Leonard has had numerous psychiatric hospitalizations and many different, inaccurate diagnoses.

28. Leonard's professional team has determined that he should be moved to a supervised community living arrangement to protect him from harm and to provide a humane living environment. He has remained at STS for twenty-nine years, however, because the defendants have failed to redirect public funds from STS so that individualized services necessary to support community living can be provided.

Gregory Kabbai

29. Gregory Kabbai is forty years old and has lived at STS since April 19, 1962. Gregory brings this case by and through his guardian, Jane Williams.

30. Gregory was placed at STS on April 19, 1962. During the years that followed he was transferred to several different buildings at STS and, even to a rest home at twenty years of age.

31. Gregory's planning team has made the professional judgment that he should be moved to supervised community living to protect him from harm and provide a humane living environment. He has remained at STS for thirty-two years, however, because the defendants have failed to redirect public funds used to confine him at STS so that he can experience community living.

32. is forty-nine years old and has lived at STS for ten years. He brings this case by and through his sister and guardian,

33. was placed at STS on March 6, 1984 after more than ten years of confinement at Mansfield Training School and transfers to inadequately supported placements. He was finally admitted to STS due to the state's failure to provide proper support services in the community.

34. has been hospitalized on many occasions and has been consigned to the Health Care Unit at STS since March, 1994 due to chronic thrombosis.

35. Although staff has promised that he can leave STS, they tell him that he can't move until his medical condition is effectively treated. Unfortunately, effective treatment has proven elusive. Meanwhile, he has been forced to live in a health care unit at STS where programming is unavailable because no other unit on grounds can accommodate his physical disabilities.

36. remains at STS where programming and effective treatment are unavailable because the defendants refuse to permit

him to use state funds earmarked for his care to purchase appropriate supervision and care in the community.

People First of Connecticut, Inc.

37. People First of Connecticut, Inc. was organized and incorporated under the laws of Connecticut in 1987 to serve as a vehicle for self-advocacy development.

38. People First is a statewide organization with fourteen community and institution chapters and 350 members. Its membership is composed of people with significant disabilities, including retardation, who have been excluded entirely from educational opportunities or required to attend segregated educational programs. Its membership also includes citizens of this state who have experienced firsthand the humiliating experience of spending decades segregated at STS or Mansfield Training School where meaningful participation in Connecticut life is impossible. They are, therefore, in the best position to inform the court about what effects segregation has on the lives and self-esteem of persons with disabilities, and what society loses when such a discrete and insular minority is excluded.

ARC/Connecticut, Inc.

39. The Association for Retarded Citizens of Connecticut, Inc. ("ARC/Connecticut") is a statewide nonprofit advocacy association of parents of children and adults with mental retardation, people with mental retardation, advocates, friends and interested citizens. The Association, with 4000 members, is the largest voluntary advocacy group for persons with mental retardation in Connecticut. For forty-two years ARC/Connecticut has sponsored virtually every major piece of legislation affecting persons with mental retardation and their families. The Association has also been a party to several significant cases which shaped the service delivery system for citizens with disabilities and protected the constitutional and statutory rights of persons with retardation.

WECAHR

40. The Western Connecticut Association for Human Rights ("WECAHR") is a parent association of 250 families and individuals with an interest and concern for the welfare of people with disabilities. Its sole purpose is to provide advocacy and to protect the rights of people with disabilities in Western

Connecticut and Southbury Training School. In addition, WeCAHR staff provide support and advice to People First of Connecticut, Inc., an organization for adults with mental retardation.

Class Action

41. The plaintiffs bring this case on their own behalf and on behalf of all similarly situated persons. The members of the class include all persons who are now at STS, those who may be placed at STS in the future, and persons who have been transferred from STS and remain under the custody and control of the Director of STS.

42. This is a proper class action under Rules 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure. The class is so numerous as to make joinder of all members impracticable. There are substantial questions of law and fact common to the entire class, and claims of the plaintiffs are typical of the class and predominate over any questions affecting individual members. A class action is superior to any other available method for the fair and efficient adjudication of the controversy.

B. Defendants:

Southbury Training School

43. Until last summer Connecticut had two large institutions

for persons with retardation: Mansfield Training School and Southbury Training School. Mansfield Training School closed last summer after all its residents were transferred to properly supported and supervised community living arrangements over a ten-year period. STS was created in 1941 because of overcrowding at Mansfield Training School and the concomitant failure of the state to provide citizens with retardation services in the community. The Southbury Training School was created by the state to be an educational facility that would train and return its residents promptly to the community. Instead of fulfilling its original purpose, Southbury quickly became an institution for the long term segregation of persons with retardation under inhumane conditions.

Toni Richardson

44. Defendant, Toni Richardson, is the Commissioner of the Connecticut Department of Mental Retardation. She is responsible for the planning and development of a complete, comprehensive and integrated state-wide program for persons with retardation; for the implementation of that program; and for the coordination of efforts of DMR with other state agencies, municipal governments and private agencies providing services to persons with retardation. She is

responsible for the administration and operation of STS, the regional centers, and all state-operated community and residential facilities. She is responsible for the development of criteria for eligibility for residential and/or program services from DMR. She may also assign persons under her care to public or private facilities or may transfer such persons from one institution or facility to another.

Thomas Howley

45. Defendant, Thomas Howley, is the Director of Southbury Training School. He is responsible for the operation and administration of the training school, and for the custody and control of all persons admitted to STS. He is also responsible for authorizing transfers into and out of STS and for transferring STS residents from one facility to another. The Director is also responsible for placing persons committed or admitted to STS in a community residential setting or in another residential facility. The Director remains responsible for exercising control over the person after transfer and for exercising the power to return such person to the training school.

III. FACTS:

46. Persons were placed at Southbury Training School because defendants failed to provide alternative services in the community. When a crisis occurred, no services were available to support the family or to assist in the care and treatment and the raising of the child at home or in a community residence near the home.

47. Persons remain at Southbury Training School for the same reason; the failure of the defendants to provide alternative services, including residential support, in the community. Although the care is unconstitutionally deficient and dangerous at Southbury, persons with disabilities and their families have relied upon the institution for continuity of custody and care once they reach majority and/or after the death of their parents.

The Institution

48. The defendants have failed and/or refused to provide to persons placed at Southbury habilitation in community settings.

49. Southbury Training School is located on the outskirts of South Britain, Connecticut, a small rural community in Western Connecticut. The location is remote and inaccessible by public transportation, which limits the ability of families and friends to

maintain frequent contacts with their relatives and friends. The hardship is greater for persons with limited means, but in all cases the sheer isolation of Southbury accelerates the decline of affectionate relationships, stripping from the individual with a disability those supports, both emotional and material, which are normally available in the community.

50. Most STS residents are rarely if ever visited by their families. Many have been abandoned altogether. Moreover, the typical STS resident cannot speak for himself due to his disabilities. As a result, most STS residents are at the mercy of a vast and impersonal bureaucracy when it comes to eradicating unconstitutional conditions or realizing their elusive dream of living in the community.

51. Southbury's isolation prohibits the use of community resources as an integral part of a training program, to meet health needs, to provide employment or recreation, or as aids in the development of those diversified activities which noninstitutionalized persons take for granted. Local resources are insufficient to absorb the social needs of Southbury's population.

52. Living and activity space at STS is inadequate in design, insufficient in area, inappropriate in setting, and dehumanizing in condition. Buildings are not functional for modern needs and are not architecturally accessible to persons with physical disabilities. Buildings are dirty and unsanitary, exposing plaintiffs to physical health hazards in addition to the discomfort of constant odors and filth.

53. The physical layout and furnishing of buildings at Southbury Training School are devoid of warmth, individuality, and dignity. The living and sleeping areas are sparsely furnished and are without the lamps, sofas, rugs, comfortable chairs, pictures, magazines, and other age-appropriate furnishings associated with normal living. Plaintiffs are denied the developmental, sensory and intellectual stimulation, comfort and pleasure community residents obtain from the usual physical accoutrements in homes, schools, restaurants, workplaces, and recreational facilities.

54. The physical setting at STS does not allow privacy, individuality, or freedom of association. Plaintiffs are deprived of freedom to choose or reject associates and to determine when and in what way they relate to their friends.

55. Few closets or chests for personal possessions are available, and those that exist are not accessible or permitted to be used by residents. Because of the shortage of staff and the lack of facilities for storage of personal items, the few belongings which plaintiffs own are usually lost, stolen or destroyed within a short period of time. These conditions deprive plaintiffs of their dignity and identity.

56. Toilet facilities are inadequate. Bathrooms frequently lack wall partitions or curtains between toilets or doors on stalls. Many living areas have a definite stench of urine. Plaintiffs are deprived by these conditions of the right taken for granted by other citizens to exercise their bodily functions in privacy and to observe proper hygienic measures.

The Staff

57. Staff resident ratios and staff training are inadequate to provide care, let alone to evoke development and habilitation or to protect plaintiffs from harm. The staffing requirements of recognized authoritative minimum standards are not met.

58. Plaintiffs are not provided with the services, stimulation and attention necessary to prevent deterioration of and

injury to their physical condition, psychological well-being, and personal development. Staff-patient ratios and the gross scale of institutional living operate to discourage personal, intimate, primary relationships, like those enjoyed in normal living.

59. Defendants have failed to recruit, employ and train direct care and professional personnel in sufficient numbers, and have failed to place personnel in an environment where it is possible for them to stimulate and assist in the daily life activities of plaintiffs.

60. Adequate and regular evaluations of each resident's physical, social, psychological, and personal development are not made. Defendants have not uniformly utilized a standard process for assessment of each resident. Individualized habilitation plans and programs for each resident of Southbury Training School are not uniformly provided.

61. Defendants have failed to provide periodic review of the appropriateness and effectiveness of the plaintiffs' plans or programs.

62. Defendants have failed to provide necessary services, including medical and dental care and treatment, nursing care,

psychological services, personal care and protection, social work services, physical and occupational therapy, speech pathology and audiology services, recreation, and vocational and rehabilitative training.

63. Defendants have failed to prepare residents for or assist them in securing gainful employment.

64. Defendants have failed to provide each resident an individualized exit plan for placement in a less restrictive integrated community setting.

65. Activities such as eating, toileting, and bathing are often conducted en masse, at predetermined and unchanging times, chosen for the convenience of the institution. This regimentation deprives plaintiffs of the normally experienced freedom and dignity of choosing when to attend to their individual daily tasks and interests, and arranging their appearances according to their personal taste.

66. Physical and pharmaceutical restraint procedures are frequently utilized for convenient control of residents and as a substitute for appropriate care and programs of habilitation.

67. Southbury Training School has not provided its residents with minimally professionally acceptable levels of active programming or habilitation or protection from harm, which has caused deterioration and injury to residents and decreased levels of safety.

68. There are no active habilitation programs for persons with the most severe physical and behavioral handicaps. Many of the persons with severe behavioral problems have not developed those behaviors as a result of their disabilities. Rather, they are the outgrowth of the inhumane environment, lack of habilitation programs and crowded and chaotic conditions on living units. Physically handicapped persons are also at risk because basic therapies and equipment necessary to preserve their health and prevent loss of use of the limbs are not provided.

69. As a result of the conditions set out in paragraphs 47 through 55 above, plaintiff classmembers have suffered numerous lacerations, broken bones and other serious injuries, have been subjected to frequent physical and mechanical restraints, and have suffered severe physical deterioration.

70. Medical care at STS is so deficient that plaintiffs are exposed to risk of harm and death.

71. A substantial percentage of the STS budget is spent on approximately one-third of the residents who live in federally certified units. This disproportionate spending on one-third of the population deprives two-thirds of the residents of basic services and decent living conditions.

72. Do Not Resuscitate Orders are imposed as a matter of course on many STS residents who are admitted to community medical facilities for treatment. Do Not Resuscitate Orders needlessly subject plaintiffs to an increased risk of death.

73. Persons with retardation, like all people, are capable of growth and development throughout life.

74. Habilitation is necessary for persons with retardation, especially those with the most severe disabilities, to maintain their health and safety and protect them from harm and unnecessary restraint. Without habilitation programs STS residents will regress and lose the skills they had when admitted to STS.

75. No person with retardation needs to be at Southbury Training School. All can live in the community as long as

habilitative services, supervision and support are provided. Multiple handicaps or severe medical conditions do not preclude persons with retardation from living safe and productive lives in the community. In recognition of these facts, no new admissions to STS have been made for nearly a decade.

76. A necessary condition of growth and development and maintenance of skills of persons with retardation is individualized habilitative programs and individualized relationships in normalized settings.

77. The learning characteristics and capabilities of persons with retardation require that they have an opportunity to receive programs or training and habilitation in environments that are integrated (i.e. allow for interaction between persons with disabilities and nondisabled persons).

78. The State of Connecticut, like most other states, has adopted policies and professional practices based upon the professionally accepted facts concerning the developmental potential of persons with retardation and the requirements of normalization, individualization and integration for persons with retardation to realize their developmental potential and, at the

same time, be protected from harm and unnecessary restraint while in the state's care.

79. Despite their own policies and professional judgments that each plaintiff and each classmember should be transferred to an appropriately structured community setting, defendants have not acted to transfer the resources being used to support them at Southbury Training School to the community so that plaintiffs can leave STS.

80. On or about October 30, 1986 the United States of America filed a lawsuit entitled United States v. State of Connecticut, No. N-86-252 (EBB). At the same time the United States filed and moved for expedited adoption of a Consent Decree. The court ultimately approved the Consent Decree after denying intervenor status to many individuals and organizations, including some of the plaintiffs in this lawsuit, who were directly affected by the Consent Decree. The court's ruling, however, expressly permitted plaintiffs to file a separate lawsuit if the USA v. Connecticut Consent Decree was not effective in remediating violations of the rights of Southbury Training School residents.

81. Although the USA v. Connecticut Consent Decree has been in effect for nearly nine years, the conditions at STS have actually worsened. A recent investigation by the United States documented gross violations of human rights at STS, many of which place classmembers at risk of serious harm and death.

COUNT I: DUE PROCESS

82. The acts and omissions of the defendants deny plaintiffs and members of the plaintiff class their constitutional rights secured by the Due Process Clause of the Fourteenth Amendment to the United States Constitution:

- a) to an individually controlled and designed habilitation plan and program to help classmembers maintain self-care skills;
- b) to a humane and decent existence;
- c) to habilitation necessary to ensure that Southbury Training School residents are safe and free from unnecessary physical, mechanical and chemical restraint;
- d) to adequate shelter, clothing, nutrition and medical care;
- e) to have community placements that are integrated in society that will enable STS residents to enjoy the benefits of

citizenship;

f) to have all community placement decisions made on an individualized basis and implemented in accordance with the recommendations of planning teams composed of friends and family and professionals who know the person with a disability best and an opportunity to be heard periodically on the appropriateness of placement plans prior to and after discharge or transfer from Southbury Training School;

g) to have community placements provided when planning teams composed of friends, family and professionals who know classmembers best develop self-determined support plans and determine that transfer to the community is necessary to protect classmembers' rights under the federal constitution and federal laws;

h) to have individual advocates assist classmembers in protecting their rights under state and federal law;

i) to have individual budgets to implement the decisions of properly composed planning teams.

COUNT II: DISCRIMINATION CLAIM

83. By failing to provide residents of Southbury Training School the opportunity to receive state support in the community

rather than in a segregated institution and by failing to provide the most severely handicapped residents of Southbury Training School with the same opportunity to benefit from programs and community living as are provided residents of STS with mild disabilities, defendants have violated plaintiffs' rights secured by the Americans with Disabilities Act, 42 U.S.C. 12132, and the Rehabilitation Act, 29 U.S.C. 794.

COUNT III: SOCIAL SECURITY ACT CLAIM

84. Defendants have violated the rights of some three hundred residents of Southbury Training School by not providing active treatment as required by 42 U.S.C. 1396 et seq. by a) failing to provide training and habilitation services to all residents regardless of the nature or severity of his or her disability; b) failing to provide the professional services to residents including physical therapy, occupational therapy, medical services and psychological services; c) failing to develop adequate activities for residents; d) failing to provide individual treatment plans; e) failing to evaluate the appropriateness of continued placement at STS; f) failing to develop meaningful discharge plans.

IV. RELIEF:

WHEREFORE, proposed plaintiffs respectfully request that this Court:

1. Certify this case as a class action and designate plaintiffs as representatives of a class of persons that includes all persons residing at Southbury Training School, all persons who may be placed at or transferred to Southbury Training School at some future date and all persons who have been transferred out of STS yet remain under the Director's custody and control.

2. Enjoin defendants from admitting persons to Southbury Training School or transferring persons from STS unless such transfer is to an integrated community home with supports developed through a person-centered planning process by a team comprised of the classmember, his friends, family and professionals who know him best.

3. Enjoin defendants to identify through a person-centered planning process a written plan for each classmember which describes the individualized programs, supports and supervision necessary to protect each classmember and to meet his/her individualized needs and how and when those services will be

provided.

4. Enjoin the defendants to identify in a written plan the community homes necessary to protect classmembers' rights under the United States Constitution and federal laws and to remediate the environmental and program deficiencies identified in this complaint and to provide the community supports through individualized person-centered planning processes.

5. Enjoin the defendants to make available individual and independent advocates for each plaintiff and member of the plaintiff class to assist them in securing their rights.

6. Enjoin the defendants to provide plans, support services and community living opportunities to all classmembers, regardless of the severity or nature of their disabilities.

7. Enjoin the defendants to prohibit the use of Do Not Resuscitate Orders on classmembers until procedures are developed and followed which assure protection of rights secured to classmembers by the federal Constitution and laws.

8. Enjoin the defendants to submit to plaintiffs and the court for its approval a plan for the implementation of the aforesaid.

9. Award the plaintiffs costs and attorneys' fees.

INDIVIDUAL PLAINTIFFS AND PLAINTIFF,
PEOPLE FIRST OF CONNECTICUT, INC.,

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