

The Jerome N. Frank Legal Services Organization

YALE LAW SCHOOL

November 28, 2022

Department of Veterans Affairs
Office of General Counsel
Torts Law Group
810 Vermont Avenue, NW
Washington, DC 20420

Re: FTCA Claim of Conley Monk, Jr., Administrator of the Estate of Conley Monk, Sr.

To Whom it May Concern,

The Jerome N. Frank Legal Services Organization at Yale Law School represents Mr. Conley F. Monk, Jr. Enclosed please find an administrative claim we are filing on his behalf for injury inflicted upon his father, Conley Monk, Sr. (deceased), under the Federal Tort Claims Act. The claim consists of:

1. A Standard Form 95;
2. An Attachment to the Standard Form 95 detailing the basis of his claim; and
3. Mr. Monk, Jr.'s Appointment as Administrator of the Estate of Conley Monk, Sr.

In the attached, we detail how multiple Secretaries of Veterans Affairs and, previously, Administrators of the Veterans Administration, violated their statutory obligations and duty of care by administering the agency's veterans benefits system in a manner they knew or should have known was racially discriminatory, which harmed Mr. Monk, Sr. We submit this claim without the benefit of formal discovery. Mr. Monk, Jr. reserves the right to amend or supplement his claim.

Sincerely,

/s/ Michael J. Wishnie

Michelle Fraling, Law Student Intern
Rebecca Harris, Law Student Intern
Adam Henderson, Law Student Intern
Beatrice Pollard, Law Student Intern
Michael Sullivan, Law Student Intern
Jason Parkin, Supervising Attorney
Michael Wishnie, Supervising Attorney
michael.wishnie@ylsclinics.org

*Counsel for Conley Monk, Jr., Administrator, Estate
of Conley Monk, Sr.*

**CLAIM FOR DAMAGE,
INJURY, OR DEATH****INSTRUCTIONS:** Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.FORM APPROVED
OMB NO. 1105-0008

1. Submit to Appropriate Federal Agency:

U.S. Department of Veterans Affairs

2. Name, address of claimant, and claimant's personal representative if any.
(See instructions on reverse). Number, Street, City, State and Zip code.Conley F. Monk, Jr. c/o Michael Wishnie
Jerome N. Frank Legal Services Organization,
Yale Law School,
127 Wall Street, New Haven, CT 06511

3. TYPE OF EMPLOYMENT

 MILITARY CIVILIAN

4. DATE OF BIRTH

XXXXXX

5. MARITAL STATUS

XXXXXX

6. DATE AND DAY OF ACCIDENT

Ongoing

7. TIME (A.M. OR P.M.)

N/A

8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary).

See attached.

9. **PROPERTY DAMAGE**

NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code).

N/A

BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED.
(See instructions on reverse side).

N/A

10. **PERSONAL INJURY/WRONGFUL DEATH**

STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT.

See attached.

11. **WITNESSES**

NAME

ADDRESS (Number, Street, City, State, and Zip Code)

See attached.

12. (See instructions on reverse).

AMOUNT OF CLAIM (in dollars)

12a. PROPERTY DAMAGE

12b. PERSONAL INJURY

12c. WRONGFUL DEATH

12d. TOTAL (Failure to specify may cause forfeiture of your rights).

N/A

\$1,000,000

N/A

\$1,000,000

I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.

Text

13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).

13b. PHONE NUMBER OF PERSON SIGNING FORM

14. DATE OF SIGNATURE

XXXXXX

11/28/2022

**CIVIL PENALTY FOR PRESENTING
FRAUDULENT CLAIM**

The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).

**CRIMINAL PENALTY FOR PRESENTING FRAUDULENT
CLAIM OR MAKING FALSE STATEMENTS**

Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident Insurance? Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. No

N/A

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? Yes No 17. If deductible, state amount.

N/A

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

N/A

19. Do you carry public liability and property damage insurance? Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). No

N/A

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

- (a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.
- (b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.
- (c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.
- (d) **Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.**

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

- B. **Principal Purpose:** The information requested is to be used in evaluating claims.
- C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.
- D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

Answer 8: Basis of Claim

Conley F. Monk Sr. (“Mr. Monk”) was an Army veteran who served in combat in World War II with a primary Military Occupational Specialty (“MOS”) of motor transport. Following his service, Mr. Monk lived a fulfilled life as the father of eight beloved children, the husband of Olivia Monk, and a prominent and an esteemed member of the New Haven community. Yet, like countless Black veterans, Mr. Monk also struggled with a series of illnesses related to his military service that went uncompensated by the Department of Veterans Affairs and its predecessor agency, the Veterans’ Administration (collectively “VA”). When Mr. Monk applied for service-connected disability benefits in 1946, VA rejected his application. Mr. Monk passed away in 1989.

Conley Monk Jr., son of Mr. Monk, brings this claim in his capacity as administrator of his father’s estate under the Federal Tort Claims Act (FTCA) and Connecticut’s survival statute because current and former Secretaries of the Department of Veterans Affairs (and before the Department was established by Congress, Administrators of the Veterans’ Administration) have violated their statutory duty of care by administering veterans’ benefits in a negligent and racially discriminatory manner. *See* 38 U.S.C. § 303 (“The Secretary is responsible for the proper execution and administration of all laws administered by the Department”); *see also* 38 U.S.C. § 210(b)(1) (1958) (“The Administrator . . . is responsible for the proper execution and administration of all laws administered by the Veterans’ Administration”). These Secretaries and Administrators, and other VA officials and employees, knew or should have known of pervasive, longstanding racial disparities in the award of VA benefits, and they negligently failed to redress this continuing racial discrimination. For instance, they did not implement auditing, record-keeping, training, or supervision measures sufficient to address the explicit or implicit racial bias that caused racial disparities in benefit awards year after year. The result of this negligence by VA Secretaries and Administrators, and other VA officials and employees, has been to deprive Mr. Monk, thousands of Black veterans like him, and their families of services, benefits, and care that they earned through their service.

Claimant learned of these longstanding racial disparities, and of VA’s knowledge of such disparities, only in September 2021, after a Yale University statistician completed an analysis of recently-disclosed VA benefits data. VA disclosed this data in summer 2021 in response to Freedom of Information Act (“FOIA”) litigation brought by the Black Veterans Project (“BVP”) and the National Veterans Council for Legal Redress (“NVCLR”), an organization co-founded by Mr. Monk’s sons, Conley Monk Jr. and Garry Monk.

This claim seeks to recover for the negligence of VA Secretaries, Administrators, managers, and staff in failing to redress the longstanding racial disparities in VA benefits administration, about which VA leadership has known or should have known for decades. Under 28 C.F.R. § 14.3(b), a claim under the Federal Tort Claims Act “for personal injury may be presented by the injured person, his duly authorized agent, or legal representative.” During his lifetime, Mr. Monk had a right of action against VA for its negligent administration of benefits. Pursuant to the laws of Connecticut, where claimant Conley Monk Jr. resides and where Mr. Monk resided prior to his death, this right of action survives Mr. Monk’s death and may be brought by Conley Monk Jr. in his capacity as the administrator of Mr. Monk’s estate.

I. VA's Improper Administration of Benefits

On February 22, 2021, NVCLR, in partnership with the BVP, filed FOIA requests to three VA components. These FOIA requests sought information regarding the administration of service-connected disability compensation. Over the following months, VA disclosed some records in response to the FOIA requests. NVCLR and BVP also filed a federal lawsuit (No: 3:21-cv-00935-VLB (D. Conn.)) against VA on July 8, 2021 for failure to conduct a reasonable search and produce additional requested records, as required by law.

Through their counsel, BVP and NVCLR consulted with the Yale University StatLab to analyze the data. A statistician determined that there was a statistically significant difference in claim outcomes (the number of claims denied, partially granted, or granted) between: (1) Black veterans and white veterans; (2) Black male veterans and white male veterans; and (3) Black female veterans and white female veterans. Black veterans, Black male veterans, and Black female veterans were all denied disability benefits at statistically higher rates than their white counterparts.

Federal law imposes a duty of care on the Secretary to administer veterans' benefits in a non-discriminatory manner. Congress first enacted this duty in 1930 when it established the Veterans' Administration. Under former law, the VA Administrator, "under the direction of the President, shall have the control, direction, and management of the various agencies and activities [enumerated herein]" concerning the "administration of the laws relating to the relief and other benefits provided by law" for veterans. 38 U.S.C. § 11 (1934). In 1957, Congress amended the statute, providing that "[t]he Administrator . . . is responsible for the *proper execution and administration of all laws* administered by the Veterans' Administration and for the control, direction, and management of the Veterans' Administration." 38 U.S.C. § 210(b) (1958) (emphasis added). Today, the statute still provides that "[t]he Secretary is responsible for the *proper execution and administration of all laws* administered by the Department and for the control, direction, and management of the Department." 38 U.S.C. § 303 (2018) (emphasis added). VA leaders violate this statutory obligation and duty of care to properly execute and administer the law when they administer veterans' benefits in a manner they know or should know results in racial disparate outcomes, and when VA leadership negligently fails to redress those pervasive racial disparities.

The records that NVCLR and BVP received from VA through their FOIA requests demonstrate that for decades VA leadership, including the VA Secretaries and Administrators, knew or should have known of pervasive, longstanding racial disparities in veterans' benefits for Black veterans. And for years, VA leadership has negligently failed to redress these disparities through, for instance, auditing, record-keeping, training, and supervision measures.

The statistical disparities uncovered by BVP and NVCLR are consistent with prior anecdotal accounts of VA racial disparities and rooted in longstanding, institutionalized racism against Black veterans, including Black World War II veterans like Mr. Monk. Historical accounts and public reports have documented how Black World War II veterans were systematically denied access to G.I. benefits due to racist policies like segregation, redlining, and arbitrary denials of benefits applications. See Erin Blakemore, *How the GI Bill's Promise Was Denied to a Million Black WWII Veterans*, HISTORY (June 21, 2019), <https://perma.cc/2KFG->

UX6L. VA itself actively sought to prevent Black World War II veterans from using G.I. benefits to attend universities. See Hilary Herbold, *Never a Level Playing Field: Blacks and the GI Bill*, J. BLACKS HIGHER EDUC., Winter 1994, at 104-108, 107 (“[T]he Veteran’s Administration often joined with . . . 3niversity[ies] in efforts to channel highly qualified [Black] applicants into degree programs or colleges judged more suitable and less prestigious with the threat of denials of benefits, and actual denials of benefits . . .”). VA counselors, who were predominantly white, often “refused to help [B]lack veterans who had received a ‘general’ or ‘blue’ discharge . . . which the Army had issued disproportionately to [B]lack ‘troublemakers’ who had dared to protest their poor treatment and segregated conditions.” David H. Onkst, “*First a Negro... Incidentally a Veteran*”: *Black World War Two Veterans and the G.I. Bill of Rights in the Deep South, 1944-1948*, 31 J. SOC. HIST. 517, 520 (1998). And VA initially refused accreditation to the United Negro and Allied Veterans of America, “the only agency formed expressly to assist Black veterans” immediately following World War II. Herbold, *supra*, at 106. The historical evidence strongly indicates that the disparities between Black and white veterans were not only in existence when Mr. Monk applied for VA benefits but were even more substantial and egregious.

Academic studies on VA also indicate that VA leadership knew or should have known of disparities and discrimination within the VA. See, e.g., Nathaniel Rickles, Silvia Domínguez & Hortensia Amaro, *Perceptions of Healthcare, Health Status, and Discrimination Among African-American Veterans*, 4 J. HEALTH DISPARITIES RES. & PRAC. 50, 63-64 (2010) (“[A] significant proportion of African-American veteran participants . . . reported perceived discrimination in healthcare, low perceived quality of care, and low levels of satisfaction with the healthcare they receive [from the VA.]”); Samantha Saha, Michele Freeman, Joahd Toure, Kimberly Tippens, Christine Weeks & Said Ibrahim, *Racial and Ethnic Disparities in the VA Health Care System: A Systematic Review*, 23 J. GENERAL INTERNAL MED. 654, 654 (2008) (“Racial disparities in the VA exist across a wide range of clinical areas and service types.”). Public coverage of the VA confirms the same. Alex Horton, *VA Will be Investigated After ‘Staggering Accounts of Racism,’ Sen. Warren Says*, Wash. Post (Oct. 1, 2020), <https://perma.cc/E5NV-H6F5> (“White and Black veterans [were] treated differently while in crisis. Black veterans were removed from [a] facility for aggressive behavior that was overlooked for White veterans.”); Matt Evans, *Protestors Calling for End to Racial Discrimination at Kansas City VA Medical Center*, KMBC News (June 15, 2020), <https://perma.cc/LM85-HGGK> (reporting on allegations of “racial discrimination against [B]lack veterans and [B]lack staff members” at a VA hospital, which included “an emergency room nurse who allegedly called a [B]lack veteran a racial slur”).

VA’s records and historical coverage of VA by researchers and the media show that VA leadership knew or should have known about disparities and discrimination within the agency. Yet, VA leaders have negligently failed to redress this longstanding, well-known race discrimination. VA leadership did not implement auditing, record-keeping, training, and supervision measures sufficient to remedy the explicit or implicit racial bias that caused these disparities. Because VA leadership continued to administer the veterans’ benefits system in a discriminatory manner, VA leaders failed to exercise their duty of care to properly execute and administer all laws administered by VA. As such, VA Secretaries and other VA leadership acted negligently and injured Mr. Monk and countless other Black veterans. VA Secretaries and Administrators, and other VA officials and employees, failed to properly control, direct, and

manage VA, which impacted Mr. Monk's ability to access VA benefits in the same manner as his white counterparts.

Claimant reserves the right to supplement this claim in the future.

II. Mr. Monk's History of Military Service and Applications for VA Benefits

Mr. Monk was born in 1919 in Johnston, North Carolina, into the accomplished Monk family that includes the jazz musician Thelonius Monk, the Hall of Fame football player James Arthur ("Art") Monk, and generations of teachers, police officers, and public servants. In 1943, at the age of 23, Mr. Monk voluntarily enlisted into the U.S. Army, with a primary military occupational specialty of motor transport. Like all Black servicemembers at the time, Mr. Monk was forced to serve in a segregated unit. Nevertheless, Mr. Monk served his country with honor and courage, including through participation in the Normandy invasion in 1944. In January 1946, Mr. Monk received an honorable discharge from the Army and returned to his home in North Carolina.

During his time serving abroad, Mr. Monk developed stomach issues, including epigastric pains and an ulcer. Shortly after returning home, in 1946, Mr. Monk applied for service-connected disability benefits for his stomach issues. VA acknowledged that Mr. Monk's stomach troubles were caused by service-connected neurosis, but it nonetheless denied him disability benefits on the basis that his disability rating was less than 10%. Around the same time, Mr. Monk applied for VA benefits so that he could care for his dependent mother, Mamie Lottin Monk. VA rejected his application and provided a cursory explanation that Mr. Monk had not presented "evidence . . . adequate to establish [his mother's] dependence." Based on his c-file, it does not appear that Mr. Monk ever applied for G.I. benefits.

Mr. Monk struggled to find work after returning home from North Carolina, in large part due to Jim Crow-era laws that significantly limited his employment prospects. With no stable job and no financial support from VA, Mr. Monk decided it would be best for him and his family to move up north. Thus, in 1952, Mr. Monk, his wife Olivia, and his young children—including claimant Conley Monk Jr.—left North Carolina and moved to New Haven, Connecticut.

After moving to New Haven, Mr. Monk worked two jobs to support his family, one at Yale New Haven Hospital and the other at Seamless Rubber Company, a New Haven-based manufacturer of rubber products. He became a beloved and highly respected leader of the New Haven community, serving as the Chairman of the Deacon Board at Thomas Chapel Church of Christ in New Haven and the head of the church's Sunday School program. Mr. Monk was also passionate about helping those in his community who were disadvantaged, particularly young people. He and his wife Olivia often provided struggling community members with food, shelter, and financial assistance.

While he worked tirelessly to support his family and community, Mr. Monk was quietly struggling with several serious health issues. He suffered a stroke at age 55 and was diagnosed with Parkinson's disease shortly thereafter. His stomach issues also persisted throughout his lifetime, and based on his c-file, it does not appear that he ever received VA disability benefits

for these service-connected disabilities. On January 20, 1989, after a long struggle with Parkinson's, Mr. Monk passed away.

Mr. Monk's life experiences with discrimination and his difficulty obtaining VA benefits were, sadly, far from uncommon. VA denied disability and other benefits to thousands of Black World War II veterans because of their race. *See Blakemore, supra*. VA often actively discouraged Black World War II veterans from using G.I. benefits to apply to institutions of higher education. *See Herbold, supra*, at 107. And white VA counselors frequently refused to help Black World War II veterans apply for benefits. *Onkst, supra*, at 520. Unfortunately, this history of institutionalized racism, and the failure of VA leadership to address it, continues to materially harm Black veterans, as their applications for disability benefits continue to be denied at higher rates than those of their white counterparts. Based on this longstanding history and the data uncovered by BVP and NVCLR, VA Secretaries and Administrators, and other VA officials and employees, knew or should have known about the pervasive racial disparities in the awarding of VA benefits, yet they failed to redress them through auditing, record-keeping, training, supervision, or other measures, which has led to systematic benefits obstruction. VA Secretaries' and Administrators' negligent supervision of VA managers and adjudicators violated their statutory duty to ensure the proper execution of VA laws, injuring Mr. Monk and thousands of Black veterans like him.

Answer 10, Personal Injury/Wrongful Death

Mr. Monk was injured as a result of the negligence of VA leadership, including VA Administrators' and Secretaries' negligence in failing to meet their statutory duty of care, because they administered the veterans' benefits system in a discriminatory manner and negligently failed to redress longstanding, pervasive race discrimination of which they knew or should have known. Due to this negligence, Mr. Monk was denied up to tens of thousands of dollars' worth of disability benefits. He also suffered dignitary and reputational harm as a result of VA's discriminatory actions.

Under 28 C.F.R. § 14.3(b), "a claim for personal injury may be presented by the injured person, his duly authorized agent, or legal representative." Conley Monk Jr. brings this administrative claim in his capacity as the duly appointed administrator of Mr. Monk's estate and as a resident of Connecticut, where Mr. Monk also resided. Under Connecticut's survival statute, "a cause or right of action shall not be lost or destroyed by the death of any person, but shall survive in favor of or against the executor or administrator of the deceased person." CONN. GEN. STAT. § 52-599 (2022). Mr. Monk's right of action against VA thus survives his death and may be pursued by son and estate administrator, Conley Monk Jr.

On behalf of his deceased father, claimant Conley Monk Jr demands no less than \$1,000,000 for damages resulting from VA's negligent administration of benefits.

Answer 11, Witnesses

- Denis McDonough, VA Secretary
- Dat Tran, Acting VA Secretary

- Robert Wilkie, VA Secretary
- Peter O'Rourke, Acting VA Secretary
- David Shulkin, VA Secretary and Under Secretary of Veterans Health Administration
- Robert Snyder, Acting VA Secretary
- Robert McDonald, VA Secretary
- Sloan D. Gibson, Acting VA Secretary
- Eric Shinseki, VA Secretary
- James Peake, VA Secretary
- Jim Nicholson, VA Secretary
- Anthony Principi, VA Secretary
- Hershel W. Gober, Acting VA Secretary
- Thomas J. Murphy, Acting Under Secretary of Veterans Affairs for Benefits
- Paul R. Lawrence, Under Secretary of Veterans Affairs for Benefits
- Allison A. Hickey, Under Secretary of Veterans Affairs for Benefits
- Michael Walcoff, Under Secretary of Veterans Affairs for Benefits
- Richard A. Stone, Acting Under Secretary of Veterans Health Administration
- James Wilson Holsinger, Jr., Under Secretary of Veterans Health Administration
- Kenneth Kizer, Under Secretary of Veterans Health Administration
- Thomas L. Garthwaite, Under Secretary of Veterans Health Administration
- Robert H. Roswell, Under Secretary of Veterans Health Administration
- Jonathan Perlin, Under Secretary of Veterans Health Administration
- Robert Petzel, Under Secretary of Veterans Health Administration
- Carolyn M. Clancy, Interim Under Secretary of Veterans Health Administration

This is not intended to be an exhaustive list of possible witnesses.