

Coalition to Fix Folsom



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July 22, 2024

Sacramento District Attorney's Office

Attn: Mr. Michael Blazina

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Via electronic mail and hand delivery

Re: Supplement #3 to complaint re Detective Melanie Catanio, Post ID C38-T99 and Folsom Police Sgt. of Internal Affairs David Canepa for perjury and *Brady* violations;

NEW COMPLAINT re Folsom Asst. City Attorney Sari Dierking for suborning perjury

Dear ADA Blazina:

John Fitzgerald Kennedy said it best: "The very word 'secrecy' is repugnant in a free and open society; and we are as a people inherently and historically opposed to secret societies, to secret oaths, and to secret proceedings." Recent media coverage from ABC 10, Fox 40 and *The Sacramento Bee* has unmasked some of the secrecy and graft within the Folsom Police Department. However, there is still much work left to do.

This letter is the THIRD supplement to the initial complaint I filed with your office regarding Detective Melanie Catanio, formerly a sworn officer of the Folsom Police Department and currently employed by the Anderson Police Department ("Catania") and Lt. David Canepa of the Folsom Police Department Internal Affairs Unit ("Canepa"). This third supplement provides additional evidence of wrongdoing by Catania and Canepa, and also introduces new evidence that demonstrates that Assistant City Attorney Sari Dierking ("Dierking") knew that she was suborning perjury from Canepa on July 7, 2021 when Dierking called Canepa to testify in a pre-trial *Pitchess* hearing regarding Catania in Sacramento Superior Court for the *People v Patricia Lane* criminal case. You will continue receiving monthly supplements until I have been notified in writing of the disposition of my complaints regarding each of Catania, Canepa and Dierking.

As previously documented in my initial complaint and the first two supplements, both Catania and Canepa have committed perjury and *Brady v. Maryland* violations. Catania and Canepa should be relieved of their law enforcement duties and decertified by CA POST. An ethics complaint against Dierking to the California Bar Association should be filed for the misconduct described in this third supplement and my initial complaint dated April 4, 2024. Felony charges

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should be considered against Catanio and Canepa for committing perjury and against Dierking for suborning perjury for the reasons described below.

Attached hereto as Exhibit 43 is a true and correct copy of the Citizen Complaint Form regarding Catanio that was filed by Jude Chabot on March 11, 2019 with the Folsom Police Department (“Catanio IA Complaint”). As you recall, I previously provided a sworn declaration from Jude Chabot as Exhibit 33 with the first supplement regarding Catanio on May 24, 2024. The Catanio IA Complaint demonstrates the veracity of Chabot’s declaration, and includes the following allegations:

- “I sent screenshots of my phone call log of that night to Officer Catanio showing that I had not called Life Time gym. I know that screenshots aren’t great evidence because phone calls can be deleted from a phone, so I also offered to retrieve my phone records from Verizon to be submitted as evidence in the report. I also gave Officer Catanio the contact information of my friend Josh Smith, whom I was with at a concert in Wheatland, CA from approximately 5:00 pm until about 11:30 pm. I even had pictures that had my geographic location and time it was taken on my phone that I sent Officer Catanio. All of this evidence that I offered and sent to the officer was purposefully left out of the report and it was written as a one sided, biased report. Officer Catanio turned what was me calling to report an incident of my ex-wife violating her restraining order and not leaving the gym into a stalking case against me and chose to leave out pertinent information and evidence that proves I was being setup again by my ex-wife.”
- “Officer Catanio spoke with Ken Mills and again, didn’t report the conversation that she spoke to a witness. This information should have been put into the report but was left out on purpose.”
- “Catanio took a one sided report and turned me into a suspect, not even bothering to look into the restraining order or why this lady was not allowed to see her own children. Officer Catanio showed up in trial last week as a witness for Andrea and testified that she did not put the evidence I provided her into the report. She also testified to not even looking up Andrea or reading the restraining order, knowing that she was a convicted felon on probation at the time of the incident.”
- “Officer Catanio also testified that she did not contact Andrea after the report was written and passed on, but there are text messages from Catanio’s personal cell phone between her and Andrea that proves otherwise. Officer Catanio has now lied under oath and should be investigated.”
- Officer Catanio’s “conduct shows that she was biased against me.”
- “I want a full internal affairs investigation done on both Officer Catanio and Officer Nezik as to how many policies they violated within your department, regarding report writing, evidence tampering, evidence withholding, conduct unbecoming, and possible perjury.”
Ex. 43 at p. 3-5.

All of Jude Chabot’s 2019 allegations about Catanio could be easily confirmed by the evidence available to the Folsom Police in the Placer County Superior Court public records at the

time of their Internal Affairs (“IA”) investigation into Catanio’s misconduct. Attached hereto as Exhibit 44 is a Placer County Superior Court ruling on extending Jude Chabot’s domestic violence restraining order against Andra Chabot dated March 12, 2019, as well as a Court ruling dated February 19, 2019 from the same case. The Court’s findings of fact clearly vindicated Jude Chabot and cast dispersion on the investigation undertaken by Catanio on behalf of the Folsom Police Department. For example, Exhibit 44 demonstrates that the Court found that:

- “With respect to the issuance of the final restraining order after the trial in 2015, the court made specific findings of abuse pursuant to Family Code sections (FC) 6203(a)(3), 6203(a)(4), and 6203(b). The court specifically found that Jude was subjected to years of abuse perpetrated by Andrea from 2011 through 2014. That abuse involved physical, emotional and financial abuse. The court also found that [name of minor child redacted] was traumatized through Andrea’s deceit and fraud, and found that FC 3044 applied to her conduct. With respect to Andrea’s allegations of abuse by Jude, the court specifically made a finding that there was no credible evidence of domestic violence by Jude and that he did not perpetrate domestic violence on her. These findings were set forth in the minutes and are attached to this ruling.”
- “At the hearing on the extension [of the DRVO], Jude testified and was credible in expressing his genuine fear of future abuse by Andrea. Although he no longer bases his fear on a concern for further physical incidents between them, he explained in moving detail the continued disruption of his peace and security based upon his fear of Andrea’s capacity for manipulation and deceit; and her sophisticated ability to steal and fraudulently use his personal information and identity. And described above, subjective fear is not enough; it has to be reasonable. As discussed below, this court finds that his fear is in fact reasonable, and he is entitled to renewal [of the DRVO].”
- “Much ink has already been written to describe the degree of fraud, deception, and manipulation perpetrated by Andrea towards her own family that underlies the basis for the [original] restraining order. In this hearing alone, evidence of her sentencing report and the victim impact statement of Andrea’s mother Jeanie was admitted. (Ex. 2) Jeanie described how her daughter’s actions were not only devastating financially, but done with disregard for the personal consequences. Andrea was present to witness the stress and emotional toll she personally created. At the time of her sentencing, Jeanie described her daughter as a ‘master manipulator one who had no boundaries when it came to exploiting vulnerabilities and relationships’.”
- “Jude continues to feel victimized by Andrea, and expressed a genuine fear of her obtaining his private personal information. His emotional state was corroborated by the testimony of his friend, Josh Smith.”
- “With respect to Jude, his concern and reaction upon unexpectedly encountering Andrea was not unfounded. Both times he called the police because he wanted the incident documented for his own protection. Jude testified about Andrea’s capacity to manipulate others to believe her; and of his fear of being accused of doing something he didn’t do by an elaborate professional. Andrea had falsely accused him of domestic violence during

their marriage resulting in his arrest. Although charges were not filed and she recanted (Ex. 24), the damage to his career as a Roseville Police Officer was done. All of this had been litigated during the previous trial on the restraining order: ‘Prior to the dissolution trial, a trial on Husband’s request for a restraining order was held. The court issued a restraining order protecting Husband and the minor child from Wife. Wife falsely accused Husband of abuse during the trial and on prior occasions. The court finds the Wife was not credible. Husband was in no way responsible for any domestic violence conduct previously alleged by Wife. The Court finds that Wife, and not Husband, has perpetrated emotional and physical abuse on Husband within the meaning of Family Code section 6211.’ (Ruling on Submitted Matter, filed December 23, 2015).”

- “Andrea’s response to these encounters only corroborates Jude’s fears. Upon being contacted by a Folsom Police Officer [Catanio] about the gym incident, she accused Jude of following her there and stalking her. Even though Jude had reported the incident to [Folsom] police, he became the focus of the investigation and felt victimized once again. Andrea then attempted to file two DRVO(s) in August and September of 2017 in Sacramento County, despite Placer County being the venue that has had the history between the parties. In both restraining order requests she referred to previous allegations of abuse that had already been litigated and found to lack credibility. The first restraining order was denied in full pending a hearing (Ex 10), and the second was granted in part pending a hearing (Ex 11). She [Andrea] failed to show up for her hearings and the matters were dropped.”
- “In the present case, upon consideration of all the evidence presented to the court during the renewal request, this court finds Jude to have reasonable apprehension for future abuse such that a permanent restraining order is appropriate. The court acknowledges that it has discretion to choose the alternative of only five years, but chooses not to do so. Given what he has experienced, Jude’s reasonable fear from Andrea’s sophisticated ability to fraudulently use the personal information of others will not subside in five years, ten years, or even twenty. Although the parties have separated, the specter of fraud, unlike physical abuse, remains. The parties are intertwined due to their daughter, and ongoing protection for the father is vital to his emotional well-being and sense of security. Andrea remains a convicted felon” Ex. 44.

Despite the voluminous evidence cited above that was furnished to Folsom Police Department’s Internal Affairs in support of the Catanio IA Complaint that Jude Chabot filed in March of 2019, Chief Richard Hillman and Police Commander M. Schanrock issued a disposition letter to Mr. Chabot dated September 10, 2019, a copy of which is enclosed herewith as Exhibit 45, that concluded, “After an evaluation of your complaint, the information obtained does not support the **allegations** of misconduct” (“Disposition Letter”). Notably, the 2019 City of Folsom correspondence addressed to Mr. Chabot refers to “allegations of misconduct” in the plural tense. In other words, the Disposition Letter acknowledged that the Catanio IA Complaint submitted by Mr. Chabot alleged multiple allegations of misconduct – as opposed to a *single allegation* of failure to investigate. Attached hereto as Exhibit 46 is a screenshot from <https://transparentcalifornia.com> indicating that Dierking’s City of Folsom salary history from

2019 shows that Dierking was employed as the Assistant City Attorney by the City of Folsom at the time the Disposition Letter was issued.¹

The Catanio IA Complaint, which was signed and dated by Mr. Chabot and provided as Exhibit 43 to this supplement, was indisputably contained within Catanio's Folsom Police Department IA file at the time that Mrs. Patricia Lane's criminal defense attorney filed the *Pitchess* motion regarding Catanio's history of dishonesty in June of 2021.² A copy of the *Pitchess* motion filed by the defense in the *People v Patricia Lane* case regarding Catanio, together with the City of Folsom's opposition thereto which was signed by Dierking and filed under Dierking's California State Bar Number 226805, was previously provided to your office as Exhibit 28 to my initial complaint submitted on April 4, 2024 ("*Pitchess* Motion & Opposition"). Dierking's *Pitchess* Opposition acknowledged that "In this case, Defendant seeks information from each officer's personnel file relating to five areas of alleged officer misconduct: fabrication of evidence, destruction of evidence, lying in a police report, failing to properly book evidence, and behavior involving moral turpitude. If the Court finds good cause to review the Officers' personnel files, the City does not dispute that most of the above-referenced categories of alleged officer misconduct, with the exception of general behavior involving moral turpitude (addressed below), might be potentially relevant to the pending criminal case under the circumstances." Ex. 28 at p. 01273-01274.³ Dierking's *Pitchess* Opposition further stated that "Should this Court find 'good cause', proceed to an *in camera* review, and determine that any disclosure is appropriate in this case, the scope of the information that may actually be released is limited to the names and addresses of the complaining parties and witnesses, if any, and the disposition of any complaint regarding the relevant areas of alleged officer misconduct." *Id.*

The transcript of the *Pitchess* hearing in the *People v. Patricia Lane* case dated July 7, 2021 wherein Canepa testified under oath regarding Catanio's IA files and Dierking appeared on behalf of the City of Folsom in Sacramento Superior Court was also previously provided to your office as Exhibit 29. The *Pitchess* Opposition and transcript documents indisputably prove that Canepa committed perjury when he testified at the *Pitchess* hearing on July 7, 2021 in the *Lane* case regarding Catanio, and further demonstrate that Folsom Assistant City Attorney knowingly suborned perjury from Canepa when she called him to testify and intentionally mischaracterize the contents of Catanio's IA file to the Court. Dierking's actions were not only a breach of her ethical duties as a member of the state bar, but also a felony under Penal Code section 127.

¹ Public records indicate that the value of Dierking's salary and benefits from the City of Folsom taxpayers in 2023, which is the most recently available data, exceeded a quarter of a million dollars annually.

² In addition to being fully aware of the Catanio IA Complaint filed by Jude Chabot in 2019, Dierking and Canepa were also on written notice that the O'Neel family had filed a tort claim with the City of Folsom in June of 2021 prior to the *Pitchess* Motion and Opposition, and that the O'Neel claim also alleged misconduct by Catanio related to witness tainting, destruction of evidence, failure to properly book evidence, seizing children without a warrant, and other malfeasance. See Ex. 1 to initial complaint and letter to DA dated April 4, 2024.

³ Note the striking similarities between the conduct described in the *Lane* 2021 *Pitchess* Motion and Opposition regarding Catanio (Ex. 28) to the accusations contained in the Catanio IA Complaint filed by Mr. Chabot in 2019, which were nearly identical: "lied under oath", "biased against me," and citing "policies they violated within your department, regarding report writing, evidence tampering, evidence withholding, conduct unbecoming, and possible perjury." Ex. 43 at p. 3-5.

Dierking had the following exchange with the Court in the presence of Canepa wherein she acknowledged her understanding that Catanio was being accused of dishonesty and failure to properly disclose evidence:

- “Ms. Dierking: Well, my understanding, although I’m not directly involved in the criminal case, but reading the Pitchess motion in this case, my understanding is that there was an issue with retaining the recorded interview of two alleged victims that were minors, and that discrepancy – I think basically the recorded interviews were lost or not provided to the defense, and as a result of that the Pitchess motion is forthcoming, talking about – Court: Right. But that’s because the defense is making an allegation that essentially Folsom, or this particular detective, has engaged in some sort of cover-up, or that she’s being dishonest by not turning them over. It’s not a matter of whether or not she was trained to do it, right?
Ms. Dierking: Right.” Ex. 29 at p. 64-65.

Dierking and Canepa were also present in Court on July 7, 2021 when Mrs. Lane’s defense attorney explained the problems with Catanio’s investigation in the Lane case that warranted filing the *Pitchess* Motion, which once again, were chillingly similar to the Catanio IA Complaint filed by Mr. Chabot (Ex. 43) and the tort claim filed by the O’Neel family (Ex. 1):

- [Defense Attorney]: “There have been a number of interviews that a narrative was prepared [by Catanio], and the transcript is significantly different from the narrative. In a lot of instances there has been suggested questions. The manner in which the interview was done. Not following up on impeachment evidence of the complaining witnesses that’s been provided. And so the interviewing techniques of the officer is going to be a significant part of the trial, and so whether or not the officer is interviewing witnesses and conforming with her training is going to be relevant, just like it would in the case – other police -conduct cases – criminal cases, not civil cases – whether or not the police officers are following their training, and the training that they’ve been given in a certain area. So in various reports there has been suggestibility. I mean, I am inquiring with an expert on that issue, and may want to present testimony regarding that.” Ex. 29 at p. 68.

Further, Dierking and Canepa were both present at the *Pitchess* hearing when the Court ruled:

- “Ms. Ferrentino has made allegations – or a request for documents in the personnel records of two officer, Officer Melanie Catanio and Kimberly Lim, alleging fabrication of evidence, destruction of evidence, lying in a police report, and failing to properly book evidence.” *Id.*⁴

⁴ The allegations by Mrs. Lane were nearly identical to the Catanio IA Complaint filed by Mr. Chabot in 2019, which was in the possession of both Dierking and Canepa when the *Pitchess* Motion and Opposition were filed in late June of 2021 and when Canepa testified in early July of 2021.

- “What I do think is she [Defense Attorney Ferrentino] has made a showing of good cause for is the names – looking on page 2 [...] Item No. 2. Names, address, and telephone numbers of the persons who filed complaints described in Item 1 – which is what I just read, and I think would include – and who witnessed the misconduct above. So names, address, and telephone numbers is what is called for.” *Id.* at p. 72.

Despite the Court’s unequivocally clear ruling above, Dierking and Canepa did not disclose the names and contact information for the Chabot and O’Neel complainants who had filed claims against Catanio for dishonesty, destruction of evidence, personal bias, perjury and witness tainting. The *Pitchess* transcript at Ex. 29 demonstrates that neither the names and contact information of the complainants nor the witnesses were EVER provided to the Lane defense. The O’Neel tort claim previously produced as Ex. 1 and the Catanio IA Complaint filed by Mr. Chabot which is attached as Ex. 43 were both responsive to the Court’s Order and in the possession of Canepa and Dierking at the time. Their covert refusal to produce the responsive contact information for the prior responsive complainants /witnesses constituted intentional disobedience to the Court’s order by Canepa and Dierking.

CANEPA’S PERJURY WAS DOCUMENTED IN THE RECORD WHEN HE DENIED THE EXISTENCE OF CLEARLY RESPONSIVE DOCUMENTS; SARI DIERKING WAS PRESENT AND SUBORNED PERJURY DURING CANEPA’S DIRECT EXAMINATION:

- [Court]: “So did you review the personnel records of these two officers?
A [by Canepa]: I did.
Q [by Court]: And did you record any – or did you notice whether or not there were any complaints that had been registered with the agency by anyone – whether it’s a fellow officer or private citizen – alleging any fabrication of evidence, destruction of evidence, lying in a police report, or failing to properly book evidence?
A [by Canepa]: No. Not in those categories, Your Honor. And there were no sustained complaints for either officer.” Ex. 29 at p. 78.

CANEPA’S SWORN DENIAL OF ANY PRIOR COMPLAINTS REGARDING CATANIO FABRICATING/DESTROYING EVIDENCE, LYING IN A POLICE REPORT OR FAILING TO PROPERLY BOOK EVIDENCE WAS AN ABSOLUTE LIE. THE CATANIO IA COMPLAINT FILED BY MR. CHABOT IN 2019 WAS RIGHT IN FRONT OF CANEPA AND DIERKING AT THE TIME OF THIS TESTIMONY! See Ex. 43 and 29. The O’Neel tort claim was similarly already in their possession because the City of Folsom sent a claim rejection letter to the O’Neel family on June 24, 2021 denying their tort claim against Catanio, and the City Attorney’s Office was copied on that correspondence. See Ex. 1 and Ex. 2(a) at p. 1. The Court asked Canepa during the *Pitchess* hearing to affirm that he was comfortable with answering the questions posed by the Court based on his experience as Custodian of Records for the City of Folsom: “So you are comfortable, based on the training that you have received, that you know exactly what it is you are supposed to search for and how to search for it?” Canepa responded, “I am.” Ex. 29 at p. 81. Therefore, Canepa himself testified that he knew exactly what was required of him at the *Pitchess* hearing when he reviewed Catanio’s IA file and testified under oath regarding its contents.

With respect to the Catanio IA Complaint filed by Mr. Chabot, the Court specifically inquired of Canepa whether it was relevant to the Court's Order on the *Pitchess* Motion during the Lane hearing, and Canepa PERJURED HIMSELF AGAIN:

- [Canepa]: "There is an external complaint in which Detective Catanio was exonerated.
[Court] Q: There is a complaint from IA, the internal affairs file:
[Canepa] A: Correct.
[Court] Q: And so somebody made a complaint to do with something not part of our – that doesn't fit within the five areas or so that the defense alleges in this case, correct?
[Canepa] A: Correct." Ex. 29 at p. 82

The Court then supposedly reviewed Catanio's IA file, which contained a large volume of documents, and misstated the nature of its contents:

- "So this complaint, I've just now completed reading it. It's a fairly thorough report, even involving also a transcript of testimony by Officer Catanio. In March of 2019 Folsom received a complaint by a person by the name of Jude Chabot, C-h-a-b-o-t, alleging an improper investigation and follow-up on a restraining-order violation that occurred on August 10 of 2017 by Officer Catanio [...] Ultimately internal affairs concluded that the investigation was proper, and that Officer Catanio did nothing wrong. I don't think this is related in any way to the areas – there is nothing alleging dishonesty here or fabrication or destruction of evidence or failing to book evidence, so based on that I don't think any of this is covered in any way by [Defense] Attorney Ferrentino's request for this information, so I will not be turning over any information from this.[...] It will never be opened unless there is a special request by the Third District Court of Appeal to open it, and at that time they can look at what I looked at to make their own assessment. Ms. Dierking, do you have a problem with that?" Ex. 29 at p. 89.
- Dierking: "No, Your Honor." *Id.* at p. 90.

At that moment, Dierking and Canepa BOTH should have called the Court's attention to the allegations contained in the Catanio IA Complaint made by Mr. Chabot which specifically alleged perjury/dishonesty, destruction/fabrication of evidence, falsifying a police report, and personal bias. Ex. 43. Dierking and Canepa similarly should have corrected the record by producing the O'Neel Tort Claim, which was also responsive to the Court's order. Ex. 1. Yet neither Canepa nor Dierking complied with their duty of candor to the Court by supplying the information they were ordered to produce.

Instead, at the end of the *Pitchess* hearing, Dierking was so pleased with her successful judicial deception that she sought guidance about how she could rush to solidify the Court's mistaken failure to disclose the Catanio IA Complaint made by Mr. Chabot in 2019: "Your Honor, before we move on from Detective Catanio, I had a question with respect to the sealed records, the IA complaint [filed by Chabot]. Is there a certain period that that would be maintained on file, or is there a procedure where the City could request that that be purged, or how would that work?" Ex. 29 at p. 95. In other words, Dierking's first instinct after Canepa's perjury succeeded

in fooling the judge was to determine whether they could permanently destroy the Catanio IA Complaint so that it would be forever hidden from the world. This statement on the record about how to permanently destroy the Catanio IA Complaint evidences Dierking's consciousness of guilt. Dierking and Canepa had full knowledge that the Catanio IA Complaint was directly responsive to the Court's order in the *Lane* case, and highly relevant to Catanio's propensity for truthfulness in all cases. Canepa and Dierking violated Mrs. Lane's Constitutional right to a fair trial when they chose to protect the "thin blue line" by hiding Catanio's documented history of misconduct during the *Pitchess* hearing. Thereafter, they sought to cover their tracks by seeking to permanently eliminate all evidence of their wrongdoing.

Officers and attorneys like Catanio, Canepa and Dierking have no rightful place in our system of justice. Public trust in police and prosecutors is at an all-time low right now for obviously legitimate reasons. Please do not ignore the crimes taking place in your jurisdiction for the sake of solidarity with other law enforcement officers. Your time and investigation of these very important matters is appreciated. Should you require any further information or documentation, please do not hesitate to contact me at the telephone number below or via email at mmartin@gavrilovlaw.com.

In liberty,



Mary Anne Martin, Esq.
Coalition to Fix Folsom

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This letter, together with all exhibits and the initial complaint and first two supplements, may be accessed at the following link:

<https://gavrilovandbrooks.box.com/s/0trlw1cwvpxm1r85hgh7r1gws0u8x8fu>

Attachments:

- Ex. 43 Catanio IA Complaint filed by Jude Chabot March 11, 2019 with Folsom Police
- Ex. 44 Placer County Superior Court rulings dated March 12, 2019 & February 19, 2019 re Chabot
- Ex. 45 City of Folsom disposition letter to Jude Chabot dated September 10, 2019 re Catanio allegations
- Ex. 46 City of Folsom Assistant City Attorney Sari Dierking 2019 public salary & benefits information