

Michael J. Rose Robin B. Kallor* Melinda A. Powell Cindy M. Cieslak[†] Andrew B.F. Carnabuci Christopher M. Neary Megan L. Nielsen

Paralegals: Kiva T. Bynum Vicky D. Pilon

*Also admitted in New York and New Jersey

†Also admitted in New York and Massachusetts

November 22, 2021

VIA EMAIL

Jeffrey Londregan, Esq. Conway, Londregan, Sheehan & Monaco, P.C. 38 Huntington Street New London, CT 06320

Re: Conway, et al - Investigation

Dear Attorney Londregan,

Below please find an executive summation of the oral report presented to you on Wednesday November 17, 2021.

On or about October 6, 2021, you reached out to me to address a claim of made by involving events which purportedly occurred over two years ago. Additionally, brough this accusation to the City's attention in the context of an unfavorable Internal Affairs report, claiming the negative finding was a function of then Captain Wright's purported antipathy toward him. The was biased because that Chief was banter or because Chief Wright was candidated and thought was a function of the Captain banter or because Chief Wright was candidated and thought was candidated and thought was calcium of the address a claim of calcium of the address and calc

In order to investigate the allegation of banter which occurred in 2019, I interviewed a number of officers, including former department employees. Both wright were interviewed (twice). Each party submitted the names of potential witnesses, and I reviewed all communications sent to me by each party.

Rose Kallor, LLP November 22, 2021 Page 2

I find that during the period of 2019, (and likely before and after) there was a group of officers who engaged in "locker room banter." That banter included teasing by both Chief Wright and (directed at each other). That teasing and banter was occasionally of a nature, and sometimes involved double entendre. Chief Wright acknowledged his rare participation in this, and numerous witnesses confirmed role as a prankster and occasional participant.

However, uncivil speech is not illegal under Title VII and the Connecticut Fair Employment Practices Act. Moreover, the passage of time (two years) and the absence of a prompt complaint, along with my assessment of the parties, leads me to conclude that whatever banter occurred, it was not severe and pervasive. Most importantly, whatever commentary or banter that occurred ceased two years ago. Indeed, the goal of Title VII is just that. To prevent and stop harassing behavior.

The second question addressed by your request, addressed whether Chief Wright's findings were motivated by (based on the suggestion that Chief Wright believed that was) or retaliation for rejecting certain discussions two years earlier.

I have reviewed the complaint and report. There is no evidence that Chief Wright brought any animus to the inquiry. Notably, the union (and implicitly approved the selection of Chief Wright after they sought to remove objected to Chief Wright's appointment nor referenced any prior issue between the two. Irrespective, the investigation was professionally handled and there is no indicia of bias on the part of Chief Wright.

In conclusion, I note the following, the first inquiry should be considered unsubstantiated. The second inquiry, retaliation, should be labelled "exonerated."

had the legal right to pursue this inquiry, and absent a finding of lack of good faith, may not be subjected to any retaliation for bringing this claim.

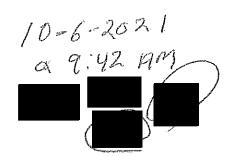
Very truly yours,

Michael J. Rose

MJR/ktb

October 6, 2021

Steve Fields Chief Administrative Officer City of New London



Mr. Fields

Please accept this letter as a formal complaint against Chief Brian Wright of the New London Police Department for Sexual Harassment, Creating a Hostile Working Environment and Retaliation in violation of Law, the City of New London Personnel Rules and the police department's General Duty Manual.

As you are aware, I am a police officer with the New London Police Department and have been employed full time for the past years. Currently, I hold the rank of and have so since During my year career, I have never been subjected to such sexually inappropriate, derogatory, and embarrassing remarks and gestures directed to me from a superior officer, while on duty.

During the spring, summer and fall of 2019 Chief Brian Wright, then a Captain, made on numerous occasions extremely inappropriate sexual remarks to me while we were both on duty. These remarks occurred, while I was alone, in the control office when it was temporarily being housed in the roll-call room. I would estimate these attacks occurred approximately 20 to 30 times during this time period.

On numerous occasions, I responded back to his inappropriate remarks saying "I feel uncomfortable with this conversation" in hopes the unwanted and inappropriate remarks and gestures would stop. On most occasions the attack did stop but often it would begin again during our next conversation.

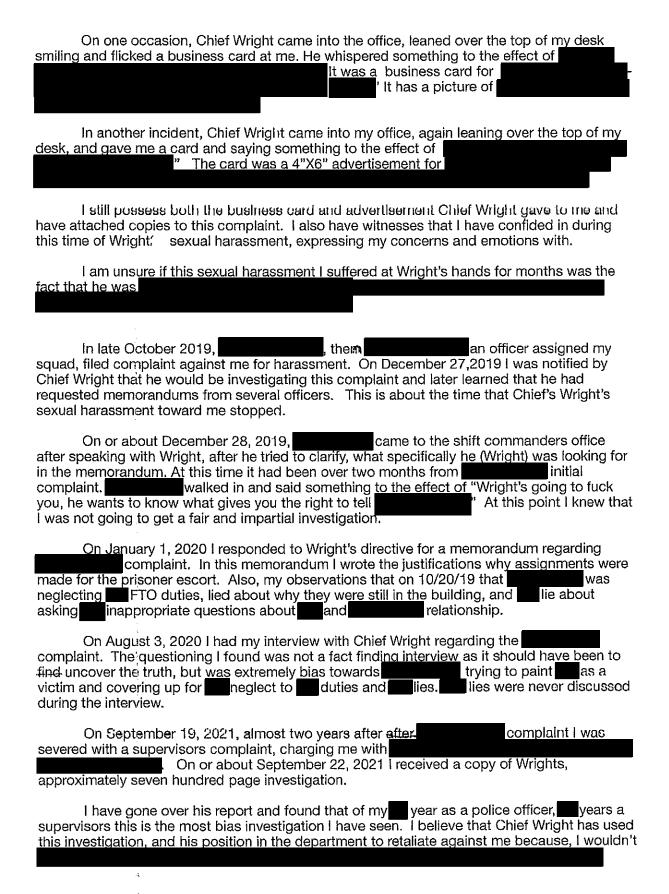
The harassment would begin with Chief Wright coming into the office when he arrived at work. He would stop in my office and begin with a casual conversation with me. The conversation would then turn to a sexual nature with him making the unwanted, inappropriate sexual remarks to me during this time.

Some of the inappropriate and offensive remarks he made to me were:

e		
ø		
•		
•		
•		
•		

These comments were often accompanied by hand gestures, by him, with

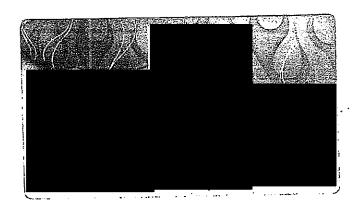
. It was very disturbing.



I fear that by coming forward at this time I will continued to be retaliated against by Chief Wright and /or other's that support him. I have already seen this.



CC: Union Local 724



.

