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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 [REDACTED] harassment made by [REDACTED] involving events which purportedly occurred over two years ago. Additionally, [REDACTED] brought 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. [REDACTED], through his union, asserted that Chief Wright was biased because [REDACTED] rejected his [REDACTED] banter or because Chief Wright was [REDACTED] (and thought [REDACTED] was [REDACTED]).

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

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 [REDACTED] (directed at each other). That teasing and banter was occasionally of a [REDACTED] nature, and sometimes involved [REDACTED] double entendre. Chief Wright acknowledged his rare participation in this, and numerous witnesses confirmed [REDACTED] 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 [REDACTED] (based on the suggestion that Chief Wright believed that [REDACTED] was [REDACTED]) or retaliation for rejecting certain discussions two years earlier.

I have reviewed the [REDACTED] complaint and report. There is no evidence that Chief Wright brought any animus to the inquiry. Notably, the union (and implicitly [REDACTED]) approved the selection of Chief Wright after they sought to remove [REDACTED]. Neither the union nor [REDACTED] objected to Chief Wright’s appointment nor referenced any prior issue between the two. Irrespective, the [REDACTED] 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.”

[REDACTED] 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

10-6-2021  
at 9:42 AM  
[Redacted]

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 [Redacted] years. Currently, I hold the rank of [Redacted] and have so since [Redacted]. During my [Redacted] 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 [Redacted] 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:

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

These comments were often accompanied by hand gestures, by him, with [Redacted]  
[Redacted]. It was very disturbing.

On one occasion, Chief Wright came into the office, leaned over the top of my desk smiling and flicked a business card at me. He whispered something to the effect of [REDACTED]

It was a business card for [REDACTED]  
[REDACTED] It has a picture of [REDACTED]

In another incident, Chief Wright came into my office, again leaning over the top of my desk, and gave me a card and saying something to the effect of [REDACTED]  
[REDACTED] The card was a 4"X6" advertisement for [REDACTED]

I still possess both the business card and advertisement Chief Wright gave to me and have attached copies to this complaint. I also have witnesses that I have confided in during this time of Wright's sexual harassment, expressing my concerns and emotions with.

I am unsure if this sexual harassment I suffered at Wright's hands for months was the fact that he was [REDACTED]  
[REDACTED]

In late October 2019, [REDACTED], then [REDACTED] an officer assigned my squad, filed complaint against me for harassment. On December 27, 2019 I was notified by Chief Wright that he would be investigating this complaint and later learned that he had requested memorandums from several officers. This is about the time that Chief's Wright's sexual harassment toward me stopped.

On or about December 28, 2019, [REDACTED] came to the shift commanders office after speaking with Wright, after he tried to clarify, what specifically he (Wright) was looking for in the memorandum. At this time it had been over two months from [REDACTED] initial complaint. [REDACTED] walked in and said something to the effect of "Wright's going to fuck you, he wants to know what gives you the right to tell [REDACTED]" At this point I knew that I was not going to get a fair and impartial investigation.

On January 1, 2020 I responded to Wright's directive for a memorandum regarding [REDACTED] complaint. In this memorandum I wrote the justifications why assignments were made for the prisoner escort. Also, my observations that on 10/20/19 that [REDACTED] was neglecting [REDACTED] FTO duties, lied about why they were still in the building, and [REDACTED] lie about asking [REDACTED] inappropriate questions about [REDACTED] and [REDACTED] relationship.

On August 3, 2020 I had my interview with Chief Wright regarding the [REDACTED] complaint. The questioning I found was not a fact finding interview as it should have been to find and uncover the truth, but was extremely bias towards [REDACTED] trying to paint [REDACTED] as a victim and covering up for [REDACTED] neglect to [REDACTED] duties and [REDACTED] lies. [REDACTED] lies were never discussed during the interview.

On September 19, 2021, almost two years after [REDACTED] complaint I was severed with a supervisors complaint, charging me with [REDACTED]  
[REDACTED]. On or about September 22, 2021 I received a copy of Wrights, approximately seven hundred page investigation.

I have gone over his report and found that of my [REDACTED] year as a police officer, [REDACTED] years a supervisors this is the most bias investigation I have seen. I believe that Chief Wright has used this investigation, and his position in the department to retaliate against me because, I wouldn't  
[REDACTED]

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.

Respectfully,

CC: Union Local 724

