

TOWN OF WOODBRIDGE
BOARD OF ETHICS – APRIL 2, 2025
MEETING MINUTES

The Wednesday, April 2, 2025, Special Meeting of the Board of Ethics was called to order by Chairman Andrew Schaffer at 12:31 pm, for consideration of whether the allegations in Complaint 2025-01 fall within the Board's jurisdiction by providing reasonable cause to find that a violation of the Code of Ethics has occurred.

Board Members Present: Andrew Schaffer, Teri Schatz, and Rona Shapiro. Also Present: Town Attorney Nicholas Bamonte, and the Respondent, Kathleen Hunter.

Attorney Nicholas Bamonte noted for the record that Board of Ethics member Dominick Thomas has recused himself from this matter because he previously served on the Town's Housing Committee with Ms. Hunter. A quorum of the Board was present throughout the entirety of the meeting.

Ms. Hunter read a statement responding to the allegations, which she also submitted electronically to the Board with supporting materials.

After a motion made by Ms. Shapiro, seconded by Ms. Schatz, the Board VOTED UNANIMOUSLY (Schaffer-Shapiro-Schatz) that Complaint 2025-01 does not provide reasonable cause to find that a violation of the Code of Ethics has occurred, as the allegations do not meet the standards of a violation of the Town Code of Ethics under Section 34-1.

On a non-debatable motion by Chairman Schaffer, seconded by Ms. Schatz, the Board adjourned at 1:03pm.

ETHICS DEFENSE STATEMENT

From: Kathleen Hunter, Chair Housing Committee, Alternate Member Town Plan & Zoning Commission, and Member of Technical Assistance Committee

To: Woodbridge Board of Ethics, Members Rabbi Shapiro, Attorney Schaffer, Attorney Thomas, Ms. Schatz, and Mr. Esposito

Date: April 2, 2025

RE: Response to Ethics Complaint — Request for Dismissal, Written Findings, and Published Report pursuant to Woodbridge Town Ethics Code §§ 34-1 and 75-18, and CGS §§ 1-82a (a)-(e) and 7-148h(a)

I. This Complaint Is an Attack — Not an Ethics Concern

As you are aware, the State of Connecticut has authorized the Town of Woodbridge to establish this Board for the purpose of investigating allegations of unethical conduct, corrupting influence, and unlawful activity involving public officials. Pursuant to the rights and protections afforded to me under state and local law, I respectfully request that this investigation by the Town and any resulting findings and report be made public—not only in the interest of transparency and good governance, but also to ensure that my professional reputation is restored in a fair and open manner.

These allegations are unfounded. They mischaracterize my conduct by conflating a disagreement over housing policy with allegations of unethical conduct, corrupting influence, and illegal activity. In doing so, they misrepresent both the legal standards under the Town Code of Ethics and the factual reality of my actions. What they refer to as a 'conflict of interest' is, in fact, nothing more than lawful public service grounded in compliance and transparency. A true conflict of interest involves personal gain or private benefit—not policy engagement or subject-matter expertise. Ethics rules exist to guard against private self-interest, not to punish those who are fulfilling their legal and civic obligations. Compliance with housing law is not misconduct — it's a legal obligation.

To be clear, the intent behind this complaint is not motivated by a genuine interest in good governance. This is about removing me at the very moment our Town is under legal and public pressure to comply with housing law. On its surface, limiting dual roles between housing and zoning may appear prudent. But in practice, it has been turned into a selective weapon to suppress only one side of the housing debate. This effort to limit perceived conflicts between housing policy and zoning authority creates a narrative that fairness and inclusion are somehow "outside interests" in conflict with the Town's welfare.

I am targeted for my roles as Chair of the Housing Committee (HC), as an Alternate Member on the Town Plan & Zoning Commission (TPZ) and as a Member of the Technical Assistance Committee (TAC) —not because of misconduct, but because I support equity, inclusion, and housing opportunity.

For the Board's consideration and the record, I have attached the ethics complaint as **Appendix A** to this statement. I am prepared to read it into the record, or, alternatively, I respectfully request that the Board take notice of its contents.

II. My Conduct Fulfills Town Ethics Code § 34-1(A)

Under the Town Ethics Code, a public official, whether or not he is compensated for his service to the Town, shall directly or indirectly have:

1. No Private Business or Financial Conflict

I do not engage in any private business, transaction, or employment that conflicts with my duties as a public official. I have no financial interest, direct or indirect, in any matter pending before the Town, nor do I stand to gain personally from any zoning or housing decision.

2. No Improper Representation of Private Interests

I have never appeared before any Town body as an agent or representative of a private person, group, firm, or corporation. My participation in Town governance is solely in my official capacity as a public servant.

3. No Disclosure of Confidential Information

I have never disclosed confidential information obtained through my official duties.

4. No Special Favor or Advantage Granted

I have not granted — nor attempted to influence the granting of — any special consideration, advantage, or favor to any person, group, or organization. All decisions I have participated in have been grounded in fairness, process, and law.

5. No Improper Gifts or Promises Accepted

I have not accepted any gratuity, gift, favor, or promise intended to influence my judgment or actions as a public official. My decisions are my own, guided by the law, not by pressure or inducement.

6. **No Personal Use of Town Property**

I have never used Town vehicles, equipment, materials, or property for personal purposes, and I remain committed to the proper stewardship of Town resources.

In short, I have honored both the letter and spirit of the Town Ethics Code. I welcome the Board's scrutiny on each of these points and trust that the record will affirm my continued adherence to the ethical standards expected of all Town officials.

III. No Conflict Exists Under Town Ethics Code §§ 34-1 (B) (1)-(2)

Under the Town Ethics Code, a conflict of interest arises when a public official has a purely private personal or financial interest, direct or indirect in any matter or transaction to which the Town is a party, other than such interest as is vested in and shared by members of the general public. The public official must disqualify himself with respect to and refrain from considering and acting upon any matter or transaction coming before him in his official capacity in which he has any such purely private personal or financial interest. I have neither.

- I own no property that would be affected by any pending or proposed zoning decision.
- I derive no financial benefit, directly or indirectly, from housing development or zoning changes.
- I serve in a volunteer capacity, without pay or private interest.
- I do not work for, represent, or receive support from any developer, advocacy group, or private entity with a stake in town matters.
- My engagement is driven solely by public service and lawful obligations to support thoughtful, inclusive planning.

To suggest that supporting compliance with housing law creates a conflict of interest, misunderstands the purpose of the Town Ethics Code. Public service should not be contingent on one's viewpoint about housing policy.

IV. My Conduct Fulfills Duties under Town Ethics Code § 34-1(B)(3)

Under the Town Ethics Code, a public official is required to discharge the duties of his office in a manner calculated to serve the best interests of the Town and its citizens and in accordance with the highest standards of morality, ethics and good conscience.

That is what I have done — and will continue to do. My actions have been:

1. In pursuit of full compliance with local, state and federal law, including Connecticut's housing and zoning statutory requirements.
2. Aligned with recognized planning principles and best practices.
3. Focused on the long-term well-being of the Town, including fiscal sustainability, inclusion, and legal integrity.

4. Carried out transparently, ethically, and in good faith — even in the face of personal attacks and political resistance.

V. Point-by-Point Response to the Specific Allegations

Below are the core allegations from the complaint, each addressed individually. I will pause after each point and welcome any specific questions the Board may have:

1. Allegation concerning professional background (City of Bridgeport, Supportive Housing Works, Kazanas Development Strategies)

The complaint attempts to cast doubt on my integrity by referencing my professional background — including my work for the City of Bridgeport, Supportive Housing Works, and Kazanas Development Strategies — as if experience in housing law and policy somehow constitutes unethical conduct, corrupting influence, or even unlawful activity. This suggestion is wholly unsupported by any evidence and is entirely without foundation.

My career has been grounded in public service, compliance with law, and advancing housing equity — all in line with the very principles that good governance demands. To imply that this work is suspect reflects a fundamental misunderstanding of ethics and appears intended more to discredit me than to protect the public interest.

2. Allegation of ignorance

The complaint alleges that I demonstrated a “depth and breadth of ignorance” regarding TPZ principles during a February 15, 2023, HC meeting. That characterization is false and misleading. First, the February 15, 2023, meeting was a special meeting of the HC and to the best of my recollection, there was no discussion of subdivision hearings as potential barriers to housing.

The issue the complainants appear to be referencing was thoroughly addressed during the November 7, 2022, TPZ meeting, not the February 15, 2023, HC meeting. At that TPZ meeting, the commission reviewed two subdivision applications and was required to determine whether to exercise its discretion to hold public hearings since there is no requirement under the law. One proposal was larger in scale and impact, and I supported holding a hearing in that instance. The other was a much smaller application, and I raised a thoughtful, well-grounded question about whether a discretionary hearing was necessary.

My concern was not about avoiding transparency — it was about ensuring fairness. Discretionary hearings, when applied automatically or without context, risk becoming tools to delay or obstruct development. The public deserves a clear understanding of when hearings are required by law and when they are used selectively. It was our role as commission members to clarify that distinction, and my remarks aimed to do exactly that. Explaining the proper exercise of discretion is not ignorance — it is responsible governance.

Unfortunately, rather than engage in that conversation, the complainants have distorted my remarks in an effort to discredit me. Their portrayal is not only inaccurate, but also retaliatory. These individuals — one a former First Selectman, the other a long-time political actor and chair of a PAC opposing housing — are well-versed in Town process and land use law. They know this was a legitimate, good-faith question. Mischaracterizing it as incompetence is a deliberate attempt to suppress dissent and eliminate a pro-housing voice from public service.

I respectfully urge this Board to review the video of the November 7, 2022, TPZ meeting to fully understand the context of my remarks. For ease of reference, I have provided the relevant link <https://www.youtube.com/watch?v=zkX3KXRclX4> to the meeting. The discussion for the large-scale subdivision can be heard beginning at timestamp 2:00:50 and the small-scale subdivision beginning at timestamp 2:16:10. What the video reveals is not a lack of understanding on my part, but rather a lack of good faith in the framing of this complaint. If anything deserves closer examination, it is the repeated attempt to twist legitimate, thoughtful questions into a basis for removal.

Raising concerns about procedural fairness is not a display of ignorance — it is a hallmark of diligence and responsible governance. Yet building upon this baseless allegation, the complainants go a step further, seeking to disqualify me from future deliberations — citing, for example, a special exception application related to opportunity housing.

3. *Allegation regarding dual service on the Housing Committee and TPZ*

The complaint references and includes a letter from a resident suggesting that my concurrent service on the HC and TPZ constitutes a conflict of interest. However, this assertion is not supported by the Town Ethics Code. Notably, the letter was not submitted to this Board as a formal ethical complaint, nor is there any indication that the resident consented to its use in this proceeding, although complainants ascribe to the letter.

The letter was originally addressed to the Board of Selectmen — not the Town Ethics Board — raising questions about its purpose. Its inclusion here appears to be designed to escalate political pressure and improperly influence an independent process. If the Selectmen may later act on this Board's investigation and findings, the use of such correspondence risks creating the appearance of a coordinated campaign to discredit my service through parallel channels of political and procedural attack. In towns such as Woodbridge, the standard in matters of dual service is not automatic disqualification but appropriate disclosure and recusal — standards that I have fully met and remain committed to honoring.

4. Allegation of bias in Opportunity Housing Bulk Requirements

The complaint challenges my vote to amend the bulk requirements to support development of Opportunity Housing, alleging misconduct. This is meritless. My voting record reflects adherence to the Zoning Enabling Act and Fair Housing laws, and consideration of the expert testimony that was provided at a properly noticed public hearing. I have not prejudged any application, nor have I expressed bias in any proceeding. Like any public official, I bring informed values to the table, but my decisions are grounded in facts and legal obligations in the record. Disagreement with a lawful decision is not an ethics violation.

5. Allegation related to service on the Technical Assistance Committee

My appointment to the TAC was appropriate and entirely consistent with the purpose of the BAR planning grant, which expressly encourages participation by individuals with subject-matter expertise. The TAC, that is guiding the redevelopment of the Country Club of Woodbridge, includes committee chairs and an at-large resident, one who lives in close proximity to the site, is a major contributor to the PAC opposing housing development at the site, and appears to have actively worked to have me removed from the committee based on speculative concerns of bias or predetermination should any related matter eventually come before the TPZ. The complainants' addendum on this issue echoes concerns raised by the at-large TAC member and appears to reflect a coordinated effort to exclude my technical housing expertise from the implementation planning process under the guise of preventing bias or ensuring neutrality.

Whether or not an implementation plan for reuse of the site emerges and will come before TPZ is speculative. Should that occur and an absent member or, at the discretion of the Chair, seek to seat me before my term expires, I will follow the appropriate legal and ethical framework to ensure impartiality, including — where applicable — recusal, disclosure, or other mitigation strategies. I would exercise the same ethical responsibility I have always shown.

6. Allegation of misstating law, facts, or data

The complaint makes broad and vague claims that I have misstated the law, distorted facts, or misused data. These claims are entirely unfounded.

Whenever I refer to CGS § 8-30g or PA 21-29 my references are entirely accurate and well supported. For instance, I have explained on several occasions to the Board of Selectmen and the complainants that PA 21-29 requires zoning regulations to provide for the development of housing opportunities, which include multifamily housing for low- and moderate-income families for residents of our town and residents of the region to which our town is part. No formal legal opinion from Town Counsel has ever contradicted this interpretation — because

none could. My statements are grounded in established statutory language and informed by over 30 years of experience in housing law and policy.

As for demographic background data — including enrollment projections and population estimates — it appears the complainants are attempting to discredit a well-reasoned Affordable Housing Plan prepared by RKG by misrepresenting these figures. I was asked to address this data publicly at Board of Selectmen meetings on three separate occasions. My comments have always been consistent. I did not reject the value of data; rather, I emphasized the importance of not allowing narrow or hard-to-verify consultant projections to distract from a more urgent and fundamental reality: Woodbridge has just 1.24% affordable housing and generally since 1990 that figure has not changed.

I have responded multiple times to the complainants' assertions regarding the language in the Town Affordable Housing Plan, yet they have willfully ignored those responses, preferring instead to mislead others about what the plan actually says. Specifically, the plan, prepared by RKG Associates, references the 10% affordable housing threshold under CGS § 8-30g. I have repeatedly explained — including at Board of Selectmen meetings — that this figure is not a general mandate. It applies solely to whether the “builder’s remedy” is available in municipalities that fall below the 10% threshold.

When this reference is removed from its legal context and conveniently misrepresented as a blanket mandate by the complainants it invites misleading and inaccurate critiques of the Town Affordable Housing Plan. To address this, I recommended that the Board of Selectmen revise the plan to clarify the context each time the 10% threshold is mentioned. This misrepresentation has now resurfaced in the form of a knowingly false ethical complaint — filed with full awareness that it lacks any foundation in fact.

7. Allegation of disregarding public survey responses

The complaint alleges that I have blatantly disregarded the results of public surveys — an accusation that misrepresents both my conduct and intent.

I have given survey responses the thoughtful and appropriate consideration they deserve as part of a broader policy discussion. What I have challenged — and what I continue to raise as a valid concern — is the idea that selectively mobilized survey participation, particularly when driven by PACs or individuals with a vested interest in blocking housing, should be elevated above statutory obligations and sound planning principles.

This is not a dismissal of public input. It is a recognition, echoed by statewide experts and fair housing defenders, that planning decisions must be grounded in law, data, and equity — not shaped solely by orchestrated campaigns or reactive opposition. To suggest that raising this well-supported concern renders me unfit for service is not an ethics issue.

8. Allegation of improper conduct in the POCD process

The complaint suggests that my participation in recommendations from the HC concerning the development of the Town Plan of Conservation and Development involved procedural misconduct or was otherwise improper. That claim is entirely without merit. The recommendation at issue was fully vetted by all members of the HC consistent with established procedures and practices. My involvement in the process was transparent, appropriate, and in furtherance of the Town planning goals.

VI. The Complaint Is Frivolous and Retaliatory

Local ethics complaints are rare and sporadic. To my understanding, the last ethics case in Woodbridge dates to 2014. That makes the current complaint more troubling — not because it reflects a genuine effort to uphold integrity, but because it appears to use the ethics process to retaliate against a volunteer who supports lawful housing reform.

This complaint is frivolous, entirely lacking in merit, and appears to have been filed for the sole purpose of harassment and political retaliation. It has been brought with full knowledge that its allegations are without factual foundation. The claims are not only baseless — they are part of a broader smear campaign, coordinated with a PAC intent on silencing pro-housing perspectives.

Many of the allegations raised in this complaint have already been publicly addressed, corrected, or refuted through prior meetings, board hearings, and official records — including my own repeated explanations. Yet they are repeated here without regard for the truth, recycled like a political mantra, not because they have substance, but because they serve a narrative.

The continued assertion of claims that have already been disproven reflects not error, but intent. This is not a good-faith ethics concern. It is a knowing and malicious abuse of process, made with knowledge of its falsity.

VII. Public Intimidation and Retaliatory Campaign

This complaint cannot be viewed in isolation from the broader political context in which it was filed. One of the complainants serves as the chair of a PAC that has consistently opposed housing reform and actively works to discredit me. In addition to the making of this baseless complaint, the smear campaign includes:

1. Defamation via Public Mailings

Right after filing this complaint on January 29, 2025 and January 31, 2025, on or about January 31, 2025, the PAC mailed inflammatory flyers to residents using USPS bulk mail.

These flyers contain misleading and false claims targeting me personally and closely resemble the themes in this ethics complaint. I have retained and attached one of these flyers as **Appendix B** to this statement. The flyer urges residents to attend specific public meetings to oppose housing proposals, falsely portraying my actions.

2. Intimidation at Public Meetings

At a February 5, 2025 Housing Committee meeting that was heavily attended by individuals mobilized by the PAC opposing housing reform, former TPZ Chair Donald Celotto — a known contributor to the PAC opposing housing reform, and as you know a complainant in a recent related ethics complaint, pointed at me in a physically aggressive manner and declared “ma’am you ought to leave.” I respectfully urge this Board to review the video of the February 5, 2025, HC meeting to fully understand the context of his remarks. For ease of reference, I have provided the relevant link <https://www.youtube.com/watch?v=0y97TPeawLc> to the meeting. His intimidation can be heard beginning at timestamp 26:49. The audience’s applause following the remark — including from one the complainants and multiple PAC supporters — underscores the orchestrated effort to publicly discredit and intimidate me.

At a Board of Selectman meeting on January 8, 2025, the former TPZ Chair, narrated publicly about an “unwritten compact” among past zoning officials and the selectmen that appointed such public officials. For ease of reference, I have provided the relevant link <https://www.youtube.com/watch?v=TZrUiYz3JZE> to the meeting. The nostalgically framed, insular compact, can be heard beginning at timestamp 1:44:39. I have chosen to highlight but just two of these incidents in my defense because they involve a former TPZ Chair directly and are central to understanding the retaliatory nature of this ethics complaint being investigated by the Town. These displays, captured on video, reflect not civic engagement but a coordinated attempt to marginalize and silence those working to ensure the Town’s compliance with its legal obligations regarding housing.

Notably, the flyer also urges residents to attend specific meetings and voice opposition, including before the very boards where I serve. It refers to a “radical housing agenda,” inaccurately attributes motives, and seeks to stir public outrage. The effect — if not the intention — is clearly to silence dissent and disqualify those advancing lawful housing goals.

The inclusion of this flyer as part of the public record is necessary not to relitigate policy disagreements, but to underscore for this Board the extent to which the ethics process is being used in tandem with public intimidation and now with a Town investigation.

3. Coordinated Campaign by Insiders

This complaint appears to be part of a coordinated effort involving contributors to a PAC, appointed town officials, and residents who have consistently opposed housing reform.

Several of these individuals hold positions on boards and commissions with direct influence over housing-related matters. The pattern that emerges is one of viewpoint discrimination — where only certain perspectives are treated as acceptable for public service, and those who support compliance with housing law are singled out for exclusion.

4. Overall Context

These actions — from PAC mailings to behind-the-scenes pressure — make clear that this complaint is not rooted in genuine ethical concern. It is part of a coordinated campaign to remove a public official for fulfilling her duties in accordance with state law and sound planning principles. Using the ethics process in this way undermines its credibility and erodes the foundations of open, fair, and inclusive governance.

It is essential for officials and residents alike to understand that supporting fair and inclusive housing — including lawful efforts to ensure compliance with Public Act 21-29 and the Fair Housing Act — is not misconduct. It is a legal obligation and, in many cases, a form of protected activity under both state and federal civil rights laws.

VIII. Ethics Process Abuse — Coordinated and Improper

This complaint was directed to and shared with members of the Board of Selectmen by the complainants before any probable cause investigation and without my knowledge or consent. That premature disclosure caused reputational harm before I was even afforded an opportunity to respond. The confidentiality intended to protect the integrity of this process was breached long before I had the opportunity to assert it.

At a Board of Selectmen meeting on February 26, 2025, during the Town Counsel update Selectmen publicly acknowledged both the existence and substance of this complaint — a fact clearly captured on video. For ease of reference, I have provided the relevant link <https://www.youtube.com/watch?v=k8BWaYbCbag> to the meeting. The Town Counsel report can be heard beginning at timestamp 4:25:45.

This procedural irregularity reinforces what is now plain that this complaint is not about ethical governance. It is part of a coordinated effort to discredit, marginalize, and ultimately silence a public official whose views do not align with those of the complainants.

I respectfully submit that the Ethics Board should not only evaluate the merits of this complaint but also reckon with the misuse of the process itself. This is not simply about one complaint — or even another that was dismissed in Executive Session. It is about whether this Town will allow its institutions to be used for political retaliation. I recognize that the Board is not acting as a trier of fact at this probable cause stage, but I respectfully submit that it is empowered to take action, and I respectfully ask that it issue findings, offer

recommendations, and take steps necessary to safeguard the integrity of the ethics process and protect against its misuse.

IX. REQUESTED DISPOSITION - PROBABLE CAUSE REVIEW

In light of the record before the Board, I respectfully request the following and have attached a draft report for the Board as **Appendix C** to this statement:

1. That the complaint be dismissed for lack of probable cause, as there is no reasonable basis to believe that a violation of the Town Code of Ethics has occurred;
2. That the Board issue and publish a written advisory report necessary to protect the integrity of the process and the reputation of the respondent;
3. That the Board acknowledge, to the extent permitted, that the complaint was filed with knowledge that it lacked foundation in fact;
4. That the Board affirms that seeking compliance with Public Act 21-29 does not constitute misconduct, but rather represents a protected activity consistent with legal obligations and public service; and
5. That the Board recommend procedural safeguards to prevent future misuse of the ethics complaint process, particularly where politically motivated complaints are used to silence, discredit, or remove individuals engaged in lawful service.

X. Conclusion

As a public official entrusted with quasi-judicial responsibilities when seated as a TPZ member, I have a duty to model integrity, transparency, and accountability. That is why I chose to waive confidentiality and request this process be conducted openly. I believe the public deserves to see how these proceedings unfold, and whether the ethics process is being used properly — or used to silence, intimidate, and remove those who are simply fulfilling their obligations.

Respectfully submitted,

Kathy Hunter
Chair Housing Committee
Alternate Member Town Plan & Zoning Commission
Member Technical Assistance Committee

Appendix A: Ethics Complaint

To: Board of Ethics, Town of Woodbridge, c/o Town Clerk

CC: Board of Selectmen

Date: January 23, 2025

RECEIVED

JAN 23 2025

TIME: _____

TOWN CLERK, WOODBRIDGE, CT

It has come to our attention that a member of the Town Plan and Zoning Commission (TPZ) is operating under a clear conflict of interest. Currently, Kathy Hunter serves both as the chair of the Town's Housing Committee, an ad hoc advocacy committee, AND as an alternate member of the Town Plan and Zoning Commission. We urge the Board of Ethics to review the conflicts described below and to take action before the TPZ's next Public Hearing, scheduled for March 3, 2025.

Ms. Hunter's career has involved longtime advocacy for housing, from her time in the City of Bridgeport Housing Department, to her decade at Supportive Housing Works, to her current position at Kazanas Development Strategies, an agency that writes grants for non-profits in the affordable housing/community development sector.

Ms. Hunter was seated as a voting member of the TPZ on December 2, 2024, and voted in favor of a dramatic change in the Woodbridge zoning regulations that now allow, in Residential Zone A:

1. an increase in maximum building height from 2.5 to 4 stories;
2. an increase in density from 15 to 18 units;
3. an increase in maximum lot coverage from 22.5% to 30%.

We attach a letter written to the Board of Selectmen on January 7, 2025, read during Public Comment at their January 8th meeting, by town resident Mary Gorham, describing her objection to the dual role that Ms. Hunter played in the TPZ decision of December 2 and her request that Ms. Hunter resign from the TPZ due to the conflict of interest. We echo Ms. Gorham's concern and request that the Board of Ethics find Ms. Hunter's appointment to both the TPZ and Housing Committee constitutes a clear conflict of interest that must be corrected by Ms. Hunter's removal from TPZ.

As Ms. Gorham asserts, the Housing Committee plays an *advocacy* role; Ms. Hunter's personal and professional biases as a housing advocate, both in her volunteer position in Woodbridge and in her thirty-year career, materially interfere with her independent judgment on the TPZ. Fair and impartial judgment is not only expected but required of a public official charged with the authority to issue regulations and grant or deny permits.

Further, Ms. Hunter exhibits a disregard of facts and data, repeatedly misstating both the Affordable Housing statute and the Zoning Enabling Act as well as basic facts about the town, such as whether the town's school enrollment is rising or falling. When questioned on these errors, Ms. Hunter replied (as in the most recent Housing Committee meeting of January 8th, 2025), that getting the facts right does not matter. These factual errors, pointed out to her repeatedly but not corrected by her, show that she is incapable of the careful consideration of factual information that should serve as the basis for any public official given the responsibility for assessing the merits of a permit application. Moreover, her disregard for the details of relevant state law flies in the face of her current responsibility as a TPZ member to issue carefully crafted regulations in accordance with state law.

In the Housing Committee meeting of February 15, 2023, Ms. Hunter displayed the depth and breadth of her ignorance of the basic principles that govern our town's public affairs when she described a recent vote in the TPZ. She opposed having a public hearing on a subdivision and said: "To me, public hearing is a barrier to getting anything done when it comes to housing and development because the people who are going to come out to a public hearing are the people who are going to talk against wanting something so I'm not a fan of public hearings." This sentiment is undemocratic and should in itself

disqualify Ms. Hunter from serving in any public office, and especially on the TPZ which has scheduled a Public Hearing on March 3, 2025.

Ms. Hunter's bias and unsuitability for her appointed positions is further evidenced in the recommendations submitted by her on behalf of the Housing Committee for the upcoming revision of the Town Plan of Conservation and Development (POCD).

The TPZ's consultants began the POCD revision process with a robust survey of town residents. The survey results indicated that residents welcome housing diversity, but NOT large apartment complexes. The survey also showed that, for the next decade, Woodbridge residents prioritize (#1) schools, (#2) economic development, and (#3) open space. Housing goals are much less important: respondents rated affordable housing (#8) and housing stock (#10) out of 11 listed options. Yet, in her role as the Housing Committee Chair Ms. Hunter ignored this survey and has gone so far as to call for the construction of 1000 NEW market rate homes and 500 NEW affordable homes in the Town.

While members of the Housing Committee are advocates, they serve as public representatives of the residents and should show some consideration for the survey responses. Here, Ms. Hunter is also a member of the TPZ which solicited the survey response so she is ignoring the survey results which as a TPZ member she solicited. Isn't that a clear conflict of roles and responsibilities, making it impossible for Ms. Hunter to serve as an unbiased member of TPZ?

Further, the record suggests that Ms. Hunter submitted the 1000/500 housing unit recommendations as coming from the Housing Committee, yet there is no indication in the minutes that the full Housing Committee ever voted on those recommendations for the POCD. Instead, the minutes suggest that the recommendations were written and submitted by Ms. Hunter alone. She solicited input from the committee members but incorporated virtually none of it in the final report. As the Chair of the Housing Committee, it is Ms. Hunter's responsibility to follow proper committee procedure. Yet she failed to obtain a committee vote on the document and then passed it off as a document from the Committee as a whole. Any member of TPZ must be especially careful to follow rules of procedure. Ms. Hunter's disregard for committee rules of conduct highlights her unfitness for the rigorous procedural requirements applicable to TPZ members.

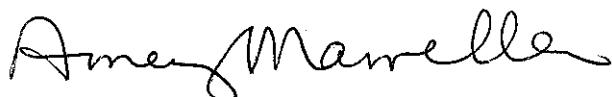
TPZ board members are charged with promoting the general welfare, they are not meant to advocate on behalf of their personal agendas. In this instance, Ms. Hunter is an advocate whose personal bias and disregard for the importance of factual accuracy and committee procedure disqualifies her from serving on the TPZ.

Respectfully submitted,



Catherine Wick

181 Rimmon Road



Amey Marrella

184 Rimmon Road

January 7, 2025

Dear Members of the Board of Selectman,

I very recently learned of a zoning change for most of the town of Woodbridge which I find deeply concerning both for the process that was used to make the change, and for the change itself which would allow large 4-story apartment buildings throughout Zone A. While I understand that 4-story buildings could only be built where there is public sewer and water, additional public water and sewers could be installed at any time anywhere. So while this zoning change is being billed as a small change, it is actually a very significant zoning change for our town. This is very concerning, particularly since 99% of Woodbridge residents did not know about this change before it was made.

While I understand that the zoning office put a notice about a Dec. 2nd hearing in the New Haven Register on Thanksgiving, practically no one reads the New Haven Register at any time, and the very few who do, were probably not reading it on Thanksgiving. So if another notice was also put in earlier (did that earlier notice actually appear?) and the letter of the law was followed, the spirit of the law was not followed, particularly as there were no other means used for people to find out about this change before it was made. It was not on the town's website, and most importantly, it was not in the town's e-newsletter. In addition, there were no emails, nor were there postings in the library or anywhere else. While the zoning office did what it was told to do, the TPZ and the BOS should have insisted on wider communication.

Because no one knew about the Dec 2nd hearing, no one came to it. If people had known about it, many people would have attended.

I also understand that there is a person who is on the housing committee who is also an alternate on the TPZ, and that she cast a vote on this issue. It seems to me that it is a clear conflict of interest to allow someone to be on an advocacy committee (such as the housing committee) and at the same time be on the TPZ that makes the decisions about all zoning. How this was allowed to happen is very concerning. The town's ethics code should have prevented it.

The effect of all of this on our town is very damaging. There is a sense that there was not sufficient effort made to be transparent (even if legal requirements were met) and a perception that the TPZ quietly slipped this new zoning by the town's residents. The public's trust has been badly hurt. This is bad not only for the residents of Woodbridge, but for the TPZ and the BOS who need the public's support.

I therefore recommend the Board of Selectmen do three things:

- 1) First, going forward, ensure that no one is allowed to serve on the TPZ in any capacity (including as an alternate) if they are also a member of an advocacy committee such as the housing committee. Ask the person who is on both committees to resign from the TPZ effective immediately.

- 2) Second, given the conflict of interest just noted above, the new zoning rule should be declared invalidated, and the process should be done over again with full transparency this time. In addition, investigate any other legal objections to the process that may exist. Then start the proposed zoning change process over again, and publicize hearings widely this time.
- 3) Third, pause all discussions and future hearings about the proposed Fountain Street property until the process for reviewing, discussing, and voting on the town's zoning can be done properly and with full transparency.

With the country club property soon to be discussed, it is going to be critically important that the town's BOS show bold leadership on this zoning issue. By demanding that the TPZ do the entire process over in a way that is transparent, with lots of community input, the BOS and TPZ will have a chance to regain the public's trust. Nothing could be more important for our town.

Sincerely,

Mary Gorham
21 Old Mill Road
Woodbridge

RECEIVED

JAN 31 2025

To: Board of Ethics, Town of Woodbridge, c/o Town Clerk

CC: Board of Selectmen

Date: 1/31/2025

TIME: _____
TOWN CLERK, WOODBRIDGE, CT.

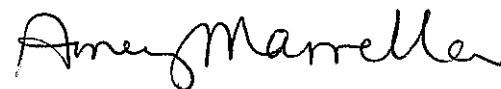
In follow up to our Ethics Complaint submitted 1/23/25, we would like to add yet another circumstance that the Board of Ethics should consider in evaluating Ms. Hunter's unsuitability for the Town Plan and Zoning Commission (TPZ). As Chair of the Housing Committee, she has been placed on the Technical Assistance Committee (TAC) advising the consultant team that is creating the Master Plan for the Country Club of Woodbridge property. The TAC is made up primarily of chairs of town boards and commissions, with the notable exception of the TPZ and the Inland Wetlands Agency (IWA). Those two boards are deliberately and appropriately excluded from the TAC, because they will be required to vote on any proposals that emerge from the planning process. Ms. Hunter's simultaneous presence on the TAC and on the TPZ taints the proper and sensible separation between the Master Plan process and the TPZ and IWA.

Respectfully submitted,



Catherine Wick

181 Rimmon Road



Ameey Marrella

184 Rimmon Road

CALL TO ACTION

WOODBRIDGE RESIDENTS: LET YOUR VOICES BE HEARD!

On December 2nd, the Woodbridge Town Plan and Zoning Commission (TPZ) adopted a regulation change to allow a 4-story, 96-unit apartment building at 804 Fountain Street. The neighbors were not notified of this change before it was adopted; town officials have acknowledged that notice of the public hearing was "inadequate." It is therefore important to make our voices heard on the application to develop 804 Fountain Street.

WHAT CAN YOU DO? SPEAK UP!

SPREAD THE WORD TO WOODBRIDGE NEIGHBORS AND FRIENDS

Speak at the following meetings at the Town Hall:

Housing Committee Meeting

Wednesday, February 5th

Public Comment at 7:00 PM

Board of Selectmen Meeting

Wednesday, February 12th

Public Comment at 6:00 PM

TPZ Public Hearing on Fountain Street Project

Monday, March 3rd

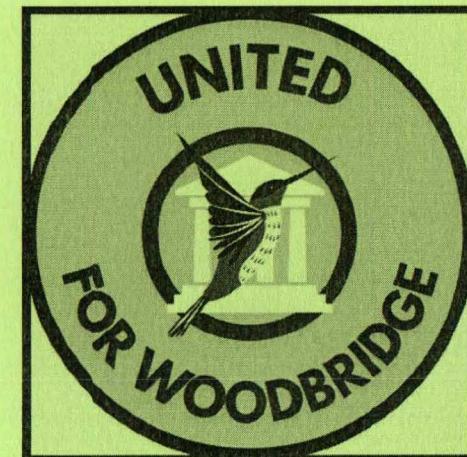
Public Hearing starts at 6:30 PM

Speak against the application and let the committee know that the developer has requested two special exceptions to the regulations that should not be granted!

United for Woodbridge
Woodbridge, CT 06525

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HERE'S WHAT YOU NEED TO KNOW...

The new rule applies in all of Residential A (most of the town) and includes 4 story building height and 18 units of density per acre which is:

- higher than the commercial district (3 stories)
- higher than all other zoning districts (2.5 stories)
- denser than all other zoning districts in town including the commercial district

The new rule also REDUCES the percentage of apartments that must be affordable, from 20% to 12%. This change effectively increases the developer's profit while decreasing the town's overall percentage of affordable housing.

This apartment building application and the enabling rule change are likely to result in additional applications for similar dense development projects throughout the town. For example, Beecher Road (between Ansonia and Rimmon, where there also is public sewer and water service) could be rebuilt to include as many as 482 apartments where 15 single family homes now stand!

WHY IS THIS HAPPENING?

It seems that a small number of people in town, led by the chair of the Housing Committee, are pursuing what was called a "RADICAL HOUSING AGENDA" by a speaker at the last Board of Selectmen's meeting. This radical agenda is in direct conflict with the community survey that the TPZ commissioned last summer to guide their work on the town's 10-year Plan of Conservation and Development. The survey showed that Woodbridge residents welcome housing diversity, but NOT large apartment complexes. The survey also showed that, for the next decade, Woodbridge residents prioritize (#1) schools, (#2) economic development, and (#3) open space. Housing goals are much less important: (#8)affordable housing and (#10) housing stock out of 11 listed options. Yet, the Housing Committee has gone so far as to call for the construction of

1,000 NEW MARKET RATE HOMES AND 500 NEW AFFORDABLE HOMES IN THE TOWN.

Under such a scheme, which would increase the number of homes in town by NEARLY 50%, school enrollment (and thus taxes) would skyrocket, further burdening our already overcrowded elementary school and already overtaxed residents. These developments will also require town resources and taxpayer dollars for maintenance and other services. It is possible, for instance, that new multi-million-dollar fire protection equipment could be needed to serve what would be the tallest buildings in town.



WANT TO LEARN MORE ABOUT HOW TO GET INVOLVED?



UNITEDFORWOODBRIDGE@GMAIL.COM



UNITED FOR WOODBRIDGE

APPENDIX C: [PROPOSED] REPORT
FOR IMMEDIATE RELEASE
APRIL 2, 2025

WOODBRIDGE BOARD OF ETHICS —REPORT TO BOARD OF SELECTMEN

RE: Complaint 2025-01 Filed Against Kathleen Hunter — Findings Pursuant to Town Ethics Code §§ 34-1 and 75-18 and released pursuant to CGS §§ 1-82a (a)-(e)

Background:

The Board received a complaint alleging that Kathleen Hunter, in her multiple roles as Chair of the Housing Committee (TAC), Alternate Member of the Town Plan and Zoning Commission (TPZ) and Member of the Technical Assistance Committee (TAC) , violated the Town Code of Ethics by engaging in actions that constituted unethical conduct, corrupting influence, or unlawful activity. The complaint arises in a politically charged environment, amidst pending zoning reforms and a Superior Court desegregation lawsuit brought against the Town.

FINDINGS AND OPINION:

After reviewing the complaint, the relevant facts, and the applicable provisions of the Town Code of Ethics, the Board finds no probable cause to support any claim of unethical conduct, corrupting influence, or illegal activity by Kathleen Hunter, and that specifically:

1. Based on the information provided, there is no probable cause to support that Ms. Hunter has engaged in any prohibited conduct that would give rise to a violation under Town Ethics Code § 34-1(A)(1)–(6);
2. Based on the information provided, there is no probable cause to support that Ms. Hunter has a personal, private, or financial interest, direct or indirect, in any matter or transaction to which the Town is a party, other than such interest as is vested in and shared by members of the general public that would give rise to a violation under Town Ethics Code § 34-1(B)(1)–(2);
3. Based on the information provided, there is no probable cause to support that Ms. Hunter has not discharged the duties of her office in a manner calculated to serve the best interests of the Town and its citizens and in accordance with the highest standards of morality, ethics and good conscience under Town Ethics Code § 34-1(B)(3);

4. The Board finds that seeking compliance with PA 21-29 is not misconduct and is a protected activity;
5. The Board notes credible evidence that this complaint was advanced in a coordinated fashion by individuals affiliated with a political action committee that has publicly opposed Ms. Hunter's service to the Town. The premature public disclosure of the complaint, documented intimidation at public meetings, and the use of mass mailings suggest the ethics process is being leveraged as a tool of political retaliation;
6. The Board notes credible evidence that the complaint was made with knowledge that it was made without foundation in fact and to have been brought for retaliatory purposes. The Board finds that the Town Ethics Code must not be used to chill civic participation or punish volunteers for lawful service in the public interest;
7. While the Board takes no position on broader policy changes regarding dual service on Town commissions, we affirm that nothing in the current Town Ethics Code prohibits such service, provided members take conflict mitigation measures when warranted. Policy questions of structure and governance should be addressed through the Town Charter or Code amendments — not through selective ethics enforcement; and
8. Based on the record and applicable law, the Board advises that the complaint should be dismissed and that protections be put in place to prevent future misuse of the ethics process. We further recommend that the Board of Selectmen and Town commissions avoid allowing the appearance of political influence or retaliation to undermine the integrity of Town government.

At the request of Ms. Hunter, and consistent with the requirements of CGS § 1-82a (a)-(e), this report along with her public statement submitted for the record shall be published and made available to the public.

By: Teri Schatz, Secretary
Date: April 2, 2025
