

FREEDOM OF INFORMATION COMMISSION  
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Cassidy Long Williams and WFSB TV  
Channel 3,

Complainants

against

Docket #FIC 2025-0075

Chairman, State of Connecticut, Board of  
Regents, Connecticut State Colleges and  
Universities; and State of Connecticut,  
Board of Regents, Connecticut State  
Colleges and Universities,

Respondents

January 14, 2026

The above-captioned matter was heard as a contested case on August 6, 2025, at which time the complainants and the respondents appeared and presented testimony, exhibits and argument on the complaint. The Commission takes administrative notice of the respondents' video recording of the Special Meeting on February 5, 2025 of the Board of Regents for Connecticut State Colleges and Universities.<sup>1</sup>

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.
2. By email dated February 5, 2025, the complainants appealed to this Commission, alleging that the respondents violated the Freedom of Information ("FOI") Act with respect to a February 5, 2025 special meeting ("special meeting") of the respondent Board of Regents ("respondent Board") for Connecticut State Colleges and Universities ("CSCU"). Specifically, the complainants alleged that:
  - (a) the agenda for the special meeting failed to fairly apprise the public of the business to be conducted in executive session;
  - (b) during the special meeting, the respondents failed to properly state the reasons for entering the executive session; and

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<sup>1</sup> See CSCU, Board of Regents Special Meeting (February 5, 2025), <https://www.youtube.com/live/xYg7IOwLajI>.

- (c) the respondents failed to reconvene the public portion of the special meeting to properly adjourn such special meeting.<sup>2</sup>

3. Section 1-225, G.S., provides, in relevant part, as follows:

- (a) The meetings of all public agencies, except executive sessions, as defined in subdivision (6) of section 1-200, shall be open to the public. The votes of each member of any such public agency upon any issue before such public agency shall be reduced to writing and made available for public inspection within forty-eight hours and shall also be recorded in the minutes of the session at which taken. Not later than seven days after the date of the session to which such minutes refer, such minutes shall be available for public inspection and posted on such public agency's Internet web site, if available, except that no public agency of a political subdivision of the state shall be required to post such minutes on an Internet web site. Each public agency shall make, keep and maintain a record of the proceedings of its meetings.

....

- (d) Notice of each special meeting of every public agency ... shall specify the time and place of the special meeting and the business to be transacted. No other business shall be considered at such meetings by such public agency....

....

- (f) A public agency may hold an executive session as defined in subdivision (6) of section 1-200, upon an affirmative vote of two-thirds of the members of such body present and voting, taken at a public meeting and stating the reasons for such executive session, as defined in section 1-200.

4. With regard to the complainants' allegation described in paragraph 2(a), above, it is found that the respondent Board issued a notice and agenda for the special meeting that specified the time and place of such meeting. It is also found, however, that such notice and agenda included an item 3, which simply stated: "Executive Session Anticipated".

5. It is well established that a meeting agenda must "fairly apprise the public of the action proposed," and of the "matters to be taken up at the meeting in order to [permit the public] to properly prepare and be present to express their views." See Zoning Bd. of Appeals of the Town of Plainfield v. Freedom of Info. Comm'n, No. CV 99-047917-S, 2000 WL 765186, \*3 (Conn. Super. Ct. May 3, 2000), rev'd on other grounds, 66 Conn. App. 279 (2001).

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<sup>2</sup> At the hearing on this matter, the complainants alleged additional violations of the FOI Act that were not fairly raised in their complaint, and therefore, will not be further addressed herein.

6. Moreover, this Commission has long held that in order for the public to be fairly apprised of the reason for an executive session, the public agency must give some indication of the specific topic to be addressed. Descriptions such as “personnel,” “personnel matters,” “legal,” or even “the appointment, employment, performance, evaluation, health, dismissal of a public officer or employee,” are inadequate. See, e.g., Bradshaw Smith v. Craig Cook, Superintendent of Schools, Windsor Public Schools, et al., Docket #FIC 2014-833 (September 24, 2015) (agenda item, “Potential Executive Session to Review Attorney/Client Privileged Communication Regarding Personnel Matter,” did not fairly apprise the public of matter to be discussed); Richard L. Stone v. Board of Selectmen, Town of Cromwell, Docket #FIC 2010-738 (August 24, 2011) (agenda item, “[e]xecutive session: [p]ersonnel,” did not fairly apprise the public of proposed matter to be discussed); Preston D. Schultz and the Citizens for Prudent Spending v. Board of Education, Woodstock Public Schools, Docket #FIC 2008-236 (February 25, 2009) (agenda item, “discussion of attorney/client privilege [sic] documents and pending litigation,” did not fairly apprise the public); Bradshaw Smith v. Milo W. Peck, Jr., Member, Board of Education, Windsor Public Schools, Docket #FIC 2007-003 (August 8, 2007) (agenda item, “employee personnel matters,” did not fairly apprise the public of the matter to be discussed in executive session); John Voket and the Newtown Bee v. Board of Education, Newtown Public Schools, Docket #FIC 2006-013 (October 11, 2006) (agenda item, “executive session – personnel,” did not fairly apprise the public); Trenton Wright, Jr. v. First Selectman, Town of Windham, Docket #FIC 1990-048 (agenda item, “executive session – personnel matters,” did not sufficiently state the reason for the executive session); and Robert Cox v. Ridgefield Board of Education, Docket #FIC 88-165 (January 25, 1989) (the agenda item listing executive session to “receive advice from legal counsel on a legal matter,” was insufficient).

7. It is found that the agenda item described in paragraph 4, above, was not sufficiently specific to apprise the public of the business to be transacted or action proposed at the special meeting and failed to state a proper reason for convening in executive session.

8. It is therefore concluded that the respondents violated the notice requirements of §1-225(d), G.S., as alleged in paragraph 2(a), above.

9. With regard to the complainants’ allegation described in paragraph 2(b), above, it is found that, prior to moving for a vote to enter executive session, the Chair of the respondent Board (“Chair”) stated:

[t]he board will move into executive session for the purpose of discussing matters under Connecticut General Statutes §1-200(6)(A). No votes will be taken in the executive session. Additionally, there will be no discussion, action or votes by the Board following executive session. The only action following executive session will be a declaration of adjournment by the Chair.<sup>3</sup>

10. This Commission has repeatedly held that in order for the public to be fairly apprised of the business to be transacted during an executive session, the public agency must give some

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<sup>3</sup> See CSCU, Board of Regents Special Meeting (February 5, 2025), <https://www.youtube.com/live/xYg7IOwLajI>.

indication of the specific topic to be addressed, prior to convening such session. Therefore, similar to the findings described in paragraph 6, above, descriptions such as “personnel,” “personnel matters,” “legal” or even “strategy and negotiations with respect to pending claims or pending litigation” are inadequate and do not state the reason for convening in executive session, within the meaning of §1-225(f), G.S. See, e.g., María Pereira v. Budget and Appropriations Committee, City Council, City of Bridgeport, et al., Docket #FIC 2018-0221 (November 14, 2018); and Kate King and the Stamford Advocate v. Water Pollution Control Authority, City of Stamford; and City of Stamford, Docket #FIC 2012-502 (May 8, 2013). See also Durham Middlefield Interlocal Agreement Advisory Board v. Freedom of Info. Comm’n et al., No. CV-96-0080435, 1997 WL 491574, \*4 (Conn. Super. Ct. August 12, 1997) (it was reasonable for the Commission to require something more detailed than “Executive Session Re: Possible Litigation”).

11. It is found that, by citing to §1-200(6)(A), G.S., without more, the respondent Board’s motion to convene the executive session failed to identify with sufficient particularity the reason for the executive session.

12. It is therefore concluded that the respondents violated the notice requirements of §1-225(f), G.S., as alleged in paragraph 2(b), above.

13. With regard to the complainants’ allegation, described in paragraph 2(c), above, it is found that, subsequent to the conclusion of the executive session, the public was not invited back into such special meeting, and the video recording of the special meeting was not turned back on.<sup>4</sup>

14. At the hearing in this matter, the respondents testified, and it is found, that no additional business was conducted at the special meeting subsequent to the conclusion of the executive session. The respondents argued that the Chair, prior to convening in executive session, had moved to adjourn the special meeting upon the conclusion of the executive session, and that, at worst, such improper motion and adjournment could potentially be a violation of Robert’s Rules of Order. The respondents further argued that this Commission does not have jurisdiction to enforce Robert’s Rules of Order.<sup>5</sup>

15. It is found, however, that during the public portion of the special meeting that preceded the executive session, as described in paragraph 9, above, the Chair specifically stated that following the executive session, there would be “a declaration of adjournment by the Chair.” It is also found that, in moving for a vote to convene in executive session, the Chair stated: “[t]herefore, allow me to call for a motion to move to executive session, for the purpose I have described, and to adjourn by declaration of the chair, when that discussion in executive session concludes.”<sup>6</sup> It is further found that the respondent Board’s special meeting did not end until

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<sup>4</sup> See CSCU, Board of Regents Special Meeting (February 5, 2025), <https://www.youtube.com/live/xYg7IOwLajI>.

<sup>5</sup> The Commission agrees with the respondents that it does not have authority to enforce Robert’s Rules of Order. See Dept. of Public Safety v. Freedom of Information Commission, 103 Conn. App. 571, 577 (2007) (the Commission is a creature of statute with limited jurisdiction; it can only administer and enforce the provisions set forth in the FOI Act).

<sup>6</sup> See CSCU, Board of Regents Special Meeting (February 5, 2025), <https://www.youtube.com/live/xYg7IOwLajI>.

such time as the Chair officially declared it “adjourned,” and that such declaration of adjournment should have been made during the public portion of the special meeting after the conclusion of the executive session and reconvening of the special meeting.

16. It is therefore concluded, based upon the facts and circumstances of this case, that the respondents committed a technical violation of §1-225(a), G.S., when they failed to reconvene the special meeting in public, at the conclusion of the executive session and prior to the Chair’s declaration of adjournment, as alleged in paragraph 2(c), above.

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Henceforth, the respondents shall strictly comply with the notice provisions of §§1-225(d) and 1-225(f), G.S., and the open meeting requirements of §1-225(a), G.S.

Approved by Order of the Freedom of Information Commission at its regular meeting of January 14, 2026.

  
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Molly E. Steffes  
Acting Clerk of the Commission

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

**CASSIDY LONG WILLIAMS AND WFSB TV CHANNEL 3**, c/o Attorney Eric S. Parker, Romano Parker, 621 Cromwell Avenue, Rocky Hill, CT 06067

**CHAIRMAN, STATE OF CONNECTICUT, BOARD OF REGENTS, CONNECTICUT STATE COLLEGES AND UNIVERSITIES; AND STATE OF CONNECTICUT, BOARD OF REGENTS, CONNECTICUT STATE COLLEGES AND UNIVERSITIES**, c/o Attorney Christopher E. Engler, CT State Colleges & Universities, Office of General Counsel, 61 Woodland Street, Suite 309, Hartford, CT 06105



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Molly E. Steffes  
Acting Clerk of the Commission