

FREEDOM OF INFORMATION COMMISSION  
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Katherine Camara,

Complainant

against

Docket #FIC 2025-0077

Mark Raimo, Town Manager, Town of  
Watertown; and Town of Watertown,

Respondents

January 28, 2026

The above-captioned matter was heard as a contested case on August 28, 2025, at which time the complainant and respondents appeared and presented testimony, exhibits, and argument on the complaint.

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. It is found that, on November 15, 2024, the complainant requested from the respondents, among other records, contracts and agreements between CliftonLarsonAllen (“CLA”) and the Town of Watertown (the “Town”).<sup>1</sup>
3. It is found that between November 22, 2024, and January 9, 2025, the respondents had sent the complainant various records responsive to those portions of the November 15 request that are not at issue in this matter.
4. It is found that, on January 6, 2025, the complainant notified the respondents that she had not received the contract between CLA and the Town. It is further found that, on January 8, 2025, the complainant inquired whether the respondents intended to provide copies of such contracts or agreements.
5. It is found that, on January 9, 2025, the respondents provided the complainant with a copy of a proposal from CLA, which the respondents represented to be the agreement. The

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<sup>1</sup>The complainant’s November 15 request described in paragraph 2, above, also requested four other categories of records; however, the only records that are at issue in the instant complaint are the contracts and agreements between CLA and the Town of Watertown.

respondents further informed the complainant that she had been provided with all records responsive to her November 15 request and closed the request.

6. It is found that, on January 26, 2025, the complainant submitted another request for records in which she specifically identified the Master Services Agreement (“MSA”) and the Statement of Work (“SoW”) between CLA and the Town. It is found that on January 29, 2025, the respondents provided the complainant with such records.

7. By complaint received and filed on February 8, 2025, the complainant appealed to this Commission, alleging that the respondents violated the Freedom of Information (“FOI”) Act by failing to provide copies of the MSA and SoW described in paragraph 6, above, in response to her November 15 request. The complainant also requested that the Commission consider assessing a civil penalty against the respondents.

8. Section 1-200(5), G.S., provides:

“[p]ublic records or files” means any recorded data or information relating to the conduct of the public’s business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

9. Section 1-210(a), G.S., provides in relevant part that:

[e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to (1) inspect such records promptly during regular office or business hours, (2) copy such records in accordance with subsection (g) of section 1-212, or (3) receive a copy of such records in accordance with section 1-212.

10. Section 1-212(a), G.S., provides in relevant part that “[a]ny person applying in writing shall receive, promptly upon request, a plain, facsimile, electronic or certified copy of any public record.”

11. It is concluded, therefore, that the records described in paragraph 2, above, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

12. It is found that included among the records that the respondents provided to the complainant, was a July 1, 2024 email between the respondent Town Manager and a Principal for CLA. That email included versions of the MSA and SoW shared via links to sites operated by CLA. The respondents testified, and it is found, that they had inadvertently overlooked the links contained in that email when they were providing the complainant with responsive records.

13. Accordingly, it is found that the respondents maintained copies of the MSA and SoW at the time of the complainant's November 15 request and that such records were responsive to her request for contracts and agreements between CLA and the Town, as described in paragraph 2, above.

14. As found in paragraph 6, above, however, the complainant submitted another request specifically identifying the MSA and the SoW, which the respondents provided three days later. The complainant testified, and it is found, that after receiving the MSA and SoW, she had received all records responsive to her November 15 request.

15. It is concluded, therefore, that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., by not providing copies of the MSA and SoW in response to the complainant's November 15 request.

16. Accordingly, the only remaining issue before the Commission is whether the respondents' violation of the FOI Act warrants the imposition of a civil penalty against the respondents pursuant to §1-206(b)(2), G.S.

17. Section 1-206(b)(2), G.S., provides, in relevant part:

upon the finding that a denial of any right created by the Freedom of Information Act was without reasonable grounds and after the custodian or other official directly responsible for the denial has been given an opportunity to be heard at the hearing conducted in accordance with sections 4-176e to 4-184, inclusive, the commission may, in its discretion, impose against the custodian or other official a civil penalty of not less than twenty dollars nor more than five thousand dollars.

18. As found in paragraph 12, above, the respondents inadvertently failed to provide actual copies of the MSA and SoW to the complainant, because such records were linked in the body of the July 1, 2024 email.

19. The respondents further testified, and it is found, that because the complainant's January 26 request specifically identified the MSA and SoW as responsive records, they were able to identify the links in the July 1, 2024 email containing records responsive to the complainant's requests. It is also found that upon identifying the MSA and SoW as responsive, the respondents sent such records to the complainant, three days later.

20. It is found that the respondents did not act in bad faith or in a manner intended to deliberately frustrate the complainant's rights to access public records. In fact, the respondents provided the complainant with nearly all records responsive to her November 15 request as part of a rolling production occurring between November 22, 2024, and January 9, 2025.

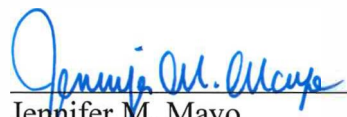
21. It is further found that once the respondents realized the specific records the complainant was seeking (in both her November 15 and January 26 requests), they provided such records quickly and without undue delay.

22. Accordingly, based on the facts and circumstances of this case, the respondents' violation was not without reasonable grounds and a civil penalty is not warranted.

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

1. Henceforth, the respondents shall strictly comply with the disclosure provisions of §§1-210(a) and 1-212(a), G.S.

Approved by Order of the Freedom of Information Commission at its regular meeting of January 28, 2026.

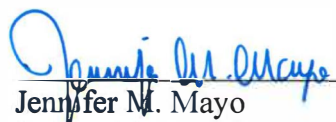
  
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Jennifer M. Mayo  
Acting Clerk of the Commission

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:

**KATHERINE CAMARA**, 31 Cottage Place, Oakville, CT 06779

**MARK RAIMO, TOWN MANAGER, TOWN OF WATERTOWN; AND TOWN OF WATERTOWN**, c/o Attorney Paul R. Jessell, Slavin, Stauffacher & Scott, P.O. Box 9, Watertown, CT 06795

  
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Jennifer M. Mayo  
Acting Clerk of the Commission