

FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Sanjay Gupta,

Complainant

against

Docket #FIC 2025-0516

Superintendent of Schools, West
Hartford Public Schools; and West
Hartford Public Schools,

Respondents

June 10, 2026

The above-captioned matter was heard as a contested case on November 13, 2025, and March 19, 2026, at which times the complainant and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits and argument on the complaint. For hearing purposes, this matter was consolidated with Docket #FIC 2025-0519, Sanjay Gupta v. Town Clerk, Town of West Hartford et al. (“Docket #FIC 2025-0519”). The Commission takes administrative notice herein of the testimony and exhibits in Docket #FIC 2025-0519.

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 June 9, 2025, the complainant requested the following records from the respondents:

[Part 1]

Munis Budget-vs-Actual Object Detail reports for all West Hartford Public Schools funds FY 2017-FY 2025, limited to Object codes 5300-5399, 330, and 810. Fields: fiscal yr., fund, org, object, vendor, voucher date, original budget, final budget, actual, variance.

[Part 2]

Vendor-level payment ledgers (check/ACH registers) for the same years and object codes.

[Part 3]

All mid-year budget transfers or Journal/BTR entries dated 1 Jul 2016-30 Jun 2025 that increase appropriations to these object codes or transfer funds for litigation/claims costs. Include Board approvals.

[Part 4]

Engagement letters or fee agreements FY 2017-FY 2025 with any outside counsel or e-discovery vendor (e.g., Shipman & Goodwin, Carlton Fields, Bartlett Law, Epiq, etc.).

3. It is found that on June 9, 2025 the respondents acknowledged receipt of the complainant's request described in paragraph 2 above, and informed the complainant that they would begin to process the request.

4. By complaint received and filed on June 25, 2025, the complainant appealed to this Commission alleging that the respondents violated the Freedom of Information ("FOI") Act by failing to provide records responsive to his request described in paragraph 2, above.

5. 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.

6. 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 . . . (3) receive a copy of such records in accordance with section 1-212.

7. It is concluded that the records described in paragraph 2, above, to the extent they exist and are maintained by the respondents, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

8. With respect to Part 4 of the complainant's request described in paragraph 2, above, it is found that the respondents provided the complainant with responsive records on October 30, 2025. It is found that such records included all engagement letters and fee agreements for 2022 through 2025 and a single engagement letter from 2019.

9. It is found that with the exception of the one letter from 2019 identified in paragraph 8, above, the respondents did not maintain any engagement letters or fee agreements from 2017 through 2019, as such records were disposed of pursuant to the state's general records retention schedule for municipalities which permits destruction of such records after three years.¹

10. It is found, therefore, that the respondents provided the complainant with all records responsive to his request which they maintained at the time of his request described in paragraph 2, above. Accordingly, it is concluded that the respondents did not violate the FOI Act as alleged with respect to Part 4 of the complainant's request described in paragraph 2, above.

11. With respect to Parts 1 through 3 of the complainant's request described in paragraph 2, above, it is found that the term "object code" refers to a four digit code² used by the Town of West Hartford (the "Town") to identify different entities within their financial management system ("FMS"). It is found that entries in the Town's FMS in the 5000s refer to transactions involving the respondents.

12. It is found that midway through 2020, the Town transitioned from its prior FMS, Dynamix, to its current FMS, Munis. It is found, however, that in making this transition, the Town did not import all data from Dynamix into Munis. Rather, for the fiscal years prior to the transition to Munis ("legacy data"), the Town imported only balance totals, and not detailed transaction information.

13. It is found that while at the time of the complainant's request described in paragraph 2, above, the Town's Finance Department maintained a small number of licenses to access detailed legacy data in Dynamix, the respondents in this matter did not have any such licenses. Accordingly, it is found that the respondents could only directly search the Munis FMS.

14. It is found that the respondents queried Munis using the object codes requested by the complainant and generated several spreadsheets for fiscal years 2020 through 2025. It is further found, however, that for fiscal years 2017 through 2019, the respondents could only provide balance totals as described in paragraph 12, above.

15. It is found that the records located and identified in paragraph 14, above, were provided to the complainant on October 30, 2025.

16. It is found that in response to the complainant's request at issue in Docket #FIC 2025-0519, seeking identical information from the town clerk pertaining to the requested object codes,

¹ See General Records Retention Schedules for Municipalities, Schedule M1 – General Administration Records (Item Number M1-070 permitting the destruction of contracts for services three years after the expiration).

² Accordingly, 330 and 810 are not valid object codes used by the respondents or the Town. It is found that the respondents searched the entire 5000-series of object codes to account for any errors in the request (i.e., requesting object codes 5330 and/or 5810).

the Town's Finance Department was able to provide the complainant with the available legacy data from the Dynamix FMS, on October 31, 2025.³

17. As found in paragraph 11, above, the legacy data with respect to the 5000-series object codes in the Dynamix FMS pertain to the respondents' transactions. It is found that the respondents owned and/or used such records and, therefore was "maintained" by the respondents within the meaning of §1-210(a), G.S. See Docket #FIC 2016-0791, Dan Barrett et al. v. Town Manager, Town of Enfield et al. (June 14, 2017) (finding that although public records were not in the possession of a public agency and stored elsewhere, such records were nevertheless "owned" or "used" by the respondents within the meaning of §1-200(5), G.S.)⁴

18. It is found, however, that the respondents did not request such legacy data from the Town's Finance Department *in connection with the request in the instant matter*, and thus failed to conduct reasonably diligent and thorough search. Accordingly, it is found that the respondents failed to provide the complainant with all records responsive to his request described in paragraph 2, above.

19. It is concluded, therefore, that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., by not providing the complainant with the legacy data from the Dynamix FMS in connection with the request in *this* matter. Nevertheless, because the Town's Finance Department provided the complainant with the legacy data the day after the complainant received responsive records from the respondents, as a result of their search related to Docket #FIC 2025-0519, the respondents failure to directly provide the complainant with the legacy data amounts to a technical violation.

20. It is found that between the records provided by the respondents on October 30, 2025, and the records provided by the Town's Finance Department on October 31, 2025, described in paragraphs 14 and 16, respectively, the complainant received all records responsive to his request described in paragraph 2, above.

21. At the March 19, 2026 continued hearing, in the instant matter, however, the complainant alleged that the respondents violated the FOI Act, because: (i) they failed to coordinate their response with the response from the Town's Finance Department to the request at issue in Docket #FIC 2025-0519; (ii) they did not provide the statutory citation to support any redactions made to the records; and (iii) they failed to promptly provide records responsive to his request described in paragraph 2, above.

³ Whether and to what extent the Town's Finance Department was obligated to provide records responsive to the complainant's request in Docket #FIC 2025-0519, is not the subject of the instant matter and therefore will not be considered herein.

⁴ Lash v. Freedom of Info. Comm'n, 116 Conn. App. 171, 187 (2009), *aff'd in part, rev'd in part*, 300 Conn. 511 (2011), is not applicable in the instant matter. Lash is applicable in Docket #FIC 2025-0519, because in that case the complainant submitted his request to the Town Clerk seeking records of another distinct public agency. The instant matter is markedly different, because, although some of the requested records were in the possession of the Town's Finance Department such records were "owned" or "used" by respondent West Hartford Public Schools as set forth in paragraph 17, above.

22. The complainant's argument that the respondents were required to coordinate their response to the request in the instant matter with the Town's Finance Department's response to the request at issue in Docket #FIC 2025-0519 is without merit. The only "coordination" required under the FOI Act was for the respondents to request that the Town's Finance Department retrieve the legacy data in response to the request *in the instant matter* because they stored such data on behalf of the respondents herein. Nothing in the FOI Act requires two distinct public agencies to coordinate a response to separate records requests as the complainant suggests, even if those requests are identical.

23. In addition, the complainant's argument that the respondents violated the FOI Act by failing to cite the statutory authority for any redactions made to the requested records is without merit. It is well established that a public agency has no duty to answer questions or create a record in response to a records request; rather, a public agency must only provide access to, and copies of, public records under the FOI Act. See Kimberly Albright-Lazzari et al. v. Colleen Murphy, Connecticut Freedom of Information Commission et al., CV105014984S, 2011 WL 1886878, at *3 (Conn. Super. Ct. April 21, 2011).⁵

24. With respect to the complainant's claim that the records were not provided to him "promptly," the Commission has held that the meaning of the word "promptly" is a particularly fact-based question. In Advisory Opinion #51, In the Matter of a Request for Declaratory Ruling, Third Taxing District of the City of Norwalk, Applicant (Notice of Final Decision dated January 11, 1982), the Commission advised that the word "promptly," as used in §1-210(a), G.S., means quickly and without undue delay, taking into consideration all of the factors presented by a particular request.

25. The advisory opinion goes on to describe some of the factors that should be considered in weighing a request for records against other priorities: the volume of records requested; the time and personnel required to comply with a request; the time by which the person requesting records needs them; the time constraints under which the agency must complete its other work; the importance of the records to the requester, if ascertainable; and the importance to the public of completing the other agency business without the loss of the personnel time involved in complying with the request. In addition, common sense and good will ought to be the guiding principles.

26. As found in paragraph 20, above, the complainant received all records responsive to his request described in paragraph 2, above, by October 31, 2025, (i.e., 144 days after the complainant made his June 9, 2025 request).

27. It is found, however, that:

- i. around the time the respondents received the complainant's request they were dealing with a significant degree of staff turn

⁵ The complainant does not challenge the redactions made by the respondents in the instant matter, rather his argument appears to be solely limited to the fact that the respondents did not cite a specific statutory exemption in their response to his request described in paragraph 2, above.

over and, therefore, were required to dedicate significant time and resources to recruitment and training;

- ii. the respondents required technical assistance in providing the information sought by the complainant in a single report;
- iii. the respondents' Director of Finance and Planning was new to her position around the time the complainant made his request described in paragraph 2, above;
- iv. the respondents were dealing with multiple competing deadlines around the time they were processing the complainant's request, including, but not limited to, implementing new payroll requirements;
- v. the complainant had submitted a number of other requests to the respondents around the time of his request described in paragraph 2, above, all of which were fulfilled within the same month they were made; and
- vi. the complainant never expressed a time by which he needed the records, nor was it apparent that the records were of particular importance to the complainant.

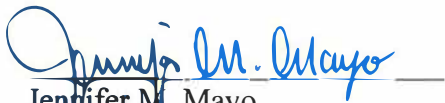
28. It is further found that nothing in the administrative record suggests that the respondents deliberately delayed their response or otherwise acted in bad faith with respect to their processing of the complainant's request described in paragraph 2, above.

29. It is found that the respondents provided the complainant with records responsive to his request described in paragraph 2, above, quickly and without undue delay under the specific facts and circumstances of the instant matter.

30. It is concluded, therefore, that the respondents did not violate the promptness provisions of §§1-210(a) and 1-212(a), G.S.

Under the facts and circumstances of this case, no order by the Commission is hereby recommended.

Approved by Order of the Freedom of Information Commission at its regular meeting of June 10, 2026.

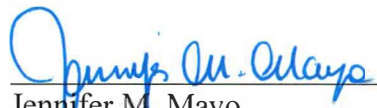

Jennifer M. Mayo
Acting Clerk of the Commission

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:

SANJAY GUPTA, 54 Orchard Road, West Hartford, CT 06117

SUPERINTENDENT OF SCHOOLS, WEST HARTFORD PUBLIC SCHOOLS; AND WEST HARTFORD PUBLIC SCHOOLS, c/o Attorney Cynthia Lauture, Office of the Corporation Counsel, 50 South Main Street, West Hartford, CT 06107



Jennifer M. Mayo
Acting Clerk of the Commission