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May 15, 2024

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Town of Ledyard Land Use Department
Attn: Patricia A. Riley, Town Clerk
741 Colonel Ledyard Highway
Ledyard, Connecticut 06339-1511

Patricia A. Riley
TOWN CLERK

Re: **Freedom of Information Act Request;**

Application No.: IWWC22-18URA of Avery Brook Homes, LLC, 1641 Rte. 12, Gales Ferry, CT 06335; 8-30g Re-Subdivision located on 94, 96, 98, and 100 Stoddards Wharf Road, Ledyard, Connecticut;

Application No.: PZ#22-18SUB of Avery Brook Homes, LLC 1641 Rte. 12, PO Box 335, Gales Ferry, CT 06335 for a 36-Lot Re-subdivision/Affordable Housing Development pursuant to 8-30g of the Connecticut General Statutes, on four parcels of land located at 94, 96, 98 and 100 Stoddards Wharf Road, Ledyard, Connecticut 06339 (withdrawn); and

Pending Application No.: PZ#24-2RESUB – 96, 98, and 100 Stoddards Wharf Rd., Ledyard, CT, Agent: Harry Heller, Esq. Heller, Heller & McCoy – Applicant/Owner: Avery Brook Homes, LLC for an 18-Lot Resubdivision/Affordable Housing Development pursuant to CGS §8-30g. (Submitted 03-28-24, Date of Receipt 04-11-24, PH set for 05-09-24).

Dear Ms. Riley:

Pursuant to the provisions of the Connecticut Freedom of Information Act, Connecticut General Statutes Section 1-200, et. seq. (specifically Connecticut General Statute Section 1-210), Avery Brook Homes, LLC hereby requests certified copies of the following documents related to the Inland Wetlands and Watercourses Application No.: IWWC22-18URA of Avery Brook Homes, LLC, 1641 Route 12, Gales Ferry, Connecticut 06335; 8-30g Re-Subdivision located on 94, 96, 98, and 100 Stoddards Wharf Road, Ledyard Connecticut; the withdrawn Re-Subdivision Application No.: PZ#22-18SUB of Avery Brook Homes, LLC 1641 Route 12, PO Box 335, Gales Ferry, Connecticut 06335 for a 36-Lot re-subdivision/Affordable Housing Development pursuant to 8-30g of the Connecticut General Statutes, on four parcels of land located at 94, 96, 98 and 100 Stoddards Wharf Road, Ledyard, Connecticut 06339; and the pending Re-Subdivision Application No.: PZ#24-2RESUB – 96, 98, and 100 Stoddards Wharf Rd., Ledyard, CT, Agent: Harry Heller, Esq. Heller, Heller & McCoy – Applicant/Owner: Avery Brook Homes, LLC for an 18-Lot Resubdivision/Affordable Housing Development pursuant to CGS §8-30g. (Submitted 03-28-24, Date of Receipt 04-11-24, PH set for 05-09-24). (hereinafter, collectively, the “Applications”).

- a. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town’s Director of Land Use and Planning, Juliet Hodge, and any member and/or alternate member of the Inland Wetlands and Watercourses Commission regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- b. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents

- pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and any member and/or alternate member of the Planning and Zoning Commission regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- c. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and the Town's Interim Wetlands Official, Len Johnson regarding the Applications, Avery Brook Homes LLC, Heller, Heller, & McCoy, Peter C. Gardner, and/or Harry Heller.
 - d. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and the Town's Interim Zoning & Wetlands Official, John Herring regarding the Applications, Avery Brook Homes, LLC, Heller, Heller, & McCoy, Peter C. Gardner, and/or Harry Heller.
 - e. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and any member of the public regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
 - f. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and Groton Public Utilities and/or the City of Groton, including but not limited to any of their agents, assignees, employees, consultants, representatives, and/or attorneys regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
 - g. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Director of Land Use and Planning, Juliet Hodge, and any elected or appointed official of the Town of Ledyard regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
 - h. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents

pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and any member and/or alternate member of the Inland Wetlands and Watercourses Commission regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.

- i. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and any member and/or alternate member of the Planning and Zoning Commission regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- j. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and the Town's Interim Wetlands Official, Len Johnson regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- k. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and the Town's Interim Zoning & Wetlands Official, John Herring regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- l. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and the any member of the public regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- m. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and Groton Public Utilities and/or the City of Groton, including but not limited to any of their agents, assignees, employees, consultants, representatives, and/or attorneys regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.
- n. Copies of all communications, including but not limited to any correspondence, e-mails, notes, telephone logs, diaries, letters, video recordings, audio recordings, and documents

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pertaining to written, verbal or electronic communications between the Town's Land Use Assistant, Makenna Perry, and any elected or appointed official of the Town of Ledyard regarding the Applications, Avery Brook Homes, LLC, Heller, Heller & McCoy, Peter C. Gardner, and/or Harry Heller.

Please send the requested documentation to our attorney, Harry B. Heller, Heller, Heller & McCoy, 736 Norwich-New London Turnpike, Uncasville, Connecticut 06382; or, if sending via e-mail to hheller@hellermccoy.com.

In accordance with the requirements of Section 1-212(a)(2) of the Connecticut General Statutes, we will pay for the reproduction of such documentation, upon receipt of your invoice for the copies provided, at a rate not to exceed 50/100 (\$.50) Cents per page.

Should you have any questions or need anything further, please feel free to contact the undersigned.

Very truly yours,
AVERY BROOK HOMES, LLC

By: 

Harry B. Heller, its attorney

Cc: Attorney Robert A. Avena via US Mail
Suisman Shapiro Attorneys-at-Law
20 South Anguilla Road
P.O. Box 1445
Pawcatuck, CT 06379