

*Law Offices of R. Bartley Halloran*

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R. BARTLEY HALLORAN  
DIRECT DIAL  
(860) 676-3222  
E-MAIL ADDRESS:  
rhalloran@ldlaw.com

74 BATTERSON PARK ROAD  
FARMINGTON, CT 06032  
MAILING ADDRESS:  
P.O. Box 887  
FARMINGTON, CT 06034-0887

December 22, 2010

Mr. Santiago Malave  
Director of Human Resources & Labor Relations  
City of Hartford  
550 Main Street  
Hartford, CT 06103

Dear Mr. Malave:

Thank you for forwarding to me the calendars of former Mayor Eddie Perez. I wanted to review those calendars to attempt to calculate any days which might have been vacation days. I have completed my review.

Based on the records of the City, Mayor Perez is owed 1216.68 hours of vacation pay and 768.00 hours of sick pay. I enclose a copy of a pay stub which verifies these amounts. In addition, this stub sets his hourly rate at \$66.885 per hour.

The City has cooperated in paying Mayor Perez the salary which was owed at his resignation, and has cooperated in the COBRA compliance. To date, Mayor Perez has not received any compensation at all for the accrued sick time or the accrued vacation time.

Based upon my review of the records I am attaching a sheet of paper which sets forth the dates the former mayor believes were used for vacation. As I am sure you are aware, while acting as mayor there is never truly a vacation, as he was constantly on call. Mayor Perez, however, wants to have the days listed deducted from any vacation payment because he wishes to end this matter in an amicable manner, as quickly as possible.

This offer to compromise the claim by deducting the time from vacation is made in an effort to resolve this matter as soon as possible. I have advised Mayor Perez that I believe he is entitled to receive all of the City's calculated vacation and accrued sick time to the limits set

CORPORATION COUNSEL  
10 DEC 28 AM 9:01

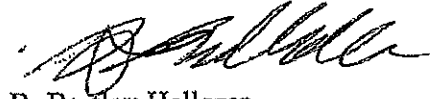
Santiago Malave  
December 22, 2010  
Page -2-

forth in the City ordinances on these matters, and that the City's calculation is an admission of responsibility. If we cannot quickly resolve this matter I will maintain that position in litigation, and seek interest on the sums owed.

Could you please let me know if the listed days have already been deducted from accrued vacation time? If they have not, I am authorized to accept a payment which in fact deducts those payments from accrued vacation time, and also includes the appropriate amount for accrued sick time.

I can be reached by email ([rhalloran@ldlaw.com](mailto:rhalloran@ldlaw.com)), or on my cell phone (860-690-2032) to resolve this matter.

Very truly yours,



R. Bartley Halloran

cc: David B. Panagore, Chief Operating Officer (w/encls.)  
✓ Sandra Kee Borges, Corporation Counsel (w/encls.)

CITY OF HARTFORD

Advice Amount **4,445.96**

Emp No	Employee Name	Dept	Advice Date	Period End	City Pay	Advice Number					
944414	EDDIE A PEREZ	CMO1	07/23/2010	07/17/2010	CITY PAY	3173768					
Earnings	Rate	Hours	Total Amount	YTD	Deductions	Current	YTD	Leave Code	Seamed	Used	Balance
REG PAY	66.8885	80.00	5351.08	77590.66	SOC SECUR	324.53	4734.85	VACATION			1216.68
EMP REIMB				30.00	MEDICARE	75.90	1107.31	SICK			768.00
IMP LIFE				322.00	HLTHN PRET	116.66	1422.04				
					FED TAX		9358.66				
					CT TAX		3018.60				
					UNCL PENSI	321.06	4655.37				
					LT DISABIL	51.59	656.04				
					COMM WKS 1	3.84	57.60				
					UNITED WY	7.70	115.50				
					UNC FUND 1	3.84	57.60				
					DIRECT DEP	4445.96	50198.80				
					BANK OF AMERICA						
					DNTL PRE-T		122.60				
<b>Advice Totals</b>											
					Total Pay		5,351.08				
					YTD		77,942.66				
					Taxable Gross Pay		4,913.36				
					YTD		71,712.65				
					Deductions		906.12				
					YTD		75,504.97				
					Net Pay		4,445.96				
					YTD						
<b>Withholding Allowances</b>											
					Federal	M 99	\$ .00				
					State	E 99	\$ .00				

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER • THERMOCHROMIC INK ON BACK



**Office of the City Treasurer**  
 CITY OF HARTFORD  
 550 Main Street  
 Hartford, CT 06103

Advice Date 07/23/2010    Advice Number 3173768

\*\*\* \$4,445.96 \*\*\*

Deposit \*\*\*\*\* Four Thousand Four Hundred Forty Five Dollars and 96 Cents \*\*\*\*\*

To The Order Of  
 EDDIE A PEREZ  
 69 BLOOMFIELD AVENUE  
 HARTFORD, CT 06105

**DIRECT DEPOSIT  
 NON-NEGOTIABLE**

Security features included. Details on back.

MAYOR PEREZ VACATION AND DAYS OFF

2004-2009

2004	Nov 2	2008	July 3
	Nov 26		July 28-Aug 1
	Dec 27		Dec 24
	Dec 31	2009	June 26
2005	July 25		June 29
	Aug 9-12		Aug 19
	Sept 19		Aug 21
	Oct 19		Sept 4
	Nov 25		Nov 23-27
	Dec 27-30		Dec 24
2006	Jan 2		
	Jan 30-Feb 2		
	Feb 3 (1/2 day)		
	Feb 5 (1/2 day)		
	Mar 5 (1/2 day)		
	Apr 17		
	Apr 10-14		
	Aug 28 – Sept 1		
	Nov 24		
2007	May 25		
	Sept 10-11		
	Sept 13-14		
	Nov 5-7		
	Nov 23		
	Dec 24		



# CITY OF HARTFORD

DEPARTMENT OF HUMAN RESOURCES AND LABOR RELATIONS  
350 Main Street  
Hartford, Connecticut 06103

**PEDRO E. SEGARRA**  
Mayor

Telephone: (860) 757-9800  
Fax: (860) 722-8042  
[www.hartford.gov](http://www.hartford.gov)

**SANTIAGO MALAVE**  
Director

December 29, 2010

R. Bartley Halloran  
74 Batterson Park Road  
P.O. Box 887  
Farmington, CT 06034-0887


Dear R. Barley Halloran:

This is written in response to your letter dated December 22, 2010 and received in the Human Resources Department on December 28, 2010 in which you asked me to get back to you regarding the dates you provided representing the periods of time when former Mayor Perez used vacation leave time. Based on your request and the information you provided, we will be conducting a review of the former Mayor's calendar of activities. Upon completion of the review, we will get back to you accordingly.

In response to your question, the vacation leave days and times you provided have not been deducted from the former Mayor's vacation balance.

If you have any questions or concerns regarding this matter, feel free to get back to me.

Sincerely,



Santiago Malave

Director of Human Resources and Labor Relations

C: Sandra Kee-Borges, Corporation Counsel



HALLORAN & HALLORAN  
ATTORNEYS AT LAW

CORPORATION COUNSEL  
11 APR 13 AM 10:57

R. Bartley Halloran, Esq.  
[rhalloran@halloranlawct.com](mailto:rhalloran@halloranlawct.com)

Concetta B. Aresco, Paralegal  
[caresco@halloranlawct.com](mailto:caresco@halloranlawct.com)

Kaitlin A. Halloran, Esq.  
[khalloran@halloranlawct.com](mailto:khalloran@halloranlawct.com)

Chelinda M. Paterno, Paralegal  
[cpaterno@halloranlawct.com](mailto:cpaterno@halloranlawct.com)

April 6, 2011

Sandra Kee Borges, Esq.  
Corporation Counsel  
City of Hartford  
550 Main Street  
Hartford, CT. 06103

Re: Freedom of Information Request – Eddie Perez

Dear Attorney Sandra Kee Borges:

Pursuant to the Connecticut Freedom of Information Act (Connecticut General Statutes Section 1-200 et. Seq.), please provide copies of the following documents:

1. All documents relating to the former mayor Eddie Perez's pension.
2. All documents relating to the former mayor Eddie Perez's vacation time.
3. All documents relating to the former mayor Eddie Perez's sick time.

I am ready and willing to send a check for the copy fee applicable under Connecticut General Statute Section 1-212. Time is of the essence and we appreciate your cooperation in this matter.

We can be reached at the office (860)726-7810, on R. Bartley Halloran's cell (860) 690-2032, and via email [RHalloran@halloranlawct.com](mailto:RHalloran@halloranlawct.com) or [KHalloran@halloranlawct.com](mailto:KHalloran@halloranlawct.com). Thank you in advance.

Very truly yours,

R. Bartley Halloran  
Counsel to Eddie Perez



# CITY OF HARTFORD

OFFICE OF THE CORPORATION COUNSEL

550 Main Street  
Hartford, Connecticut 06103

Telephone: (860) 757-9700  
Fax: (860) 722-8114  
www.hartford.gov

SAUNDRA KEE-BORGES  
Corporation Counsel

CARL R. NASTO  
Deputy Corporation Counsel

April 15, 2011

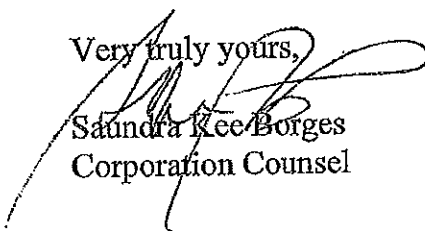
R. Bartley Halloran, Esq.  
Halloran & Halloran  
CityPlace II – 15<sup>th</sup> Floor  
185 Asylum Street  
Hartford, CT 06103

**Re: FOI Request Dated 4/6/11**

Dear Attorney Halloran:

This office is in receipt of your freedom of information request sent via first class mail to Sandra Kee Borges dated April 6, 2011. Please be advised that City staff is gathering the documents that are responsive to your request. In accordance with your request, upon my receipt of any such documents, I will make the same available to you.

Very truly yours,

  
Sandra Kee Borges  
Corporation Counsel

## Kaitlin Halloran

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**From:** Bart Halloran  
**Sent:** Wednesday, April 20, 2011 10:39 AM  
**To:** Kaitlin Halloran  
**Subject:** FW: Perez benefits

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**From:** Malave, Santiago [mailto:MALAS002@hartford.gov]  
**Sent:** Wednesday, April 06, 2011 12:51 PM  
**To:** Bart Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

Bart, Sandra Kee Borges, the City's Corporation Counsel, has requested that you contact her to discuss potential arbiters. Her telephone number is 860-757-9705.....

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**From:** Bart Halloran [mailto:rhalloran@halloranlawct.com]  
**Sent:** Wednesday, April 06, 2011 9:45 AM  
**To:** Malave, Santiago  
**Subject:** RE: Perez benefits

Mr. Malave,

I wanted to inquire as to the status of the Perez arbitration. When will we discuss potential arbiters? Dates?

Sincerely yours,  
R. Bartley Halloran

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**From:** Malave, Santiago [mailto:MALAS002@hartford.gov]  
**Sent:** Wednesday, March 23, 2011 9:22 AM  
**To:** R. Bartley Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

The issue with the sick leave time is the same issue as with the vacation time. Because of the absence of timesheets, we are not able to determine the amount of sick leave time the former Mayor used during his employment. The sick time used needs to be deduction from the payment he is entitled to receive as a former employee who separated with vest rights.

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**From:** R. Bartley Halloran [mailto:RHALLORAN@ldlaw.com]  
**Sent:** Tuesday, March 22, 2011 1:43 PM  
**To:** Malave, Santiago  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

Mr. Malave,



I received your letter dated March 7, 2011 re: Mr. Perez's sick/vacation time. I will agree to arbitrate this matter but we need to agree to exchange *all* records and exhibits prior to the arbitration. I also do not understand why the city cannot pay Mr. Perez his sick time prior to the arbitration. I understand the vacation time is an issue of dispute but the sick time should not be an issue dispute.

Sincerely yours,  
R. Bartley Halloran

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**From:** Malave, Santiago [mailto:MALAS002@hartford.gov]  
**Sent:** Friday, January 28, 2011 12:05 PM  
**To:** R. Bartley Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

We are working on this matter. Due to recent retirements and medical absences in our office we have not been able to finalize the review. We should have the task completed no later than mid February.

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**From:** R. Bartley Halloran [mailto:RHALLORAN@ldlaw.com]  
**Sent:** Friday, January 28, 2011 9:25 AM  
**To:** Malave, Santiago ; R. Bartley Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

Dear Mr. Malave,

After I sent to you our calculations on the days we feel should be credited to the city as vacation you responded that the city had not taken these dates into consideration when listing the days of accrued vacation. As I mentioned in my earlier letter, Mr. Perez wishes to resolve these issues, and has instructed me to work out a reasonable arrangement with the city. I feel I have done this, by sending the list of days which can be considered vacation. I would ask that you give this matter your immediate attention.

Sincerely yours

R. Bartley Halloran

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**From:** Malave, Santiago [MALAS002@hartford.gov]  
**Sent:** Wednesday, November 24, 2010 11:51 AM  
**To:** R. Bartley Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

I am in receipt of a DVD-R disc that contains the calendars for the former Mayor as indicated below. Do you want us to mail the disc to your office to your attention?...

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**From:** R. Bartley Halloran [mailto:RHALLORAN@ldlaw.com]  
**Sent:** Tuesday, November 23, 2010 9:34 PM  
**To:** Malave, Santiago  
**Subject:** RE: Perez benefits

Thank you

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**From:** Malave, Santiago [MALAS002@hartford.gov]  
**Sent:** Tuesday, November 23, 2010 12:49 PM  
**To:** R. Bartley Halloran

**Cc:** Kee Borges, Sandra; Panagore, David B.  
**Subject:** RE: Perez benefits

Attorney Halloren,

I have asked our IT Dept to download his calendars beginning in 2004 up through his last day of work for your review and follow-up. As soon as I am I in receipt of this information, I will get back to you.....

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**From:** Panagore, David B.  
**Sent:** Monday, November 22, 2010 1:59 PM  
**To:** Malave, Santiago ; R. Bartley Halloran  
**Cc:** Kee Borges, Sandra  
**Subject:** RE: Perez benefits

Attorney Halloran:

I believe the information remains in the system. I think the appropriate approach is to work through the Human Resource Department keeping Corporation Counsel informed. So by this same email I ask that Santiago follow up with you.

David B. Panagore  
Chief Operating & Development Officer  
City of Hartford, CT  
860-757-9514

"If there is no dull and determined effort, there will be no brilliant achievement"  
- Hsun-Tzu

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**From:** R. Bartley Halloran [mailto:RHALLORAN@ldlaw.com]  
**Sent:** Monday, November 22, 2010 1:32 PM  
**To:** Panagore, David B.  
**Subject:** Perez benefits

David,

I have reviewed the mayor's calendars from 2004 in an effort to determine vacation days. I do not have calendars from 2001 through 2004. I would like to be as certain as I can be before making representations about the amount of vacation taken. If they still exist, can you have someone send the calendars for this time period to me? Of course I will pay whatever charges are incurred. After reviewing the calendars, I would like to sit down with someone to try to resolve the payment of accrued vacation time. I do not believe there is a dispute on accrued sick time, and would ask that the payment for those days be calculated, sent to me for a quick review, and then processed.

Thank you for your consideration,

Bart Halloran

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Levy & Droney, P.C.  
74 Batterson Park Road, P.O. Box 887

Farmington, CT 06034-0887

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