Valerio Dominello & Hillman, LLC

One University Avenue
Suite 300B
Westwood, MA 02090

T 617.862.2005
F 617.862.2025
W VDHBoston.com

Jennifer F. King, Esq.
Jennifer.King@VDHBoston.com

May 18, 2026

VIA EMAIL
Mary Warzynski
[redacted]

RE:	Open Meeting Law Complaint
Public Body:	Sudbury School Committee
Complainant:	Mary Warzynski
Alleged Violation Date:	May 12, 2026

Dear Ms. Warzynski:

Reference is made to the above-captioned matter. The Sudbury School Committee ("Committee") met in executive session on May 18, 2026 during which it reviewed your complaint under the Massachusetts Open Meeting Law, M.G.L. c. 30A, §§18, et seq. and authorized our office to respond on its behalf.

You made your complaint on May 12, 2026. Within the lens on the Massachusetts Open Meeting Law, M.G.L. c. 30A, §§18, et seq., your complaint alleges that the Sudbury School Committee violated the Open Meeting Law on May 12, 2026 when it met in executive session under Purpose 1 to discuss a complaint filed against it in the form of a petition. As set forth below, the allegations set forth in your complaint, namely the legal conclusions, are incorrect and the Committee has not violated the Open Meeting Law.

The Open Meeting Law was enacted "to eliminate much of the secrecy surrounding deliberation and decisions on which public policy is based." *Ghiglione v. School Board of Southbridge*, 376 Mass. 70, 72 (1978). The law requires that all meetings of a public body be conducted in an open session, unless an executive session is convened. G.L. c. 30A, §§ 20(a), 21(a). A public body may enter an executive, or closed, session for any of the ten purposes enumerated in the Open Meeting Law. Executive session Purpose 1 allows a public body to discuss "the reputation, character, physical condition or mental health, rather than professional competence, of an individual, or to discuss the discipline or dismissal of, or complaints or charges brought against, a public officer, employee, staff member or individual." G.L. c. 30A, § 21(a)(1).

Indeed, the Committee met in executive session under Purpose 1 on May 12, 2026 to address a complaint filed against it in the form of a petition for a special town meeting. The petition states that:

ARTICLE: Vote of No Confidence in the Sudbury School Committee

To see if the residents of the Town of Sudbury will vote no confidence in the current Sudbury School Committee.

MOTION: That the Town of Sudbury hereby expresses its no confidence in the Sudbury School Committee. This vote is non-binding and serves as a formal expression of the will of Sudbury residents.

The actions of the current School Committee have demonstrated a pattern of conduct inconsistent with the standards of transparency, integrity, and ethical governance that Sudbury residents expect of their elected officials. Specifically, residents have raised serious concerns regarding the conduct of School Committee members in connection with an active procurement process, including potential violations of Massachusetts conflict of interest law (M.G.L. c. 268A) and the Open Meeting Law; the improper use of executive session to conduct business that should be subject to public deliberation; and a pattern of conduct that has eroded public trust, destabilized district leadership, and placed the interests of individual Committee members above the educational welfare of Sudbury students.

The residents of Sudbury hold their public schools among their highest civic priorities. The current School Committee's conduct places that priority at risk.

The Attorney General's Office has determined that complaints against a public body are "by its nature 'brought against a public officer,' namely, the members of the public body." *See OML 2021-200; OML 2012-119.* To this end, the Attorney General's Office has long and unequivocally held that a public body may enter executive session under Purpose 1 to review complaints against the body. *See OML 2021-21; OML 2019-170; OML 2019-163; OML 2019-64; OML 2019-34; OML 2019-32; OML 2019-31; OML 2015-105; OML 2013-82; OML 2012-119; OML 2011-6*. Here, where the petition is a complaint about the Committee that led to the scheduling of a special town meeting to address the complaint, it falls within the allowable reason to use Purpose 1 to meet in executive session.

Your complaint also inaccurately states that the petition/complaint was against an individual named Jillian Kelton. However, that individual is not a member of the Committee or otherwise the recipient of the complaint and therefore has no Purpose 1 rights. While it is understood you contacted the Division of Open Government[1] regarding the executive session purpose, based on your complaint, it appears you framed the matter as a "Citizens Petition" rather than a petition/complaint against the Committee. It is also relevant that their alleged

[1] Your complaint incorrectly identifies this entity the "Office of Open Government."

guidance to you was that "if the School Committee **intends to simply discuss the Citizen's [sic] Petition** however, then this may not be an appropriate discussion under Purpose 1 or any other executive session purpose." (emphasis added). However, the purpose was not to discuss any Citizens' Petition, it was to discuss a complaint against the Committee in the form of a petition. Our office agrees that if the Committee was discussing a Citizens' Petition in general, Purpose 1 would not apply – however, these circumstances are distinguishable because it involved a complaint against the Committee.

Lastly, as to your requested relief, you state "[t]his Committee was required to complete OML training as a consequence of a previous violation which they cancelled and have never rescheduled. At this point, I leave any corrective action to the discretion of the Attorney General's office." This statement is factually inaccurate. In a March 6, 2025 response to a separate OML complaint, the Committee agreed to remedy a violation by engaging in OML training. OML training is held virtually by the Attorney General's Office for public body members to attend individually based on their own availability. By way of example, the current Committee Chair (Karyn Jones) completed this OML training in June 2025 and fellow member Elizabeth Sues completed this OML training in April 2025. Notwithstanding this, the Committee has new members who are required to complete OML training within a certain time period of being sworn into their positions.

Accordingly, the Committee has not violated the Open Meeting Law in the manner alleged.

Very truly yours,

/s/ Jennifer F. King

Jennifer F. King

Enclosures

cc: Karyn Jones, Sudbury School Committee