



The Commonwealth of Massachusetts  
Office of the Attorney General  
One Ashburton Place  
Boston, Massachusetts 02108

## OPEN MEETING LAW COMPLAINT FORM

### Instructions for completing the Open Meeting Law Complaint Form

The Attorney General's Division of Open Government interprets and enforces the Open Meeting Law, Chapter 30A of the Massachusetts General Laws, Sections 18-25. Below is the procedure for filing and responding to an Open Meeting Law complaint.

#### Instructions for filing a complaint:

- o Fill out the attached two-page form completely. Sign and date the second page. File the complaint with the public body within 30 days of the alleged violation. If the violation was not reasonably discoverable at the time it occurred, you must file the complaint within 30 days of the date the violation was reasonably discoverable. A violation that occurs during an open session of a meeting is reasonably discoverable on the date of the meeting.
- o To file the complaint:
  - o For a local or municipal public body, you must submit a copy of the complaint to the chair of the public body AND to the municipal clerk.
  - o For all other public bodies, you must submit a copy of the complaint to the chair of the public body.
  - o Complaints may be filed by mail, by email, or by hand. Please retain a copy for your records.
- o If the public body does not respond within 14 business days and does not request an extension to respond, contact the Division for further assistance.

#### Instructions for a public body that receives a complaint:

- o The chair must disseminate the complaint to the members of the public body.
- o The public body must meet to review the complaint within 14 business days (usually 20-22 calendar days).
- o After review, but within 14 business days, the public body must respond to the complaint in writing and must send the complainant a response and a description of any action the public body has taken to address the allegations in the complaint. At the same time, the body must send the Attorney General a copy of the complaint and a copy of the response. The public body may delegate this responsibility to an individual member of the public body, its counsel, or a staff member, but only after the public body has met to review the complaint.
- o If a public body requires more time to review the complaint and respond, it may request an extension of time for good cause by contacting the Division of Open Government.

#### Once the public body has responded to the complaint:

- o If you are not satisfied with the public body's response to your complaint, you may file a copy of the complaint with the Division by mail, by email, or by hand, but only once you have waited for 30 days after filing the complaint with the public body. Mail may be sent to: The Division of Open Government, Office of the Attorney General, One Ashburton Place - 20<sup>th</sup> Floor, Boston, MA 02108. Emails may be sent to: [openmeeting@state.ma.us](mailto:openmeeting@state.ma.us).
- o When you file your complaint with the Division, please include the complaint form and all documentation relevant to the alleged violation. You may wish to attach a cover letter explaining why the public body's response does not adequately address your complaint.
- o The Division will not review complaints filed with us more than 90 days after the violation, unless we granted an extension to the public body or you can demonstrate good cause for the delay.

If you have questions concerning the Open Meeting Law complaint process, we encourage you to contact the Division of Open Government by phone at (617) 963-2540 or by email at [openmeeting@state.ma.us](mailto:openmeeting@state.ma.us).



## OPEN MEETING LAW COMPLAINT FORM

Office of the Attorney General  
One Ashburton Place  
Boston, MA 02108

### Your Contact Information:

First Name: Jadeane

Last Name: Sica

Address: 12 Cleveland St

City: Malden State: MA Zip Code: 02148

Phone Number: 781-603-2345 Ext. \_\_\_\_\_

Email: jbjs24@yahoo.com

Organization or Media Affiliation (if any): \_\_\_\_\_

Are you filing the complaint in your capacity as an individual, representative of an organization, or media?

(For statistical purposes only)

Individual  Organization  Media

### Public Body that is the subject of this complaint:

City/Town  County  Regional/District  State

Name of Public Body (including city/town, county or region, if applicable): Malden City Council

Specific person(s), if any, you allege committed the violation: Karen Colon Hayes

Date of alleged violation: 11/18/2025

## Description of alleged violation:

Describe the alleged violation that this complaint is about. If you believe the alleged violation was intentional, please say so and include the reasons supporting your belief.

Note: This text field has a maximum of 3000 characters.

The Open Meeting Law strictly prohibits serial deliberation—that is, a series of private, non-public communications among members of a public body that, taken together, involve a quorum and constitute deliberation outside of a posted public meeting.

Based on information available to me, Councillor Hayes has engaged in private communications with at least five other members of the Malden City Council—representing a quorum—for the purpose of influencing or shaping the Council's deliberations on paper #432-25 regarding the appointment of Jeffrey Donahue presently before us.

These communications reportedly occurred via text message, email, and/or phone calls, and were explicitly related to strategy, positions, and intended outcomes regarding the agenda item from last night.

Such serial private communications violate:

M.G.L. c. 30A, § 18, which requires deliberations to occur in an open and publicly accessible meeting; and The Attorney General's guidance prohibits "daisy-chain" or "hub-and-spoke" communications that collectively involve a quorum.

While publicly advocating transparency, these private discussions directly undermine the public's right to observe the deliberative process. The integrity of tonight's proceedings is compromised when members participate in off-record deliberation intended to influence the outcome of a public vote.

What action do you want the public body to take in response to your complaint?

Note: This text field has a maximum of 500 characters.

To preserve the integrity of this process and ensure compliance with the Open Meeting Law, I respectfully request the following:

That Councillor Hayes recuse herself from all participation, deliberation, and voting on this matter due to the serial deliberation described above.

That the Council take corrective action, including public acknowledgement of the violation and implementation of safeguards to prevent further serial deliberation or private lobbying among members.

That this complaint be forwarded to the Attorney General's Division of Open Government for review, as required by law.

## Review, sign, and submit your complaint

### I. Disclosure of Your Complaint.

**Public Record.** Under most circumstances, your complaint, and any documents submitted with your complaint, is considered a public record and will be available to any member of the public upon request.

**Publication to Website.** As part of the Open Data Initiative, the AGO will publish to its website certain information regarding your complaint, including your name and the name of the public body. The AGO will not publish your contact information.

### II. Consulting With a Private Attorney.

The AGO cannot give you legal advice and is not able to be your private attorney, but represents the public interest. If you have any questions concerning your individual legal rights or responsibilities you should contact a private attorney.

### III. Submit Your Complaint to the Public Body.

The complaint must be filed first with the public body. If you have any questions, please contact the Division of Open Government by calling (617) 963-2540 or by email to [openmeeting@state.ma.us](mailto:openmeeting@state.ma.us).

By signing below, I acknowledge that I have read and understood the provisions above and certify that the information I have provided is true and correct to the best of my knowledge.

Signed: Jadeane M. Sica

Date: 11/19/2025

For Use By Public Body  
Date Received by Public Body:

For Use By AGO  
Date Received by AGO: