Geraghty & Bonnano, LLC
Attorneys at Law

PAUL M. GERAGHTY*
MICHAEL S. BONNANO
JOHANNA McCORMICK
MARK A. DUBOIS†
PATRICIA A. KING**
JONATHAN E. FRIEDLER††

*Also Admitted in New York
† Board Certified, Trial Advocate
**Se habla español
†† Also Admitted in Massachusetts and North Dakota

July 2, 2020

Via email ggoeschel@eltownhall.com

Gary Goeschel
Director of Planning/IWC Official
Town of East Lyme
108 Pennsylvania Avenue
Niantic, CT 06357

Re: 297 Boston Post Road, East Lyme, IWC Connecticut Cease & Desist

Dear Mr. Goeschel:

This correspondence shall serve notice that I have been retained by Pazz & Construction, LLC with regard to the above cease and desist notice. Section 14 of the East Lyme Inland Wetlands Regulations requires my client be given a hearing within ten (10) days of the notice of violation. The Commission failed to afford my client the opportunity of a hearing within the required time frame.

We therefore deem the cease and desist to be void. I should point out that Al Smith, the owner of the property has been storing vehicles and material on the property prior to the enactment of wetland regulations by the town. More importantly, the activities presently conducted on the site have no impact on the lake which forms the boundary of the property.

Please feel free to contact me should you have any questions or which to discuss these matter further.

Sincerely,

Paul M. Geraghty

cc: Jason Pazzaglia.

Replies to New London only at:
38 GRANITE STREET, PO BOX 231
NEW LONDON, CONNECTICUT 06320
131 DWIGHT STREET
NEW HAVEN, CONNECTICUT 06511
WWW.GERAGHTYBONNANO.COM
TELEPHONE (860) 447-8077 / FAX (860) 447-9833