

October 3, 2025

City of Middletown
Department of Human Resources
Justin Richardson, Director

cc. Mayor Gene Nocera, City of Middletown

This emailed Memorandum is in response to an interview conducted by Mr. Justin Richardson, Director of Human Resources of the City of Middletown, with me on October 3, 2025, in regards to allegations made against me as it relates to payments made to a private contractor by the Public Works Department of the City of Middletown.

The following is my recital of fact:

1. I was hired by the City of Middletown, Mayor Dan Drew, in January 2019 as the Chief Management Analyst, under the Department of Finance. My direct supervisor was listed as the Director of Finance, Carl Erlacher. I have a Finance Degree from Boston College, and an MBA in Finance from Fordham University.
2. From my date of hire, I occupied an office within the Mayor's Office, until April 2025, at which time I was moved into an empty office down the hall formerly occupied by the Assistant Director of Public Works, without explanation.
3. From the date of my hire until this move, my routine job duties mainly involved assisting various City departments with their budgeting, assisting the Public Works Department with their paving projects and sanitation enterprise fund, and various ad hoc requests from department heads. I was not responsible for payment of Public Works invoices.
4. In December of 2021, Christopher Holden, the former Deputy Director of Public Works, was named the Director of Public Works, replacing William Russo who retired. The role of Deputy Director remained vacant at that time. For a brief period of time, from approximately February to August of 2022, I was asked to serve as Acting Deputy Director of Public Works, and received supplemental pay. My responsibilities mainly involved support of Director Holden, which included drafting of contracts for paving programs, contracts for renovations of city buildings. I was not responsible for payment of Public Works invoices. Mr. Holden remained in the Director position until approximately March of 2024, when his employment was terminated for reasons unknown to me. Upon his termination, the position of Director of Public Works remained vacant.
5. Howard Weissberg was hired as the Deputy Director of Public Works in October of 2022, and was employed in that position until March of 2024, when he moved into the Interim Director of Public Works role. He stayed in this role until he voluntarily resigned from City employment in March of 2025. During his time as interim Director, there was no Deputy Director of Public Works.
6. Upon physically moving to the Deputy Director of Public Works' former office in April of 2025, nobody was serving as Director or Deputy Director of Public

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Works. There was no person in any role in that department who was able to continue necessary and vital functions of the office at that time. Compounding the issue, in March of 2025, the Budget Analyst of Public Works, responsible for payment of Public Works bills and the handling of sanitation issues, went on maternity leave, and did not return until July of 2025. In accordance with the job descriptions of the administrative secretaries remaining as the only employees in that department, they were unable to pay out such bills.

7. The Mayor of the City of Middletown, Ben Florsheim, stepped down in June of 2025, at which time Gene Nocera, the Chairman of the Public Works Commission, stepped in as acting Mayor. The Mayor's Chief of Staff, Bobbye Knoll Peterson, continued in that role at that time.
8. From approximately March of 2025 through August of 2025, Public Works functioning stalled to an almost complete halt. In an effort to continue with vital functions in Public Works, I carried out to the best of my ability and without instruction or supervision the duties normally undertaken by the Director of Public Works, Deputy Director of Public Works, and Budget Analyst of Public Works, in addition to my normal duties as Chief Management Analyst. My involvement was well known to all Department heads including the Mayor, Finance, Legal, and Human Resources, in addition to the Commission of Public Works. During this time, I attended all Commission meetings related to Public Works, without any change of job description or supplemental pay. I received no additional training for these new duties, and received no training on statutory compliance from the Legal Department.
9. Throughout this period, I expressed concern to the Public Works Commission, Human Resources, and the Legal Department that the Public Works Department was in critical condition and in dire need of staffing. Multiple times, and as bills piled up in Public Works, I was instructed, to "do the best that you can."
10. The C&C Concrete payments in question were made in June of 2025 and were handled in accordance with the prior practice of former Acting Director of Public Works, Howard Weissberg, as I understood them from Mr. Weissberg. Under that practice, all projects were to be managed under one umbrella, with side and adjacent streets attributed to the applicable streets listed on the City Road Bond. Several overdue invoices presented by C&C for work done listed not only the street that was bonded, but also adjacent streets. C&C was seeking payment for their past due invoices. Due to the staffing issues, late payment of invoices by the Public Works Department was a frequent occurrence. In accordance with what I understood to be the prior practice of Mr. Weissberg, I processed the payments due to C&C.
11. In late June of 2025, when a representative from C&C Concrete inquired with me as to their payment, I immediately provided a full and transparent explanation of the adjustments I needed to make to the applicable purchase order to allow it to be paid. C&C expressed gratitude to me for stepping in to process their invoices that had gone unpaid for several months due to lack of staffing.
12. On August 7, 2025, I was contacted by Mayor Gene Nocera who informed me there were discrepancies on the C&C invoices, which he became aware of as a result of C&C inquiring about payments still outstanding for retainage. At that

time, I informed Mayor Nocera that I in fact paid the C&C invoices in the manner of the prior practice described herein, and I also advised him that, to the best of my knowledge, there were no other instances of such practice attributed to me. Mayor Nocera notified me at that time that I was physically locked out of my office, my city email access was taken away, and I had no further access to the financial software program of the City.

13. Upon my return from vacation on Saturday, August 23, 2025, Mayor Nocera called me personally to say that a formal investigation would be taking place as to these invoices. On Monday, August 25, 2025, I met with Mayor Nocera, Director of Human Resources, Justin Richardson, the Human Resources Manager, Michelle Langston, Chief of Staff, Bobbye Knoll Peterson, and the Director of Finance, Carl Erlacher. At that meeting they informed me of the allegations regarding the C&C invoices, that an investigation would be taking place, and during the course of the investigation I would be reassigned to the Tax Collector's office for purposes of me assisting the Tax Collector with reconciliation of the fiscal year 2025.
14. From August 23, 2025 to present, I have continued to work with financial data in the Tax Collector's office, yet remained locked out of my office and City email and databases. I am not aware of any other employee during my time of employment with the City of Middletown to receive this treatment for any reason.
15. On September 5, 2025, I was informed by Mayor Nocera that a follow-up meeting would take place within a two-week period, likely September 19, 2025, to discuss the progress of the investigation.
16. In mid September I was made aware that the City's Anti-Racism Task Force and local chapter of the NAACP were notified by concerned co-workers of this investigation and my treatment during this investigation, with both organizations requesting a formal meeting with Mayor Nocera to discuss the discriminatory and derogatory treatment of me.
17. On September 19, 2025, I was contacted by Mayor Nocera that the meeting would need to be postponed and rescheduled to September 26, 2025 because the Human Resource Department was unable to complete components of their investigation, despite Mayor Nocera's urgency.
18. On September 26, 2025, I was again contacted by Mayor Nocera and told that the rescheduled meeting would be postponed once again, due to the Human Resource Department again being unable to complete components of their investigation. The next scheduled date would be October 3, 2025. At that time, I requested restoration of my email, in an effort to assist the Public Works Administrative Secretary, who was currently handling all functions of Public Works on her own which she expressed was overwhelming.
19. On September 29, 2025, I was contacted by Mayor Nocera, notifying me that my email account had been restored and access to my office, if I so chose, was now allowed. Additionally, he indicated that the scheduled meeting for October 3, 2025 would be postponed for the third time due to Human Resources still being in the process of conducting several follow-up interviews with various City employees, all relating to this investigation.

20. On September 29, 2025, I received an email from the Human Resource Director, Justin Richardson, stating a mandatory meeting with me was scheduled for October 3, 2025 at 10AM in his office, which happens to be my former office in the Mayor's office. In his email he stated that the investigation resulted in no further payment discrepancy existing other than what was already known about the C&C account. Throughout this time, I have received repeated calls from Mayor Nocera that the investigation was nearing a conclusion and I would be restored to my normal duties soon since it was clear I had not done anything improper. Despite this, I was made aware of emails Mr. Richardson sent to other employees scheduling their mandatory meetings with Human Resources regarding this matter that can be described as nothing other than defamatory to me.
21. The mandatory meeting was held as planned on October 3, 2025, with Justin Richardson, Michelle Langston, Attorney Jonathan Shapiro, my wife Sarah Shapiro, and myself. At that meeting I was questioned by Mr. Richardson and Ms. Langston regarding staffing issues, my job roles, and the C&C invoices. The contents of this memorandum were discussed.
22. As of October of 2025, the positions of Director of Public Works and Deputy Director of Public works have now remained vacant for seven (7) long months. As the Chief Management Analyst, I am fully aware that the Department of Public Works has one of the largest budgets and employs the most people of all City departments. To have that department devoid of leadership for so long is a detriment to the entire City.
23. It is my representation that for far too long, the entire responsibility for Public Works operations has rested squarely on my shoulders. In the absence of a Director, a Deputy Director, or sufficient staff, I have taken on duties far beyond my job description with the acquiescence of all City leadership - because the work had to be done and nobody else was willing to do it. What should be recognized as dedication and leadership on my part is now being construed as nefarious conduct. I have raised concerns over the past several years, repeatedly and in good faith, regarding the systemic problem of vendors contacting the City complaining of unpaid invoices. These vendor complaints are the direct result of structural deficiencies in staffing and support. To now weaponize these circumstances against me after I raised concerns is not only baseless, it is also profoundly unjust and retaliatory. What should be viewed as my willingness to go above and beyond is being repackaged into a false narrative of misconduct. The accusation that I committed any wrongdoing with City funds - which is the narrative that is being shared across the building and across City departments - is entirely unfounded, reckless, and damaging—not just to me professionally, but to the integrity of the City itself. I have always embraced my work responsibilities with pride and carried them out with integrity. I have built my career on trust, transparency, and an unwavering commitment to ethical conduct. To suggest otherwise ignores facts, disregards the sacrifices I have made on behalf of this City, and insults the very standards of public service I have upheld throughout my career.