



Aeton Law Partners, LLP
MARIO CERAME
Partner

Ext. 119
Direct Dial: 860.499.3402
mario@aetonlaw.com
mario@speechdefense.com

MAILING ADDRESS:
311 Centerpoint Drive
Middletown, CT 06457
T: 860.724.2160

aetonlaw.com
speechdefense.com

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VIA ELECTRONIC AND PRIORITY MAIL

October 26, 2026
Attorney Jonathan Harding
Corporation Counsel, City of Hartford
550 Main Street, Room 210
Hartford, CT 06103

RE: General Statutes §§ 7-465 & 7-101a Notice:

- **Mayor Arulampalam in his Individual Capacity;**
- **Attorney Harding in his Individual Capacity;**
- **Doe Coconspirators in their Individual Capacities;**
- **The City of Hartford**

Dear Attorney Harding,

This letter is a follow-up to a message I left for you in the morning on Friday, October 9, 2026, about anticipated litigation. You did not return my call. I represent Trantolo & Trantolo, Keith Trantolo, and Scott Trantolo in connection with the unlawful prior restraint and retaliation by the Mayor and others.

This letter serves as **§§ 7-465 & 7-101a Notice** as well as Notice of Representation and an early invitation to negotiate to limit the defendants' exposure to reasonable attorneys' fees. In addition to relevant exhibits, please also find enclosed a Preservation Letter and a FOI request.

The Mayor acted based on content and viewpoint, and invoked a rule that both doesn't apply and is itself unconstitutional on its face for content discrimination. Commercial or ideological, free speech requires the right reason and the right rule.

Pursuant to General Statutes §§ 7-465 and 7-101a, my clients give **notice** of their intention to commence an action against the City and the responsible officials for violations of their constitutional rights arising from the events in Hartford, described below, beginning on or about August 8–9, 2026, and continuing through the subsequent grievance proceedings. Injuries and misconduct include **deprivation of the right to freedom of speech** and abuse of process, as well as deprivation of other expressive rights under the federal and state constitutions, deprivation of due process and due course of law under the federal and state constitutions, suppression of protected expression, retaliation, negligence, recklessness, loss of the opportunity to communicate their public-safety message, economic expenses incurred in responding to the retaliatory grievance proceedings, reputational injury, economic harm, and civil conspiracy to commit these wrongs.

My clients furthermore give notice that the action will be based on malicious, wanton or wilful acts by defendants as well as negligence, and for violation of my clients' civil rights under the state and federal constitutions. Qualified immunity or government immunity or other immunities do not apply.

BACKGROUND

For more than a century, the Trantolo family has been a part of the Hartford community. A couple of months ago, my clients published public-safety, political messages, in the form of temporary sidewalk-stencils, along with the firm's name. The Mayor effected an illegal prior restraint by destroying my clients' protected speech, illegally retaliated against that speech, and unlawfully commandeered and coopted the Hartford Police Department. Does unknown to us at this time are almost certainly co-conspirators. And you personally took part in this unconstitutional co-conspiracy.

The Messages

The messages were published as temporary sidewalk-stenciled messages about public safety, around the city, on or about August 8–9, 2026. They were written with USSC Spraychalk temporary chalk. They were part of a campaign to promote public safety across Connecticut. Some of the published facts tend to put the Mayor in a bad light.

The messages included ordinary safety advice and statistics such as “Look Both Ways Before You Cross,” “633 pedestrians have been hit in Hartford in the last five years,” and other Hartford crash statistics. The firm's name and practice appear beneath the warnings.

Of course the firm wanted the public to know who was speaking. But the messages themselves warned pedestrians about danger and reported local crash statistics. The fact that lawyers signed those warnings did not strip them of constitutional protection.

As the Mayor's public statements make clear, he didn't like the content and viewpoint of the speech or the speakers. “The government may not regulate [speech] based on hostility—or favoritism—towards the underlying message expressed.” (Internal quotation marks omitted.) *Morascini v. Commissioner of Public Safety*, 236 Conn. 781, 792, 675 A.2d 1340 (1996). “[L]isteners' reactions to speech are not the type of secondary effects that will classify a regulation as content-neutral.” (Internal quotation marks omitted.) *Id.*, 794.

Mayor Personally Orders Police to Punish Speakers, Political Spectacle

The Mayor harvested my clients' speech rights to personal political benefit.

According to the Mayor, on Monday, August 10, 2026, he received complaints about the sidewalk chalk. On Tuesday, August 11, 2026, the Mayor ordered police to issue a citation. The citation was an end run on ordinary police procedure. The ticket issued at 5:00 p.m. At 5:27 p.m., the Mayor made a large post on his political Facebook page that he ordered the citation.

Any rational investigation would have uncovered that the messages were made using USSC Spraychalk, and that this product is indicated for temporary messages on concrete. The product is used across the United States for temporary markings, including on concrete and asphalt. It comes off with ordinary foot traffic and exposure to the elements; the container indicates it can be removed with a broom.

The City alleged approximately 28 such chalk-stenciled messages.¹ The Mayor asserted that the sidewalk-chalk messages violated Hartford City Ordinance § 3-1, for advertising without a permit on public property. The City removed some of the messages, and, under retaliatory legal threat, my clients removed others.²

The City's § 3-1 claim was a fig leaf for viewpoint- and content-based discrimination. The Mayor abused his authority over the law-enforcement process to punish protected speech. He publicly made it plain he disliked the content of the speech and the speakers and their viewpoint.³ In addition, the retaliatory grievance is expressly premised on content and viewpoint of the speakers.

¹ As to location, we understand that these approximately 28 locations are known to the city, as the city has alleged them. *See* JD-GC-6 at 2.

² *See Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 83 S. Ct. 631 (1963).

³ Among other things, the Mayor publicly stated:

- “People don't want to walk through city streets or down Bushnell Park and think about slip and falls.” NBC Connecticut, August 12, 2026.
- “People are sick of advertising by personal injury lawyers, and for ‘disrespect’ shown for the ‘aesthetics’ of Hartford, he said.” *Courant*, August 13, 2026.
- “Mayor . . . was outraged by the messages when he learned of them this week” *Courant*, August 15, 2026.
- “He said it was disrespectful to the city and its residents.” *Id.*

These describe enforcement based on content, class of the speaker, and on a claimed offensive mental effect on the audience.

Retaliatory Grievance

By Tuesday, August 11, 2026, the Mayor was telling the press about a contemplated grievance filing. On Thursday, August 13, 2026, you personally signed a JD-GC-6. The grievance complaint was filed shortly thereafter.

In that filing, you wrote a brief narratives. Some of these statements are unfair characterizations, but opinions nonetheless—such as that the city found the speech “disrespectful.” You go beyond mere opinion, however. You claim intentional damage to public property. You claim more than \$1,500 in loss. You invoke a felony criminal-mischief statute. You misidentify the substance applied as a paint.

You allege the warnings were “designed” to distract people to cause them to get hurt. Normally this might be a mere opinion. Not so here.

You are the government official charged with defending the city against negligence claims. In the context of a grievance application, the reader understands that when signed by *you*, your statement necessarily implies a factual basis and special knowledge outside of the four corners of the document. Your allegations against a personal injury firm, in context, were particularly pernicious and evince reckless or wilful misconduct. The malicious and reckless abuse of the grievance process to quash protected speech is outrageous.

To be clear—if you were acting as Mr. Harding, private citizen, this would be **different**. That’s protected speech. In this case, you are acting as a government official. That’s *government* speech—free speech restrictions don’t apply to government speech.⁴

Historical Context

About forty years ago, Keith and Scott Trantolo’s father and uncle faced similarly illegitimate grievance complaints.⁵ The firm made public statements quoting John Locke on Law Day—akin to the public safety messages here. The firm made other statements on television that were “informative and in no way misleading or deceptive”—but made the mistake of appearing in an unusual medium. Then it was television. Here it is sidewalk chalk.

A trial court upheld the grievance. But our Supreme Court reversed. Like the 1984 cases, “[c]haracterization of the statement as ‘ideological’ or ‘commercial’ is unnecessary, however, for as either the statement is protected.”⁶

⁴ See *Markley v. SEEC*, 349 Conn. 67, 102 n.15, 313 A.3d 1170 (2024).

⁵ See *Grievance Committee for Hartford-New Britain Judicial District v. Trantolo*, 192 Conn. 15, 470 A.2d 228 (1984); see also *Grievance Committee for Hartford-New Britain Judicial District v. Trantolo*, 192 Conn. 27, 470 A.2d 235 (1984).

⁶ *Trantolo*, supra, 192 Conn. 27, 36.

Just because some find the speech “distasteful” doesn’t strip the speech of constitutional protection.⁷ “[A]ttorneys are as entitled to public expression of their sentiments as any other citizen.”⁸

The § 3-1 Claim is a Sham

Regulating commercial speech requires a substantial interest in preventing a particular evil—that’s the heart of the *Central Hudson* test.

So—too much sidewalk chalk in Hartford? Too much hopscotch, too many rainbows, an overabundance of ‘save this’ or other temporary markings? No.

The ordinance claim is a sham:

- The Mayor publicly identified speech he disliked, directed the police to cite its publisher, and defended that decision by attacking the message and the profession of the people who published it. He did not discover an offense by investigating a public danger.
- The stated reasons for the citation depend upon reading the message, identifying the speaker, and subjective offense. Accordingly, the application is impermissibly based on viewpoint and content.
- Hartford’s sign regulations distinguish among categories of expression according to their content. To the extent the City employed those distinctions in enforcing § 3-1, enforcement was impermissibly content-based under *Reed v. Town of Gilbert*, 576 U.S. 155, 163, 135 S. Ct. 2218 (2015).
- Similarly, being content-based on its face, the scheme is itself facially unconstitutional under *Reed*.
- Moreover, my clients’ messages fall within the plain language of the 8.13.2(C) exception, being constructed on durable concrete, and being political in nature as to public safety.
- Likewise, the text of § 3-1 contemplates signage that is a physical device, not sidewalk-chalk stencils. The ordinance does not apply, even if lawful.
- Finally, even if these messages are treated entirely as commercial speech, the City’s enforcement must satisfy *Central Hudson*.⁹ A municipal interest in aesthetics does not automatically justify suppressing truthful public-safety information, particularly where the City has not established why the temporary messages presented a danger requiring their removal.

Wrong Reason; Wrong Rule

In the Mayor’s own words, he didn’t like what the messages made people think about. He didn’t like the speakers or the content of their messages. Furthermore,

⁷ *Trantolo*, supra, 192 Conn. 15, 27.

⁸ *Trantolo*, supra, 192 Conn. 27, 36.

⁹ See *Trantolo*, supra, 192 Conn. 27, 33 (citing *Central Hudson v. Public Service Commission of New York*, 447 U.S. 557, 561, 100 S.Ct. 2343 (1980)).

the City relies on an ordinance that is designed for physical signs, not sidewalk chalk, and the regulatory structure is impermissibly content-based. Wrong reason, wrong rule.

Invitation for Negotiation

The constitutional questions are not close. The City can reduce its exposure to reasonable fees with prompt action. Declining to do so can increase those fees by orders of magnitude, however. My clients are prepared to discuss a prompt and reasonable resolution and invite early negotiations. Refusal to resolve this matter at an early stage will unreasonably result in additional attorneys' fees recoverable under 42 U.S.C. § 1988 that can be avoided.

Conclusion

For more than a hundred years now, the Trantolos have been a part of Hartford. My clients know the people who get hurt. That's their job. It's their job to know how lives are changed from getting hurt. It's their job to know causation in excruciating detail, how people get hurt and why. It's their job to know the clients' pain, physical and otherwise. If their client dies, it's their job to know the grief of the families left behind. It's their job to persuasively communicate the whole grim account.

My clients have been helping people who get hurt in Hartford for generations. They are specially positioned to communicate messages asking people to take a bit of care near the crosswalk. It is sad that you, the Mayor, and the City took these messages as occasion for censorship.

Govern yourselves accordingly.

Mario Cerase
Aeton Law Partners LLP
speechdefense.com
311 Centerpoint Drive
Middletown, CT 06457
T: 860-724-2160
F: 860-724-2161
mario@aetonlaw.com
mario@speechdefense.com

Cc: Hartford City Clerk
550 Main Street,
First Floor, Suite 104
Hartford, CT 06103