

**DISCLOSURE OF APPEARANCE OF CONFLICT OF INTEREST  
AS REQUIRED BY G. L. c. 268A, § 23(b)(3)**

PUBLIC EMPLOYEE INFORMATION	
Name of public employee:	SUZANNE Juope
Title or Position:	VP Town Council Counselor Precinct 4
Agency/Department:	Town Council
Agency address:	1 Metcalf Sq. Winthrop MA 02152
Office Phone:	617 846 1852
Office E-mail:	towncouncil@winthrop.ma.gov
	<p>In my capacity as a state, county or municipal employee, I am expected to take certain actions in the performance of my official duties. Under the circumstances, a reasonable person could conclude that a person or organization could unduly enjoy my favor or improperly influence me when I perform my official duties, or that I am likely to act or fail to act as a result of kinship, rank, position or undue influence of a party or person.</p> <p>I am filing this disclosure to disclose the facts about this relationship or affiliation and to dispel the appearance of a conflict of interest.</p>
APPEARANCE OF FAVORITISM OR INFLUENCE	
Describe the issue that is coming before you for action or decision.	I made the following motion: The Town Council moves to join the Town of Winthrop with the legal case seeking to exempt the town from the MBTA Commuter Act.
What responsibility do you have for taking action or making a decision?	Voting
Explain your relationship or affiliation to the person or organization.	My daughter Diana Viers and colleague Michael Walsh are lawyers representing this case
How do your official actions or decision matter to the person or organization?	I have no financial interest in this case and this does not affect my judgement.

<b>Optional:</b> Additional facts – e.g., why there is a low risk of undue favoritism or improper influence.	<i>This case is filed pro bono by my daughter and her colleague.</i>
<b>If you cannot confirm this statement, you should recuse yourself.</b>	<b>WRITE AN X TO CONFIRM THE STATEMENT BELOW.</b> <input checked="" type="checkbox"/> Taking into account the facts that I have disclosed above, I feel that I can perform my official duties objectively and fairly.
Employee signature:	<i>Suzanne Purpe</i>
Date:	<i>January 21, 2026</i>

Attach additional pages if necessary.

Not elected to your public position – file with your appointing authority.

Elected state or county employees – file with the State Ethics Commission.

Members of the General Court – file with the House or Senate clerk or the State Ethics Commission.

Elected municipal employee – file with the City Clerk or Town Clerk.

Elected regional school committee member – file with the clerk or secretary of the committee.

Form revised July, 2012

**RECEIVED**  
 2026 JAN 26 P 3:58  
 TOWN CLERK  
 WINTHROP, MASS

**DISCLOSURE OF APPEARANCE OF CONFLICT OF INTEREST**

**AS REQUIRED BY G.L.C.268A 23(B) (3)**

**Name of Public Employee: Suzanne Swope**

**Title or Position: Town Councilor**

**Agency/department: Town of Winthrop, Town Council**

**Agency address: 1 Metcalf Square, Winthrop MA 02152**

**Office Phone: 617-846-1852**

**Office Email: sswope@town.winthrop.ma.us**

**Describe the issue**

**that is coming before you for action or decision.**

**The planning board's recommendation per the MBTA Communities Act which is a determination of general policy which is to change the Zoning rules to allow construction of more residential units within reasonable distance of MBTA transit locations. The particular matters include, for example, decisions and determinations about the specific Zoning changes to help accomplish that general policy.**

**What responsibility do you have for taking action or making a decision?**

**I am one of nine councilors who will be asked to vote on the planning board's recommendation**

**Explain your relationship or affiliation to the person or organization. How do your actions or decision matter to the person or organization?**

**The financial interest that I have as a home owner is shared with 10% or more of the population in the town. So if my financial interest as an owner of a dwelling is shared with 10% or more of the population, 19 (b) (3) allows me to participate as a member of the Town Council in the particular matters. I believe that the 10% threshold or more of the population of the Town shares my financial interest as a homeowner as they also own real property located in the Zones that now or in the future the Town Council may or may not vote to change to allow for the development of more housing**

*no ff.  
Halt.  
owner  
renter*

**in those Zones. Particular matter the Town Council will consider about Zoning changes could increase or not increase the numbers of residential units, which would affect the value of existing residential units like mine. Thus based on that information, 19 (b) (3) allows me to participate, as a member of Town Council, in decisions and determinations and ultimate votes the Town Council will make about the proposed Zoning changes.**

---

**Describe the Issue:**

**In addition my daughter, Diana, filed lawsuit in Superior Court on behalf of the “Winthrop Says No to 3A Committee.” But since filing that lawsuit, I learned from Diana that the Court might follow what happened in similar lawsuit by a group of Rockport’s concerned citizens who wanted to challenge 3A. In the Rockport case, the Court found that concerned citizens in Rockport did not have standing to file a lawsuit against the EOHLC. Thus, it’s possible that in Diana’s filing, the Town of Winthrop would have to be a party to the lawsuit or, at least, file its own lawsuit against the EOHLC.**

**I initially thought that Winthrop’s Town Council might be taking up the matter about whether to join the lawsuit filed by “Winthrop Says No to 3A Committee” and/or to file its own. But you have since learned that the Town Council will not be getting involved in the lawsuit Diana filed.**

**Diana also filed a citizens petition (after obtaining 1037 signatures) with the Town Clerk about Section 3A, to have a warrant article that opposes Section 3A as applied to Winthrop on the Town Ballot, and the Clerk rejected the petition. The Winthrop Says No to 3A has again filed the petition.**

**It is my understanding that the Town Council does not vote on whether a citizen’s petition can be placed on a ballot.**

**The Winthrop Says No Committee has also filed in Superior Court a case to exempt Winthrop from 3A zoning.**

**The Town Council will likely consider another Zoning change presented by the Planning Board in November this year, and this one will be the only Zoning change the Town Council will consider about 3A. The prior proposed Zoning changes will no**

longer be considered. The Council will either approve or not approve this one. This Zoning change involves a proposed overlay to Seal Harbor 1,3, and Fort Heath, Governor's Park and an offset to an existing Commercial Zone that would allow, as of right, the construction of over 200 new dwelling units within an area called the CBD (Central Business District)

As before with the prior particular matter about proposed Zoning changes relative to 3A, I considered whether the Latest Zoning Proposal---this particular matter that the Town Council will review/approve/not approve---is one in which I, as a homeowner, would have a reasonably foreseeable financial interest.

As before, given the number of existing dwellings in the Town, I share the same financial interest as other home owner in Winthrop which is at least 10% or more of the population in the *entire* municipality..

So, once again, § 19(b)(3) will not prohibit me from participating in the Town Council's particular matters about this proposed Zoning Change.

I am complying with § 23 of the law. § 23(b)(3) specifies that I must not "act in a manner which would cause a reasonable person, having knowledge of the relevant circumstances, to conclude that any person can improperly influence or unduly enjoy my favor in the performance of my official duties, or that I am likely to act or fail to act as a result of kinship, rank, position or undue influence of any party or person." But this section also provides, "It shall be unreasonable to so conclude that if I disclose in a manner which is public in nature, the facts which would otherwise lead to such a conclusion."

A reasonable person likely would conclude that Diana might unduly enjoy my favor with respect to my actions as a Town Councilor about the Latest Zoning Proposal because of her efforts devoted to the petitions and the lawsuit that challenge 3A. Thus, before I "act" during a Town Council meeting on the agenda item about the Latest Zoning Proposal, I am disclosing on the public record the relevant facts, e.g., Diana's work on the two petitions and the lawsuit I am filing this form as a public record of disclosure. I believe that I make decisions in this case based on my own judgement of the information presented.

Below are two points of law:

930 cmr 6.25(3)(a) Recusal is not required "if the particular matter involves a determination of general policy, and the financial interest of the elected official or

**immediate family member is shared with at least 10% of the population of the entire geographic area represented by the official is the same in nature as the constituents' financial interests.**

**Statute –glc 268a s19(b)(3) recusal not required if “the particular matter involves a determination of general policy and the interest of the municipal employee or members of the immediate family is shared with a substantial segment of the population of the municipality.”**

To: Denise Quist

From: Suzanne Swope

For my file

RECEIVED  
2024 NOV 18 A 10:13  
TOWN CLERK  
WINTHROP, MASS.

