

SUPREME COURT OF CONNECTICUT

Commission on Human Rights & Opportunities ex rel. Wendy Pizzoferrato et al. v. The Mansions, LLC et al.

Pizzoferrato · No. SC 21111, SC 21113 · Decided March 31, 2026

SUMMARY

The Connecticut Supreme Court affirmed the Appellate Court’s reversal of a trial court judgment in a housing-discrimination action involving a request to accommodate two emotional support dogs. The court held that the trial court found only that Wendy Pizzoferrato was regarded as having a mental disability and did not implicitly find that she had a record of such a disability. Because a person regarded as having a disability was not entitled to the requested accommodation under the applicable statute, the court vacated the Appellate Court’s discussion of the necessity standard.

CASE DETAILS

COURT	Supreme Court of Connecticut
WRITING FOR THE COURT	Mullins, C. J.; McDonald, J.; D'Auria, J.; Ecker, J.; Alexander, J.; Dannehy, J.
JURISDICTION	Connecticut Supreme Court
DECIDED	March 31, 2026
DOCKET	SC 21111, SC 21113
DISPOSITION	other
PROCEDURAL POSTURE	Certified cross-appeals from the Connecticut Appellate Court's reversal of a trial court judgment for the plaintiffs in a housing-discrimination action involving a requested accommodation for two emotional support dogs.
STANDARD OF REVIEW	Questions concerning the interpretation of a trial court judgment are reviewed as questions of law. The Supreme Court construed the trial court's memorandum of decision and the surrounding circumstances to determine the trial court's intent.
PRECEDENTIAL VALUE	Published and precedential Connecticut Supreme Court opinion
PARTIES	The Mansions, LLC, 75 Hockanum, Inc., Candace Barnard, Commission on Human Rights and Opportunities v. Commission on Human Rights and Opportunities, Wendy Pizzoferrato, Rudy

TOPICS

reasonable accommodation regarded as disabled ada / disability public accommodations discrimination
appellate procedure

PRACTICE AREAS

fair housing disability discrimination appellate procedure statutory interpretation

QUESTIONS PRESENTED

1. Whether the Appellate Court correctly construed the trial court's judgment as implicitly finding that Wendy had a record of a mental disability under General Statutes § 46a-51 (20).
2. Whether a person who is only regarded as having a disability may establish a failure-to-accommodate claim under Connecticut's fair-housing laws.
3. Whether the Appellate Court's discussion of the legal standard for determining whether an accommodation is necessary under General Statutes § 46a-64c (a) (6) should remain in effect.

HOLDINGS

1. The Appellate Court incorrectly inferred that the trial court found Wendy had a record of a mental disability. The trial court expressly found only that Wendy was regarded as having a disability, and a finding that she had a record of a disability was an independent alternative basis rather than a subsidiary finding necessary to support the judgment.
2. Under the circumstances of this case, and because the commission conceded the point, a person who is only regarded as having a disability is not entitled to a reasonable accommodation and cannot establish the failure-to-accommodate claim at issue.
3. The Appellate Court's discussion of the record-of-disability prong and the legal standard for determining when an accommodation is necessary was vacated because those issues were not necessary to the disposition and could have legal consequences if left in place.

KEY QUOTATIONS

“The judgment of the Appellate Court is affirmed insofar as it reversed the judgment of the trial court; the judgment of the Appellate Court is vacated insofar as it addresses the “record of” prong of § 46a-51 (20) and the legal standard of what constitutes “necessary” for purposes of the state fair housing laws.”

FACTUAL BACKGROUND

The Pizzoferratos sought to rent an apartment at The Mansions while keeping two emotional support dogs despite the complex's no-pet policy. The defendants approved one dog but requested additional information to justify the second, including explanations concerning the necessity of two dogs and information relating to

Wendy's anxiety. The defendants later cancelled the lease, and the commission brought a housing-discrimination action alleging constructive denial of a reasonable accommodation.

PROCEDURAL HISTORY

The Commission on Human Rights and Opportunities brought a civil action in the Superior Court after an administrative investigation found reasonable cause to believe that the defendants had committed a discriminatory practice. Wendy and Rudy Pizzoferrato intervened as plaintiffs. After a bench trial, the Superior Court entered judgment for the plaintiffs, finding that the defendants had constructively denied a reasonable accommodation. The Appellate Court reversed. The Connecticut Supreme Court granted certification for separate appeals by the commission and the defendants, affirmed the Appellate Court's reversal of the trial judgment, and vacated portions of the Appellate Court's reasoning.

DISPOSITION

other

CASES CITED

- Commission on Human Rights & Opportunities ex rel. Pizzoferrato v. Mansions, LLC, 231 Conn. App. 121, 332 A.3d 933 (2025)
- Wheelabrator Bridgeport, L.P. v. Bridgeport, 320 Conn. 332, 355, 133 A.3d 402 (2016)
- O'Brien v. O'Brien, 326 Conn. 81, 113-14, 161 A.3d 1236 (2017)
- DeCicco v. Dynata, LLC, 354 Conn. 51, 58-59, 349 A.3d 7 (2026)
- Matarese v. Archstone Pentagon City, 795 F. Supp. 2d 402, 434 (E.D. Va. 2011), aff'd in part and vacated in part sub nom. Matarese v. Archstone Communities, LLC, 468 Fed. Appx. 283 (4th Cir. 2012)
- Vorchheimer v. Philadelphian Owners Assn., 903 F.3d 100, 107 (3d Cir. 2018)
- State v. Boyle, 287 Conn. 478, 487-90, 949 A.2d 460 (2008)

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