

# PIERCE ATWOOD

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May 30, 2018

Admitted in: MA, ME, RI

**BY REGULAR AND CERTIFIED MAIL,**  
**RETURN RECEIPT REQUESTED**  
**# 9214 8901 8220 9300 0000 0027 43**

East Greenwich Town Council  
c/o Leigh Carney, Clerk  
125 Main Street  
East Greenwich, RI 02818

Re: Lt. William Perry

To the East Greenwich Town Council:

I am writing on behalf of my client, Lt. William Perry, pursuant to R.I. Gen. Laws § 45-15-5. Lt. Perry claims that the Town of East Greenwich is liable to him for defamatory and sexually harassing statements made about him by Susan Cienki, president of the Town Council, in a public setting in June 2017. In particular, Ms. Cienki stated to Lt. Perry that “[she] will cut his balls off and feed them to his dog.”

When Lt. Perry protested Ms. Cienki’s statements with a formal written complaint to the Town, the Town refused to take any corrective action regarding Ms. Cienki. Instead, the Town retaliated against Lt. Perry and his family. Lt. Perry’s brother, James Perry, was fired from the Town fire department and was only reinstated through court intervention. Lt. Perry’s wife, Laurie Perry, who worked for the Town, was passed over for an open position despite being the most qualified and most senior Town employee who applied. Then, in August 2017, the Town laid off Ms. Perry altogether.

After Ms. Perry’s lay off, she and Lt. Perry went to the Town Hall in August 2017 to retrieve her personal belongings. The Town, through Gayle Corrigan and Linda Dykeman, immediately obtained two no-trespass filings to prevent Ms. Perry from entering any Town building. Ms. Corrigan directed the then-Fire Chief Russ McGillivray to “instruct Lt. Perry that he is not to come into Town Hall during normal business hours unless it is directly related to his duties and responsibilities as a firefighter.”

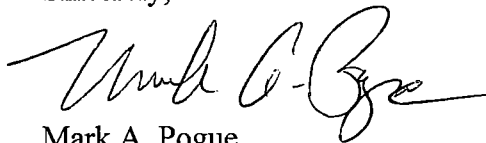
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The Town's campaign of harassment against Lt. Perry continued into April 2018 when Ms. Corrigan mischaracterized Lt. Perry's testimony at public hearing regarding the proposed change to 56-hour work week for Town firefighters. Ms. Corrigan then emailed every Town resident repeating her misstatements and concluding that Lt. Perry's testimony was "false and misleading." Ms. Corrigan's email was defamatory and unnecessarily disclosed personal information about Lt. Perry's home address.

Lt. Perry contends that he has incurred damages in the amount of \$500,000 as a result of the actions of the Town and its agents Corrigan, Dykeman, and Cienki. Unless just and due satisfaction of this demand is made to Lt. Perry within forty (40) days, Lt. Perry may commence an appropriate legal action to obtain this relief.

Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Pogue", with a stylized flourish at the end.

Mark A. Pogue