



18 JAN -3 AM 8: 54

# SINAPI LAW ASSOCIATES, LTD.

Richard A. Sinapi, Esq.  
Stephanie P. McConkey, Esq.\*  
Danilo A. Borgas, Esq.\*  
Joshua D. Xavier, Esq.

December 29, 2017

Anthony E. Sinapi, Esq.\*\*  
Gregory A. Mancini, Esq., of counsel\*

\*admitted in MA  
\*\*only admitted in MA

**PRIORITY EXPRESS MAIL**

East Greenwich Town Council  
East Greenwich Town Hall  
125 Main Street  
East Greenwich, RI 02818

**RE: Presentment to the Town Council of a Claim or Demand Against the Town of East Greenwich by  
Kristen B. Benoit Pursuant to R.I.G.L. §45-15-5**

Dear Members of the East Greenwich Town Council:

This letter hereby constitutes presentment to the Town Council of a claim or demand against the Town of East Greenwich ("Town") by this firm's client, Kristen B. Benoit, pursuant to R.I.G.L. §45-15-5.

Kristen B. Benoit seeks, among other things, monetary compensation from the Town for wrongful termination of her employment on or about June 30, 2017 and denial of employment and other rights and protections in violation of 1) the Rhode Island Open Meetings Act ("OMA"), R.I.G.L. § 42-46-1, *et seq.*; 2) the Town of East Greenwich Town Charter, 3) the Rhode Island Parental and Family Medical Leave Act, R.I.G.L. §28-48-1, *et seq.* ("RIPFMLA"); and 4) the Rhode Island Civil Rights Act of 1990, R.I.G.L. §42-112-1, *et seq.* ("RICRA").

The factual and legal basis of Ms. Benoit's claims for relief against the Town are set forth in a copy of the Complaint attached hereto recently filed in the Kent County Superior Court in the matter of *Kristen B. Benoit v. Gayle Corrigan, et al.*, C.A. No. KC2017-1302.

As a proximate result of the Town's wrongful and/or unlawful discriminatory acts and/or omissions, including, but not limited to, those described herein, Ms. Benoit suffered, is now suffering, and will continue to suffer emotional and economic injury including, but not limited to, pecuniary losses, loss of income, loss of back and front pay, loss of employment benefits, emotional pain and suffering, inconvenience, mental anguish, loss of enjoyment of life, humiliation, damage to her professional and personal reputation, and has incurred and will continue to incur expenses for legal services, and other great harm

**WHEREFORE**, demand is hereby made on the Town for compensation in the amount of **\$100,000.00<sup>1</sup>**. If you have any questions regarding the foregoing, please feel free to contact the undersigned.

Kristen B. Benoit  
By her attorneys,  
**SINAPI LAW ASSOCIATES, LTD.**

Richard A. Sinapi, Esq.

RAS/ras  
Enclosure  
cc: Client

<sup>1</sup> To date, Ms. Benoit has sustained loss of income and benefits along with consequential damages totaling in excess of \$46,000.00, plus pain and suffering as well as counsel fees and costs. *Please note that all components of her damages are ongoing and will continue to accrue and increase until such time as this matter is resolved.*