



SINAPI LAW ASSOCIATES, LTD.

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February 2, 2018

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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 Sharon L. Kitchin 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, Sharon L. Kitchin, pursuant to R.I.G.L. §45-15-5.

Ms. Kitchin seeks, among other things, monetary compensation from the Town for wrongful termination of her employment on or about June 30, 2017, failure to pay wages, 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, and 3) violation of the Rhode Island Payment of Wages Act ("RIPWA"), R.I.G.L. § 28-12-1, *et seq.* and § 28-14-1, *et seq.*

The factual and legal basis of Ms. Kitchin's claims for relief against the Town are set forth in a copy of the Complaint attached hereto which my client intends to file in the Kent County Superior Court if her claim is denied.

As a proximate result of the Town's wrongful and/or unlawful acts and/or omissions, including, but not limited to, those described in the Complaint, Ms. Kitchin 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 **\$60,000.00¹**. If you have any questions regarding the foregoing, please feel free to contact the undersigned.

Sharon L. Kitchin
By her attorneys,
SINAPI LAW ASSOCIATES, LTD.

Richard A. Sinapi, Esq.

RAS/ras
Enclosure

cc: Client (email only)
David M. D'Agostino, Esq., Town Solicitor (email only)

¹ To date, Ms. Kitchin has sustained loss of income and benefits totaling approximately \$34,000.00, 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.*