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July 16, 2025

**Via Email Only**

Steven Contente  
Town Administrator  
Town of Bristol  
10 Court Street  
Bristol, Rhode Island 02809  
[administratoroffice@bristolri.gov](mailto:administratoroffice@bristolri.gov)

**Re: Lynn Boudreau; Petition to Town Council;  
Objection to License to Maintain Town Property**

Mr. Contente,

This office represents Stephen J. Zbyszewski (“Zbyszewski”) regarding Lynn Boudreau’s Petition to the Bristol Town Council to obtain a license to maintain Town Property (hereinafter the “Petition”). As you may know, Zbyszewski, along with his wife Kathleen M. Briggs, are the owners of the property located at 40 Harrison Street (the “Zbyszewski Property”), which abuts Ms. Boudreau’s property located at 36 Harrison Street (the “Boudreau Property”).

Ms. Boudreau’s Petition requests a license to maintain the shared Mailbox Bay located on Town property which contains six mailboxes of homes located in the immediate area, including her own mailbox and the Zbyszewski mailbox.<sup>1</sup> My clients object to any license being issued to Ms. Boudreau to maintain the Mailbox Bay.

It is unclear why the Town cannot maintain this small area or why Ms. Boudreau needs the exclusive right to maintain it. There is a concern that this license may be used as a pretext by Ms. Boudreau to prohibit people for accessing and using their mailbox or inhibiting the postal service from delivering mail. Based on Ms. Boudreau’s statements in the Petition, it appears she wants to force her neighbors to

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<sup>1</sup> The following addresses have mailboxes at the Mailbox Bay: 15 Harrison Street, 23 Harrison Street, 30 Harrison Street, 32 Harrison Street, 36 Harrison Street, 40 Harrison Street.

eventually move their mailboxes so she can have a stand-alone mailbox where the current shared Mailbox Bay is located. We believe she will misuse this license in an effort to achieve this goal and therefore object to the issuance of this license.<sup>2</sup>

More concerning to my clients, are the false and defamatory narratives submitted by Ms. Boudreau in her Petitions. We are in possession of two separate emails submitted by Ms. Boudreau with her Petition, wherein she makes false claims against Mr. Zbyszewski and directly attacks his character and reputation. It appears the Town requested Ms. Boudreau sanitize her narrative and re-submit it based on the personal attacks she levied against Mr. Zbyszewski in her Petition, which were not only false, but completely irrelevant to her request before the Town Council.

Despite the sanitized second narrative, Ms. Boudreau's claims still attack Mr. Zbyszewski's reputation and character. As you may know, Mr. Zbyszewski has lived in Bristol for 24 years and has been an active member in the community. He has a stellar reputation in his neighborhood and the Town of Bristol as a whole. Ms. Boudreau should not be allowed to use her Petition as a vehicle to defame Mr. Zbyszewski at a public hearing before the Town Council.

We are requesting that the Petition **not be accepted as drafted** based on the false and irrelevant information regarding the interactions between Mr. Zbyszewski and Ms. Boudreau. None of that information is necessary for the Town Council to determine whether a license should be granted and only serves to defame Mr. Zbyszewski. We ask that you contact Ms. Boudreau and request that she refile her Petition without the false and irrelevant information so the Town Council may decide on her Petition without defaming Mr. Zbyszewski. We also request that when and if this matter is heard before the Town Council, **that Ms. Boudreau be instructed not to discuss Mr. Zbyszewski at all, as it is irrelevant to the issue before the Council.**

As discussed above, my clients object to a license being issued to Ms. Boudreau. However, if the Town is inclined to issue a license, the license must include specific conditions as to the scope and limitations of the license. Any license granted by the Town should have provisions which specifically prohibit Ms. Boudreau from restricting access to the mailboxes in any way and should be strictly limited to the upkeep and maintenance of the Mailbox Bay. The License should also require notice provisions to any homeowner who has a mailbox at the Mailbox Bay regarding any maintenance or upkeep that will be occurring in the area.

I appreciate your time on this matter. Please contact my office at your earliest convenience to discuss further.

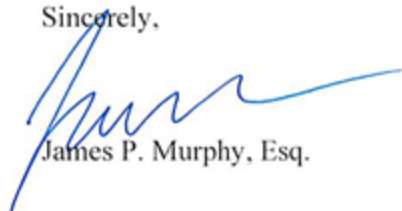
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<sup>2</sup> It is also unclear if all the Bristol Residents who have a mailbox at the shared Mailbox Bay have been provided notice of this Petition and will be provided an opportunity to be heard.

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Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Murphy', is written over the printed name 'James P. Murphy, Esq.'.

James P. Murphy, Esq.

CC: Michael A. Ursillo, Esq. [mikeursillo@utrlaw.com](mailto:mikeursillo@utrlaw.com)  
Melissa Cordeiro; [mcordeiro@bristolri.gov](mailto:mcordeiro@bristolri.gov)