



PETITION TO THE TOWN COUNCIL

CLERK'S OFFICE
BRISTOL, RHODE ISLAND
2026 APR -8 PM 2:02

To the Honorable Town Council of the Town of Bristol:
The undersigned hereby respectfully request of your
Honorable Body that:

Melissa Cordeiro
Council Clerk

Please see attached petition
to the town council - filed this day
4/8/26 @ 1:59 PM in person by attorney
Mark Gemma.

MARK@GEMMALAW.COM

ATTORNEY
FOR: ANN-
MARIE
LANCASTER

PLEASE NOTE:

Petition must be returned by 12:00 noon on the
Friday prior to the Town Council meeting to
appear on the docket of the 4/22/2026
meeting for review and possible action, It is
Council policy that action may not be taken on
petitions unless recommendations, if necessary,
from appropriate departments are received prior
to the Council meeting.

SIGNATURE: [Signature]

NAME: MARK GEMMA

21 RESERVOIR AVE

DATE RECEIVED: 4/22/2026

Town of Bristol
State of Rhode Island

PETITION TO THE TOWN COUNCIL

PERSONAL INJURY

TO THE HONORABLE TOWN COUNCIL OF THE TOWN OF BRISTOL:

The undersigned respectfully petitions your honorable body for compensation for injuries and damages sustained pursuant to R.I.G.L 45-15-5:

1. The Petitioner, Ann-Marie Lancaster, is a resident of Westport, MA.
2. The Petitioner was volunteering services through the Friends of the Bristol Animal Shelter at the Bristol Animal Shelter located at 10 Minturn Farm Road in Bristol, R.I. on May 21, 2023.
3. The Bristol Animal Shelter is under direct care and control of the Town of Bristol. The Bristol Animal Shelter is designed to shelter animals in need until they find a permanent home.
4. At said time and place, the Petitioner was working with a dog "Lucky" which suddenly and abruptly jumped at her, charged and attacked her.
5. When Lucky arrived at the Bristol Animal Shelter on a date before May 21, 2023, the dog exhibited violent and dangerous propensities. Prior to May 21, 2023, Lucky bit the Petitioner. Lucky's violent propensities and prior bite were known to the Bristol Animal Shelter prior to May 21, 2023, invoking strict liability and double damages under Rhode Island Law.
6. Deborah DaSilva, supervisor of the Bristol Animal Shelter and an employee of the Town of Bristol, who was operating within the scope of her employment, was present when the Petitioner was attacked and bitten by the dog on May 21, 2023, as well as the prior occasion.
7. A copy of the Town of Bristol Police Department Incident Report memorializing the events of May 21, 2023, is attached for review.
8. The Bristol Animal Shelter is under the direct care, custody and control of the Town of Bristol.
9. The employees of the Bristol Animal Shelter, including Deborah DaSilva, are employed by the town of Bristol.
10. It is the responsibility and duty of the Town of Bristol, its' employees, agents and/or servants to create a safe environment for individuals who visit or volunteer services at the Bristol Animal Shelter.
11. The employees of the Bristol Animal Shelter, including Deborah DaSilva, acted in an unreasonable and negligent manner in many ways; including but not limited to: supervising Lucky,

allowing Lucky access to Petitioner, not muzzling Lucky, having the Petitioner interact with Lucky, and allowing the dog to attack and bite the Petitioner. The Bristol Animal Shelter and The Town of Bristol are also strictly liable to Petitioner under Rhode Island Law and subject to double damages.

12. The failure to act in a reasonable manner and create a safe environment and violating Rhode Island Law resulted in a dangerous and hazardous situation and resulted in injuries to the Petitioner.

13. As a direct result thereof, the Petitioner was attacked and bitten and sustained permanent personal injuries; including but not limited to: injuries that required surgery, a several night hospital stay, permanent surgical scarring, pain and suffering, and mental anguish. Petitioner incurred bite-related medical expenses in the approximate amount of \$38,554.35.

- Bristol Fire Department: \$2,845.42
- Rhode Island Hospital: \$31,278.49
- Brown Emergency Medicine: \$2,696.54
- RI Medical Imaging: \$590.00
- Lifespan Physician Group: \$571.95
- Lifespan Physician Group: \$571.95

Petitioner will continue to incur medical expenses in the future. Petitioner also suffered emotional harm and will continue to suffer emotional and physical harm into the future.

14. The injuries sustained by the Petitioner are a direct result of the Town of Bristol, its' employees, agents, and/or servants,' including Deborah DaSilva's failure to maintain a safe environment on property as it relates to the animal in question, which was directly under their care, custody and control and their strict liability under Rhode Island Law.

15. At all times pertinent hereto, the Town of Bristol, its employees, agents, and/or servants, including Deborah DaSilva, owed a special duty to the Petitioner and were under a special obligation to the Petitioner. The Town of Bristol and its employees acted in an egregious manner and created a situation that placed Petitioner in a position of extreme peril which could and should have been abated and/or remediated. The Town of Bristol and its employees had constructive and actual notice of said danger and peril and failed to eliminate it after having a reasonable amount of time to do so. The Town of Bristol was also acting in a proprietary role in all relevant times mentioned herein.

16. As a direct and proximate result of the Town of Bristol's negligence, strict liability and double damages, the Petitioner sustained personal injuries, great pain, suffering, scarring, emotional harm and medical expenses as well as other damages. Should this claim not be paid within forty (40) days, a civil action against The Town of Bristol will be filed against the Town of Bristol and/or its Treasurer/Finance Director for recovery in this matter.

WHEREFORE, petitioner demands judgement against the Town of Bristol in the amount of One Million Dollars, plus costs, plus interest.

By Petitioner's Attorney,

A handwritten signature in black ink, appearing to read 'M. Gemma', with a long, sweeping horizontal flourish extending to the right.

MARK A. GEMMA
OF GEMMA LAW ASSOCIATES, INC.
231 RESERVOIR AVENUE
PROVIDENCE, RHODE ISLAND 02907
(401) 467-2300

Bristol Police Department
Incident Report

Page: 1
07/14/2023

Incident #: 23-669-OF
Call #: 23-13356

Date/Time Reported: 05/21/2023 1621
Report Date/Time: 05/21/2023 1733
Occurred Between: 05/21/2023 1600-05/21/2023 1621
Status: No Crime Involved

Reporting Officer: Patrol Officer MICHAEL KELLY
Approving Officer: Sergeant BRIAN MORSE

Signature: _____

Signature: _____

EVENTS (S)

LOCATION TYPE: Government/Public Building Zone: 14
ANIMAL SHELTER
10 MINTURN FARM RD
BRISTOL RI 02809

1 Animal Complaint DOG BITE

#	PERSON (S)	PERSON TYPE	SEX	RACE	AGE	SSN	PHONE
1	LANCASTER, ANN-MARIE [REDACTED] [REDACTED] DOB: [REDACTED]	PARTICIPANT	F	W	47	[REDACTED]	[REDACTED]
	EMPLOYER: VOLUNTEER- ANIMAL SHELTER INJURIES: Severe Laceration TAKEN TO: RI HOSPITAL CONTACT INFORMATION: Home Phone (Primary) [REDACTED]						
2	DASILVA, DEBORAH [REDACTED] [REDACTED] DOB: [REDACTED]	PARTICIPANT	F	W	62	[REDACTED]	[REDACTED]
	EMPLOYER: TOWN OF BRISTOL CONTACT INFORMATION: Home Phone (Primary) [REDACTED] Home Phone [REDACTED] Home Phone [REDACTED] Cell Phone [REDACTED] CallBack Number (Primary) [REDACTED]						

NARRATIVE FOR PATROL OFFICER MICHAEL D KELLY

Ref: 23-669-OF

Entered: 05/21/2023 @ 1743	Entry ID: KELM
Modified: 05/21/2023 @ 1837	Modified ID: KELM
Approved: 05/21/2023 @ 2118	Approval ID: MORE

On 5/21/23 at approximately 1621 hours, I responded along with Bristol Rescue and Paramedics, to the Bristol Animal Shelter, located at 10 Minturn Farm Rd for a dog bite. Upon arrival I met with the Deborah DaSilva (DOB [REDACTED]) who advised one of the Animal Shelter volunteers, identified as, Ann-Marie Lancaster (DOB [REDACTED]) was working with one dogs who then bit her. DaSilva escorted myself and Paramedics to the dog kennel area where Lancaster was.

Upon arrival in the kennel area I observed Lancaster sitting inside one of the kennels. Blood was observed on Lancaster's jeans and body and also inside the kennel. Lancaster stated she was outside working with a Shepard named "Lucky" when he changed and made her feel uncomfortable. At this time Lancaster stated she turned and was attempting to walk inside when Lucky jumped on her back. Lancaster gave commands for Lucky to get down and she turned towards him to throw a dog toy to distract him. When Lancaster turned Lucky bit her in the left thigh then began biting both her ankles. Lancaster stated she began yelling for help while crawling on the ground towards one of the dog kennels. Lancaster stated Lucky continued to bit her ankles as she was crawling and attempting to free herself. Lancaster was able to crawl through the dog door into the kennels and continued to attempting to free herself from Lucky but he refused to stop biting her ankles. At this time DaSilva heard Lancaster yelling and responded to the area and was able to free Lucky.

As Paramedics removed Lancaster's jeans it was observed she had severe bite marks on her left thigh, left ankle, right ankle/calve, as well as a possible ruptured right achilles. I photographed the injuries and Lancaster was transported to RI Hospital via Bristol Rescue.

At this time I spoke with DaSilva who advised she was in the reception area as Lancaster was working with Lucky outside as she usually does. DaSilva stated she then heard screaming coming from kennel area but was unable to determine if it was an animal in distress or Lancaster. As DaSilva entered the dog kennel area she observed Lancaster inside a kennel as Lucky was biting her ankle. DaSilva stated she grabbed Lucky's collar in the attempt to remove him but Lucky continued to bite as DaSilva pulled his collar off. DaSilva stated she then grabbed the scruff of Lucky's neck and ordered him to drop and again he refused to respond to commands. Dasilva then twisted one of Lucky's ears and he finally released and DaSilva was able to secure him in another kennel and called for a Rescue.

All parties were advised a report would be placed on file.