

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF RHODE ISLAND

**PATRICIA ROYAL,**  
*Plaintiff,*

**v.**

**The Valley Breeze, aka OBW-BREEZE  
LLC, fictitious name, Breeze Publications,  
John Doe Entities 1-2,**

*Defendants.*

**C.A. No. 1:25-cv-00123**

**PLAINTIFF DEMANDS TRIAL BY JURY**

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**COMPLAINT AND JURY DEMAND**

This defamation *per se* action is commenced by Plaintiff PATRICIA ROYAL against Defendants the Valley Breeze news publication, aka, OBW-BREEZE LLC, fictitious names, Breeze Publications and The Valley Breeze, as well as John Doe Entities 1-2.

**PARTIES**

1. PLAINTIFF PATRICIA ROYAL, is the Superintendent of Pawtucket School Department, (hereinafter “Plaintiff” or “Ms. Royal”), and she resides in Rhode Island, in the town of Cranston, in the County of Providence, State of Rhode Island the vast majority of her time, but she owns property in, and occasionally visits, Florida during school vacations primarily; Plaintiff may be considered legally domiciled in either Rhode Island or Florida due to these factors.
2. The Valley Breeze, entity legal name OBW-BREEZE LLC, fictitious names, Breeze Publications and The Valley Breeze (hereinafter “the Valley Breeze”), is a “local print and online publisher” which has published and republished numerous defamatory statements about Plaintiff since 2023; this is a foreign for-profit corporation, upon information and belief,

organized under the laws of the state of Virginia, with a primary place of business in 20 Pidgeon Hill Drive, #201, Sterling, Virginia.

3. John Doe Entities 1-2 are entities named to replace, in the future, any entity parties associated with “The Valley Breeze” publication which are not presently named but potentially responsible for any liability herein; these entities are domiciled in a state other than Rhode Island, like the Valley Breeze, upon information and belief.

### **JURISDICTION AND VENUE**

4. This Court has proper subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332, diversity jurisdiction, because this civil action is between citizens of different states and the amount in controversy exceeds \$75,000.
5. This Court has personal jurisdiction over the Defendants including the Valley Breeze as it operates in Rhode Island, and prints stories about Rhode Island, and therefore has minimum contacts with Rhode Island; Defendant has purposely availed itself of the privilege of conducting activities in the forum state, invoking the benefits and protections of the Rhode Island’s laws.
6. This Court has proper venue over this action pursuant to 28 U.S.C. § 1391(b) in that Defendants are subject to personal jurisdiction within the District of Rhode Island and the events giving rise to this action occurred in this District.

### **FACTUAL ALLEGATIONS**

7. Plaintiff Patricia Royal (hereinafter “Superintendent Royal” or “Plaintiff”) is a limited-purpose public figure or public figure, who is a career public servant within public school districts in Florida and Rhode Island, and up until recently, was actively working as the Superintendent of Pawtucket School District (“PSD”).

8. The Valley Breeze is a local news outlet, with corporate headquarters and legal domicile in Virginia; the outlet covers much of ongoings of the Pawtucket School Committee (“PSC”), Pawtucket Mayor Donald Grebien and the City of Pawtucket (“City”), and the PSD.
9. Since Plaintiff’s application to, and hiring into PSD, as the First African American Superintendent of PSD, and the First African American Female Superintendent in Rhode Island upon information and belief, the Valley Breeze has published several articles referencing, or directly about, Superintendent Royal, PSD’s (poor) functioning, and/or about Plaintiff’s staff’s actions and omissions.
10. A number of these articles included patently false statements.
11. In fact, the Valley Breeze, in publishing<sup>1</sup> these false statements, acted with serious doubts about the truth of many statements, or worse, intentionally lied in publishing these statements.
12. Further, the Valley Breeze, and its reporters, upon information and belief, were provided knowingly false information by several individuals known to be opponents of Plaintiff.
13. It is known to the Valley Breeze that these individuals are opponents of Plaintiff because Plaintiff is the First African American Superintendent of PSD (and First African American Female Superintendent in the State of Rhode Island), and/or because she is known to be a rule-following Superintendent that was whistleblowing potential legal concerns perpetrated by the City, upon information and belief.

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<sup>1</sup> To be clear for non-legal individuals reading this complaint or legal practitioners not familiar with defamation law, in defamation law, a “publication” can be any relaying of a statement to a third party, whether spoken or in writing. According to legal dictionaries, “published” has the following meaning: “The statement made was *published* in some fashion, meaning it was told to others either verbally or in writing.” See [Defamation - Definition, Examples, Cases, Processes](https://legaldictionary.net/defamation/) <https://legaldictionary.net/defamation/> (element #2 of Defamation), last visited April 1, 2025. Thus, as to the Valley Breeze, when the term “republished” occurs in this Complaint, it means that a person other than those at the Valley Breeze initially “published” (relayed to third parties) the false statement and then the Valley Breeze “republished” it, generally if not exclusively through the traditional meaning of “publishing” as statement which is by putting the statement in a public article. Thus, where the Valley Breeze is alleged to have “published” a false statement that means it made the statement first, but where it is alleged the Valley Breeze “republished” a false statement, that means it republished the statement previously “published” (in the legal sense by sharing with a third party) by another person or entity.

14. These individuals that provided knowingly false information to the Valley Breeze are, upon information and belief, include but are not exclusive to Assistant Superintendent Lee Rabbit, members of the PSC including Mr. Omar Reyes, Mr. James Chellel, Ms. Joanne Bonollo, Mr. Matthew Wildenhain, and Ms. Kim Grant, members of the Pawtucket City Council, Mayor Donald Grebien, members of Mayor Grebien's and the City's staff, and top leadership of the Pawtucket Teachers' Alliance, the teachers' union, including Mr. Ron Beaupre (hereinafter collectively "members of the City, PSC, and PSD").
15. These members of the City, PSC, and PSD that provided knowingly false information to the Valley Breeze communicated the information without the expectation of confidentiality or Privilege in many cases.
16. Further, the false statements published by the Valley Breeze were not published or republished as part of a government proceeding but were published in a news article; moreover, those members of the City, PSC, and PSD originally publishing the false statements, where applicable, published these to the reporters before and after such government proceedings, rather than during the proceeding.
17. The false statements republished by the Valley Breeze, and any original publication of the same or similar false statements by members of the City, PSC, and PSD, were *not* made on the proper occasion, were *not* from proper motive, and were *not* in a proper manner or based upon "reasonable cause."
18. The false statement obtained by the Valley Breeze reporters, which were subsequently republished, are not "confidential information" as the information is not "given either in secret or in confidence to the news entity that claims the privilege." See Outlet Communications, Inc. v. State, 588 A.2d 1050, 1052 (R.I. 1991).

19. In fact, the Valley Breeze reporters often interview sources, including members of the City, PSC, and PSD, in public.
20. The information provided to – and republished by – the Valley Breeze and its reporters is relevant to clear violations of law and is essential to the outcome of one or more cases.
21. Thus, for all of the aforesaid reasons, the false statements published and republished by the Valley Breeze are not protected under the “shield laws,” Reporter’s Privilege, Absolute Privilege, or Qualified Privilege.
22. The Valley Breeze and its reporters published false statements with actual malice.
23. The Valley Breeze knew it was publishing and republishing false statements and/or the Valley Breeze published the statements in reckless disregard of the truth.
24. To be sure, there is a charged and polarized political climate in the PSC, PSD, and City – especially when it comes to the first African American Superintendent of Pawtucket Schools (who is also female).
25. The charged and polarized political climate is on full view at every Pawtucket public school committee and city council meeting, is very well known to residents of, and is thus known to the media outlets that cover Pawtucket, including the Valley Breeze.
26. Given the political climate in the City, PSC, and PSD, especially with respect to Plaintiff, information provided by known opponents of Plaintiff, including but not exclusive to the aforesaid members of the City, PSC, and PSD, should have been viewed with caution by the Valley Breeze and its reporters as a reasonable means to avoid defaming Plaintiff.
27. Given the political climate in the City, PSC, and PSD, especially with respect to Plaintiff, information provided by the aforesaid members of the City, PSC, and PSD should have therefore been verified by the Valley Breeze and its reporters prior to publication.

28. Where the political climate *and* subject of the reporting (here Plaintiff and PSD's performance under her leadership) is known to be in controversy, reasonable media outlets ensure published statements are *true and verified* by a source *other than* just the source providing the information, and this is an action which would tend to avoid a determination of intentionality or recklessness in publishing false statements.
29. Further, given the accessibility of Plaintiff and her staff, ensuring published statements are verified with or denied by Plaintiff and her staff, is an action employed by reasonable media outlets and an action which would tend to avoid a determination of intentionality or recklessness in publishing false statements.
30. Yet, the Valley Breeze and its reporters only infrequently contacted Plaintiff or her staff, and rarely, if ever, asked for or attempted to obtain documents or other proof, which was available and would refute published untrue statements, prior to publishing the false statements.
31. Where the political climate *and* subject of the reporting (here Plaintiff and PSD's performance under her leadership) is known to be in controversy, reasonable media outlets ensure published statements are *true by verifying the information and statements with documents and video, where available*, and this is an action which would tend to avoid a determination of intentionality or recklessness in publishing false statements.
32. In all cases of the below and other examples of defamation by the Valley Breeze, the Valley Breeze and its reporters failed to verify information by multiple sources, failed to contact Plaintiff and/or ask for proof, failed to review available documents and/or videos, and otherwise failed to avoid a determination of intentionality or recklessness in printing untrue facts in a knowing the highly charged political environment.
33. Therefore, the Valley Breeze published several false statements with actual malice.

34. Specifically, the Valley Breeze and its reporters published and republished false statements, knowing the statements were false.
35. The Valley Breeze and its reporters published and republished false statements in reckless disregard of the truth for the aforesaid reasons.
36. These untrue statements that the Valley Breeze published over the past year and a half, are not just untrue, they are defamatory because such statements were of a character which would tend to harm the reputation of Plaintiff, lower the estimation of Plaintiff in the community, or that would tend to deter third persons from associating or dealing with Plaintiff.
37. Moreso, these published and republished false statements degraded, criticized, and impugned Plaintiff's job-related skills, her job performance, her fitness to be a school Superintendent, and thus, her career.
38. In fact, the Valley Breeze and its reporters/editors intentionally or recklessly published and republished false statements that placed Plaintiff's reputation as to her work and career in *substantial* risk of damage or injury – for a year-and-a-half.
39. By publishing these false statements, the Valley Breeze caused foreseeable harm to Plaintiff's reputation, current position, and future career prospects and success.
40. By publishing these false statements, the Valley Breeze caused foreseeable harm to Plaintiff financially now and in the future, until her inevitable retirement in ten (10) or more years in the future.
41. Thus, the Valley Breeze is, or may be found, responsible for financial injury spanning ten (10) or more years for a person who, prior to the defamation, had a skill set and reputation that commanded approximately \$200,000.00 per year.

42. Over ten (10) years or more, that is a minimum of potential economic damage of \$2,000,000.00 before considering other forms of damages including severe emotional distress which was foreseeable.
43. By publishing these false statements, the Valley Breeze in fact caused foreseeable harm to Plaintiff mental health and caused severe emotional distress resulting in physical injury.
44. Further, these false statement have in fact prejudiced Plaintiff in her profession and career.
45. As such, these cited false statements below, and those not listed but that will be raised later once in discovery, are defamation *per se* under the law and therefore, Plaintiff is entitled to presumed damages, rather than being required to prove her actual damages.
46. Those individuals that provided the Valley Breeze and its reporters with the false statements are the subject of a separate lawsuit for the defamation *per se* among other claims; that suit has been filed for those separate unlawful acts under the caption Royal v. Pawtucket School Committee et al, 1:25-cv-00113\_JJM-LDA.
47. The Valley Breeze, however, has also committed defamation *per se* against Plaintiff by *republishing* statements by those members of the City, PSC, and PSD, and publishing false statements of its own or from origins other than those that members of the City, PSC, and PSD provided; the Valley Breeze's definition of Plaintiff is the subject of *this* lawsuit.
48. Non-exclusive examples of the Valley Breeze's regular publication and republication of false statements, with full knowledge of the statements' falsity, or in reckless disregard of whether the statement is false or not, are plentiful but some examples are listed below.
49. One of the most recent and most glaring examples involve the published and republished false statement that Plaintiff is out of work as Superintendent of PSD for – or being replace due to – “personnel” reasons.



50. To be clear, a “personnel matter” refers to an individual’s “holding of, application for, or appointment to a relevant office or employment [as well as] decisions [] concerning an individual, whether in relation to his appointment, promotion, demotion, transfer, discipline, or cessation or termination of employment...” See personnel matter Definition – Law Insider, <https://www.lawinsider.com/dictionary/personnel-matter>, last visited March 31, 2025.
51. In other words, a “personnel” matter both technically, and in a reasonable public person’s understanding, is a matter that involves the status of employment, the change of employment, and/or performance or discipline problems related to employment.
52. Yet, in several articles, while the Valley Breeze knew Plaintiff was out on medical leave, or in reckless disregard of this well-known fact, the Valley Breeze published and republished false statements that Plaintiff was out of work due to and/or being replaced with an Interim/Acting Superintendent because of, a “personnel” matter.
53. That false statement was republished in the February 28, 2025 article titled, “Buck named acting superintendent in Pawtucket.”
54. In reality, on that date, Plaintiff was coming off of one pre-approved medical leave for a minor medical procedure and resulting minor complications, and was going onto FMLA job-protected medical leave for “work related anxiety” following, and as a direct a result of, reading the Valley Breeze’s February 27, 2025 article titled Pawtucket Superintendent faces potential firing” which relayed – for the first time to Plaintiff – that she was potentially being terminated.
55. Importantly, and this fact bears repeating, the “work related anxiety” that sent Plaintiff out of work on a new and different medical leave, on or around February 27, 2025 (with approval running into February 28, 2025), was caused by a year-and-a-half of ongoing harassment by the members of the City, PSC, and PSD, as well as the Valley Breeze’s defamatory articles; Plaintiff sought medical treatment when – without notice and while on prior-approved medical leave –

Plaintiff saw a Valley Breeze article on February 27, 2025, headlined, “Pawtucket Superintendent faces potential firing.”

56. Notably, that and one other article from February 27, 2025 have now disappeared, as discussed *infra*.
57. But as to the February 28, 2025, Valley Breeze article, “Buck named acting superintendent in Pawtucket”, the Valley Breeze made a false statement that Plaintiff was replaced as Superintendent because she was on leave “due to a personnel matter” which is patently false.
58. Specifically, in that February 28, 2025 article, the Valley Breeze republished the false statement by PSC Chairman Reyes, specifically that PSC and PSD “replace[d] Royal as she’s on leave due to a *personnel matter*.”
59. That statement is patently untrue.
60. The Valley Breeze published this false statement knowing it was false or in reckless disregard of the truth.
61. As described, “personnel matter” and medical leave are two *very* different reasons to replace an employee, with wholly different implications on one’s reputation for their fitness for a job.
62. Being replaced due to a “personnel matter” would mean that Plaintiff was replaced due to something related to her “appointment, promotion, demotion, transfer, discipline, or cessation or termination of employment,” see *Id.*, rather than being replaced due to being on medical leave.
63. Moreover, there were no “personnel matters” that Plaintiff was made aware of (then or now) and Plaintiff was simply on medical leave, as far as she knew at the time (and as far as the public and the Valley Breeze knew).
64. The Valley Breeze published the aforesaid false statements about Plaintiff being replaced due to a “personnel matter” despite readily available knowledge to the contrary, which the Valley Breeze knew or was in reckless disregard of the truth for not learning prior to publication.

65. Notably, upon information and belief, similar false statements about Plaintiff's reason for not being at work and/or her potential "firing" were published on February 27, 2025, in two *additional* articles.
66. Unfortunately, both of these articles have now been deleted and/or written over with the February 28, 2025 article, "Buck named acting superintendent in Pawtucket" noted above.
67. As to these two missing articles, the first article was titled "Pawtucket superintendent faces potential firing"; this was the Valley Breeze article which sent Plaintiff to her doctor who put her out on medical leave/FMLA due to related distress, that same day, February 27, 2025.
68. First, that title of that article is plainly defamatory in that Plaintiff was never going to be "fired", even according to PSD at the time and presently.
69. Upon information and belief, the body of that article is also defamatory; it had a picture of Plaintiff in proximity to the statement that she was potentially going to be fired and included several other false statements, upon information and belief.
70. Second, and possibly relatedly, when this article is searched for on computer, that article no longer shows up at all.
71. However, when counsel searched on an iphone, that article still comes up in the search results, along with the date of publication being February 27, 2025; the first couple sentences in the article show as well.
72. Unfortunately, upon clicking to open the article, that February 27, 2025 defamatorily titled article and its content have been overwritten with the February 28, 2025 article, discussed above, titled "Buck named acting superintendent in Pawtucket"; notably, that article has a picture of Buck.
73. Further, the second now missing article was titled "Pawtucket superintendent potentially on her way out" and was also from February 27, 2025 as well upon information and belief.

74. That article *also* included a defamatory title (as Plaintiff was not going to be “on her way out” even according to PSD at the time and now); the article also had several false statements, upon information and belief.
75. Like the first article, when searched on computer, that article no longer shows up at all.
76. But, when searched on an iphone, that article still comes up in the search results, along with the date of February 27, 2025 and the first couple of sentences in that article.
77. Unfortunately, like the first article, upon opening that article by clicking on it, that article is gone.
78. Instead, what shows up is the *same* February 28, 2025 article titled “Buck named acting superintendent in Pawtucket.”
79. Upon information and belief, these articles were removed and/or written over by the Valley Breeze to cover up and spoil evidence of defamation *per se* against Plaintiff.
80. Importantly, in the same timeframe that the two articles disappeared and/or were overwritten, a related federal lawsuit was being prepared and filed: Royal v. Pawtucket School Committee et al., 1:25-cv-00113-JJM-LDA.
81. As to other defamatory statements in the February 28, 2025 article “Buck named acting superintendent in Pawtucket” there are other false and misleading statements, as applied to Plaintiff.
82. For example, that article further published that:

“Reyes said prior to Friday's vote that when an acting superintendent is appointed, it is typically due to another employee going on an extended leave of absence due to personnel or performance issues, medical reasons, or personal reasons.”
83. The statement may true as to other employees, but statement is false and highly misleading (as well as wholly untrue) as to Plaintiff.
84. Specifically and first, Plaintiff was not on “extended leave of absence.”

85. Plaintiff was in fact nearing the end (in days) of her *pre-approved* leave for her medical procedure and resulting minor complication, and in fact, her medical provider for that condition cleared her to return to work early, on February 28, 2025.
86. Further, due to the Valley Breeze's now deleted article "Pawtucket Superintendent faces potential firing" and the previous defamation and work harassment, Plaintiff was put on leave on February 27, 2025 for approximately four weeks.
87. However, this leave was unknown to most other than those Plaintiff sent it to until the next week, starting Monday, March 3, 2025.
88. Thus, the public and PSD knowledge, and thus the Valley Breeze's knowledge, was only that Plaintiff was on a *very* short leave ending in a matter of days and then she was returning to her position.
89. A leave of days is not in any conception an "extended leave."
90. Thus, it is untrue, as published by the Valley Breeze, that Plaintiff was on "extended leave" as the republishing of Chairman Reyes' statement implies.
91. Moreover, Plaintiff was not at all on leave for "personnel or performance issues" or due to "personal reasons" which were the only options other than "extended" medical leave in the statement by Chairman Reyes which was republished by the Valley Breeze on February 28, 2025.
92. Because of that statement, republished by the Valley Breeze, a reasonable reader could conclude that Plaintiff was on leave due to performance issues or "personnel" issues, just as stated earlier in the article, or she was just taking time off for "personal reasons," or she was on some form of long-term leave; all of those reasons for not being at work at such a critical time at PSD is defamatory as those are statements which would tend to diminish Plaintiff's fitness for her job or her work ethic.

93. Finally, that same February 28, 2025 article, “Buck named acting superintendent in Pawtucket” also published *another* false statement that “[d]uring [Plaintiff’s] tenure, the district has struggled with financial accounting deadlines...”
94. The Valley Breeze knew that statement was untrue as discussed *infra*.
95. The Valley Breeze could have easily discovered the falsity of that statement and thus, the Valley Breeze published that statement in reckless disregard of the truth.
96. The false statements that during Plaintiff’s “tenure, the district has struggled with financial accounting deadlines...” is of the type of statement that impugns Plaintiff’s reputation, her job performance, and her fitness for her position, and thus, impugns her career and abilities; it is therefore defamation *per se* as well.
97. Then, on or about March 5, 2025, the Valley Breeze republished a similar false statements about Plaintiff being the subject of a “personnel matter” in an article titled “Buck appointed lead as Royal goes on leave.”
98. In that article, just after the article discusses Plaintiff’s replacement, the Valley Breeze republished a plainly defamatory statement, again by PSC Chairman Reyes: “Reyes said they’re not able to comment on what he described as a personnel matter with Royal.”
99. Once again, a “personnel matter” and medical leave are two *very* different matters with wholly different implications on one’s reputation for their fitness for a job.
100. Plaintiff being involved in a “personnel matter” as stated by Chairman Reyes and republished by the Valley Breeze, would mean that Plaintiff was replaced due to something related to her “appointment, promotion, demotion, transfer, discipline, or cessation or termination of employment,” and largely implies a performance issue or termination. See personnel matter Definition – Law Insider, <https://www.lawinsider.com/dictionary/personnel-matter>, last visited March 31, 2025.

101. Further, by March 5, 2025, the Valley Breeze knew that Plaintiff was on medical leave.
102. The Valley Breeze had been expressly told the fact that Plaintiff was on medical leave by that time, upon information and belief.
103. The Valley Breeze knew not just that Plaintiff was on medical leave, but also knew that Plaintiff was *not* out of work due to a “personnel matter.”
104. The Valley Breeze could have easily discovered that Plaintiff was not out of work due to a “personnel matter” and/or was on medical leave by March 5, 2025, because Plaintiff’s medical and FMLA leave was the subject of increasing public discussions by that time.
105. In fact, the *title of the Valley Breeze’s own article included the fact* that Plaintiff was on medical leave: “Buck appointed lead as *Royal goes on leave*.”
106. Yet, the Valley Breeze published the false statement that Plaintiff was the subject of a “personnel matter.”
107. The Valley Breeze knew that statement was false prior to republishing it, or acted with reckless disregard to the truth of the statement in republishing that false statement.
108. That statement, once again, impugns Plaintiff’s job performance, career, and implies disciplinary action and/or termination, rather than being out of work due to medical reasons, implicating defamation *per se* and presumed damages.
109. Further this March 5, 2025 article *bolsters* the reader’s impression that Plaintiff was the subject of a “personnel” matter, versus out on medical leave, when the Vally Breeze again printed in the March 5, 2025 article, that:  
  
“Reyes said prior to Friday's vote that when an acting superintendent is appointed, it is typically due to another employee going on an extended leave of absence due to personnel or performance issues, medical reasons, or personal reasons.”

110. That statement, again, may true as to other employees, but statement is false and highly misleading as to Plaintiff for the same reasons stated *supra* in reference to the February 28, 2025 article.

111. Yet, the Valley Breeze republished the statement.

112. The implication that Plaintiff was out of work for a “personnel or performance” issue or due to “extended” medical or personal leave impugns Plaintiff’s reputation, job performance, and her fitness for her job, and thus, impugns her career and abilities; it is therefore defamation *per se*.

113. The Valley Breeze’s intentional defamation of Plaintiff, her school district’s performance, her job performance, and her fitness for the job, however, did not just begin at the time of her replacement by Mr. Buck in February of 2025; the defamation was continuous during Plaintiff’s year-and-a-half tenure.

114. For example, a few months earlier, in the January 29, 2025 Valley Breeze article, titled “Pawtucket councilors rip school officials on 'embarrassing' audit delays,” the entire article implies, to the reasonable reader, that Plaintiff and PSD were the cause of the “embarrassing” audit extension that the City had to request from the Auditor General (and subsequently blamed Plaintiff and PSD for).

115. First, the published words in that article expressly blame PSD for audit extension needed by the City, rather than blame the real culprit, the City.

116. It is false that the PSD was to blame for the extension to the audit.

117. In fact, there are extensive documents and witnesses well known to the Valley Breeze reporters, as well as publicly available *PSC meeting videos and minutes*, which demonstrate that the audit extension *was not the fault of the school district but instead, the fault of the City*.



118. Additionally, the Valley Breeze republished the following false statement: “Councilors last week called the two late audits, after so many years with no such failures, an embarrassment and unacceptable.”
119. Further, the Valley Breeze expressly republished the false statement by City Council member Mercer, that “...no other municipalities in the state [] have requested extensions two years in a row.”
120. Importantly, the Valley Breeze republished the last two statements about “no such failures” and “no other municipalities...request[ing] extensions two years in a row” *despite* knowledge of the City’s own *two back-to-back audit extensions* in 2014 and 2015.
121. As a reminder, Plaintiff did not run the school district in 2014 and 2015.
122. Mercer’s statement about “..after so many years with no such failures...” was untrue.
123. The Valley Breeze knew that the statement was untrue, or was in reckless disregard of the truth in republishing that statement, since there was publicly available evidence that the City of Pawtucket had in fact requested back-to-back extensions in 2014 and 2015.
124. In fact, the Valley Breeze and its reporters were reminded of this fact soon after that January 29, 2025 article, yet *did not print a retraction, correction, or apology*.
125. Specifically, not long after the aforesaid article on January 29, 2025, PSD CFO Mr. McGee raised, at a PSC meeting, the falsity of the the Valley Breeze article and Mercer’s claim that “no other municipalities...have requested extensions two years in a row,”; in fact, Mr. McGee **held up the Valley Breeze article and then proof of the 2014 and 2015 City audit extensions**, demonstrating that the City Counciler’s statement, republished by the Valley Breeze, was patently false.
126. The Valley Breeze covered this meeting, yet did not report the truth about the 2014 and 2015 audit extensions by the City, nor did the Valley Breeze print a retraction, correction, or apology

to Plaintiff or Mr. McGee about the prior defamatory statements it republished from Mercer and other council members in that January 29, 2025 article.

127. Moreover, as to that January 29, 2025, Valley Breeze article statements that relayed that a late audit was a really shameful event, that was also false; in reality, these extensions not uncommon.
128. In fact, following the January 29, 2025 Valley Breeze article, which called the late audit “an embarrassment and unacceptable,” the State Auditor General is quoted as calling these extensions not uncommon.
129. Specifically, the next Valley Breeze article stated, “Rhode Island Auditor Gen. David Bergantino countered comments made by councilors last week about the rarity of audit extension requests by saying that they're not actually infrequent. Since becoming AG in 2023, he told The Breeze that about 30 percent of municipalities filed by Dec. 31 as required.”
130. Thus, it is untrue that late audits are a big deal, let alone an “embarrassment” or “unacceptable” as the Valley Breeze republished in false statements in its January 29, 2025 article.
131. Moreover, the Valley Breeze could *easily* have learned that late audits are not uncommon by simply contacting the Auditor General *prior to publishing* the defamatory January 29, 2025 article which impugned Plaintiff’s job performance and fitness for her role.
132. Instead, the Valley Breeze printed the defamatory headline “Pawtucket councilors rip school officials on 'embarrassing' audit delays” and republished false statements about “two late audits...[being] an embarrassment and unacceptable” and that “no other municipality” had two late audits, which were untrue, without even checking the City’s history with audit extensions or checking with the Auditor General, upon information and belief.

133. Again, despite the Auditor General's statements to the Valley Breeze after the January 29, 2025 article, the Valley Breeze failed to print a retraction, a correction, or an apology to Plaintiff or Mr. McGee.
134. All of the false statements in the January 29, 2025 article were not just untrue, but they impugned Plaintiff's job performance, her fitness for the role, and falsely degraded the performance of PSD (which is her responsibility).
135. Thus, those statements are defamatory *per se* and presumed damages are implicated.
136. As another example of the long-standing defamation by the Valley Breeze, less than a year into Plaintiff's tenure as Superintendent, on June 12, 2024, the Valley Breeze republished false statements by City Council Members Mercer and Moran which were defamatory to Plaintiff.
137. This article was titled "Council members blast school officials for statements on funding."
138. The article was framed to make Plaintiff and PSD officials appear to be lying about "level funding" of the PSD schools and implying that any PSD performance problems were solely because of PSD (and Plaintiff) and not because of the City's funding, which the article republished was "more than [PSD] needed."
139. Upon information and belief, level funding occurs when the City funds a school district with the same amount, year after year, despite increased costs, inflation, or other changes, such as the new teachers' and staffs' contract Plaintiff obtained for PSD.
140. In that June 12, 2024 Valley Breeze article, the following statement was published: "Further, said Mercer prior to the council approving the city's budget ordinance last week, comments made that all departments are getting an increase while the schools are being level funded are simply false." (Emphasis added).
141. It is actually very true, not "simply false," that the City level funds PSD, if that was the intention of Mercer's statement as republished by the Valley Breeze.

142. Further, the article also republished the following false statement attributed to Member Moran:
- “As for [Chairman] Charbonneau calling out years of level funding *when [PSD] got more than they needed*, Moran wasn’t mincing words, *calling it “utter nonsense”* and told him to “knock it off.”
143. It is patently false that PSD got “more than they needed” and that ‘level funding’ was “utter nonsense,” because the City *has* in fact level funded (i.e. not raised its contribution) PSD since the 2019-2020 school year *according to a February 3, 2025 email from a RIDE official*.
144. Likewise, PSD also does *not* get “more than they needed” according to statements by RIDE in the same February 3, 2025 email.
145. Specifically, a February 3, 2025 email from RIDE employee Brian Darrow to Drew Echelson, RIDE Deputy Commissioner, later forwarded to Plaintiff and the other RIDE deputy commissioner, Lisa Odom-Villella, included a table titled “Pawtucket Local Taxes Contribution” which lists City taxes provided to PSD by school year since 2010.
146. That table indisputable shows that since the 2019-2020 school year, the City has not increased its local tax contribution to PSD – with the exact same contribution of \$32,805,937 provided to PSD for *every school year* from 2019-2020 through 2023-2024.
147. Importantly, that email expressly calls this sort of funding by the Mayor, City Council, and City of Pawtucket “level fund[ing]”.
148. To be sure, the email states, “[h]ere’s Pawtucket’s local contributions since FY10. Looks like the LEA has been level funded since FY20.”
149. Moreover, in the same February 3, 2025 email from RIDE employee Brian Darrow to Drew Echelson, RIDE Deputy Commissioner, later forwarded to Plaintiff and the other RIDE deputy commissioner, Lisa Odom-Villella, there is a statement that “Pawtucket expends less per pupil than peer LEAs of Providence, Central Falls, and Woonsocket.”

150. Pawtucket spending less per pupil than even Providence, Central Falls, and Woonsocket school districts would make Councilman Moran's statement that PSD "got more than they need" patently false.
151. Moreover, that same email from the RIDE official also states the City has *decreased* the percentages of its budget going to the PSD versus City over time; the statement by the RIDE official in the email is specifically that, "*the % of Pawtucket's budget made up by local funds has decreased by 1.9% pts over the last five years.*" (Emphasis added).
152. Thus, the Valley Breeze published false information about the City's actual and relative contributions to the PSD and republished false statements by City Council Members Moran and Mercer on this topic.
153. Yet, the information about level funding, the City's decreasing percent of budget contributions to PSD, and deficient per-pupil spending, was available to the Valley Breeze through RIDE, public documents and data, or were available through Plaintiff, at all times.
154. Yet, the Valley Breeze never attempted to obtain the truthful information about the City's relative and actual spending, or more pertinently to verify the republished statement by City Council Members Moran and Mercer, prior to publishing the defamatory statements which imputed Plaintiff's job performance and fitness for her job.
155. Like other false statements, the Valley Breeze knowingly printed false statements, or printed false statements in reckless disregard of their truth, which is defamation *per se*.
156. As another example approximately a month later and still only a year into Plaintiff's tenure, in a July 17, 2024 Valley Breeze article with the title of "Another CFO out of Pawtucket schools," the Valley Breeze paints Plaintiff in a negative light about losing the "third chief financial officer" in a year.

157. Specifically, the article published the statement that, “[t]he stability school officials had hoped for with the hiring of the third chief financial officer in a year wasn’t to be.”
158. The article’s very next line is, “Supt. Patricia Royal confirmed to The Breeze Monday that the newest CFO, hired within the past few weeks, is no longer with the district.”
159. The article, immediately after that, publishes the following statement: “Former CFO Anthony Voccio had left in February after a short stint with the district following former longtime CFO Melissa Devine’s departure a year ago.”
160. Read fairly, these published statements paint a picture that Plaintiff *herself* has lost three CFOs which is not true.
161. Melissa Devine departed *prior to Plaintiff* starting her role.
162. To be sure, the information about Plaintiff’s start date and the date of Ms. Devine’s departure is information known to and/or easily assessable to the Valley Breeze and its reporters.
163. Thus, Plaintiff cannot be blamed for “losing” that CFO.
164. Moreover, the loss of the CFOs were all for legitimate reasons unrelated to Plaintiff, upon information and belief.
165. Yet, the Valley Breeze printed statements, falsely stating *Plaintiff herself* lost three CFOs despite knowing it was untrue or in reckless disregard of the truth of that statement.
166. The statements impugn Plaintiff’s job performance and fitness for her job and thus are defamation *per se*.
167. As another example of the Valley Breeze publishing and republishing false statements, **in an article from only a month after starting Plaintiff started her new role** was in an August 2, 2023 article titled, “Pawtucket teachers protest after contract vote.”
168. That article states that teachers were “taking issue with the fact that the committee awarded Royal...use of a car [as part of her contract].”

169. However, the committee did not award Royal use of a car.
170. The correct fact is that Plaintiff was given a car stipend.
171. A car stipend is different than being given use of a car, which seems an odd and lavish perk – use of a car without financial responsibility.
172. In contrast, a car stipend only covers part of the car expenses in virtually all cases in the real world; further, this form of compensation is common in high-level leadership positions, especially where the new hire has to move states for a new job.
173. However, by the Valley Breeze published the false statement that Plaintiff was given “use of a car” despite clearly having access to the real terms of Plaintiff’s contract, given it accurately noted Plaintiff’s compensation level.
174. The Valley Breeze knew Plaintiff did not get “use of a car” as part of her contract, or printed this false statement in reckless disregard of the truth.
175. This statement, like the others, is of the type which would tend to hurt Plaintiff’s reputation in her job and career, as well as make a reasonable person think less of Plaintiff, and as such, is defamatory *per se*.
176. As another example, about nine (9) months into her new job, in a March 20, 2024 Valley Breeze article titled “Pawtucket school department CFO Voccio steps down, city finance director calls for action,” Plaintiff was defamed again.
177. The article discusses how with the loss of PSD’s CFO the City has to take action to “keep everything in order” and like false statements.
178. In fact, the City has zero authority over PSD finances, and the Valley Breeze knows this since the City versus PSD’s authority over PSD finances is clearly written in state laws.
179. Thus, the Valley Breeze’s statements below are patently false and the Valley Breeze knew that before publication, or were in reckless disregard of the truth when publishing the statements.

180. Specifically, the Valley Breeze republished the false statements by Mayor Donald Grebien's Chief of Staff Ryan Holt, that "[w]ith the CFO gone, we as an administration are trying to keep everything in order," and that "[t]he city is aware of it and wants to protect taxpayers as well as get everything in order."
181. None of those statements are true.
182. Moreover, those statements imply to a reasonable reader that the taxpayers need protection from PSD, that the finances are out of order with the CFO gone, and that it is only the City which "get" or "keep" "everything in order."
183. Those statements are not only false, they are of the type which would seriously impugn PSD, and Plaintiff as head of PSD, with respect to her job performance and fitness for her job.
184. As to the plainly clear falsity of these claims, the City has no ability to "protect taxpayers" with respect to PSD finances, and has no ability to "get everything in order," nor can they even "try[] to keep everything in order" as the statement claims.
185. In fact, the City has no authority over, control over, or oversight of PSD finances pursuant to R.I.G.L. §§ 16-2-9 and 16-2-11.
186. To be sure, in a letter that was available to the Valley Breeze due to it being in the possession of *many* City and school district officials since June of 2024, PSD attorney Conley had to remind the City, in a June 24, 2024 letter, that "[t]he City Finance Department does not have authority to approve, cancel or delete budget transfers, purchase requisitions, or any other financial transaction made by PSD...[p]ursuant to R.I.G.L. §§ 16-2-9 and 16-2-11" and that "only Superintendent Royal, or her designee is statutorily authorized to make all such actions, and only the Pawtucket School committee is statutorily authorized to supervise such transactions."



187. Moreover, Attorney Conley’s letter demonstrated that, if anything, the City *interferes and undermines* PSD with respect to finances, putting the taxpayer and PSD at much more risk and disrupting more than the simple loss of a CFO.
188. Specifically, Mr. Conley’s letter stated that, the “City Finance Department has repeatedly withheld funds, delayed monitory transactions, and limited access of the Pawtucket School Department (PSD) to the Municipal Uniform Information System (MUNIS) required for the day-to-day financial operation of PSD.”
189. Mr. Conley’s letter further alleged, “[m]ost recently the City Finance Department unilaterally truncated PSD’s FY24 fiscal year without authority by imposing a hard deadline of June 12, 2024 for all purchase requisition requests[]” and further alleged that the “City Finance Department intentionally deleted approximately 33 properly uploaded purchase requisition without warning.”
190. Mr. Conley’s letter further alleged, that the “City Finance Department thereafter continued to limit PSD access to MUNIS” and stated that these “actions have cause PSD to waste time, effort and resources, and have also exposed PSD to possible legal and financial liabilities.”
191. Mr. Conley’s letter provided the applicable legal citations for Plaintiff’s statutory authority that condemned the City’s interference with PSD finances due to the City’s “limited statutory role...as defined by Chapter 2 of Title 16 of Rhode Island General Laws.”
192. The City’s lack of authority over PSD finances, with or without a CFO, is known to the Valley Breeze, again because it is *in a state law – specifically* R.I.G.L. §§ 16-2-9 and 16-2-11 and also was also available in this widely circulated letter by Attorney Conley.
193. Thus, the Valley Breeze knew it was untrue that City could “protect taxpayers” and “get” or “keep” “everything in order” with respect to PSD finances, since the City had no statutory authority to do so.

194. Yet the Valley Breeze republished the false statements knowing they were untrue or in reckless disregard of the truth.
195. Notably, that same article published the false statement that the “school department [wa]s having cash flow issues that have been affecting the city” which was also false.
196. All of those false statements severely degrade Plaintiff’s ability to manage PSD, disregard that upon the CFO leaving *Plaintiff was a competent acting CFO*, and imply that Plaintiff needs the City to help her “protect taxpayers,” to “get everything in order,” or at least “try[] to keep everything in order.”
197. Thus, such false statements impugn Plaintiff’s reputation as to her job performance and fitness for her position, and are therefore defamation *per se* with presumed damages.
198. Likewise, the July 20, 2024, Valley Breeze article titled “Supt. Royal defends herself against 'daggers' from city officials,” also impugns Plaintiff’s job performance with the false statements.
199. In this article, the Valley Breeze republished more statements by the Mayor’s Chief of Staff, Mr. Holt, which were known to be false or were published in reckless disregard of the truth.
200. Specifically, the Valley Breeze republished statements about the normality of the City’s act closing the 2024 Fiscal Year earlier than its actual closing date on June 30, 2024; the City closed it on June 12, 2024.
201. Specifically, the Valley Breeze published false statements about how the City had been “closing its budget early each year” since 2019 and that the City gave PSD “several emails” of notice prior to the June 12, 2024 early close to the Fiscal Year.
202. Those statements are both untrue.
203. The truthful information is available in emails and from *several* people; this truthful information could have been obtained or those persons contacted to obtain the truthful information.

204. Specifically, there are two emails and several persons on each email chain – as well as those who had been involved in PSD finances in the past – that could have verified the City’s early closing of the 2024 fiscal year books (and the City’s deletion to the PSD requisitions plus the blocking of the PSD access to Munis for that year) was highly unusual.
205. One email from June 14, 2024, states, “I reached out to the previous Business Team Office team to inquire about end of year closing process. They shared with me this has never been the practice especially during this time of the school year.”
206. There were approximately eight (8) people on that email chain, so the information that closing the books early was not normal was accessible, if not common knowledge.
207. The second email from June 19, 2024, states “[a]fter a meeting with our accounts payable clerk to understand this process further, we learned that in previous years, she had access to toggle back and forth between the current fiscal year and the following fiscal year. This year she does not have the same access...” and further states “Ms. Bourski was out of her jurisdiction in deleting 33 requisitions entered by the school district without...prior approval or prior communication.”
208. There were ten (10) people on that email chain which were mostly different from the prior email, and thus, there were *several* people that knew that the City closing the books early and deleting the PSD requisitions, was not, in fact, normal for the City to do.
209. Additionally, it is untrue that the City provided “several emails” of proper notice to PSD about the early closing, despite the Valley Breeze publishing or republishing this untrue statement.
210. These false statements – once again – disparage Plaintiff and PSD’s management of finances and financial deadlines, and thus, these statements are defamatory *per se* as they impugn Plaintiff’s job performance and her fitness for her position running PSD.

211. In fact, later Valley Breeze articles make that exact false claim about Plaintiff's poor management of finances and financial deadlines at PSD. See the February 28, 2025 article *supra*, titled "Buck named acting superintendent in Pawtucket" where the Valley Breeze published that "[d]uring [Plaintiff's] tenure, the district has struggled with financial accounting deadlines..."
212. As a final example of defamation by the Valley Breeze, in an August 7, 2024 article, the Valley Breeze again paints a picture of an incompetent Plaintiff, impugning Plaintiff's ability to manage PSD and her competence in her job.
213. The subject of these defamatory statements was related to a number of vacancies which were the normal result of Plaintiff's changes to the district and raising the responsibility levels for Principals, which some Principals did not want to comply with or left for related reasons.
214. These false statements about a "vacancy crisis" were printed by the Valley Breeze despite the fact that Plaintiff walked into a real "vacancy crisis" when she started in 2023, yet the Valley Breeze never characterized it that way.
215. This August 7, 2024 article was even titled in a defamatory manner, stating: "Vacancy crisis raises more questions in Pawtucket schools."
216. This statement is defamatory to Plaintiff as the individually ultimately responsible for PSD.
217. The body of the article republished false and defamatory statements including that, "[a] vacancy crisis weeks before the start of school has led to new questions about how things are operating under the current district administration."
218. This statement is false in that there was not a "vacancy crisis."
219. Moreover, there were not, except from those trying to undermine, sabotage, defame and discriminate against Plaintiff, "questions" about how things were operating under Plaintiff's administration.

220. As to the falsity of the “vacancy crisis” statement, first, the Valley Breeze’s cited a “vacancy crisis” about the expected vacancies which occurred as a result of leadership changes and changes to the district which not all Principals liked.
221. Second, the Valley Breeze’s “crisis” involved only the Principal and Vice Principal positions.
222. In contrast, in July of 2023 Plaintiff walked into a real “vacancy crisis” where there were varied and extremely important administrative vacancies such as nearly an entire finance office which had resigned prior to Plaintiff, a need for an HR chief, and other administrative vacancies, *in addition* to vacancies in the Principal and teacher ranks.
223. Yet, the Valley Breeze called the 2024 *expected* vacancies just within the Principal and Assistant Principal ranks a “vacancy crisis” but did not call a worse situation in 2023 a vacancy crisis.
224. The Valley Breeze knew that the vacancies in 2024 were less serious than what Plaintiff walked into in 2023, and thus calling it a “vacancy crisis” was false and defamatory.
225. Calling the 2024 vacancy situation a “vacancy crisis” impugned Plaintiff’s job performance in managing PSD, imputed her fitness for the job, and impugned her skills, implicating defamation *per se* with presumed damages.
226. That same August 7, 2024 article, titled “Vacancy crisis raises more questions in Pawtucket schools” *also* included multiple defamatory and patently untrue statements by an anonymous source who the Valley Breeze identified only as “[o]ne of the districts’ longest-serving staff members.”
227. Upon information and belief, that anonymous source was Assistant Superintendent Lee Rabbit who is named, individually, in a separate lawsuit by Plaintiff in Federal Court, 1:25-cv-00113-

JJM-LDA for her role in unlawfully removing Plaintiff after using state powers<sup>2</sup> to undermine and sabotage her, as well as claims that Ms. Rabbit defamed and discriminated against Plaintiff.

228. The “anonymous source” stated falsely, and the Valley Breeze republished as if a fact, in that August 7, 2024 article that “the feeling remains prevalent that the district hired the wrong Superintendent.”

229. That statement by the “anonymous source” strongly impugns Plaintiff’s reputation for job performance and fitness in her job.

230. That statement was not about the source’s own feelings, but relaying – as fact – others’ sentiment, and thus, is not a protected opinion.

231. The Valley Breeze also republished a patently false statement by the “anonymous source” that PSD, “unnecessarily [lost] valued teachers, administrators, and support staff” because of Plaintiff.

232. It is patently untrue that the staff were lost “unnecessarily” as it is the normal result of leadership changes and Plaintiff’s changes to the district which not all staff were on board with, all of which is normal.

233. The Valley Breeze knew that the statements by the “anonymous source” were false but printed them anyway, or republished these false statements by the “anonymous source” in reckless disregard of the truth.

234. These statements are defamatory *per se* as they impugn Plaintiff’s job performance and her fitness for her job.

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<sup>2</sup> Ms. Rabbit, as an employee of PSD, is a “state actor” for constitutional law claims alleged in 1:25-cv-00113-JJM-LDA.

235. Importantly, these and other defamatory statements, already viewed by the public and still on the internet due to the Valley Breeze's defamation will, upon information and belief, cause Plaintiff great difficulty in ever obtaining a new role as Superintendent for the rest of her career.
236. Plaintiff spent approximately thirty-three (33) years rising through the ranks from a teacher to earn the role as Superintendent.
237. Thus, Plaintiff's economic damages are massive.
238. Plaintiff is nowhere near retirement age.
239. The Valley Breeze's defamation is also causally linked to Plaintiff's current status at PSD of being replaced.
240. The Valley Breeze's defamation is also causally linked to Plaintiff's current status as being on medical leave and in ongoing extreme emotional distress resulting in physical injury.
241. The Valley Breeze's defamation is also causally linked to Plaintiff's additional, unstated damages.

**COUNT I**  
**DEFAMATION PER SE**

242. Plaintiff incorporates by reference paragraphs 241 above as if fully set forth herein.
243. Defendants' agents published and republished, orally and/or in writing, false statements concerning Plaintiff as stated *supra*.
244. The aforesaid statements were published to third parties.
245. These false statements are of the type that a reasonable person would find would tend to harm the reputation of Plaintiff, lower the estimation of Plaintiff in the community, or that would tend to deter third persons from associating or dealing with Plaintiff.
246. Moreover, these false statements impugn Plaintiff's job performance, fitness for her job, and job skills; thus, her career.

247. These false statements are of the character that would cause reputational, economic, and emotional distress harm.
248. Defendants' agents published the false statements despite foreseeability that such published false statements would cause reputational, economic, and emotional distress harm and damage to Plaintiff.
249. Defendants' agents published the false statements despite foreseeability that such published false statements despite knowing these statements would be understood by the party receiving the publication of the false statements as harmful to Plaintiff.
250. Parties receiving the publication did, in fact, understand the publication as a statement that would in fact actually harm Plaintiff, her reputation, cause reputational to Plaintiff's job and career, and cause economic, emotional, and other damage to Plaintiff.
251. Defendants' agents' published and republished these false statements despite the aforesaid knowledge.
252. The published statements did in fact harm Plaintiff in the aforesaid manners.
253. Plaintiff experienced the damages aforesaid as a proximate result of Defendants' agents' intentional conduct.
254. The false published statements were related to and impacted Plaintiff's career or vocation.
255. Thus, presumed damages for defamation/slander *per se* are proper.
256. Because Defendants' conduct was intentional, willful and/or wanton, punitive or exemplary damages are warranted.
257. Defendants are responsible for the acts and omissions of the Defendants' agents under the theory of Respondeat superior.



**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays that this Court:

- a. Order judgment for Plaintiff against Defendant on all Counts of the Complaint and declare that the practices detailed in this Complaint are unlawful;
- b. Order, presumed damages for defamation *per se*.
- c. Order, for all applicable Counts, that Defendant make Plaintiff whole by awarding appropriate compensation for damages occurring for lost pay and lost future and career opportunities, through presumed or other damages, including compensation for all other lost income and benefits, earning capacity, career earnings through retirement, and all other relevant entitlements and emoluments;
- d. Order, for all applicable Counts, that Plaintiff be awarded an amount of money which will fairly compensate her for her complete loss of reputation, and potentially permanent online defamatory information, which disparages Plaintiff, her reputation, her job performance, her career, and/or defames her in other manners, along with causing her economic and other damages;
- e. Order, the Valley Breeze to issue a correction and/or retraction to help repair Plaintiff's decimated reputation as to her person, her job-related skills, and her present and future career.
- f. Order, the Valley Breeze to remove the defamatory articles found from internet to help repair Plaintiff's decimated reputation as to her person, her job-related skills, and her present and future career.
- g. Order, the Valley Breeze to de-index the articles found to be defamatory to lessen that impact of the articles found to be defamatory on Plaintiff's decimated reputation as to her person, her job-related skills, and her present and future career.

- h. Order, for all applicable Counts, that Plaintiff be awarded an amount of money which will fairly compensate her for his mental anguish, emotional pain and suffering, other damage to her reputation, loss of standing in the community, and other damages incurred;
- i. Order, for all applicable Counts, that the Defendant pay Plaintiff's costs and reasonable attorney's fees resulting from this action;
- j. Order, for all applicable Counts, that the Defendant pay punitive or exemplary damages, as appropriate to punish Defendant for their malicious conduct, recklessness conduct, and/or callous indifference to the statutorily and common law protected rights of Plaintiff;
- k. Order, for all applicable Counts, that Defendant pay post-judgment interest where appropriate and allowable by law;
- l. Order, for all applicable Counts, that Defendant pay pre-judgment interest, including interest for all damages awarded to Plaintiff from the date the cause of action accrued, where appropriate and allowable by law;
- m. Retain jurisdiction of this action to ensure full compliance; and
- n. Order, for all Counts, such other relief to Plaintiff as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

***PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE***

April 1, 2025

Respectfully Submitted,  
**PLAINTIFF PATRICIA ROYAL,**  
By her attorney,

/s/ Paige Munro-Delotto  
Paige Munro-Delotto, Ph.D., Esq. #9291  
Munro-Delotto Law, LLC  
400 Westminster St., Ste. 200  
Providence, RI 02903  
(401) 521-4529  
(866) 593-9755 (fax)  
Email: Paige@pmdlloffices.com