

## MUTUAL RELEASE OF ALL CLAIMS

I, John D. Lancellotta, for myself, my heirs, personal representatives and assigns (hereinafter collectively referred to as "Releasor"), in consideration of the sum of Sixty Thousand dollars<sup>1</sup> (\$60,000.00), do hereby remise, release and forever discharge Kristen Benoit, in her capacity as Finance Director of the Town of West Warwick, the Town of West Warwick, West Warwick Public Schools, Karen Tarasevich, Louis Colon, Rene Coutu, Susan St. Armand, Joseph DiMartino, Angela Coburn, and The Rhode Island Interlocal Risk Management Trust, and their affiliates, officers, former and current employees, agents, successors and or assigns (hereinafter collectively referred to as "Releasees") from all claims, actions, causes of actions, grievances, arbitrations, suits, proceedings, debts, controversies, agreements, attorneys' fees, judgments and demands whosoever, in law or equity, which Releasor ever had, now has, or shall have as of the date of this Mutual Release of All Claims, and more particularly, on account of all loss or damages of any kind sustained or that may hereafter be sustained, arising from his employment with the Town of West Warwick Public Schools, including but not limited to those matters alleged in the Amended Complaint filed in the United States District Court for the District of Rhode Island, *John Lancellotta v. West Warwick Public Schools, et al* (C.A. No. 22-cv-00465-WES-LDA).

To procure payment of the said sum, Releasor acknowledges and declares: that I am more than 18 years of age; that no representation about the nature and extent of said damages made by any attorney or agent of any party hereby released, nor any representations regarding the nature and extent of legal liability or financial responsibility of any of the parties released, have induced me to make this settlement.

Releasor acknowledges and understands that the parties hereby released admit no liability of any sort and that said payments and settlements in compromise are made to terminate further controversy respecting all claims for damages heretofore asserted or that may be asserted by Releasor or his personal representatives.

For and in consideration of the promises made herein by Releasor, the West Warwick Public Schools hereby remise, release, and forever discharge John Lancellotta, his heirs, administrators and assigns from all claims, actions, causes of action, suits, proceedings, whatsoever, in law or equity, which the West Warwick Public Schools ever had, now has, or shall have as of the date of this Mutual Release of All Claims, and more particularly, on account of all loss or damage of any kind sustained or that may hereafter be sustained, arising from John Lancellotta's employment with the Town of West Warwick Public Schools.

This Mutual Release of All Claims contains the entire agreement and the parties hereto, the terms of which are contractual and not a mere recital.

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<sup>1</sup> The Rhode Island Interlocal Risk Management Trust is paying \$45,000, and the Town of West Warwick Public Schools is paying \$15,000 toward the settlement amount.

The Releasor further states that he has read the foregoing, that he knows the contents thereof and that he signs the same as his free act and deed.

John Lancellotta  
John D. Lancellotta

STATE OF RHODE ISLAND  
COUNTY OF Kent

On this 16<sup>th</sup> day of July, 2024, before me personally appeared to me, known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as his free act and deed.

Notary Public: Jennifer Kyle Fletcher  
My commission expires: 03-20-2027



I state that I have read the foregoing, know the contents thereof, and that I am authorized to execute same on behalf of the Town of West Warwick Public Schools

TOWN OF WEST WARWICK PUBLIC SCHOOLS

By: Karen A Tarasevich  
Karen A. Tarasevich, Superintendent of Schools

STATE OF RHODE ISLAND  
COUNTY OF Kent

On this 29<sup>th</sup> day of July, 2024, before me personally appeared to me, known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as his free act and deed.

Notary Public: Kristine Ann Cumiskey  
My commission expires: 3/4/2028  
ID# 771740

