

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

ROBERT R. COTE
Plaintiff

Vs.

DONNA TRAVIS, et al.
Defendants

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C.A. No. 23-cv-346--MRD-AEM

SECOND AFFIDAVIT OF ROBERT COTE

Robert Cote, being duly sworn, states:

1. With regard to the statements contained within the Defendants' motion respecting the council liaison, the statements are completely false. I did not accuse her of acting as a lookout. I simply asked her if any council member instructed her to notify them when I arrived. I did not accuse her of lying. I did not tell her that I no longer held her in high regard. In fact, the conversation concluded with me stating "Joanne, you know that I have always held you in high regard and this is in no way personal. However, since these text messages have now been put forth in discovery you will most likely be deposed."
2. With regard to Defendant McAllister's brother-in-law, that is Mike Rooney who works for the board of canvassers. In 2024, I had picked up declaration papers from the board and immediately after I did so, Rooney texted disparaging remarks about me to McAllister. On March 23, 2026, after I saw McAllister's discovery responses, including Rooney's text messages, I went into the board of canvasser's office and showed Rooney the text messages. I advised him that information pertaining to possible candidates was not to be broadcast and communicated to sitting elected officials in an effort to mock them.

3. The next day, I followed up that interaction with a call to the Secretary of State's office and spoke to a woman who oversees all the municipal board of canvassers. I told her about the text messages, and she informed me that what Rooney did was completely inappropriate for the office and that she would require him to undergo retraining. She followed up with a phone call telling me that he had been contacted on the issue. Defendants' motion would have the effect of preventing me from bringing this kind of misconduct to the attention of a state official.
4. With respect to Defendant Sinapi, some of what I have discussed are publicly available responses from emails that were sent out to my extensive email list pertaining to fiscal issues in the city. Hundreds of people are on the list, including some Council members. At a recent Council meeting, I read responses from emails pertaining to Sinapi's behavior. Defendants' motion would have the effect of preventing me from discussing these emails from this list.
5. In addition, I have read quotes from the character and fitness review of Sinapi from a document pertaining to his admission to the bar that is publicly available online. Anyone can access these documents and there is nothing that I have spoken about that is not public online.
6. I have reviewed the documents produced by the Defendants, including the City of Warwick, except for Rix, who has not produced his documents, as of yet.
7. The documents range in number from 41 pages (Foley) to 884 pages (City of Warwick) depending on the defendant.

8. Parts of each Defendants' production are identical to the others. The productions include Warwick City public records such as City Council bylaws, and text messages and emails with or about me on issues related to City government.
9. The documents also include many topics respecting City government not directly related to the incidents of July 17, 2023, such as the construction of a new high school, an issue in which I have professional expertise based on my work inspecting the construction of public schools in Massachusetts.
10. Defendants' motion would have the effect of preventing me from discussing my prior comments to the Council about the high school and other topics.
11. With respect to Defendant Travis, the issue of her delinquent taxes, both auto and home, were widely covered by the media, both channel 6 and channel 12, as well as articles in the Providence Journal and Warwick Beacon. See attached:

- a. <https://turnto10.com/news/local/warwick-city-council-member-donna-travis-misdemeanor-charge-filing-false-document-property-transfer-oakland-beach-association-kent-county-district-court-july-16-2024>.
- b. https://www.johnstonsunrise.net/archives/news/warwick-city-councilwoman-pleads-no-contest-gets-a-year-suspended-sentence-and-probation/article_f9c004a0-7a5a-51cf-9c21-56c448237aa9.html.
- c. <https://www.providencejournal.com/story/news/politics/government/2017/02/01/ethics-complaints-filed-against-warwick-councilwoman/20688499007/?gnt-cfr=1&gca-cat=p&gca-uir=false&gca-epti=z111505u111805e000000v111505&gca-ft=204&gca-ds=sophi>.
- d. <https://www.providencejournal.com/story/news/politics/2023/07/10/oakland-beach-neighborhood-association-calls-foul-on-property-transfer/70356553007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z114305e000200v114305d--47--b--47--&gca-ft=180&gca-ds=sophi>.
- e. <https://warwickpost.com/in-trying-to-dispel-smoke-travis-started-a-new-fire/>

12. Others have commented on social media about Travis' legal issues, including gubernatorial candidate Ken Block, among others:

- a. <https://www.facebook.com/ken.block.56027/posts/warwick-city-council-member-donna-travis-is-caught-on-hot-mike-last-night-callin/2310343872539215/>

- b. <https://x.com/KenBlockRI/status/1814058712530874649>
- c. <https://steveahlquist.substack.com/p/warwick-city-council-violated-the>
- d. <https://www.facebook.com/warwickpost/posts/councilman-vinny-gebhart-has-called-for-traviss-resignation-from-the-warwick-cit/1245407603100615/>
- e. <https://warwickpost.com/oakland-beach-association-sues-travis-sturdahl-for-fraud/>.

13. There are dozens, if not hundreds, of articles about Travis' behavior online and there is nothing in her discovery responses that has not already been in the media.

14. It is certainly true that I have characterized the nature of the Defendants' discovery responses in public comments, including their substantial delay in providing those responses. I think that is well within my First Amendment rights. I believe that Defendants' motion is simply another attempt to violate those rights, just like the incident on July 17th.

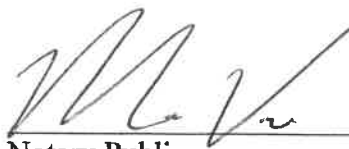
I, Robert R. Cote, upon oath do hereinafter depose and state that I have read the foregoing Affidavit, I know the contents thereof and the facts therein alleged are true and accurate.



Robert R. Cote

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

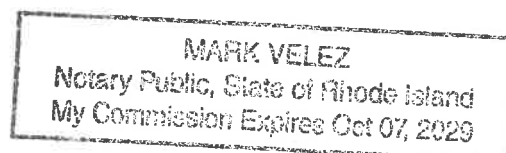
On July 30, 2026, before me, the undersigned notary public, personally appeared Robert Cote, ☐ personally known to the notary or ☒ proved to the notary through satisfactory evidence of identification, which was RI Drivers License, to be the person who signed above in my presence, and who swore or affirmed to the notary this document was signed freely and voluntarily.



Notary Public

My commission expires: Oct 7, 2029

Notary Identification Number: 760494



CERTIFICATION

I hereby certify that on August 5, 2026, a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system and served by email on attorneys for defendants. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons