

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

STATE OF RHODE ISLAND
NEWPORT, SC.

SUPERIOR COURT

Heather J. Cook, CMC, Individually, and in her
capacity as Town Clerk, Town of Little Compton
Plaintiff

v.

Patrick A. McHugh, Individually, and in his
capacity as Town Council President, Town
of Little Compton
Defendant

Superior Court C.A. No.

VERIFIED COMPLAINT

NOW COMES, the Plaintiff, Heather J. Cook, CMC, Individually, and in her capacity as Town Clerk, Town of Little Compton, State of Rhode Island, by and through her attorney, and hereby files this Verified Complaint against Patrick A. McHugh, Individually, and in his capacity as Town Council President, Town of Little Compton, State of Rhode Island.

PARTIES

1. Plaintiff, Heather J. Cook, CMC, is the Town Clerk for the Town of Little Compton (the "Plaintiff") in the State of Rhode Island. Heather J. Cook is a lifelong resident of Little Compton who is dedicated to serving the town and its residents with professionalism, fairness and integrity.¹ Plaintiff has been the Little Compton Town Clerk since January 1, 2026. She started as Office Clerk in October of 2018 until becoming Deputy Town Clerk in August of 2021. She continues to serve as the Town Clerk.

¹ Heather J. Cook's mother, Judith Cook, served as Little Compton's Town Clerk for 11 years.

2. Defendant, Patrick A. McHugh, is the President of the Town Council for the Town of Little Compton (the “Defendant”) in the State of Rhode Island. Patrick A. McHugh has served as Council President for the last 2 years.
3. On information and belief, Defendant may have been acting in concert with others relative to the accusations raised within this Complaint. In the event that the Defendant did act in concert with others, all as may be discovered through pre-trial discovery, then those parties will be added to an Amended Complaint.

JURISDICTION

4. Jurisdiction is conferred upon this Court pursuant to R.I.G.L. § 28-52-2 as well as Common Law and Equitable Relief.

FACTS

5. The Defendant has undermined the office of the Town Clerk for many months including, but not limited to, emails harassing the Town Clerk and undermining the Town Clerk’s attempts at rectifying the IT issues and work stoppage within the Town Hall to properly serve the residents and guests who visit the Town Hall.
6. Defendant has, on numerous occasions, belittled Plaintiff to other members of the Town Council as well as other departments within the Town Hall.

COUNT I

Injunctive Relief

7. The Plaintiff incorporates paragraphs 1- 6 as if fully stated herein.
8. Plaintiff’s application for injunctive relief is authorized by Rule of Civil Procedure

9. As a result of Defendant's unlawful acts, Plaintiff has been irreparably harmed. The issuance of a Preliminary Injunction, a Permanent Injunction and a Temporary Restraining Order, is necessary to provide the Plaintiff with protective relief. The Defendant's acts as described herein set forth a clear violation of R.I.G.L. § 28-52-2.
10. Injunctive relief is necessary to maintain the status quo and will prevent considerably more harm to Plaintiff than it will cause Defendant, who cannot be harmed by being prevented from engaging in unlawful behavior.
11. Injunctive relief is in the public's best interest, as the public benefits from the smooth and efficient operation of the Town Hall.
12. Accordingly, the Plaintiff is suffering and will continue to suffer irreparable harm without injunctive relief.
13. Plaintiff is seeking a civil protective order against Defendant per R.I.G.L. § 8-8.1-3.

COUNT II

Temporary Restraining Order

14. The Plaintiff incorporates paragraphs 1- 13 as if fully stated herein.
15. Plaintiff is seeking a Temporary Restraining Order against Defendant to cease and desist from harassing the Plaintiff and the staff of the Town of Little Compton Town Clerk's office
16. Plaintiff is seeking a Temporary Restraining Order against Defendant to cease and desist attempting to harass Plaintiff via a third party.
17. Plaintiff is seeking an Order that the Defendant have no contact with Plaintiff in any form or attempt to contact the Plaintiff in any format or in person or via a third party.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff, Heather Cook, respectfully requests that this Honorable Court grant the Plaintiff's request for Injunctive Relief and request for Temporary Restraining Order to prevent the Defendant from further harassment and/or interference at the workplace.

That this Honorable Court grant such other and further relief as the Court deems meet and just including, but not limited to, attorney fees, additional equitable remedies, punitive damages, and other damages.

Plaintiff,

Heather J. Cook, CMC, Individually, and in her
capacity as Town Clerk, Town of Little Compton

/s/ Richard S. Humphrey
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VERIFICATION

I, Heather J. Cook, hereby under oath state that I have read the foregoing Verified Complaint and verify the facts set forth therein are true and accurate to the best of my knowledge, information and belief, except those statements made upon information and belief, and as to such statements I believe them to be true.

Heather J. Cook, CMC, Town Clerk
Heather J. Cook, Individually and in her
capacity as Town Clerk, Town of Little Compton

Subscribed and sworn before me this 18th day of September, 2026.

Susan Marie Cook

