

TO THE HONORABLE CITY COUNCIL

The undersigned respectfully petitions your body for compensation for injuries or damages sustained as follows:

Please print information that pertains to your claim.

Motor Vehicle Accident Pothole Property Damage Tax Waiver Other

Claimant Name: ANGELA TOLJAN

Address: 1147 CARRS POND ROAD

City, State, Zip: EAST GREENWICH, RI 02818

Telephone #: 401 965 3045



Date of incident (M/D/Y) 1/9/2023 Time: 5.50 AM PM

Description of Incident/Claim: I was coming west on Knight Street from Pontiac Ave. It was dark, and I came down, around the bend & hit the second of 2 major potholes, which blew out my tire and destroyed the rim.

Vehicle Year: 2018 Make: JAGUAR Model: XF Odometer reading: 34210

The Pothole was located on KNIGHT STREET road.

I notified the Finance I Public Works department on I went on Jan 11 to renew (date) the hole & it was filled.

I did not notify PW because it was filled

The nature of my property damage is: 3 New tires, an alignment, mount fee, tire tax, sensor

Additional information about Tax Waiver (include letter from Tax Collector stating adverse decision) _____

I request reimbursement in the amount of \$ 1384.28

SIGNATURE OF CLAIMANT: [Signature] DATE 1/19/2023

AFFIDAVIT

(Petitioner Name) ANGELA TOYAN, being duly sworn, deposes and states:

1. I have petitioned the City Council of the City of Warwick for compensation for losses arising from an incident which occurred on (date) 1/9/2023 as a result of (please provide brief description):

a seriously large pot hole, which, when I drove over in the dark, damaged my tires and wheels

Said claim was filed with the Finance Department on 1/9/2023 (date).

2. Check appropriate box or boxes:

I have not sought compensation, nor will I at any time seek compensation from any source (including, but not limited to, any insurance company) other than the City of Warwick, for any loss arising from the above-described incident, understanding for pothole claims, the maximum recovery is \$300.00 under Rhode Island General Law § 24-5-13 (b).

I have received compensation from a source or sources other than the City of Warwick, (including, but not limited to, any insurance company) in connection with this incident. The amount(s) which I received total \$ 1865.08 and the source of the other payment(s) was insurance policy

I am seeking, or intend to seek, compensation from a source or sources other than and/or in addition to the City of Warwick (including, but not limited to, any insurance company), for any loss arising from the above described incident. The source or sources from which I seek such other compensation is/are: city of warwick for the balance

3. In the event that the Warwick City Council should deny my claim, I understand that I may pursue a claim against any other party who may be liable for my loss.

4. I understand that I am not entitled to recover more than the amount of my actual loss. If the City of Warwick pays any amount to me in connection with the above described incident, and if I should receive any amounts from any source other than the City of Warwick with respect to the above described incident, I will report such other receipt(s) to the Finance Department of the City of Warwick.

5. I have personal knowledge of the facts aforesaid.

[Signature]
Signature of Claimant or its Representative

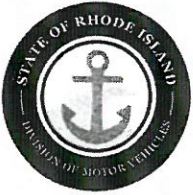
ANGELA TOYAN
Printed Name

State of Rhode Island
County of PROVIDENCE

Subscribed and sworn to before me on this 19 day of JANUARY, 2023

[Signature]
(Notary Public)
My Commission Expires 3/18/2023

JOHN G. QUINN JR.
Notary Public - Rhode Island
Notary ID #763892
My Commission Expires 3/18/2023



STATE OF RHODE ISLAND
DIVISION OF MOTOR VEHICLES

600 New London Avenue
Cranston RI 02920-3024
Web Address: WWW.DMV.RI.GOV



Date: 10/27/2022

ANGELA P TOLJAN
1147 CARRS POND RD
EAST GREENWICH RI 02818-1010

Registration Certificate

REG NUMBER: JZ748	PLATE TYPE: PASSENGER	PLATE DESIGN: WAVE	VEHICLE TYPE: PASSENGER	DRIVERS LICENSE: 8363852	REG EXP DATE: 11/30/2024
YEAR: 2018	MAKE: JAGUAR	MODEL: XF	BODY TYPE: WAGON	MAJOR COLOR: GRAY	MINOR COLOR: GRAY
VEHICLE IDENTIFICATION NUMBER: SAJBM2FV5JCY63048		RENEWAL FEE: \$112.50	GROSS WEIGHT: 4795	# OF PASSENGERS: 5	# OF CYLINDERS: 6
FUEL TYPE: GAS	CARRYING CAPACITY: N/A	LENGTH: N/A	CCs: N/A	MAX SPEED: 0	
REGISTERED OWNER/LEASING COMPANY: ANGELA P TOLJAN 1147 CARRS POND RD EAST GREENWICH RI 02818-1010			SECOND OWNER:/LESSEE		

- TAX TOWN: **EAST GREENWICH**
- Notice: The law requires that the DMV be notified within 10 days of any change in name or address. Please visit our website to update your address online.
- Plate Cancellation -Excise Tax: Plates must be **cancelled** with the DMV to ensure the vehicle is removed from the city or town tax rolls. Please retain your receipt as proof of cancellation.
- Every registration plate shall be at all times securely fastened in a horizontal position and be in a condition to be clearly legible. Validation stickers are only to be placed securely on the lower right corner of the registration plate.
- Registration Certificate shall at all times be carried in the vehicle to which it refers or shall be carried by the person driving or in control of such vehicle.
- Proof of valid insurance/financial security is required as per Rhode Island General Laws § 31-47 (Motor Vehicle Reparatons Act).
- It is your responsibility to renew your registration prior to the expiration date. Failure to do so may result in the assignment of new plates.
- Failure to obtain an **Emissions Inspection** on or before **07/15/2023** will result in this vehicle being suspended.
- Not valid without official signature of Administrator.
- Any vehicle operating in excess of legal weight limits is required to have an overweight permit per Chapter 31-25 of the Rhode Island General Laws. Failure to obtain an overweight permit may result in the imposition of fines and/or other penalties.


WALTER R. CRADDOCK
Administrator
Division Of Motor Vehicles

10/27/2022



Land Rover

Add note 

 SMART (800) 452-4827



[View on hiya](#)

January 9



6:07 PM

Outgoing call, 15 mins 10 sec

1/19/2023

Summary for Pothole Claim for City of Warwick

Angela Toljan

1147 Carrs Pond Road

East Greenwich, RI 02818

Car: Jaguar XF, Mileage 34,216

On Monday night at 5.50, Jan 9, I was driving on Knight Street, toward Greenwich Avenue, just before the Violet Hill Nursery and Stafford Street and near Pole 35, when I hit a serious pothole on the right side of the road, blowing out my passenger tire.

I pulled into the parking lots at the Pontiac Mill apartments and called for service. After fifteen minutes of trying to schedule them to come, my husband decided to put the spare on himself. With the donut tire installed by him, I drove directly to Jake Kaplan's and left the car in the lot.

My car is covered by Jaguar's extended coverage and tire insurance bought with the car, meaning only a Jaguar dealer can fix the repairs to maintain the warranty.

On Tuesday, I went by to discuss the damage, which they said would be a few days to determine, with wheel damage. On Wednesday, they called to say that I needed all new tires because the existing tires were discontinued and they were obligated to use all 4 tires the same, given that it's an all-wheel drive car. They said they would know more about the wheel damage once the insurance inspector came in the following week to view his portion of the coverage. At this point, I did not have full cost amounts.

On Thursday, I had my husband bring me to the accident site to take a picture, and the holes were already filled in. At this point, I did not call DPW, because it was fixed.

I picked the car up on Tuesday, Jan 17th, and received the full invoice pricing, with the insurance coverage deducted. I filed the paperwork on Jan 19th, after receiving the invoice.

I have attached a picture of the pothole. I did not take a picture of the flat tire, which did not show the rim damage. The invoice is clear that the rim needed replacement. Also, I have attached a picture from my phone, showing the call to Jaguar Roadside Assistance/LandRover, who ultimately did not come to help.

CUSTOMER #: 4019653045
 UNIT# NEW

270477



ANGELA TOLJAN
 1147 CARRS POND ROAD
 EAST GREENWICH, RI 02818
 HOME:401-965-3045 CONT:401-965-3045
 BUS: CELL:401-965-3045

INVOICE
 DUPLICATE 1
 PAGE 1

JAGUAR LAND ROVER WARWICK
 1346 BALD HILL RD., WARWICK, RI 02886
 (401) 461-2000

SERVICE ADVISOR: 1474 BERNADETTE CAPRA

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN / OUT	TAG
GRAY	18	JAGUAR XF	SAJBM2FV5JCY63048	JZ748	34215/34216	T021

DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
16FEB18 DD		15FEB2023	17:00 10JAN23	1		XCPR	16JAN23

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
A	PERFORM MULTI POINT INSPECTION ROVER						
	MPIR PERFORM MULTI POINT INSPECTION ROVER						
	222 IAPR						(N/C)

 B CUSTOMER STATES CHECK THE FRONT RIGHT TIRE. MICH PILOT SPORT AS3
 255/35/ZR20

MTB4 MOUNT AND BALANCE 4 TIRES							
222 CPJ						210.00	210.00
TYRDSP TIRE DISPOSAL FEE						10.00	10.00
4 12040 PILOT SPORT A/S					329.00	311.40	1245.60
4 TYRTAX RI TIRE TAX					1.00	1.00	4.00
1 LR043162 SENSOR - TYRE PR					54.72	54.72	54.72
34215							
R/R 4 TIRES AND BALANCE							
R/R 1 RIM INSTALL TO R/FRONT TPMS KIT							

 C** Alignment, Four Wheel - Check and Adjust
 SR42 Alignment, Four Wheel - Check and Adjust
 545 CPJ

34215 perform alignment						225.00	225.00
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 D** CK RIMS
 MA001 CK RIMS
 222 CPJ

1 T2H5947 WHEEL-ROAD-ALLOY					1143.30	1143.30	1143.30
SUBL RIM PO#280720							
CPJ						175.00	175.00

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

STATEMENT OF DISCLAIMER
 The factory warranty constitutes all of the warranties with respect to the sale of this item/items. The Seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
ENVL RECOVERY FEE	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

CUSTOMER #: 4019653045
 UNIT# NEW

270477



INVOICE

JAGUAR LAND ROVER WARWICK
 1346 BALD HILL RD., WARWICK, RI 02886
 (401) 461-2000

ANGELA TOLJAN
 1147 CARRS POND ROAD
 EAST GREENWICH, RI 02818
 HOME: 401-965-3045 CONT: 401-965-3045
 BUS: CELL: 401-965-3045

DUPLICATE :
 PAGE 2

SERVICE ADVISOR: 1474 BERNADETTE CAPRA

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG	
GRAY	18	JAGUAR XF	SAJBM2FV5JCY63048	JZ748	34215/34216	T021	
DEL. DATE	PROD. DATE	WARR. EXP.	PROMISED	PO. NO.	RATE	PAYMENT	INV. DATE
16FEB18 DD		15FEB2023	17:00 10JAN23	1		XCPR	16JAN23
R.O. OPENED	READY	OPTIONS:					
07:29 10JAN23	13:19 16JAN23	SOLD-STK:JCY63048 DLR:4008 ENG:3.0 Liter S/C TRN:8 SPEED AUTOMATIC AXL:1AC 1) CPO WARRANTY 2) CNA TIRE/C#24001957/P#3128225000					

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL

ESTIMATE:	3,003.86				11JAN23 10:15	SA: 1474	
CONTACT:							

ESTIMATE:	0.00				10JAN23 07:29	SA: 1474	
CONTACT:							

CUSTOMER PAY ENVIROMENTAL CHG FOR REPAIR ORDER 9.99
 CNA TIRE AND WHEEL AUTH ~THANK YOU FOR YOUR BUSINESS~
 9550380 1865.08 OUR COMMITMENT TO CUSTOMER SERVICE HAS NEVER
 BEEN HIGHER; WE STRIVE TO PROVIDE QUALITY
 WORK WITH OUTSTANDING RESULTS.

JAKE KAPLAN'S JAGUAR
 1346 BALD HILL ROAD
 WARWICK, RI 028864620

01/17/2023 08:30:21
 CREDIT CARD
 VISA SALE
 Card # XXXXXXXXXXXX9542
 Chip Card: CHASE VISA
 AID: A000000031010
 SEQ #: 4
 Batch #: 135
 INVOICE 270477
 Approval Code: 00638D
 Entry Method: Chip Read
 Mode: Issuer

SALE AMOUNT \$1384.28

CUSTOMER COPY

DESCRIPTION	TOTALS
LABOR AMOUNT	435.00
PARTS AMOUNT	2443.62
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	175.00
ENVL RECOVERY FEE	23.99
TOTAL CHARGES	3077.61
LESS INSURANCE	1865.08
SALES TAX	171.75
PLEASE PAY THIS AMOUNT	1384.28

BY CERTIFY THAT THE
 DATE UNLESS OTHERWISE
 STATED AT NO CHARGE TO
 THE APPEARANCE OF THE
 REPAIRED OR REPLACED
 IN ANY WAY WITH ANY
 CARDS SUPPORTING THIS
 THE DATE OF PAYMENT
 FOR INSPECTION BY

STATEMENT OF DISCLAIMER
 The factory warranty constitutes all
 of the warranties with respect to
 the sale of this item/items. The
 Seller hereby expressly disclaims all
 warranties either express or
 implied, including any implied
 warranty of merchantability or
 fitness for a particular purpose.
 Seller neither assumes nor
 authorizes any other person to
 assume for it any liability in
 connection with the sale of this
 item/items.

PRINTED PERSON (DATE) CUSTOMER SIGNATURE

POLE #35

