

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,  
*Plaintiff*

v.

C.A. No. 15-525-M-LDA

ROBERT F. STROM, as the Finance  
Director of the CITY OF CRANSTON, the  
CITY OF CRANSTON, and COL.  
MICHAEL J. WINQUIST, in his official  
capacity as Chief of the CRANSTON  
POLICE DEPARTMENT  
*Defendants*

**DEFENDANT, JOHN MASTRATI**  
**RESPONSE TO PLAINTIFF'S INTERROGATORIES**

1. Set forth your complete legal name and address at which you may be served with a subpoena to testify at trial, if necessary.

**RESPONSE:** John Mastrati, Patrolman, Cranston Police Department, 5 Garfield Ave., Cranston, R.I. 02920.

2. Set forth your educational background, including the names and addresses of all postsecondary schools you have attended and all degrees or educational honors you have received.

**RESPONSE:**

Military, 2006-2010;

University of Rhode Island, 45 Upper College Rd, Kingston, RI 02881, General Education Courses, 2010.

3. Set forth all positions you have held in law enforcement, including the name and address of your employers, the inclusive dates during which you were employed and the name and last known address of your immediate supervisor.

**RESPONSE:** I have been employed with the Cranston Police Department from 2011 to present. My immediate supervisor depends on my shift and/or changes in the administration.

notified of any civil or criminal matter involving the guns nor have Defendants claimed there is any," including the name and last known address of each person having knowledge of such facts.

**RESPONSE:** Objection. Defendant objects to the extent that this request seeks some responsive information that was not compiled and/or kept in the ordinary course of business. Defendant objects to the extent that this request is vague and confusing.

20. Set forth the facts upon which you deny that "Plaintiff is a law abiding individual, competent in the safe handling of weapons. Plaintiff has also been declared by a doctor not to pose a threat of harm to himself or to others. Accordingly, there exists no reasons to deny Plaintiff possession of his lawfully obtained firearms," including the name and last known address of each person having knowledge of such facts.

**RESPONSE:** I have no direct knowledge regarding plaintiff being declared by a doctor not to pose a threat of harm to himself or to others as I was not involved in the retaining, evidence storage, or return of firearms, including Edward Caniglia's firearms.

21. Set forth Defendants' policy, customs, or practices with respect to requesting or requiring people to have a mental health examination, including the name and last known address of each person having knowledge of such facts.

**RESPONSE:** Objection. Defendant objects to the extent that this request seeks some responsive information that was not compiled and/or kept in the ordinary course of business. Notwithstanding and without waiving the objection, Defendants' custom and practice depends on the facts and circumstances. In circumstances in a domestic incident where an individual makes suicidal states and places those statements into action, it is custom and practice to call rescue to transport the individual to the hospital to speak with a mental health professional or doctor. The hospital then makes the determination about whether the individual needs to undergo a mental health examination.

22. Set forth the facts upon which you deny that "On August 21, 2015, Plaintiff lawfully possessed his firearms in his home," including the name and last known address of each person having knowledge of such facts.

**RESPONSE:** Defendants had no reason to believe that Plaintiff unlawfully obtained his firearms. However, at that moment in time Defendants believed Plaintiff's continued possession of his firearm in his home created public safety issues that outweighed Plaintiff's right to possess Plaintiff's firearms.

23. Set forth the facts upon which you deny that "Defendants seiz[ed Plaintiffs] firearms without his permission and retained them for several months despite his repeated requests