

**From:** Paul Haverty <[paul@bbhlaw.net](mailto:paul@bbhlaw.net)>  
**Sent:** Friday, July 3, 2020 12:09 PM  
**To:** Cohen, Paul <[pcohen@chelmsfordma.gov](mailto:pcohen@chelmsfordma.gov)>  
**Subject:** RE: Wildlife Feed Bylaw

Paul,

Attached please see my proposed changes/comments. My biggest concern was the language regarding the prima facie determination. I believe this was too broad when applied to public areas. Essentially, once a person is found to have violated the bylaw, this provision could be interpreted as creating a prima facie case for another violation any time animals are found feeding in that area, even if there is no evidence that the person had been in that area to conduct the feeding. I think there needs to be a stronger nexus between the act and the prima facie determination.

Regards,

Paul

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