

August 22, 2021

Hello Francis,

Some comments from FLN regarding your conduct toward BEH. Intentional criminal conduct which has been assisted and concealed by numerous attorneys.

“FlightLevel wanted as little of its engineering work product as possible to be subject to Public Records requests by its litigation adversary. This too was discussed with Mark Ryan and Russ Maguire at the time, who agreed”

FlightLevel had an engineered “fueling Plan”, “which has been repeatedly shown to and reviewed by Russ Maguire and Mark Ryan, and which has been withheld from the public record, with the understanding of airport administration, due to the pendency of the litigation commenced by BEH against FlightLevel.

“Drawings memorializing a number of truck fueling routes were shown at the time to Russ Maguire and Mark Ryan in person, but were withheld from the public record” “FlightLevel wanted as little of its engineering work product as possible to be the subject of Public Records Requests by its litigation adversary”(BEH).

These are the words and claims of FLN's Attorney?

In February of 2017 Norwood Engineering presented "fuel plans" (ANOTHER MADE UP NAC TERM AND CONDITION) which as we now know were not ALL the fueling plans. According to FLN's attorney, you and Mark concealed public records with the knowledge and assistance of attorneys. FLN's attorney communicated numerous times with your attorneys, who intentionally concealed this knowledge and communication. You, and attorneys, were asked about communication through Public Records Requests, and attorney to attorney communication. This is outlined in motions and affidavits with the federal court. Documents which when compared to what was going on between FLN and Town Attorneys, show possible illegal behavior. Within days of the July 30, 2019 settlement agreement, those same attorneys violated the agreement they just crafted. They then lied about this for years, including in motions with the federal court.

All the while knowing FLN could always access their fuel facility without going on the West ramp. All the while knowing you were all lying. Then making up more lies so attorneys can keep taking taxpayer dollars defending illegal conduct. Knowing it was all based on fraud. Knowing they were assisting in the fraud. Poor Norwood Engineering. Caught in the middle of a nightmare, knowing Mark would retaliate if they exposed the truth. You continue to conceal Public Records to harm BEH, costing the taxpayers millions.

Norwood Engineering, who FLN claims is their expert witness. Who completed countless plans with misleading notations to conceal the number of plans. Who presented 1 plan knowing there were many others.

A detailed presentation was given to the NAC at the DPW garage and then concealed. Although there were detailed PowerPoint presentations done for the NAC, you again lied about this and concealed the Public Records. The Town Manager lied and knew of all this while meeting with me on numerous occasions. He completed an affidavit and appeared in front of the BOS after signing an agreement he knew was based on fraud. He then lied for months while meeting with FLN, concealing communication he knew should be given to BEH under the agreement he signed. Did he tell the Board of Selectmen he was doing all this?

The letters and emails show the deceit. Mina claimed "The Town cannot provide BEH Legal advice" How about the truth regarding honest relevant questions. How about abiding by the agreement in place. How about following the Rules of Professional Conduct. Minas' letters and claims on behalf of you and the NAC, held against the recent discovery, show the true character of so many.

I am again following up on my prior emails regarding your retaliation toward BEH. For reference I have attached additional photographs showing Helicopter operations throughout New England at real airports.

I am asking once again if you can explain the basis for your prohibition/restrictions on Helicopter operations on our leased ramps. Helicopter operations are allowed on other leased ramps at Norwood but not BEH leased ramps. There is nothing in any regulation or rule which would prohibit Helicopter operations, nor would there be.

I have also attached some additional pictures as promised on operations at airports and landing areas throughout New England. I realize in your continued retaliation toward BEH you would love to portray BEH and I as non compliant or unsafe, dangerous. A reckless out of control group who violates rules and regulations with impunity and ignores safety. You know this is not true however you have been attempting to defame and attack BEH and I for many years, through false claims and made up rules. As I have pointed out, the entire ramp area is a non movement area. No Helicopter operation by myself or BEH has ever been unsafe or reckless. Your retaliation and made up prohibitions have once again cost BEH customers money and time wasted.

Norwood Airport is home to many Helicopters. Pilots are responsible for the safe operation of their aircraft, including Helicopters. Consistent with normal and safe operations I believe Helicopter operations throughout the Norwood Airport are safe. Please provide legitimate justification and reference to your made up claims of Helicopter restrictions for BEH ramps.

I am also requesting to appear in front of the Norwood Airport Commission once again to address these issues along with other operational issues and retaliation toward BEH and I. At the NAC public meeting on Wednesday August 11, 2021 you had your letter to me listed under correspondence however you intentionally withheld my correspondence to you and the NAC.

You also withheld numerous "correspondence" as has been your practice. This is a violation of the Open Meeting Law as you know.

On April 2, 2021 you wrote a letter full of lies regarding BEH, my Son and I. What is the status of this retaliation and "investigation"?

On April 28, 2021 I asked a series of questions which have not been answered?

On April 29, 2021 I again asked questions which have not been answered.

On May 5, 2021 Mina sent a letter full of lies. In light of the recent discovery these lies are further exposed. A Judge recently made clear the leases do not grant anyone rights other than BEH. Still the lies continue.

The NAC continues to award no bid contracts with no oversight.

What about Epsilon Associates? You neglected to mention they were working for FLN. I then found them (Alyssa Jacobs) parked on my leased ramp. How come my letter of concern to you was not included in "correspondence" for the NAC meeting? What about all the other "correspondence" you conceal from the public.

The burning question remains. How come FLN, you, Mark, the NAC, Tony and all your attorneys, simply did not tell the truth? How come communication was illegally concealed between FLN and the Town? How come so many would lie, deceive and participate in fraud? Maybe some attorneys lied or concealed from others? Maybe you lied to your attorneys? How about that Joint Defense Agreement between the NAC and FLN?

Why not just be honest. Pass along every communication. Follow the law. Why would so many people allow themselves to be embroiled in your mess?

The discovery is just the tip of the iceberg. The ultimate middle finger to the taxpayers was the new NAC member terms and requirements. You have to live in Norwood, but, you can also not live in Norwood and simply work in Norwood. Could this be for the benefit of Mark Ryan who has moved out of Norwood but still "works" for the Town? A Town employee who has for 20 years destroyed the Norwood Airport with your help.

What a joke.

I invite you to review the videos of your conduct and others at WWW.NORWOODAIRPORT.COM

Your conduct and others speaks for itself.

Remember your nonsense regarding picnic tables?

Christopher Donovan

AKA. (According to Michael Sheehan) The Prison Guard with a Pilot's license.

Supreme Judicial Court Rule 3:07 Rules of Professional Conduct. (in part) ^[1]

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- ^[1] [It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation.](#) Substantive law may require a lawyer to disclose certain information to avoid being deemed as having assisted the client's crime or fraud.
 - [In the course of representing a client a lawyer shall not knowingly make a false statement of material fact or law to a third person or fail to disclose a material fact to a third person when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client.](#)

- A lawyer is required to be truthful when dealing with others on a client's behalf. A misrepresentation can occur if the lawyer incorporates or affirms a statement of another person that the lawyer knows is false. Misrepresentations can also occur by partially true but misleading statements or omissions that are the equivalent of affirmative false statements.
- A lawyer is prohibited from counseling or assisting a client in conduct that the lawyer knows is criminal or fraudulent.
- A lawyer may reveal confidential information to prevent a criminal or fraudulent act.
- A lawyer shall not knowingly make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer.
- Legal argument based on a knowingly false representation of law constitutes dishonesty toward the tribunal.
- Offering evidence requires that the lawyer refuse to offer evidence that the lawyer knows to be false, regardless of the client's wishes.
- A lawyer who knows that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, shall inform the Bar Counsel's office of the Board of Bar Overseers.

I did a "pedal turn" on this ramp in Boston Logan.



