May 30, 2016

Debra A. Walling, Esq.

Corporation Counsel

Department of Law

City of Dearborn

16901 Michigan Avenue

Dearborn, MI 48126

Re: City Council Meeting of March 1, 2016, Resolution 30

 Mario Bouchard Petition Submissions to City of Dearborn and City Council

Dear Ms. Walling,

Please be advised that the undersigned forwards this communication in behalf of 34-year Dearborn resident and homeowner Mr. Paul V. Sheridan. For perspective, we have attended to Mr. Sheridan at various times, for various legal matters, for nearly 30 years. His personal integrity and professional reputation is well known to and admired by the firm.

By use of a FOIA request, we are in receipt of documents on public file in your office, and elsewhere in the City of Dearborn, that relate to the references. We are especially concerned by the unsigned two-page letter of January 20, 2016, submitted by Mr. Mario Bouchard of 22351 Columbia Street (Attachment 1).

From the correspondence previously received by you, Mayor O’Reilly, Police Chief Haddad, Dearborn City Council, et al. from the law firm of Morgan & Meyers, dated May 27, it is clear that a motif of misleading, and blatantly false statements have been submitted by Bouchard. The purpose of this instant communication is to further demonstrate the questionable veracity of the Bouchard submissions, as such directly relates to Mr. Sheridan, and on that basis request that these submissions be extensively redacted, or purged entirely from the public films of the City of Dearborn.

**Background**

It is well-known to Bouchard that Mr. Sheridan performs nationally renowned and recognized expert services in the area of automotive safety. Recently Mr. Sheridan’s expertise was solicited to the Washington, D.C. area for a news report by an affiliate of the British Broadcasting Corporation (BBC), for international distribution and viewing. As Bouchard is fully aware, Mr. Sheridan has been featured as lead-story in the most prominent American news organizations including but not limited to ABC News 20/20, Wall Street Journal, ABC News Primetime, USA Today, CBS Moring and Evening News; again, just to name a few.

**Background** – con’t

As Bouchard is fully aware, Mr. Sheridan’s expertise and sworn jury trial testimony has been provided to local courts, district courts, courts of appeals, and his expertise were reviewed and affirmed by the United States Supreme Court (Baker v GM, Ruled for plaintiff, 9 to 0). For

these and many other dedicated professional contributions to automotive safety, Mr. Sheridan was awarded the Civil Justice Foundation National Champion Award (This is the same award given to Erin Brockovich). Mr. Sheridan is the only person in the history of the Foundation to win for automotive safety (Attachment 2).

Given the above, and many other factors, it is clear that the surreptitiously submitted, but unsigned January 20, 2016 letter by Bouchard sought to smear and damage the personal integrity and professional reputation of our client. This firm and the undersigned have no intention of allowing this Bouchard submission, which has been made publically available by your office, to remain unchallenged. Bouchard’s actions were calculated, and intended to damage Mr. Sheridan’s reputation and expertise employments.

**Discussion Descriptions**

This discussion is focused on the two-page Bouchard submission of January 20, 2016, specifically the third paragraph of the second page.

This discussion is organized into three topics as follows:

Part 1 : Bouchard hand-off of operator keys of the Family Electric Commercial Van to Mr. Sheridan in context of false Bouchard allegation that Mr. Sheridan is *“the one reporting complaints .”*

Part 2 : False Bouchard allegation that Mr. Sheridan *“has a history of having issues with the neighbors around him for years,”* with a focus on the actual recent history of such per those neighbors.

Part 3 : The Truth Regarding Bouchard  *“history of having issues with the neighbors around him for years.”* A focus is provided on the actual facts regarding that Bouchard history, which can be confirmed by the undersigned.

We apologize for delving into this minutia, but the overall character of Bouchard and his submission to the Dearborn City files is germane to our retraction requests.

**Discussion Part One : The Keys to the Family Electric Commercial Van**

Bouchard submitted to the Dearborn City Council meeting of March 1, 2016 his two-page unsigned letter January 20, 2016; a screenshot of the third paragraph of the second page is here:



Immediately, with the very first sentence, Bouchard seeks to misdirect your office and City Council. From the following you will note that at-best Bouchard is being two-faced.

Prior to departure for a trip to Connecticut on Saturday July 4, 2015, Bouchard handed Mr. Sheridan the keys to the Family Electric commercial van, and stated the following exact words:

***“Here, if that fuckin cop comes around move the van so I don’t get a ticket!”***

Bouchard wanted Mr. Sheridan to hide the Family Electric van if the Dearborn Police once again noticed the big red commercial vehicle illegally parked in the easement alley; a clear violation of Dearborn Ordinance 16-1529, Section 18-356.

In addition to the keys needed by Mr. Sheridan to repair Bouchard’s daughter’s vehicle, Bouchard handed over a second set of keys to his employer’s property, and asked that he assist with subversion of the ordinance. When Mr. Sheridan asked where he should move the van, he received gibberish not worth repeating.

This hand-off of the Family Electric van operator keys was reviewed at the time, by Mr. Sheridan, with neighbors and members of the Image Hair Salon. Similar to the character of his January 20, 2016 submission, it is doubtful that Bouchard alerted his employer to this conversion of their commercial property, over a nine day period, to the custody of a non-employee.

**Discussion Part One : The Keys to the Family Electric Commercial Van** – con’t

Please know that Mr. Sheridan is prepared to swear to the above under-oath, and openly identify the witnesses if needed. Mr. Sheridan will testify that it was not until 7 AM on Monday July 13, 2015 that Bouchard’s daughter Dayna retrieved the Family Electric van keys for her dad. Please also know that this incident was reviewed by Mr. Sheridan with your Assistant City Attorney Mr. William B. Irving, in person at the latter’s office (Attachment 3).

You see the absurdity here. Bouchard wants your office and City Council to believe, through a surreptitious submission, that Mr. Sheridan is *“the one reporting the complaints,”* but seeks to keep hidden that he had sought valet services from that same complainant (?!).

For the record, the Bouchard allegation about “complaints” is a diversion, and has no relevance to the enforcement of Ordinance 16-1529, Section 18-356. In fact, we note that Bouchard, in his submission, openly admits that he has been in conscious violation of that ordinance for years.

As Mr. Irving was informed, the only “complaint” that Mr. Sheridan has had, regarding the illegal parking of multiple vehicles by the Bouchards in the City alley, is when such blocks Mr. Sheridan’s safe ingress/egress from an alley that he has used longer than any other person.

**Discussion Part Two : False Bouchard allegation that Mr. Sheridan *“ has a history of having issues with the neighbors around him for years ”***

Also discovered through our FOIA request is a two-page Bouchard document that lists neighbors which were solicited to bolster his petition request for a waiver to Ordinance 16-1529, Section 18-356. This petition sought the granting of an exception, allowing him to legally park, for the first time, in this case, the Family Electric commercial van in the city easement (Attachment 4).

Mr. Sheridan spent some time interviewing those neighbors (listed by Bouchard) that he knows. Mr. Sheridan did not pester those persons listed that he does not know, that do not know him, and he has never met. However, **all** of those interviewed were repulsed by the allegation that Mr. Sheridan *“has a history of having issues with the neighbors around him for years.”*

For example, is Bouchard claiming that Mr. Sheridan has had issues with Mr. Berry for years?

**Discussion Part Two : False Bouchard allegation that Mr. Sheridan *“ has a history of having issues with the neighbors around him for years ”*** - con’t

Is Bouchard actually claiming that Mr. Sheridan has had issues with the Olsens for years?

Is Bouchard asserting that Mr. Sheridan has had issues with his good friend Dixie for years?

Which neighbors, that Bouchard listed in petition submission, are those that Mr. Sheridan “*has a history of having issues with . . . for years”*?!

What are the identities of **any** neighbors of **any** time, that Bouchard claims are those that Mr. Sheridan “*has a history of having issues with . . . for years”*?!

You will note that consistent with the surreptitious nature of his January 20, 2106 submission, Bouchard obfuscates those details. But a detail that Mr. Sheridan can share is the following ‘most negative’ comment he received during **his** neighborhood review:

**“ You’re so quiet, we never know if you’re home or out-of-town! ”**

You note, as introduced in the May 27, 2016 letter from Morgan & Meyers, this libeling of Mr. Sheridan is used as a smoke-screen by Bouchard to obfuscate the required solicitation of Mr. Sheridan’s approval signature to the ordinance waiver.

However, there was a neighbor that every single person in the area had an issue with, including the City of Dearborn. But the historical details and how such connects, not to Mr. Sheridan, but to Bouchard that will further affirm his motif of misleading, and blatantly false statements.

**Discussion Part Three : The Truth Regarding Bouchard’s *“history of having issues with the neighbors around him for years.”***

There was a neighbor issue in history that Mr. Sheridan was burdened with, a truth that Bouchard also obfuscated from your view. Under Attachment 5 you will find a Personal Protection Order (PPO) that this law firm assisted in acquiring. You note that both Bouchard and his wife signed the PPO. Although we could regale you with the details, the salient fact is that through Bouchard’s original discordant relationship with the respondent of the PPO, Bouchard later solicited and received the assistance of Mr. Sheridan; certainly not the other way around. As our records confirm, all legal fees involved in this Bouchard instigated neighbor issue were funded by Mr. Sheridan. Is this perhaps the “history” that Bouchard is referring to?

**Conclusion and Demand**

You were present at the March 1, 2016 meeting of Dearborn City Council wherein Attachment 1 was discussed. In that context, and others, the purpose of this communication is to demand that the Bouchard submissions, as such directly relates to and libels Mr. Sheridan be extensively redacted, or purged entirely from the public files of the City of Dearborn.

For your information and clarification, Mr. Sheridan has interviewed members of City Council regarding the coy non-specification of his name by the Bouchards in their submission of January 20, 2016 (Attachment 1). He also met with Assistant City Attorney William B. Irving on this same non-specificity issue. In both instances there was no confusion as to the identity of who is the next door neighbor to Bouchard, and who is the only other person that uses the city easement alley. In a moment of levity, Mr. Irving exclaimed:

**“It sure wasn’t a matter of *‘Who done it?!’*** ”

You will note that the adolescent wording of the Bouchards even attempts to obfuscate the libeling issue; as they put it:

***“We . . . don’t want to be the cause of any insult or slander.”***

They are, and their intent to do damage to Mr. Sheridan’s employment offerings will be emphasized in upcoming libel litigation against them. Mr. Sheridan is negotiating with a firm that specializes in libel. He seeks to avoid the listing of any officials of the City of Dearborn; a city that he has lived in, paid taxes to, and unlike Bouchard has voted in for 34 years.

In this context, and others, we are demanding that the Bouchard submissions, as such libels Mr. Sheridan, be extensively redacted or purged entirely from the publically available files of the City of Dearborn.

Respectfully,

Robert D. Kaplow, Esq.

Enclosures

cc: Mayor John O’Reilly

 Chief Ronald Haddad

 William H. Irving, Esq.

 Dearborn City Council President, Susan Dabaja

 Dearborn City Council:

 Thomas P. Tafelski

 Michael T. Sareini

 Brian C. O'Donnell

 David Bazzy

 Robert A. Abraham

 Mark Shooshanian

 Courtney E. Morgan, Jr., Esq.