June 13, 2016

Debra A. Walling, Esq.

Corporation Counsel

Department of Law

City of Dearborn

16901 Michigan Avenue

Dearborn, MI 48126

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

Reference 2: 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, I have attended to Mr. Sheridan at various times, for various legal matters. His personal integrity and professional reputation is well known-to and admired by my firm. Please see ‘Background’ below.

By FOIA, we are in receipt of documents accepted by and on public file in your office 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, 313-274-3979 (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, 2016, it is clear that a motif of misleading, and blatantly false statements have been submitted by Bouchard. The purpose of this communication is to demonstrate further the inveracity of the Bouchard submissions, as such directly relates to Mr. Sheridan. Specifically we are demanding that these libelous submissions be extensively redacted, or purged entirely from the publically available files 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 of American news organizations including but not limited to ABC News 20/20, Wall Street Journal, ABC News Primetime, USA Today, CBS Morning News, CBS 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 was 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 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 my client. This firm has no intention of allowing this Bouchard submission, which was received and made publically available by your office, to remain unrebutted. Bouchard’s actions were not accidental or a matter of ignorance. These were calculated, and intending to damage Mr. Sheridan’s reputation and expertise employments. (Please see quote in ‘Conclusion and Demand’ section below.)

**Discussion Descriptions**

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

This discussion is thrifted, and organized into three topics:

Part One : 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 Two : 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 Three : 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 apparent minutia, but the overall character of Bouchard and his submission to the Dearborn City files is germane to our retraction demands.

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

You were present at the March 1, 2016 meeting of Dearborn City Council wherein Attachment 1 was discussed. Bouchard had submitted a two-page unsigned letter of January 20, 2016; a screenshot of the third paragraph of the second page of Attachment 1is shown 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 duplicitous.

Prior to departure for a family trip (to his original birth place home in Connecticut) on Saturday July 4, 2015, Bouchard handed to Mr. Sheridan the keys to the Family Electric commercial van, and exclaimed the following exact words:

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

Bouchard had solicited the hiding of the Family Electric van when the Dearborn Police, as a consequence of routine patrols, 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.

That is, in addition to the keys needed by Mr. Sheridan to repair Bouchard’s daughter’s Volkswagen, Bouchard handed over a second set of keys to his employer’s property, and asked that he assist with subversion of the ordinance. Mr. Sheridan refused, but when he rhetorically asked where he should move the van, he received gibberish from Bouchard not worth repeating.

This hand-off of the Family Electric van operator keys was reviewed at the time, by Mr. Sheridan, with neighbors and staff to the Image Hair Salon:

**Similar to the surreptitious character of his January 20, 2016 submission, it is doubtful that Bouchard alerted his employer to this unauthorized conversion of their commercial property, over a nine day period, to the custody of a non-employee.**

For the record, Mr. Sheridan never touched the illegally parked Family Electric van.

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

Be confident that Mr. Sheridan is implicitly prepared to swear to the above under-oath, and identify witnesses. 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 was also reviewed with Mr. Irving which depicts Mr. Sheridan’s work in-progress on the Bouchard Volkswagen, and the Family Electric van illegally parked by Bouchard.**

But the Bouchard absurdities do not end there: Bouchard diverts your office and City Council into his allegation that Mr. Sheridan is *“the one reporting the complaints.”* But then, through his surreptitious submission, Bouchard schemed to keep hidden from you the fact that he had requested illicit valet services from that same complainant (?!).

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 personal vehicles, commercial vehicles, utility trailers and storages by the Bouchards in the City alley; an abuse that has occurred for years, is when such blocks Mr. Sheridan’s safe ingress/egress from an alley that he has used longer than any other person in Dearborn history.

For the record, Mr. Sheridan has still not received proper payment for his repair services on the Bouchard Volkswagen.

**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 an exception, allowing him to legally park, for the first time, the Family Electric commercial van in the city easement (Attachment 4).

Mr. Sheridan expended time interviewing neighbors (listed by Bouchard) that he knows. Mr. Sheridan did not pester those listed that he does not know, and those that he has never met.

However, **all** of those interviewed were shocked and repulsed by the Bouchard allegation that Mr. Sheridan *“has a history of having issues with the neighbors around him 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 claiming that Mr. Sheridan has had issues with Mr. Berry for years?

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

As a matter of course, your office should be concerned with the precise identities of any neighbors whom Bouchard claims Mr. Sheridan “*has a history of having issues with . . . for years.”* Your office should be concerned with the exact nature and detailed description of the “issues.”

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 ‘most negative’ comment he received during his neighborhood review:

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

As stated 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; a signature your office still does not possess.

However, there was a neighbor that many persons in the area had an issue with, including the City of Dearborn. But the historical details and how such connects to Bouchard will further affirm his motif of misleading or 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 that Mr. Sheridan was burdened with, but the truth and the details are also obfuscated by Bouchard.

Under Attachment 5 you will find a Personal Protection Order (PPO) that your office is fully aware of. You note that both Bouchard and his wife signed the PPO. Although we could regale you with the details, the instant relevance is that, through Bouchard’s original discordant relationship with the respondent of that PPO, Bouchard later solicited and received the assistance of Mr. Sheridan. As our records confirm, all legal fees involved in this Bouchard instigated neighbor issue were funded by Mr. Sheridan; certainly not the other way around.

Is this the “history” that Bouchard is referring to? Why is it Bouchard never mentions the truth: that he is the one that has a *“history of having issues with the neighbors around him for years,”* while burdening others with such? Note, this is the same petitioner that now burdens the City with false claims of “on-call 24 hour service,” but never informed your office or City Council about ‘Discussion - Part One : The Keys to the Family Electric Commercial Van.’

**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 who is legally unable to do so, 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,

Odey K. Meroueh, Esq.

Attachments

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.

 Robert D. Kaplow, Esq.