LAW OFFICES

MORGAN & MEYERS, PLC

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February 28, 2007

Ms. Michele Moody-Adams 102 Corson Place Ithaca, NY 14850 607-257-2622

Subject:

Complete Retraction of Libelous, Slanderous and Defamatory Statements

Reference:

Paul V. Sheridan v Moody-Adams

Dear Ms. Moody-Adams:

This office has represented the legal interests of Mr. Paul V. Sheridan since December 1994, and we are therefore thoroughly familiar with his person and character. We are representing Mr. Sheridan pursuant to the referenced litigation, which we anticipate filing in March 2007.

This lawsuit results from defamatory, libelous and slanderous comments publicly verbalized by you and publicly published by you to numerous third parties, during and after April 2006. The lawsuit will seek both compensation and punitive damages.

Under New York State statute you, as the defendant, are entitled the opportunity to retract your libelous, slanderous and defamatory publications and statements. The legal purpose of this retraction is the limitation of the punitive damages portion of the lawsuit. For the purposes of your complete retraction, your response must include a written retraction, signed by you, and forwarded to all parties identified in Part 2 below. Factual background details of our demand for retraction are included in Part 1, sub-parts A, B and C. Specific retraction demands are included in Part 1, sub-part D.

PART 1

A. In your letter of April 4, 2006, published on the letterhead of Mr. Sheridan's alma mater, Cornell University, and forwarded to "Officer Steinmetz," "Ms. Jean Eaton," and "Cayuga Heights Police Department," you publicly state the following libelous and defamatory statements (Attachment 1, one page):

- 1. Mr. Paul V. Sheridan "appears to be slipping into some kind of serious mental illness."
- 2. An email sent to you by Mr. Paul V. Sheridan "is just full of delusions and distortions."
- 3. You "never solicited contact with this individual" (i.e. Mr. Paul V. Sheridan).
- 4. Mr. Paul V. Sheridan has caused you to "pay a pretty high price for having tried to be a decent human being."
- B. In the Cayuga Heights Police Department General Report # 06-0592 of 04/03/06 which lists you as the complainant, you publicly reported the following libelous and defamatory statements (Attachment 2, three pages):
 - 1. "The only reason (you) continued to have contact (with Mr. Paul V. Sheridan) was because he was a member of Cornell's Alumni."
 - 2. Mr. Paul V. Sheridan "has shown signs of some mental issues because of the way he has acted the last couple of years."
 - 3. Mr. Paul V. Sheridan made telephone and/or other forms of contact with you or your agents on "March 30, 2006."
 - 4. Mr. Paul V. Sheridan made telephone contact with you on April 1, 2005 via his cellular telephone.
 - 5. During Mr. Paul V. Sheridan's telephone contact with you on April 1, 2005 (via his Dearborn home land line telephone, which lasted less than 2 minutes) he "became mad."
 - 6. During Mr. Paul V. Sheridan's telephone contact with you on April 1, 2005 (via his Dearborn home land line telephone, which lasted less than 2 minutes) he "demanded" something.
 - 7. During Mr. Paul V. Sheridan's contact with you on April 1, 2005 (via his Dearborn home land line telephone, which lasted less than 2 minutes) he identified the name "Paul Ibrahim."
 - 8. During calendar years 2000, 2001, 2002, 2003, and/or 2004, Mr. Paul V. Sheridan discussed with you "the terrorist on 9/11."
 - 9. During calendar years 2000, 2001, 2002, 2003, 2004, 2005, and/or 2006, Mr. Paul V. Sheridan discussed with you "some type of government conspiracies."
- C. In the Cayuga Heights Police Department memorandum of April 4, 2006 to "All Officers" from "J. Eaton," and in the Cayuga Heights Police Department General Report # 06-0592 of 04/03/06 which lists you as the complainant, you publicly reported the following libelous and defamatory statements (Attachment 3, one page):
 - 1. Mr. Paul V. Sheridan has "stalked" you.
 - 2. Mr. Paul V. Sheridan has "stalked" your family.

- 3. Mr. Paul V. Sheridan had "harassed" you.
- 4. Mr. Paul V. Sheridan had "harassed" your family.
- 5. Mr. Paul V. Sheridan had caused you to be "alarmed."
- 6. Mr. Paul V. Sheridan had caused your family to be "alarmed."
- 7. Mr. Paul V. Sheridan had caused you to be "annoyed."
- 8. Mr. Paul V. Sheridan had caused your family to be "annoyed."
- D. As provided under New York statute, your retractions must include all statements and publications listed above, and must be in writing. The written retractions must be signed by you, and forwarded to all parties identified in Part 2, Items 1 and 2. Your retractions must also include several other third parties as identified in Part 2, Items 3, 4 and 5 to whom you have also verbalized and published similarly libelous, slanderous and defamatory statements (Please see Part 3). These written retractions must occur not later than close-of-business on March 16, 2007, and all copies must be forwarded to this office.

PART 2

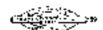
Your written retractions pursuant to Part 1 above must include but not be limited to:

- 1. The Cayuga Heights Police Department,
- 2. The Cornell University Police Department,
- 3. Any and all members of the Ithaca, New York communities, to whom you have also published the statements contained in Part I.
- 4. Any and all members of Mr. Sheridan's alma mater, Cornell University, to whom you have also published the statements contained in Part I.
- 5. Additional third parties not yet identified, but discoverable for admission at-trial, to whom you have also published the statements contained in Part I.

PART 3

We hereby demand the following information:

- The identity and contact information of all private individuals to whom you have communicated statements and publications regarding our client Mr. Paul V. Sheridan, prior to, during and after April 2006,
- The identity and contact information of all public organizations to whom you have communicated statements and publications regarding our client Mr. Paul V. Sheridan, prior to, during and after April 2006,



- The identity and contact information of all private organizations to whom you have communicated statements and publications regarding our client Mr. Paul V. Sheridan, prior to, during and after April 2006,
- The identity and contact information of all legal organizations to whom you have communicated statements and publications regarding our client Mr. Paul V. Sheridan, prior to, during and after April 2006,
- 5. The identity and contact information of all police organizations to whom you have communicated statements and publications regarding our client Mr. Paul V. Sheridan, prior to, during and after April 2006,
- 6. The time, place and manner that Part 3 items 1 through 5 occurred.

PART 4

For your information, this lawsuit will prove the following facts to the Honorable Court:

- 1. Statements and publications have been made by you to third parties about our client,
- 2. Statements and publications made by you to third parties about our client are false,
- 3. The statements and publications made by you to third parties about our client were known by you to be false,
- 4. The statements and publications made by you to third parties about our client were known by you to be false, and were in-fact made by you, and documentation of such is available to prove your guilt,
- 5. The statements and publications made by you to third parties about our client were known by you to be false, and were solely directed at our client,
- The statements and publications made by you to third parties about our client were known by you to be false, and have and will continue to expose our client to public hatred, contempt, ridicule or disgrace,
- 7. The statements and publications made by you to third parties about our client were known by you to be false, and that there is clear and convincing evidence that when you made the statements and publications, you acted with a reckless disregard of the falsity of your statements and publications.

PART 5

For your information, we will also prove the following additional facts to the Honorable Court:

1. You were fully aware at all times during your commissions of Part 1, sub-parts B and C, that Mr. Sheridan was not in the vicinity of your person or your family or your residence, was not in a "minivan" parked in front of your residence, and in-truth was known by you to be 500 miles away at his home of 27 years in Dearborn, Michigan.

- 2. You were fully aware at all times of Mr. Sheridan's reputation and status in the Ithaca, New York communities which date to not later than 1973,
- 3. You were fully aware at all times of Mr. Sheridan's reputation and status with his alma mater of 27 years, Cornell University, up to and including but not limited to the University Presidents, Deans, Professor and teaching staffs, administrative staffs, student body, et al.,
- 4. You were fully aware at all times, including during the times you made statements and publications to third parties about our client, of Mr. Sheridan's then-active employment applications with his alma mater of 27 years, Cornell University,
- 5. You were fully aware at all times, including during the times you made statements and publications to third parties about our client, of Mr. Sheridan's ongoing work as a renown public figure; work that resulted in his selection as the Civil Justice Foundation national champion along with 2008 presidential candidate Senator John R. Edwards.
- 6. You were fully aware at all times, including during the times you made statements and publications to third parties about our client, of Mr. Sheridan's ongoing work as a renown and trusted expert witness in product liability litigation involving the death and/or severe injury of clients.
- 7. You were fully aware at all times, including during the times you made statements and publications to third parties about our client, of Mr. Sheridan's ongoing work as a renown and trusted expert witness, and how the death and/or severe injury clients he served in product liability litigation relied on his reputation to assist them with the adjudication of justice in their respective cases.
- 8. You were fully aware at all times, including during the times you made statements and publications to third parties about our client, of Mr. Sheridan's ongoing work as a renown and trusted expert witness, and were in-receipt of video tape copies of several major national news programs, involving the appearance of Mr. Sheridan as the primary focus of the product liability litigation involving the death and/or severe injury of clients. We will prove that you requested and received these video tapes and that you subsequently thanked Mr. Sheridan in an email that you sent to pysheridan@aol.com in June 2001, pursuant to Attachments #5 and #6 (please see Part 6).

PART 6

For reference, copies of the following documents are attached/enclosed:

- 1. Your letter published on the letterhead of Mr. Sheridan's alma mater, Cornell University, dated April 4, 2006 to "Officer Steinmetz," "Ms. Jean Eaton," and "Cayuga Heights Police Department."
- 2. Cayuga Heights Police Department memorandum of April 4, 2006 to "All Officers" from "J. Eaton."
- 3. Cayuga Heights Police Department General Report # 06-0592 of 04/03/06 which lists "Moody-Adams, Michele M." as complainant (three pages).
- 4. Your business cards (The first edition previously personally handed to Mr. Sheridan by you in June 2001. The second edition personally handed to Mr. Sheridan by you in June 2005).

- 5. Cover letter of September 21, 2001 shipped to you and received by you via Federal Express by Paul V. Sheridan Shipper Tracking #826230108806.
- 6. Copy of Federal Express Shipper Receipt #826230108806 listing package weight of "5 lbs."
- 7. Copy of Paul V. Sheridan letter of December 15, 1987 to Dean Curtis W. Tarr, which was forwarded to you by Johnson Graduate Business School staff subsequent to your employment hiring as a professor of ethics at Mr. Sheridan's alma mater of 27 years, Cornell University.
- 8. Photograph of Mr. Sheridan at the Civil Justice Foundation national champion award gala with 2008 presidential candidate Senator John R. Edwards (previously shared with you in-person by Mr. Sheridan in June 2005 during his volunteer work at his 25th-Year reunion).

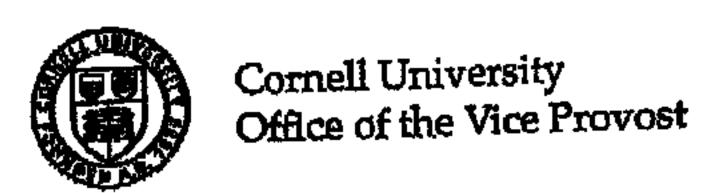
Thank you for your attention to this matter,

Courtney E. Morgan, Jr.

cc: Mr. Peter N. Littman, Esq.

Apr. 83 2005 11:45H7 F1

FROM : Planning and Budget



Date: April 4, 2006

To: Officer Steinmetz

Ms. Jean Eston

Cayuga Heights Police Department

From: Michele Moody-Adams (work #) 255-3062 (Home: 102 Corson Place 257-2622) Michele M. Moody-Adams
Vice Propost for Undergraduate Education
Director and Hutchinson Professor of
Ethics and Public Life
Professor of Philosophy
433 Day Hall
Ishaca, New York 14853-2801
1, 607.255.3062
1, 607.255.2990
mem45@cornell.odu

I am faxing the most recent e-mail that I received from the person I filed the complaint about yesterday. His name is Paul Sheridan. I have decided not to reply to this e-mail, and I have also forwarded all of the exchanges to the Cornell Police Department.

FAX NO. :6072552990

Please be advised that this e-mail is just full of delusions and distortions of how I came to interact with this person. I never solicited contact with this individual, though I was indeed polite. And now, as he appears to be slipping into some kind of serious mental illness, I am paying a pretty high price for having tried to be a decent human being.

Thank you very much for your assistance.

COPY

CAYUGA HEIGHTS POLICE DEPARTMENT

MEMORANDUM

JUN STEEN CAN

DATE: April 4, 2006

TO: All Officers

FROM: J. Eaton

SUBJECT: 102 Corson Pl

Michele Moody-Adams called today to info CHPD that her husband will be out of town this weekend - from Friday 04/07 and returning Sunday, 04/09. She is concerned as just herself and her 10 year old daughter will be home alone. She has been receiving unwanted email from a subject, Paul Sheridan. Refer to Case #06-0592 which was taken by Officer Steinmetz. Around 10:45PM last night, her husband did see a vehicle parked on the roadway, possibly a minivan or a SUV, no further description. She is very uneasy about being alone this weekend and requests extra patrols in the area

REPORT NO. 06

Oi

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GENERAL REPORT

FORM CHPD-1.1 (REV 8/95)

CAYUGA HEIGHTS POLICE DEPARTMENT

PAGE 1

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GENERAL REPORT

FORM CHPD-1.3 (REV 5/04)

CAYUGA HEIGHTS POLICE DEPARTMENT

PAGE 2

C-1 COMPLAINANT'S NAME (LAST, FIRST MIDDLE)	REPORT NO.
Moody-Adams, Michele M.	06-0592
NATURE OF REPORT	REPORTING OFFICER BADGE#
Aggravated Harassment	Steinmetz 104
REPORT NARRATIVE: LIST DATE & TIME AT BEGINNING OF	EACH ENTRY & REPORTING OFFICER'S NAME AT END OF EACH ENTRY

On 04/03/06 @ 2155 Hrs- C-1 called and wanted to report a problem she was having with an individual she had come to know through Cornell University. C-1 stated she met Paul V. Sheridan, S-1, in the spring of 2001 due to her employment with them and S-1 being an alumni member (class of 1980). C-1 said S-1 had strong ties to the university and they had met on & off for the last for years. These meetings have been at Cornell either in person or via E-Mail. C-1 stated that after the terrorist on 9/11 S-1 started changing and acting strange. He went on how he believed it was some type of government conspires. S-1 has even sent C-1 two DVD about the subject. C-1 feels that S-1 has shown signs of some mental issues because of the way he has acted the last couple of years. The only reason C-1 continued to have contact was because he was a member of Cornell's Alumni. S-1 had called C-1's office on Thursday & Friday, March 30 & 31, 2006 and asked C-1 to call him. This brings us to Saturday night. On April 1, 2006, sometime in the evening, S-1 called C-1 at home. S-1 had some issues with a student, Paul Ibrahim, who set up some web page, through a link via Cornell University's web page, and wanted it addressed. C-1 told him she was not sure what he was talking about and if she could do anything. C-1 stated that S-1 became mad and demanded she did something or directs him to the person who could. The conversation ended and C-1 didn't think much of it. Then tonight (04/03/06) at 2041 Hrs C-1 received a copy of an E-Mail S-1 wrote to this student. C-1 was concerned because now S-1 has linked her to this issue. I advised her that if the telephone call on April 1, 2006 caused her annoyance or alarm then we could pursue this incident as Aggravated Harassment. C-1 stated she was annoyed and alarmed and gave me a copy of her reply to S-1's E-mail stating the same. I advised her we could do two things, first we could have him arrested or second, I could talk to him and advise him not to contact her anymore. At this point C-1 just wanted S-1 talk to. I advised her not to have any further contact with him. STEINMETZ

04/03/06 @ 2240 Hrs - I called S-1 at the number C-1 supplied and spoke to him. I advised S-1 why I was calling and he was very surprised. He stated his conversation with C-1 on Saturday night was very polite and, in fact it ended by them agreeing to talk about the "issue" on Tuesday because C-1 was too busy on Monday. S-1 added that he has communicated with C-1 for the last four years. At no time did C-1 express any concerns or desires about S-1 not contacted her. She always told him to "Keep her informed" and "Keep up the good work". I explained that for what ever reason C-1 did not want any further contact from him at her home or at her work. S-1 stated he would not contact her at her home but I could not stop him from E-Mailing her via

GENERAL REPORT

FORM CHPD-1.3 (REV 5/04)

CAYUGA HEIGHTS POLICE DEPARTMENT

PAGE 3

C-1 COMPLAINANTS NAME (LAST, FIRST MIDDLE)	REPORT NO.
Moody-Adams, Michele M.	06-0592
NATURE OF REPORT	REPORTING OFFICER BADGES
Aggravated Harassment	Steinmetz 104
REPORT NARRATIVE: LIST DATE & TIME AT BEGINNIN	IG OF EACH ENTRY & REPORTING OFFICER'S NAME AT END OF EACH ENTRY

Cornell University. He went on about the University being a public institution which C-1 was a member as he was also. I explained that I did not have jurisdiction on the campus but he might want to contact the Cornell Police Department because I knew C-1 had contacted them. I just told him he might want to check before he dug himself and "Holes". S-1 thanked me and stated he would not contact C-1 at her home residence. I telephoned C-1 and left a message about the conversation I had with S-1. STEINMETZ

Cornell Police Report Number - 06-1000

04/06/06 – I contacted Cornell Police and they advised me Investigator Alridge, Chuck was working on the case but he was off today. As far as they knew C-1 told them that S-1 had E-mailed her stating he would not have any further contact with her (copy enclosed) so she was satisfied and did not want any thing done. I advised them of my conversation with S-1 and that I believed the contacts would continue. STEINMETZ



MICHELE M. MOODY-ADAMS

Director and Hutchinson Professor Ethics & Public life

Professor of Philosophy

240 Goldwin Smith Hall Ithaca, NY 14853-3201 Telephone: 607 255-8515 Fax: 607 255-8649 E-Mail: mmm45@cornell.edu



Michele M. Moody-Adams

Hutchinson Professor, Ethics and Public Life Professor of Philosophy

Cornell University
Vice Provost for
Undergraduate Education

Cornell University 433 Day Hall Ithaca, NY 14853 t. 607.255.3062 f. 607.255.2990 mmm45@cornell.edu 22357 Columbia Street
Dearborn, MI 48124-3431
313-277-5095
pvs6@Cornell.edu

20 June 2001

Professor Michele M. Moody-Adams Director, Ethics and Public Life 240 Goldwin-Smith Hall Cornell University Ithaca, NY 14853-3201

Subject: Corporate / Government Ethics

Dear Professor Moody-Adams:

Thank you for inviting me to visit with you last week. The work you are doing for Cornell University in particular, and the human community in general, goes beyond merely being important. It is essential.

Many might opine that that statement is an exaggeration. The statement is especially true whenever the subject, or lack thereof, affects the would-be opinionated directly. As discussed, I have witnessed their proverbial flip-flop firsthand.

I am enclosing two items as a follow-up to our brief meeting of last week. The video tape contains coverage of the Chrysler minivan hotline sting by A Current Affair of September 20, 1995.

What is appalling about this video is that during the time period that this sort-of-thing was going on, the **Department of Justice** lawyers were in court or behind closed doors with Chrysler "protecting the public" from knowing what the Department of Transportation had already confirmed about the minivan liftgate latch: the latch was a safety defect. More specifically, the court-ordered release of the DOT crash test videos occurred after the *A Current Affair* program. By then, thousands of families had been lied to by Chrysler via their hotline . . . and several additional children were buried. This criminal activity was known to, sanctioned by, and possibly encouraged by the **Department of Justice**.

The second enclosure is my letter/binder to Attorney General Janet Reno of October 27, 1999. I went to great pains to only make statements about facts I could (then) prove. I have since uncovered more evidence of misdeeds. The Attorney General refused to respond to me, despite knowing that I too was a Cornell alum. Instead, we later confirmed that the DOJ "response" involved a detailed background check, and person/home telephone surveillance of me (Please see inside sleeve.). Please review the colored tab. Note the evidence stickers from the depositions of Chrysler Chairman Robert Eaton (bottom), and Vice Chairman Robert Lutz (top).

The information contained here will take time to assimilate. However, it is my opinion that this type of behavior is not atypical in our emerging corporate/ "Popular Culture" society. We have problems, but these problems are solvable.

Sincerely and respectfully,

Law V. Theridan

Paul V. Sheridan MBA: Class of 1980

enclosures

P. S. The transcript of the A Current Affair program is contained under Tab 7.

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