

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 unrebuted. 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 thrifed, 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 1 is shown here:

We do however; have a neighbor that we believe may be the one reporting the complaints. He has a history of having issues with the neighbors around him for years and he is the neighbor we share the alley with. We have tried to be friendly and on many occasions were, as was he. In the past he and we have even considered buying the alley from the city and we have shared common ground on a few other issues as well. But over the years our relationships has been a bumpy road of sorts. On public service days, when we have to park our vehicles in the alley behind our property overnight, he has mentioned being temporarily inconvenienced, although he can still come and go with ease. We are certainly not sure of this and don't want to be the cause of any insult or slander but it just seems oddly coincidental and as a result did not ask his signature on the petition because we didn't want to take a chance and upset him further.

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.

The Bouchard gibberish was however consistent with their submission of January 20, 2016, wherein he bold-facedly misleads about his history of illegally parking a commercial van in the easement:

We have lived at this address since 1988, 15 years of which I have worked as a licensed electrician. For much of this time I have parked either a company van or a company step van in this exact spot without issue.

Bouchard has been repeatedly warned by the Dearborn Police about his abuse of the easement.

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

The Bouchard 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:

**But 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.

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.”

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 you are 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.' \*

\* For further details on the false Bouchard claim of "24 hour on call service," please consult with Dearborn Police Officer Brian Fehan, 943-2241.

## **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,

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 Bazy  
    Robert A. Abraham  
    Mark Shooshanian  
Courtney E. Morgan, Jr., Esq.  
Robert D. Kaplow, Esq.



**Mario Bouchard**  
**22351 Columbia Street**  
**Dearborn, MI 48124**  
**313-274-3979**  
**313-657-2064**

COUNCIL OFC, 25JAN2016, 10:21:59

City Council Member Board  
16901 Michigan Ave. Suite 10  
Dearborn, Michigan 48126

January 20, 2016

Re: Appeal for alley parking exemption request/possible amendment for city ordinance sec. 18-356

Members of city council;

I am respectfully requesting to appear before the board and appeal a recent decision by Traffic /Safety Commission to deny a 24 hour parking permit for my work van to be parked in the alley behind my garage.

We have lived at this address since 1988, 15 years of which I have worked as a licensed electrician. For much of this time I have parked either a company van or a company step van in this exact spot without issue. This vehicle is absolutely critical to my livelihood and a highly valued compensation from my employer. It is a new 2015 van that is not unsightly in any way. Without the 24 hour availability of this vehicle I would no longer have transportation to and from Madison Heights, where I work. It is impossible to predict how often I get emergency calls or when. Having my work vehicle located miles away would hinder my response time to those who need these services.

Losing this vehicle will also cause me and my family financial hardship. We are not in a position to afford any additional vehicles and this company van also allows me to carry the necessary tools, equipment and bulky supplies required to perform my trade. Losing the van could potentially mean losing my job. The van is parked at the inside dead end of the alley directly behind my property and has never been in the way of alley maintenance nor has it ever prevented my neighbor from accessing his driveway.

We have always been very diligent on keeping the alley clear of leaves, cutting the grass and picking up trash that is dropped from time to time and packing down the snow. Although we live at the inside dead end of the alley, we maintain the entire alley as none of the other neighbors that boarder it take care of it. We care for it as we do our own property.

In 2004-5 my wife spoke with then Mayor Guido who assured us that our vehicles both personal and work related would be allowed to park in the alley without offence. Well, that was obviously years ago yet we have never had an issue until recently.

We just want to continue living and working as usual. We've received several warnings and a couple of tickets prior to finding a very temporary place to relocate the work van and we don't see a permanent solution other than receiving the variance being requested by this letter.

Every officer that came out to mention the ordinance agreed it was outdated and many of the neighbors that signed my petition were also surprised how much effort the city was putting into removing my van which was not at issue with any of them. After being told by officers that came out that there were several complaints, we find it difficult to understand this since every one of our neighbors wasn't bothered by the van being in the alley and they understood its presence there.

We do however; have a neighbor that we believe may be the one reporting the complaints. He has a history of having issues with the neighbors around him for years and he is the neighbor we share the alley with. We have tried to be friendly and on many occasions were, as was he. In the past he and we have even considered buying the alley from the city and we have shared common ground on a few other issues as well. But over the years our relationships has been a bumpy road of sorts. On public service days, when we have to park our vehicles in the alley behind our property overnight, he has mentioned being temporarily inconvenienced, although he can still come and go with ease. We are certainly not sure of this and don't want to be the cause of any insult or slander but it just seems oddly coincidental and as a result did not ask his signature on the petition because we didn't want to take a chance and upset him further.

We were eventually referred to Sgt. Steve White who told us "to do what we had to do and if we had any trouble to see him", but we hate to continue to involve him as we are sure he has many more important things to do. We tried covering the van with a tarp to hide the work related writing but were still asked to remove it from the alley.

Since our house and garage were built in 1942, the dimensions of the garage door will not allow for me to park my work van inside.

Please look into my request and find it in your heart to allow the permanent exemption for parking my work van in the alley. I have included all the required documentation to support my request and look forward to attending a hearing or providing whatever is additionally required regarding this matter.

Thank you for your time and consideration.

Respectfully,

Mario Bouchard



Cornell Law School

Stewart J. Schwab  
The Allan R. Tessler Dean  
and Professor of Law

June 22, 2005

Dear Paul,

I was delighted to see that you are to be honored as a Community Champion by the Civil Justice Foundation in Toronto next month. Congratulations!

We are always pleased when an alumnus of Cornell University gets the recognition they richly deserve.

I hope you enjoy the occasion, & I wish you success in your future endeavors.

Sincerely,  
Stef Schwab





**Attachment 2**  
**Page 4 of 4**



  
**Sheraton Centre**

# ATTACHMENT 3



**Paul V. Sheridan**

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**From:** Nancy Fancy pants <Nmbouch@yahoo.com>  
**Sent:** Wednesday, July 08, 2015 9:13 PM  
**To:** Paul V. Sheridan  
**Subject:** Re: VW Oil

Wow! Thank you very much. The ignition coil was replaced but they bought junk yard parts I believe. We'll have that to look forward to.

Sent from my iPhone

On Jul 8, 2015, at 9:03 PM, Paul V. Sheridan <[pvsheridan@wowway.com](mailto:pvsheridan@wowway.com)> wrote:

It's in, works fine (new alt, new tensioner and new belt):

<http://pvsheridan.com/DSCN0931.JPG>

I took a zillion photos, here's more:

Rotated tires:

<http://pvsheridan.com/DSCN0907.JPG>

Fixed muffler rattle:

<http://pvsheridan.com/DSCN0917.JPG>

New air filter

<http://pvsheridan.com/DSCN0930.JPG>

Changed oil and filter as well . . .

<http://pvsheridan.com/DSCN0928.JPG>

**The ignition coil is going bad . . . tower three intermittent on coil pack causes periodic misfire in cylinder #3. . . there was a recall on these ages ago, but this one looks original (never got updated) . These are ~\$100 at Rock. Will fail eventually . . . (Sorry ☹ )**

---

**From:** Nancy Fancy pants [<mailto:Nmbouch@yahoo.com>]  
**Sent:** Sunday, July 05, 2015 10:10 PM  
**To:** Paul V. Sheridan  
**Subject:** Re: VW Oil

Hi, yes we're having a wonderful time so far. Mario said he hasn't changed the oil. Thanks.

Sent from my iPhone

On Jul 5, 2015, at 9:30 PM, Paul V. Sheridan <[pvsheridan@wowway.com](mailto:pvsheridan@wowway.com)> wrote:



Nancy:

Just in case you check your email while enjoying the Connect-tie-Cut . . . ask Dana or Mario how many times they have changed the oil on the VW since purchase . . .

Paul



PETITION

TO: City Council  
City of Dearborn  
Dearborn, MI

Representative: Mario Bouchard

Address: 22351 Columbia St.

Phone Number: \_\_\_\_\_

We the undersigned property owners respectfully petition your Honorable Body as follows:

To allow Mario Bouchard to park his work van in the alley behind his garage.

Reason for Request: parking exemption permit

Name	Address	Date
Darren Berry	22343 Columbia St.	12-3-2015
HENRY KIBIT	22329 Columbia St.	12-3-2015
Janice Kibit	22329 Columbia	12-3-2015
JERRY A. OLSON	22325 COLUMBIA	12-3-2015
Maryl Olson	22325 Columbia	12-3-2015
Kyle CARUSO	22372 OXFORD ST.	12-3-2015
Rhonda Huer	22340 Oxford St	12-3-2015
Jim Voss	22332 Oxford St.	12-3-15
Brenda Buterik	22341 OXFORD	12-3-15
Jim McE	22347 OXFORD ST	12-3-15
Monica R. John	22347 Oxford	12-3-15



LAW OFFICES

MADDIN, HAUSER, WARTELL,  
ROTH & HELLER, P.C.

THIRD FLOOR ESSEX CENTRE  
28400 NORTHWESTERN HIGHWAY  
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(248) 354-4030

(248) 355-5200

TELEFAX (248) 354-1422

MAILING ADDRESS  
POST OFFICE BOX 215  
SOUTHFIELD, MI 48037-0215

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Direct Facsimile No: (248) 359-6164

E-mail [let@maddinhauser.com](mailto:let@maddinhauser.com)

March 11, 2004

LORI E. TALSKY  
SHERYL K. SILBERSTEIN  
E. DALE WILSON  
KASTURI BAGCHI  
CATHERINE H. FINN  
DAVID M. SAFERSTEIN  
RICHARD M. MITCHELL  
JOSEPH N. EJBEH  
DANIELLE M. SPEHAR  
CHRISTOPHER A. McMICAN  
GEOFFREY N. TAYLOR  
BRIAN A. NETTLEINGHAM  
BRANDY L. MATHIE  
NICOLE E. WILINSKI  
DAVID B. KRAMER

OF COUNSEL  
WALTER J. GOLDSMITH

MILTON M. MADDIN  
(1902-1984)  
C. ROBERT WARTELL  
(1936-2001)

MICHAEL W. MADDIN  
MARK R. HAUSER  
RICHARD J. MADDIN  
RICHARD F. ROTH  
HARVEY R. HELLER  
MICHAEL S. LEIB  
ROBERT D. KAPLOW  
WILLIAM E. SIGLER  
STEWART C.W. WEINER  
CHARLES M. LAX  
STUART M. BORDMAN  
STEVEN D. SALLEN  
JOHN E. JACOBS  
MICHAEL B. PERLMAN  
GREGORY J. GAMALSKI  
JULIE CHENOT MAYER  
NATHANIEL H. SIMPSON  
RONALD A. SOLLISH  
LOWELL D. SALESIN  
MARK H. FINK  
STEVEN M. WOLOCK  
DAVID E. HART  
GEORGE A. CONTIS  
MARTIN S. FRENKEL  
GARY M. REMER  
GEORGE V. CASSAR, JR.

Sanaa Dakhlallah  
Probation Officer  
19th District Court  
16077 Michigan Ave.  
Dearborn, Michigan 48126

**Re: City of Dearborn v Lawrence Allen  
19th District Court Case Nos. 03C246248, 03C246249**

Dear Ms. Dakhlallah:

This law firm represents Paul V. Sheridan, who was the victim in the above-referenced cases. This law firm also represents Mario and Nancy Bouchard who are neighbors of Mr. Sheridan (and Mr. Allen) and who have also been harassed by Mr. Allen as described in the attached Petitions for Personal Protection Order Against Stalking (Non-Domestic). These Petitions will be filed in Wayne County Circuit Court if Mr. Allen continues harassing them and/or conducting himself in a threatening and unlawful manner. Should this occur, or if Mr. Allen contacts or otherwise bothers Mr. Sheridan, we will, of course, advise you of the same so that you may take the necessary action in connection with Mr. Allen's probation.

Very truly yours,

MADDIN, HAUSER, WARTELL,  
ROTH & HELLER, P.C.



Lori E. Talsky

LET:klh/bjt

enclosure

cc: Mr. Paul V. Sheridan  
Mario Bouchard – Nancy Bouchard  
Robert D. Kaplow, Esq. (w/o enc.)

Approved, SCAO

<b>STATE OF MICHIGAN JUDICIAL CIRCUIT COUNTY</b>	<b>PETITION FOR PERSONAL PROTECTION ORDER AGAINST STALKING (NON DOMESTIC)</b>	<b>CASE NO.</b>
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Court address

Court telephone no.

<b>A</b> Petitioners' Name      Ages 42/45      Age <span style="border: 1px solid black; display: inline-block; width: 40px; height: 20px; vertical-align: middle;"></span> Nancy/Mario Bouchard 22351 Columbia Street Dearborn, MI 48124      313-274-3979	<b>v</b>	<b>F</b> Respondent's Name      Age 41      Age <span style="border: 1px solid black; display: inline-block; width: 40px; height: 20px; vertical-align: middle;"></span> Larry Allen 22372 Oxford Street Dearborn, MI 48124      313-359-9852
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1. The petitioner and respondent have never been husband and wife, resided in the same household together, had a child in common, or had a dating relationship with one another
- B** 2.  The respondent is required to carry a firearm in the course of his/her employment.       Unknown.
- C** 3. a. There  are  are not other pending actions in this or any other court regarding the parties.
- |                          |   |                                       |
|--------------------------|---|---------------------------------------|
| Case number<br>03C246246 | Name of court and county<br>19th Judicial Court | Name of judge<br>Sobotta, Virginia A. |
|--------------------------|---|---------------------------------------|
- b. There  are  are not orders/judgments entered by this or any other court, regarding the parties.
- |             |                          |               |
|-------------|--------------------------|---------------|
| Case number | Name of court and county | Name of judge |
|-------------|--------------------------|---------------|
- D** 4. I need a personal protection order because: Explain what has happened (attach additional sheets)

1) Respondent has previously and recently falsely reported our family vehicle as being 'abandoned' resulting in our vehicle being tagged by the city as such with the potential of being towed. 2) Respondent repeatedly expressed verbal and visual anger when approached with our attempts to discuss the maintenance of the easement. 3) In retaliation, respondent has poured used concrete and piled up yard waste into the easement. 4) Respondent lit off illegal fireworks from his yard directly into our yard which led to one of my enrolled children finding it and causing a safety concern for all. 5) Also in retaliation, respondent has repeatedly parked his mobile home on Pardee which made it visibly impossible to see oncoming traffic or allowing us to pull safely out of the easement. 6) Respondent has used vulgar language and gestures in front of his own children as well as my husband on several occasions. Details are listed on attached Exhibit A.

- E** 5. I make this petition under the authority of MCL 600.2950a and ask the court to grant a personal protection order prohibiting the respondent from stalking me as defined under MCL 750.411h and MCL 750.411i which includes but is not limited to:
- following me or appearing within my sight.
  - appearing at my workplace or residence.
  - approaching or confronting me in a public place or on private property.
  - entering onto or remaining on property owned, leased, or occupied by me.
  - sending mail or other communications to me.
  - contacting me by telephone.
  - placing an object on or delivering an object to property owned, leased, or occupied by me.
  - threatening to kill or physically injure me.
  - purchasing or possessing a firearm.
  - other: please see attached Exhibit 'B'.

- F** 6. I ask the court to grant a personal protection order against stalking:
- I request an ex parte order because immediate and irreparable injury, loss, or damage will occur between now and a hearing or because notice itself will cause irreparable injury, loss, or damage before the order can be entered.

- G**  7. I have a next friend petitioning for me. I certify that the next friend is not disqualified by statute and is an adult.

I declare that the statements above are true to the best of my information, knowledge, and belief.

**H** Dec. 23, 2003  
Date

*Nancy Bouchard*  
Petitioner's signature

MCL 600.2950a, MCR 3.703

Form CC - 377

Petition for Personal Protection Order  
Against Stalking (Non Domestic)

Exhibit A  
(Addendum to Paragraph 4)

Petitioners: Nancy and Mario Bouchard

Respondent Larry Allen

Respondent has been observed using offensive physical gestures,

Respondent has been heard using profane language,

Respondent has been observed shooting illegal fireworks on several occasions, and as recently as September 2003,

Respondent has been, and has recently admitted to making anonymous telephone calls to the City of Dearborn Police Department for the purposes of filing false or misleading police reports that allege that our properly licensed and insured vehicles parked in our driveway or property are "abandoned."

Respondent has been dumping garbage and any other forms of refuse, including but not limited to grass clippings, tree leaves, etc. in the City of Dearborn driveway easement, located off of Pardee Street between Columbia and Oxford, which has been utilized by us for 16 years.

Respondent has been dumping excess housing construction materials, such as uncured concrete, etc., in the City of Dearborn driveway easement, located off of Pardee Street between Columbia and Oxford, which has been utilized by us for 16 years.

Respondent has been allowing his dog to curf in the easement and not properly removing and disposing of the waste.

Form CC - 377

Petition for Personal Protection Order  
Against Stalking (Non Domestic)

Exhibit B  
(Addendum to Paragraph 5)

Petitioners: Nancy and Mario Bouchard

Respondent Larry Allen

Using offensive physical gestures for the purposes of humiliating, embarrassing and/or inciting us

Using profane language for the purposes of humiliating, embarrassing and/or inciting us

Using profane physical gestures while driving his motor vehicle, for the purposes of humiliating, embarrassing and/or inciting us

Driving his motor vehicle in an erratic or unsafe manner, for the purposes of humiliating, embarrassing and/or inciting us

Spitting in the general vicinities of our home or surrounding areas

Spitting in the general vicinities of our physical persons

Shooting illegal fireworks in any direction at any time

Anonymously telephoning the City of Dearborn Police Department for the purposes of filing false or misleading police reports that allege that the vehicles parked in our driveway or property are "abandoned."

Dumping garbage and any other form of refuse, including but not limited to grass clippings, tree leaves, etc., in the City of Dearborn driveway easement, located off of Pardee Street between Columbia and Oxford, which has been utilized by us for ~~X~~ years.

Dumping of excess housing construction materials, such as uncured concrete, etc., in the City of Dearborn driveway easement, located off of Pardee Street between Columbia and Oxford, which has been utilized by us for 16 years.

Allowing the respondent or any members of his family to approach our property. Through the city easement in attempts to 'curb' his dog or give attention to our dog.



**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the copies of the petition for personal protection order and file proof of service with the clerk. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NON-SERVICE**

<input type="checkbox"/> <b>OFFICER CERTIFICATE</b> I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104(A)(2)), and that: (notary not required)	OR	<input type="checkbox"/> <b>AFFIDAVIT OF PROCESS SERVER</b> Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notary required)
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I served a copy of the petition for personal protection order against stalking by:

personal service    
  registered mail, delivery restricted to the respondent (return receipt attached)

on:

Respondent's name	Complete address of service	Day, date, time

I have personally attempted to serve a copy of the petition for personal protection order against stalking on the following respondent and have been unable to complete service.

Respondent's name	Complete address of service

Service fee	Miles traveled	Mileage fee	Total fee
\$		\$	\$

Signature \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.

Date

My commission expires: \_\_\_\_\_ Date     Signature: \_\_\_\_\_

Deputy court clerk/Notary public

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received a copy of the petition for personal protection order against stalking on \_\_\_\_\_

Day, date, time

\_\_\_\_\_  
Signature of respondent

<b>STATE OF MICHIGAN JUDICIAL CIRCUIT COUNTY</b>	<b>A</b>	<b>PERSONAL PROTECTION ORDER AGAINST STALKING (NON DOMESTIC)</b> <input type="checkbox"/> EX PARTE	<b>B</b>	<b>CASE NO.</b>
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Court address Court telephone no.

<b>ORI</b>	<b>MI-</b>	<b>C</b>	Petitioners' Name      Ages 42/45 Nancy/Mario Bouchard Add 22351 Columbia Street Dearborn, MI 48124      313-274-3979	<b>v</b>	Respondent's Name      Age 41 Larry Allen Add 22372 Oxford Street Dearborn, MI 48124      313-359-9852
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<b>D</b>	Full name of respondent (type or print)* <u>Lawrence W. Allen, Jr.</u>	Social security no. (if known)	Driver's license number (if known)				
Height <u>6'4"</u>	Weight <u>220 lbs</u>	Race* <u>Cau.</u>	Sex* <u>M</u>	Date of birth or Age* <u>11/03/62</u>	Hair color <u>BLK</u>	Eye color	Other identifying information

\*these items must be filled in for the police/sheriff to enter on LEIN; the other items are not required but are helpful

Date: \_\_\_\_\_ Judge: \_\_\_\_\_ Bar no.

1 This order is entered  without a hearing.  after hearing.

**THE COURT FINDS:**

- 2. A petition requesting an order to restrain conduct prohibited under MCL 750.411 h and 750.411 i has been filed under the authority of MCL 600.2950a.
- 3. Petitioner requested an ex parte order which should be entered without notice because irreparable injury, loss, or damage will result from delay required to give notice or notice itself will precipitate adverse action before an order can be issued.
- 4. Respondent committed the following acts of willful, unconsented contact: (state the reasons for issuance)

**IT IS ORDERED:**

5. \_\_\_\_\_ is prohibited from stalking as defined under

Full name of respondent

MCL 750.411h and MCL 750.411i which includes but is not limited to:

- following or appearing within sight of the petitioner.
- appearing at workplace/residence of the petitioner.
- approaching or confronting the petitioner in a public place or on private property.
- entering onto or remaining on property owned, leased, or occupied by the petitioner.
- sending mail or other communications to the petitioner.
- contacting the petitioner by telephone.
- placing an object on or delivering an object to property owned, leased, or occupied by the petitioner.
- threatening to kill or physically injure the petitioner.
- purchasing or possessing a firearm.
- other: \_\_\_\_\_

6. Violation of this order subjects the respondent to immediate arrest and to the civil and criminal contempt power of the court. If found guilty, respondent shall be imprisoned for not more than 93 days and may be fined not more than \$500.00.

7. This order is effective when signed, enforceable immediately, and remains in effect until \_\_\_\_\_  
 This order is enforceable anywhere in the United States by any law enforcement agency when signed by a judge, and upon service, may also be enforced by another state, an Indian tribe, or a territory of the United States. If respondent violates this order in a jurisdiction other than this state, respondent is subject to enforcement and penalties of the state, Indian tribe, or United States territory under whose jurisdiction the violation occurred.

8. The court clerk shall file this order with \_\_\_\_\_ who will enter it into the LEIN.

9. Respondent may file a motion to modify or terminate this order. For ex parte orders, the motion must be filed within 14 days after being served with or receiving actual notice of the order. Forms and instructions are available from the clerk of the court.

10. A motion to extend the order must be filed 3 days before the expiration date in item 6 or else a new petition must be filed.

Date and time issued

Judge

MCL 600.2950a,