

February 16, 2017

Ms. Geraldine Karonis
Office of the U.S. Trustee
U.S. Bankruptcy Court, District of NH
1000 Elm Street, Suite 1001
Manchester, NH 03101-1708

RE: **Case # 08-11816 - USA Springs Inc. - Docket # 1108** submitted by Attorney Andrew Sullivan for his client Mr. Kevin Delaney

Dear Ms. Karonis:

I am very concerned about the alleged Commitment Letter submitted on the letterhead of a company called HighPort Ventures, LLC., Richard Strachan, Managing Director, 18 Shipyard Drive, Hingham, MA and included in Docket #1108. It was submitted to the Court by Attorney Andrew Sullivan, on behalf of his client, Mr. Kevin Delaney on February 14, 2017. This pertains to the above-referenced USA Springs case which has been before this Court since June 2008.

There is a hearing scheduled for February 21st on this case at 10:00 a.m. which I plan to attend. However, since Docket #1108 was submitted on the last day (2/14) to submit objections, there was no time to file any objections to it. Thus, I wanted to give you some background information on the authenticity of the Loan Commitment Letter contained within Docket #1108. I can report the following:

1. According to the landlord (Grace Gorman, Sr. Paralegal at Samuels and Associates of Boston, 617-247-3434) that handles leases at 18 Shipyard Drive in Hingham, MA) HighPortVentures, LLC has never been a tenant at that location.
2. Richard Strachan is currently the Managing Director and Director of Business Development for the Vazza Real Estate Group in Quincy, MA. According to their website, "Prior to joining the Vazza Real Estate Group, Richard was Co-Founder of HighPort Ventures responsible for the strategic vision, identification and execution of development and acquisition investment opportunities as well as debt and equity finance".
3. According to the MA Secretary of State's Office, HighPort Ventures was Involuntarily Dissolved by the Secretary of State on June 30, 2013, for failure to file the necessary paperwork.
4. I believe that this Commitment Letter falls on the grounds of fraudulent misrepresentation. A representation was made that was false and reckless by Mr. Delaney via his Attorney Sullivan.

For background purposes, I have served as the volunteer chair of the Neighborhood Guardians (NG) for the past 6 years. The NG are a Nottingham-based local citizen action group which is **dedicated to protecting and guarding groundwater**, property values, the health and safety of the residents of Nottingham and the surrounding communities in this special region of New Hampshire.

If you have any questions, please contact me at 942-5630 or by email at jhadley@metrocast.net. Your cooperation on this important matter is appreciated.

Sincerely,



Jim Hadley, Chair ~ Neighborhood Guardians
