

# **KOLDYS & KELLEHER P.C.**

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**Also Admitted To Practice In**

**\* Connecticut**

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October 31, 2019

Councilor Brian K. Gomes  
New Bedford City Council  
133 William Street, Room 215  
New Bedford, MA 02740

Re: Panagakos Development Corp.

Dear Mr. Gomes:

This firm represents Michael W. Panagakos and Panagakos Development Corp. They are and have for some time been engaged in the development of various parcels of real estate in the City of New Bedford, including property at 606 Tarkiln Hill Road (the "Property").

It has come to my clients attention that you have engaged in efforts to interfere with their advantageous relationship with Metro Harvest, Inc. ("Metro"), a proposed tenant for space in the Property, by pressuring Metro to relocate their proposed business from the Panagakos Property to a different location, even stating that the City would grant Metro zoning relief if they would relocate to a property at which their proposed business would not comply with the existing zoning.

My clients are advised that you told the principals of Metro that you had no issue with them or their proposed business; your problem was with their landlord, my clients. That clearly indicates that your attempted interference was based purely on malice toward my clients and not on any legitimate concern regarding the interests of the City.


While your interference with my clients advantageous business relationship with Metro is serious enough in and of itself, more troubling is the fact that you engaged in that conduct in your capacity as a City Councilor. Whether your efforts to direct Metro to a different site were to benefit the owner of that site where, coincidentally, you maintain a number of campaign signs, or were simply to harm Mr. Panagakos and Panagakos Development Corp., my clients view your actions as an abuse of your office as City Councilor, using the power of that office to advance either your own personal interests or a personal vendetta.

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You are hereby advised that your tortious, improper actions must cease immediately and that my clients will take whatever steps they deem necessary and appropriate to protect their interest.

Very truly yours,

KOLDYS & KELLEHER P.C.



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14 W/18 BRIAN  
**GOMES**  
COUNCILLOR - AT - LARGE

14 W/18 BRIAN  
**GOMES**  
COUNCILLOR - AT - LARGE



I'M WITH **BRIAN**  
**GOMES**  
COUNCILLOR - AT - LARGE

I'M WITH **BRIAN**  
**GOMES**  
COUNCILLOR - AT - LARGE







I'M WITH!  
**GOMES**  
COUNCILOR

**GOMES**  
COUNCILOR AT LARGE

FOR THE BEYOND  
**GOMES**  
COUNCILOR AT LARGE

Produce





I'M WITH  
BRIAN  
**GOMES**  
COUNCILLOR - AT - LARGE

I'M WITH  
BRIAN  
**GOMES**  
COUNCILLOR - AT - LARGE