

October 3, 2022

Andover Select Board  
Andover Town Hall  
13 Bartlet Street  
Andover, MA 01810

Good afternoon Board Members---

I write to formally request the Select Board to commence Removal of Manager proceedings against Andrew Flanagan ("Flanagan"), in accordance with Section 8 of the Andover Town Charter (Chapter 571 of the Acts of 1956, as amended),

The termination request is pursuant to the "just cause" provision as defined in section 9 C of the January 13, 2020 Contract for Town Manager Services, where termination is authorized for "conduct involving moral turpitude" or "willful or reckless failure to perform his duties as Town Manager".

The termination proceedings are warranted whereas Flanagan was determined to be an "active participant" in numerous violations of Massachusetts General Laws (MGL c. 150E, s. 10 (a)(1), (5) and (6)) by the Massachusetts Department of Labor Relations (DLR) in their scathing September 6, 2022 decision. The ruling calls out Flanagan over 100 times for his lack of honesty and integrity, lying under oath, falsifying legal documentation and his participation in the destruction of evidence, and obstruction of public record requests. [https://nepba.org/wp-content/uploads/2022/09/HO\\_Decision\\_Issued.Chelmsford\\_DLR.pdf](https://nepba.org/wp-content/uploads/2022/09/HO_Decision_Issued.Chelmsford_DLR.pdf)

The DLR decision also calls for "a close examination of Flanagan's conduct and his participation in the alleged ex-parte communications".

The incidents below are further example of the reckless and persistent pattern of deception and dishonesty by Flanagan.

1. A 2019 highly public forum in which Flanagan was confronted by a Board member for misleading the Select Board ("SB") regarding the North Reading Water Agreement. The Andover Archive tape of the SB meeting has been inadvertently deleted.
2. A 2021 \$10 million wrongful termination suit filed after an esteemed community leader disparaged by the vengeful Flanagan and his private investigative team.
3. The 2021-2022 Ethics Commission investigation of Flanagan for falsifying a disclosure document regarding the \$4.0 million lawsuit by Flanagan's girlfriend. The Town will not release the "actions taken by the Commission."
4. The July 29, 2022 Land Court decision against the Town finding "egregious advice and legally untenable ground" in its treatment of a long time Andover benefactor. A multi-million damage suit is expected soon from the plaintiff.

5. 2022- Flagrantly ignoring the will of the voters from the May 17, 2022 Special Town Meeting by defying their approval of the federally approved ARPA funds to be used for needy front line workers during the pandemic.
6. 2022- Further ignoring the same voters who approved the prohibition of Non -Disclosure Agreements to silence the over 55 senior staff members of the Town Hall who were forced to resign or retire due to the abusive work place environment fostered by Flanagan.
7. September 15, 2022- A second federal lawsuit filed by Flanagan girlfriend contesting numerous violations of the plaintiff's second Amendment Rights by the Town
8. September 27, 2022- The Town of Chelmsford finds the above referenced deception so egregious and unethical, that the SB is asked to engage a hearing to consider removing their Town manager for contriving with Flanagan in deceiving the Town. It is estimated that the deception will cost the town nearly \$700,000 to remedy this chicanery.  
<https://www.lowellsun.com/2022/09/27/paul-has-lost-my-trust-cohen-receives-backlash-from-residents-union-reps-in-light-of-labor-findings>

It is simply untenable to ask the hard-working residents of Andover to endure this malfeasance any longer.

We can no longer idly sit by and ignore what is happening to our wonderful community.

**We need to demand Flanagan accountability. His unlawful and unethical behavior has consequences.**

Please schedule a SB meeting to commence the Section 8 proceedings.

Thank you



Michael Meyers

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Andover, MA 01810