



From: Muder, Angela (FAA) <Angela.Muder@faa.gov>

Sent: Thursday, June 12, 2025 1:54 PM

To: Jones, Michael G. <mjones@martinpringle.com>; Sarah Craig <craig@ucmo.edu>

Cc: Joel, Rodney (FAA) <rodney.joel@faa.gov> [REDACTED] Kyle LePage <kyle.lepage@modot.mo.gov>

Subject: FW: Skyhaven Airport - Update to UCM's Failure to Provide/Comply with Part 13 CAP

Mr. Jones,

Per our discussion earlier this week, I am including the additional information/proof of "after hours activities" still occurring at RCM. These photos were taken after our last letter to RCM was issued (per the metadata of the jpg files). Unfortunately, the anonymous source providing information to us does not want to supply any information that may be tied back to them for fear of retribution at the airport. Since I was not able to substantiate the information from our contact outside of the Part 13 complainants, I asked Mr. [REDACTED] if his clients had any knowledge or proof of the activities continuing to occur. These are the reasons Mr. [REDACTED] has provided the requested information.

Please let me know if you have any questions or need additional information.

Thank you,

Angie Muder

Compliance Specialist, ACE-610



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Sent: Wednesday, June 11, 2025 4:25 PM

To: Muder, Angela (FAA) <Angela.Muder@faa.gov>

Cc: [REDACTED] Joel, Rodney (FAA) <rodney.joel@faa.gov>

Subject: Skyhaven Airport - Update to UCM's Failure to Provide/Comply with Part 13 CAP

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Ms. Muder,

Thank you for your call regarding UCM's request for extension for their CAP deadline and your request for any additional information regarding AIP violations subsequent to the April 15, 2025 Part 13 determination letter.

Continuing Violations by UCM

Please see the email below from one of our clients regarding ongoing violations of UCM's own Rules and Regulations regarding 1) maintenance operations in individually leased hangars, as opposed to the designated maintenance hangar, 2) maintenance operations for commercial sale of aircraft, and 3) the selective application of rules in favor of university employees, such as Prof. [REDACTED] and against non-employees performing similar operations. We have attached photos the aircraft, the university employee involved in the second occurrence, and the listing of that aircraft for sale.

No Extension Justified or Required for UCM

My clients are unanimously opposed to any extensions for UCM to meet the deadline Friday 13, 2025 to provide and comply with a Corrective Action Plan (CAP) for their Grant Assurance violations. It's our belief that UCM is delaying in order to financially exhaust our clients. We appreciate of the on-going "zero pay" order regarding any issued or potential grants, but regret that UCM has allowed the situation to reach the point where this is required by the FAA.

Demand for Removal of Management Authority for Skyhaven to Competent Party

Further we believe the Skyhaven Airport management, and by extension UCM, are parties to a violation of AIP Grant Assurance 5. Rights and Powers, because the AIP Sponsor has failed its obligation to "not take or permit any action which would operate to deprive it of any of the rights and powers necessary to perform any or all of the terms, conditions, and assurances in this Grant Agreement." (Airport Improvement Program Grant Assurances for Airport Sponsors, April 2025, 5.a, https://www.faa.gov/airports/aip/grant_assurances/assurances-airport-sponsors-2025).

It is important to note that neither Skyhaven Airport nor the UCM General Counsel's Office is the AIP Sponsor for funds received. Rather every Grant Agreement we have reviewed from 2011 to 2021 lists the Missouri Highways and Transportation Commission or the Missouri Department of Transportation as the Sponsor under the State Block Grant Program (14 CFR Part 156). In some cases, UCM's attorney or provost signed for UCM as the recipient of the State Block Grant. For enforcement purposes, when money is distributed via state block grant the FAA may still "take any action, pursuant to the authority of the Airport and Airway Improvement Act of 1982, as amended, to enforce the terms of a State block grant agreement including any terms imposed upon subsequent recipients of State block agreement funds" 14 CFR 156.7 (*cf.*, Part 13 Complaint, pp. 2, 5 citing the same authority to act).

We believe UCM, and possibly the State Dept. of Transportation, is in violation of Grant Assurance 5.g. for allowing Skyhaven Airport management and the UCM General Counsel's Office to improperly manage Skyhaven Airport. The full text of 5.g. reads, "If an arrangement is made for management and operation of the airport by any agency or person other than the sponsor or an employee of the sponsor, the sponsor will reserve sufficient rights and authority to ensure that the airport will be operated and maintained in accordance with Title 49, United States Code, the regulations and the terms, conditions and assurances in this Grant Agreement and shall ensure that such arrangement also requires compliance therewith."

In a case analogous to Mr. [REDACTED] situation, the FAA found in favor of an applicant requesting to establish a maintenance and repair business, holding, "Respondent's [the Airport Sponsor's] processes and procedures for reviewing the Complainant's request to provide an aeronautical service lack transparency and documentation making them confusing in nature. These incoherent, ad hoc practices cede the Respondent's ability to adhere to the Grant Assurances which constitutes a violation of 49 U.S.C. § 47107(a) and Grant Assurance 5, Preserving Rights and Powers." (*Moore v. Sumner Cnty. Reg'l Airport Auth.*—No. 16-07-16.—No. FAA-2008-0289. Director's Determination (February 27, 2009)).

Here the State of Missouri has received money from the FAA as the Sponsor. It has designated UCM as the recipient. UCM has delegated authority to Skyhaven Airport management and its General Counsel to operate the airport in accordance with the AIP. Both parties have failed to competently administer this responsibility. Similar to the county authorities in *Moore v. Sumner Cnty. Regional*, Skyhaven Airport management and UCM's General Counsel have failed to administer the airport in a transparent manner, govern through confusing, contradictory, and ad hoc policies, and continue to openly discriminate against disfavored parties.

Remedy

For these reasons we request that UCM be found in violation of Grant Assurance 5 and that as a remedy administration of the Skyhaven Airport be placed in the hands of a Governing Board over which proper oversight by the FAA, State of Missouri, and UCM's Board of Governors may be maintained. This solution was recommended in Dec. 2024 by our clients but ignored by UCM. (See, Skyhaven Airport Tenant's Response to UCM's Response to the Part 13 Complaint, Dec. 2, 2024, p.13; Exhibit Q, Proposed Minimum Standards, para. 1-9. p. 7-8).

Commercial Applications Still Pending

As a reminder: [REDACTED] has been out of work as an A&P at Skyhaven Airport due solely to UCM's policies for now going on 10 months.

Thank you,

Subject: RE: Update Part 13 CAP

There is still no uniformity to the actions or rules of UCM and Airport operations.

Sunday, June 8, 2025 N70565 Cessna 182M

Registered to [REDACTED]

99709-2565

Cowling was removed and 3 individuals were working / Inspecting the aircraft on the Ramp (Not in Hangar 27). See attached photo as the lower cowl is being installed, their equipment is to the right of the aircraft.

Second Issue

[REDACTED] purchased a Dragonfly aircraft from another tenant/owner [REDACTED] on the field, approx. December 8, 2024.

Together they have been enjoying working on this aircraft with airworthiness as a goal. They have removed & reinstalled the engine returning the engine to a running status (Same as an A&P Mechanic). Their plans are to sell for a profit this aircraft.

I talked to [REDACTED] on Sunday, June 8, 2025, when he stopped by my hangar E-3. He was unaware of ANY restrictions for working on aircraft and has NEVER been contacted by Chris Holland for any Waiver. [REDACTED] is a UCM professor. He is openly working on the aircraft (in a Open Tee Hangar) and is not being bothered by UCM airport personnel.

I told [REDACTED] of the restrictions applied to myself (for working on aircraft) and he was NOT surprised.

UCM should NOT be given any additional time for compliance, they have caused enough problems and have not been able to comprehend the values of the Grant Assurances. I do believe the "EASY button" is a good option with a separate Airport Governing Board.

Thanks"

[REDACTED]

[REDACTED] AND CONFIDENTIAL

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10 attachments



N70565 in work.JPG
1244K



N70565.JPG
1088K



Engine Installed 06-07-2025.JPG
1711K



Engine Removed 05-18-2025.JPG
1530K