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MICHAEL G. JONES | mgjones@martinpringle.com

July 8, 2025

Via Electronic Mail

Rodney Joel, Director
Angela Muder, Compliance Specialist
Federal Aviation Administration
Office of Airports
901 Locust, Room 364
Kansas City, MO 64106

Rodney.Joel@faa.gov
Angela.Muder@faa.gov

Re: Corrective Action Plan for Informal Complaint Received October 14, 2024

Mr. Joel and Ms. Muder,

In accordance with the instructions from the FAA's April 15, 2025 letter, UCM is providing this update on the progress of the Corrective Action Plan ("CAP"). Below is the CAP timetable previously provided to you. We have highlighted updates to the table in yellow for your convenience. Please note that UCM has completed an investigation of the remaining reported violation of the Airport's Rules and Regulations. A report and determination is attached as Exhibit A. Additionally, please see the attached email sent to Mr. [REDACTED] with instructions for him to resubmit an application for commercial operations (as defined by the Rules and Regulations) using the new application process (Exhibit B). Once his submission is received, UCM will evaluate his application under the terms described in the Rules and Regulations. As noted in the table below, UCM has installed signage in the UCM Maintenance Hangar which states that no UCM employees or students may work on personal aircraft in that facility. Please see the attached Exhibit C as an example of the signs posted.

Corrective Action	Estimated Date of Completion
1. An Improved Commercial Operations Vendor Application and Agreement Process	
Implementation of an online application process that includes tracking the user's application.	Completed June 24, 2025
Implementation of a frequently asked questions "FAQ" page on the website for licensees to find information about the Commercial Operations Vendor Application and Agreement process and Airport use.	July 15, 2025

Revision of UCM's Rules and Regulations to more clearly outline the steps of the Commercial Operations Vendor Application and Agreement process and Airport use.	Completed June 24, 2025
2. Non-discriminatory Treatment Between UCM and Other Commercial Operations at the Airport	
A policy statement in UCM's Rules and Regulations regarding UCM's use.	Completed June 24, 2025
A banner code to track UCM department costs and expenses.	September 24, 2025
Signs in the UCM Maintenance Hangar stating that no UCM employee or student may work on personal aircraft.	Completed July 8, 2025
Language in UCM course syllabi for all courses taught at the Airport stating that no UCM students may work on personal aircraft.	August 1, 2025
3. Enforcement of UCM's Rules and Regulations Against Unauthorized Commercial Aviation Maintenance	
Implementation of an improved security system to better track use of the Airport.	January 2, 2026
Implementation of an enforcement provision in the revised Rules and Regulations to prohibit unauthorized commercial aviation maintenance.	Completed June 24, 2025
Investigation into allegations of unauthorized commercial aviation.	Completed July 8, 2025

UCM would also like to draw the FAA's attention to a concerning matter. Please see attached Exhibit D. The complainants in this matter have now paid for two separate newspaper ads and established a website in which they misstate the facts and the FAA's determinations regarding this Part 13 Informal Complaint. As UCM has noted in previous letters, this most recent paid ad by Mr. [REDACTED] is not the first time the complainants have not been forthcoming with accurate information. Complainant [REDACTED] has made statements under oath in a separate lawsuit which are inconsistent with the statements he has made to the FAA and in this

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complaint. UCM respectfully asks that the FAA keep this in mind in its correspondence with complainants.

Very truly yours,

MARTIN, PRINGLE, OLIVER,
WALLACE & BAUER, L.L.P.

A handwritten signature in black ink, appearing to read "Michael G. Jones", written over the printed name.

By: Michael G. Jones


MGJ/sc

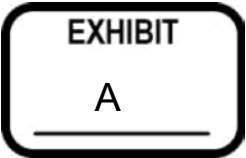
c: Holly Weiss
Lindsay Chapman
Sarah Craig
Elisabeth Wilder

Enclosures

Investigation Report

General Information

Date Possible Violation Reported:	_____ 3 July 2025 _____
Date of Possible Violation:	_____ 8 June 2025 _____
Type of Violation/ Activity:	<u>Unauthorized Commercial Activity</u>
Hangar Number (if applicable):	_____ Ramp Area _____
Name of Individuals in Violation:	
_____  _____	_____
_____	_____
Name of Individuals Reporting:	
<u>Anonymous forwarded by OGC</u>	_____
_____	_____



Investigation

Reported Violation:

“Sunday, June 8, 2025 N70565 Cessna 182M Registered to:

[REDACTED]

[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.”

Contacted Individual(s) in Possible Violation:

Date: _____ 7 July 2025 _____

Synopsis of Conversation:

Only an oil change was performed, not an inspection.

Mr. [REDACTED] finished a long flight from Fairbanks and needed to do an oil change he performed the maintenance without the assistance of a third-party A&P under the privileges outlined in 14 CFR 43.3

Evidence:



- AIRPORT RULES AND REGULATIONS Including MINIMUM STANDARDS FOR COMMERCIAL AERONAUTICAL ACTIVITIES
- 14 CFR 43.3 " Persons authorized to perform maintenance, preventive maintenance, rebuilding, and alterations".
- This person also performed this maintenance in less than 24 hours, following our rules outlined in the airport rules and regs section 2-2H.

Recommendation:

The owner performed the maintenance without the assistance of a third-party A&P under the privileges outlined in 14 CFR 43.3 " Persons authorized to perform maintenance, preventive maintenance, rebuilding, and alterations". This person also performed this maintenance in less than 24 hours, following our rules outlined in the airport rules and regs section 2-2H. Therefore, my determination and recommendation is that NO violation occurred and NO corrective action or sanction is required.

Completed By:

Assistant Airport Manager

Phillip Burns

Phillip E. Burns

Submitted to Airport Manager

Date: 7 July 2025

Internal Report: Reported Violation UCM Skyhaven Airport

Review Date: July 7, 2025

To: Doug Davenport

From: Chris Holland/Interim Airport Manager

Subject: Review of Reported Aircraft Maintenance Violation - June 8, 2025

I have reviewed the data provided by the Assistant Airport Manager regarding a reported violation of airport rules and regulations concerning aircraft maintenance on June 8, 2025. Below is a summary:

Incident Summary

The reported incident occurred on June 8, 2025. At that time, the **University of Central Missouri Max B. Swisher/Skyhaven Airport Rules and Regulations document Including Minimum Standards for Commercial Activities** revision dated March 3, 2025, was in place.

The reported violation was that the cowlings were removed, and three individuals were working/inspecting the aircraft on the ramp, not in Hangar 27. The owner of the aircraft was contacted and confirmed he was performing an engine oil change.

Relevant Regulations and Guidance

In accordance with the **University of Central Missouri Max B. Swisher/Skyhaven Airport Rules and Regulations document**, Section 2-2.G, performing of preventative maintenance, such as an oil change is not a prohibited activity. Section 2-2.H states that a public user "may" request the use of the maintenance hangar (Hangar 27). The owner did not make a request for the use of that facility.

The **FAA** has also provided guidance on such activities in **FAA Order 5190.6B Chg 3**. Section 11.3d, "Permitted Activities," states the following:

11.3. Permitted Activities. Generally, the following activities are permitted by an aircraft owner or operator, including but not limited to individuals, air carriers, air taxis, corporate flight departments, charter operators, and flight schools so long as the activities are conducted in accordance with local, state, and federal health, safety, and environmental regulations:

d. Perform self-service maintenance in accordance with 14 CFR part 43 and Advisory Circular (AC) 43-12A, Preventative Maintenance.

(1). A general aviation aircraft owner or operator may perform the activities listed in the definition of preventive maintenance in paragraph (c) of Appendix A to 14 CFR part 43. A general aviation aircraft owner or operator may also perform aircraft restoration, major repairs, and alterations if the owner or operator performing those actions holds an appropriate certificate under 14 CFR part 65, as required by part 43.

FAR 43.(g) states that:

(g) Except for holders of a sport pilot certificate, the holder of a pilot certificate issued under part 61 may perform preventive maintenance on any aircraft owned or operated by that pilot which is not used under part 121, 129, or 135 of this chapter. The holder of a sport pilot certificate may perform preventive maintenance on an aircraft owned or operated by that pilot and issued a special airworthiness certificate in the light-sport category.

FAR 43 Appendix A(c) defines and limits that maintenance to a list of items. **FAR 43 Appendix A(c)(23)** specifically allows for the "Cleaning or replacing fuel and oil strainers or filter elements."

Conclusion

The owner of the aircraft was acting within the scope of the rules in effect at that time. Therefore, no further action is required by the University of Central Missouri Max B. Swisher/Skyhaven Airport Rules and Regulations document Section 4-3.

Name: Christopher Holland

Title: Interim Airport Manager

Date: 7-7-2025



Christopher Holland <cholland@ucmo.edu>

Commercial Operations Application

1 message

Christopher Holland <cholland@ucmo.edu>

Mon, Jul 7, 2025 at 4:57 PM

To: [REDACTED]

Cc: Douglas Davenport <ddavenport@ucmo.edu>, Phillip Burns <pburns@ucmo.edu>

Mr. [REDACTED] you had contacted me regarding commercial operations at Skyhaven Airport. At that time, my understanding of your use of space at the airport did not require you to apply for and have a Commercial Vendor Operations Agreement. We have updated our Airport Rules and Regulations to clarify the terms of commercial operations. These updates can be found here, <https://www.ucmo.edu/offices/skyhaven-airport/index.php>. We have updated the application process to be online as well. If you believe your commercial operation does meet the criteria for a Commercial Vendor License Agreement, please reapply using the online application process located at <https://www.ucmo.edu/offices/skyhaven-airport/index.php>.

If you have any questions please feel free to contact me

Thank You

Chris

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Chris Holland
Airport Manager (Interim)
Department of Aviation
Skyhaven Airport
281 NW US 50 Hwy
Warrensburg, MO 64093
660-543-4916
cholland@ucmo.edu



REDEFINING WHAT'S POSSIBLE

EXHIBIT

B

**NO UCM EMPLOYEE OR
STUDENT MAY WORK ON
PERSONAL AIRCRAFT IN THIS
FACILITY**



FAA alleges UCM/Skyhaven Airport has violated provisions of federal grants; future grant dollars could be at risk.

An FAA letter dated June 3rd clarified that UCM was not in compliance with major issues being 1. Inconsistent Commercial Operations Vendor Agreement process, 2. Preferential treatment of UCM's Flight School and Aircraft Maintenance operations and 3. unauthorized commercial maintenance activities. A June 13th deadline for response has been extended to June 24th.

See www.skyhaven-pilots.com for further details.



Tuesday, Nov 5th: Flying Club aircraft grounded by UCM/Skyhaven maintenance prohibition was towed on county road to local farm so maintenance could be performed to return to flying status.

Paid for by [REDACTED]

EXHIBIT

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