

EXHIBIT 8

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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FLYERS RIGHTS EDUCATION)	
FUND, INC, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 19-3749 (CKK)
)	
FEDERAL AVIATION ADMINISTRATION,)	
)	
Defendant.)	
)	
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DECLARATION OF PAUL HUDSON

I, Paul Hudson, hereby declare and state as follows:

1. I am an attorney with 46 years of experience and an advocate for air safety and security for over 30 years. My curriculum vitae is attached hereto as Exhibit A.
2. Since 1993 I have represented airline passengers and the general public on the main safety advisory committee to the FAA, the Aviation Rulemaking Advisory Committee (ARAC) (Executive Committee, Occupant Safety Issue Group). This committee assists the FAA in developing safety regulations through subcommittees and working groups. During that tenure, I have attended and participated as a voting member in hundreds of meetings and am familiar with a broad range of aviation interests including Boeing and other plane makers, airlines, airline unions.
3. In 2013, after the Boeing 787 Dreamliner was grounded due to battery fires I petitioned NTSB with three battery experts proposed fixes, and later opposed its certification to fly long distances over oceans without extra precautions.

4. I submit this Declaration in support of the Motion of Plaintiff Flyers Rights Education Fund, Inc., for summary judgment on the grounds that the Defendant Federal Aviation Administration (FAA) has improperly invoked Exemption 4 of the Freedom of Information Act (trade secrets and confidentiality) to shield from public disclosure a large number of documents and substantial portions of documents setting out the minimum technical information needed for any independent expert to evaluate advise the public as to the basis for any FAA decision to unground the 737 MAX aircraft.

5. I have reviewed the FAA's Notice of Proposed Rulemaking setting out a proposed Airworthiness Directive approving certain changes to the Boeing 737 MAX aircraft, as a condition for recertification and ungrounding of the aircraft. FAA, *Airworthiness Directives: The Boeing Company Airplanes*, 85 Fed. Reg. 47698 (Aug. 6, 2020), FAA-2020-0686 on www.Regulations.gov. This proposal has generated approximately 340 mostly unfavorable and questioning comments, including about 50 from top aviation safety experts. These comments have raised scores of unanswered questions and concerns about the proposed ungrounding of the MAX. I submitted on behalf of Flyers Rights a comment found at FAA-2020-0686-0187.

6. In November 2019 I co-authored a white paper that details the events that led to the original FAA certification of the 737 MAX and makes recommendations, none of which have been implemented to date, also found at FAA-2020-0686-0187.

7. Expert declarations have been submitted by six or more experts in support of the subject motion and previously 6 in support of this FOIA action, including the Association of Flight Attendants (AFA), the largest flight attendant union with 40,000 members.

8. The FAA proposal omits any technical data to justify the proposed fixes (i.e., turning off the MCAS software and the autopilot whenever there is disagreement between the

two AOA sensors and requiring the aircraft to be flown manually by the pilot to a safe landing zone). For that reason, the FAA proposal raises more questions than it answers.

9. I have reviewed the documents produced by the FAA to FlyersRights in this case, and redactions in those documents. I have also reviewed the Vaughn Index filed by the FAA in this case, including descriptions of the withheld information and of the many documents withheld in their entirety.

10. Many of the documents or portions of documents withheld under FOIA Exemption 4 as “confidential” commercial information, according to the Vaughn Index, consist of Boeing’s certification plans; testing methods; means of compliance;” flight test plans and criteria; flight test results; safety analyses; and FAA and government agency or entity comments on safety analyses, all relating to various critical hardware and software components of the 737 MAX or to specific functions of those components.

11. The technical details of how Boeing intends to demonstrate compliance of various equipment and software components with FAA requirements; how Boeing intends to achieve certification of these components by the FAA; the methods of testing; and the results of testing including safety analyses, are the most critical and essential information that would need to be made public in order to disclose the actual basis for any decision by the FAA to unground the aircraft; and in order for any independent expert, aviation journalist, or public interest advocate to advise the public whether there is a sufficient basis for any FAA decision to unground the aircraft.

12. It is not possible for me to express any definitive view on whether the 737 MAX is actually safe to fly. But without access to the categories of information set out in paragraph 4 and 11, the safety of the MAX as proposed by Boeing and the FAA must be considered doubtful.

13. For example, in its *Preliminary Summary of the AFAA's Review of the Boeing 737 Max* (Aug. 3, 2020), the FAA claims more than 4,000 hours of flight testing and describes how many crews were involved, what general features were being tested and who had input into the flight plan. But the FAA does not disclose what the test flight plans actually were or any of the specific results of the test flights. Without such information, there is no way to confirm whether the test flight for a particular component or feature actually demonstrated that the component or feature worked properly and safely.

14. I am also a frequent air traveler and have flown the MAX on several occasions across the North Atlantic from New York to Ireland and from Tampa to Panama City across the Gulf of Mexico. Unlike earlier 737 models the two engine MAX is allowed by the FAA to fly across oceans where no close by emergency landing zone is available should there be a MCAS malfunction, loss of one engine or other mishap. From the limited information available, it does not appear that the test flights have accounted for flying long distances from up to several hours without MCAS and/or with only one engine.

15. Beginning in early 2019, FAA officials have repeatedly committed to the public and to Congress that the agency would be transparent, specifically about the FAA process to certify a design change for the 737 MAX and ensure it is safe to fly, before any decision to unground the aircraft.

16. Beginning in early 2019, Boeing officials as well repeatedly promised transparency with respect to “every subject,” specifically including the certification process.

17. I understand that one of the conditions for finding that information is confidential under Exemption 4 is that the information was communicated to the government agency with some assurance by the agency that the information would be kept confidential.

18. Given that the FAA specifically and publicly committed to transparency with the public with respect to the re-certification process, Boeing could not possibly have believed or understood that FAA was providing any assurance that the information Boeing was providing with respect to certification plans, testing plans, details and results, means of compliance, flight test plans and results, and safety analyses would be kept confidential.

19. To the contrary, Boeing must have clearly understood that the FAA could not meet its commitment to transparency with respect to the certification process without making these categories of information publicly available.

20. Flyers Rights conducted a survey of its members in 2019 which found that the majority would not fly the MAX when ungrounded. Other surveys have shown the same. See Exhibit B affixed hereto. Accordingly, it is in the public interest as well as the interests of the FAA and Boeing that the ungrounding details be made public.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 28, 2020

/s/ Paul Hudson



Paul Hudson

Exhibit B

Travelers hesitant to fly the Boeing 737 Max, survey finds

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[Leslie Josephs@LESLIEJOSEPHS](mailto:Leslie.Josephs@LESLIEJOSEPHS)

KEY POINTS

- The 737 Max has been grounded since mid-March after two fatal crashes in a span of five months.
- The FAA doesn't expect to lift the grounding until next year.
- A BofA survey found most travelers would wait before flying the plane but many weren't aware of the grounding.



Grounded Boeing 737 MAX aircraft are seen parked in an aerial photo at Boeing Field in Seattle, Washington, July 1, 2019.

Lindsey Wasson | Reuters

Travelers are concerned about the safety of the [Boeing](#) 737 Max and many will be hesitant to fly on it — even after regulators deem it safe, a survey released on Thursday found.

That could pose a challenge for airlines eager to put the public at ease when the planes reenter service after two fatal crashes. Regulators don't expect to clear the planes until next year but have offered no firm timeline.

A fifth of respondents said they would fly the Max immediately after it is reintroduced into airline fleets, the Bank of America Merrill Lynch survey found. Nearly two-thirds of those surveyed said they would wait at least six months before flying or never fly it, while most respondents said they would switch to another aircraft if they had the opportunity.

More than 300 Boeing 737 Max planes were in fleets worldwide at the time of the grounding in mid-March, but carriers have more than 4,000 on order.

WATCH NOW

VIDEO 01:58

Boeing likely to slow 737 production in 2020: Source

Executives at U.S. carriers, including [American](#) and [United](#), said they plan to fly the plane early on, a way to drum up confidence in the aircraft before it is fully reintegrated into fleets. U.S. carriers have taken the planes out of their schedules until early March as the grounding wears on.

Carriers have also said they will [waive fees](#) or work with travelers who are hesitant to fly on the plane and would rather to travel on another type of plane, but airlines routinely swap out aircraft so travelers don't always get the plane they prefer.

Still, about half of respondents said they were unaware the planes are grounded.

“This could be a positive if passengers ultimately don't care about the aircraft,” the bank said in its poll of 2,135 people. “However, it also could be a negative

if fliers have an unexpected negative reaction upon boarding a 737 MAX flight.”

The two crashes — one in Indonesia in October 2018 and another in Ethiopia in March — claimed 346 lives.

Boeing has developed a software fix for the jetliners, its bestselling aircraft, but regulators haven’t yet signed off on that or on proposed changes to pilot training.

The FAA’s administrator, Steve Dickson, a former Delta pilot and executive, on Wednesday said he plans to fly the updated 737 Max and undergo the new training himself before he signs off on the jets.

— *CNBC’s [Michael Bloom](#) contributed to this report.*

WATCH: [Boeing issues statement on CEO’s meeting with FAA chief](#)

<https://www.npr.org/2019/06/10/731385440/poll-shows-travelers-still-fear-737-max-as-boeing-tries-to-get-it-back-in-the-air/>

Poll Shows Travelers Still Fear 737 Max As Boeing Tries To Get It Back In The Air

- Facebook
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June 10, 2019 4:35 PM ET
Heard on [All Things Considered](#)



WADE GOODWYN

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While Boeing, the FAA and others work to get the 737 MAX back in the air, there's a lingering question: will passengers fly on the plane after two fatal crashes?

AUDIE CORNISH, HOST:

American Airlines now says it's keeping its Boeing 737 Max jets parked until after the summer travel season. The Max has been grounded for three months. Airlines have asked regulators around the globe to hold a unified press conference when they're confident the planes are safe to fly. That may not restore passengers' confidence.

NPR asked our listeners and online readers, if and when the Federal Aviation Administration allows the 737 Max back in the air, will you fly on it? As NPR's Wade Goodwyn reports, the replies came in so fast we had to close the poll after just 24 hours.

WADE GOODWYN, BYLINE: Out of the 1,600 people who responded to our questionnaire with their name, email address and phone number, more than a thousand said in a variety of iterations, no, I won't fly on the 737 Max even if the FAA says it's good to go.

MAURA BRADSHAW: I'm a pretty - I'm a nervous flyer in general, and so just hearing something like that, it was something that I followed and paid a lot of attention to.

GOODWYN: Take Maura Bradshaw, for example. She's an administrative associate at Montana Technological University in Butte.

BRADSHAW: I feel like there's a lot of faith involved in flying, and any sort of chip in that, it just - it kind of takes away your belief that that system is working safely.

GOODWYN: Bradshaw is disillusioned with Boeing's management, but she's particularly upset at the FAA for failing to protect passengers.

BRADSHAW: We have these institutions that are supposed to ensure our safety, and they're serving a massive company like Boeing, and they kind of let us down in that process. It just felt very wrong to me that they waited so long to ground them.

GOODWYN: Jeanne Pelletier, the chief operating officer for Indigo Pets, says she was stunned to learn that Boeing deliberately removed information about the Max's new flight control software from the plane's manual. She feels that keeping the pilots in the dark is unforgivable. She flies about two dozen times a year, and Pelletier says she's going to avoid the 737 Max going forward.

JEANNE PELLETIER: Absolutely, positively, and I am not someone who is - typically looks to see what kind of plane she's on. The most I might check is to see if it has Wi-Fi. But I'm going to France. And I know it's not flying yet, but I'm going to be watching to make sure that if it is released before my flight date, that I'm not on that plane.

GOODWYN: Before the Max came along, Boeing had a reputation for building planes that were pilot-reliant. U.S. pilots even had a joke about it. If it ain't Boeing, I ain't going, throwing shade Airbus's emphasis on computerized flight controls. With nearly 350 people and four colleagues dead, pilots aren't joking about Boeing's software anymore. But while most of the respondents to NPR's poll said they wouldn't fly the Max, hundreds of passengers said they would.

JAMES MCKEITH: I wouldn't hesitate to do so.

GOODWYN: Dr. James McKeith is the medical director for the United States Antarctic Program and a very frequent flyer. McKeith says Boeing has too much at stake not to get it right the second time.

MCKEITH: To a certain extent, I think it was safe to begin with. I mean, the 737 - it is one of the safest aircraft we have. And frankly, you know, in my day-to-day life, one of the safest things I do is get on a commercial aircraft.

GOODWYN: Daniel Mill Tyson (ph) in Tucson, Ariz., is currently working on getting his flight instructor certification. His faith remains unshaken. He believes Boeing and the FAA will learn from this tragedy, and he'll happily fly on the 737 Max.

DANIEL MILL TYSON: 'Cause Boeing makes generally safe airplanes, and the FAA runs the safest airspace system in the world.

GOODWYN: Remember Maura Bradshaw, the anxious flyer in Montana? Although she refuses to consider flying on the Max now, when asked if that might change down the road, she says this.

BRADSHAW: I think yes. If a year goes by and the pilots are good with it, they don't see any new problems cropping up, then I think that I would feel safe.

GOODWYN: Boeing and the airlines undoubtedly hope there will be a lot more passengers like Bradshaw who might be willing to give the 737 Max a chance after they wait and see. Wade Goodwyn, NPR News, Dallas.

CURRICULUM VITAE

September 2020

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Education: Shaker Heights HS, Shaker Heights, Ohio; University of Michigan, B.S.; Cleveland Marshall College of Law, Cleveland State University, J.D.; Harvard Law School, Program of Instruction for Lawyers

Professional Credentials: Admitted to practice law, Ohio (1974), New York (1976-present)

Selected Work Experience:

Staff Attorney, New York Public Interest Research Group (NYPIRG, third largest public interest group in USA), Albany, NY, concentrating on energy and utility law, including representation of environmental organizations in regulatory proceedings involving nuclear power plant siting and safety. 1974-77.

Legislative Counsel, Public Utility Law Project (PULP) (a project of the National Legal Services Corp.) devised legislative program on behalf of lower income utility consumers. 1977.

Counsel, NYS Crime Victims Board, chief attorney and policy advisor, supervised legal & research staff of up to 7 persons, leading expert and advocate for crime victim rights legislation, 1977-87.

Private Practice, 1987- 2012. Areas of concentration- representation of violent crime and terrorist victims re compensation and civil recoveries, real property owner property tax reductions, aviation consumer rights and interests, human rights law.

Real Estate Business owner, Kent & Haroldsen Assocs. Inc., Albany, NY 1980-94, rehabilitated, owned and managed over 1000 apt. units primarily in older larger buildings, up to 25 employees.

Executive Director, Aviation Consumer Action Project (ACAP) 1997- 2012, Washington DC. An organization founded by Ralph Nader in 1971 to act a watchdog and national advocate for aviation safety, security, air traveler rights and interests.

President, FlyersRights.org and Flyers Rights Education Fund, 2013 – present, largest airline passenger rights organization with 60,000 members, official representative of airline passengers and the general public to the FAA on aviation safety, publishes newsletter, operates free emergency hotline for airline passengers in distress, confidential tips hotline, advocates for the interests of airline passengers on national basis. Supervised staff of 5-8.

Other work experience includes middle school math and science teacher, field investigator for the Ohio Civil Rights Commission.

Selected Honors and Public Service Activities:

Listed in Who's Who in American Law, 1980s and 1990s, Who's Who in America 2000.

Community Champion Award, 2002, by Civil Justice Foundation of the American Trial Lawyers Association (ATLA) for national leadership in securing legislation advancing the rights of terrorist victims and improving aviation security; honored by Travel & Leisure Magazine for aviation consumer advocacy.

Filed original lawsuits against Libya for 1988 Pan Am 103 bombing in 1993.

Congressional testimonies on aviation passenger and terrorist victim rights and interests (approximately 14 times) 1989-2007

Chairperson, Victims of Pan Am Flight 103 (1989); President, Families of Pan Am 103/Lockerbie (1989-93) –Organization of victim family members of 270 who died in bombing of Pan Am flight 103, led successful national and international lobbying campaigns for creation of President's Commission on Aviation Security and Terrorism (1989), Aviation Security Improvement Act of 1990, UN sanctions against Libya in 1992 for state sponsored terrorism, 1996 amendments to Foreign Sovereign Immunity Act repealing immunity of foreign nations engaged in state sponsored terrorism from US civil suits by terrorist victims, and led coalition for federalization of aviation security after 9/11 in 2001

Public Member, FAA Aviation Rulemaking Advisory Committee dealing with safety regulation (Executive Committee, Occupant Safety Issue Group) 1993 to present.

Member, FAA Evacuation Advisory Rulemaking Committee (2019-20)

Member, Transportation Security Administration (formerly FAA) Aviation Security Advisory Committee, 1997-2007

Author of articles in professional journals, popular media, Congressional testimonies, and frequent appearances and interviews on national news media 1970s to 2003, 2007-present on public interest, legal and technical issues

Consultant to ABA Victims Committee and National Institute of Justice on crime victim rights, authored first Bill of Rights for Crime Victims published in 1980, most of which was enacted in 1980s in federal and state law.

Selected Publications

P.S. Hudson/NYS Crime Victims Bd., Bill of Rights for Crime Victims, Journal of Victimology, Vol. 5, Issue 2-4 (1980), p. 428-437.

Hudson, Paul S. (1984) The Crime Victim and the Criminal Justice System: Time for a Change, Pepperdine Law Review, 11:23-62.

Paul S. Hudson, Don't Let Libya Off the Hook, Op. Ed. Art., New York Times, April 10, 1999.

Ralph Nader and Paul Hudson, Toughen Up the Rules of the Sky, op ed, New York Times, 11/6/99.

Aviation Consumer Action Project (Paul S. Hudson, ed. 5th Ed.), FACTS AND ADVICE FOR AIRLINE PASSENGERS, Washington, DC, 2001.

Paul S. Hudson (Aviation Consumer Action Project), After the September 11th Attacks, A Guide for Victims, Washington, DC, 2001.

Paul S. Hudson (Aviation Consumer Action Project), Airline Passengers Guide to Aviation Security, Washington, DC, 2002.

Paul S. Hudson, Ronald Reagan's Role in Establishing Crime Victims Rights, National Law Journal, June 28, 2004.

Paul S. Hudson, Airline Passenger Compensation Rights on International Flights, Aviation Consumer Action Project, 2008.

Paul S. Hudson, Why Credit Default Swaps Should Be Illegal (guest column), Sarasota Herald Tribune, September 22, 2009.

Paul S. Hudson, Airline Passenger Tarmac Confinements and Delays: Reasonable Regulation Trumps Market Forces, ABA Air & Space Lawyer, Vol. 23, No. 2, 2010.

Paul S. Hudson, New York Courts to Victims of 11 Hour Tarmac Confinement: It's a "service", no compensation allowed, Aviation Consumer Action Project, Jan. 21, 2013.

Paul Hudson, Airline Passenger Bill of Rights 2.0, Flyersrights.org, June 2012-2014.

Paul Hudson, Learning from the Ferguson Tragedy, New York Times, Aug. 22, 2014, p. A22.

Paul Hudson, A Preview of Mueller's Questions for Trump, New York Times, May 2, 2018, p. A24.

Paul Hudson & Andrew Appelbaum, The Boeing MAX Debacle, white paper, Flyersrights.org, Nov. 5, 2019.

Media quotes & Interviews

Approximately 10,000 times including NY Times (46), Wall Street Journal, Washington Post (10), USA Today (35), AP, Reuters, LA Times (26), CBS Evening News, NBC, ABC, Fox News Channel (O'Reilly, Cavuto, Van Susteren), PBS News Hour, NPR, BBC World, CBC, RT America, Al Jazeera America, Democracy Now, Univision, NY Post, Newsday, Philadelphia Inquirer, CNBC, MSNBC, Bloomberg, C-SPAN, Chicago Tribune, The Guardian, MarketWatch, Travel Weekly, Dallas Morning News, eTN news

Featured in Air & Space Magazine, The Unfriendly Skies, 7/20/17; USA Today 7/20/08

Litigation Experience

Represented over 1,000 clients in civil litigation, tried without jury in state courts approximately 35 cases and one jury trial, tried approximately 30 cases before administrative tribunals, approximately a dozen appellate cases, and represented 6 individual clients and a public interest intervener party at the settlement stage in the class action mass stranding/tarmac confinement case, Koczara v Wayne County and Northwest Airlines, Mich. Wayne Co. Cir. Court, 2001, Index No. 99-900422; petitioner representing airline passengers in 10 rulemaking petitions and appeals to FAA, DOT, TSA.

Consulting attorney to plaintiff attorneys In re 9/11 Terrorist Attacks Litigation (2008) and several plaintiff cases against Libya arising out of terrorist acts.

Lead attorney representing aviation consumer amicus/intervener parties Air Transport Ass'n v Cuomo, 528 F. Supp. 2d 62 (ND NY, 2007) 07-5771-cv; 560 F.3d 218 (2d Cir. 2008).

Lead attorney for passenger plaintiffs in class action lawsuits: Hanni v American Airlines, US DC ND CA Case No. 08-00732 CW: Ray v American Airlines, Inc. US DC WD AR 08-5025, Harper v American Airlines, Inc., US DC ND AL, 08-2410; US DC ND TX 09-318 arising out of 12/29-30/06 mass stranding and diversion incident.

Attorney for passenger plaintiff in class action Biscone v JetBlue Airways Corporation, NYS SC Queens Co., 3776/2008/US DC ED NY 09-3533 arising out of mass stranding and confinement at JFK airport 2/14/07.

Leading role filing initial case as plaintiff/attorney in Hudson v Socialist People's Libyan Arab Jamahiriya in US and Scotland, developed legal theories for case with former counsel to US Mission to UN, assembled an international team of attorneys to prosecute the litigation in 1993-96, successfully lobbied for amendments to Foreign Sovereign Immunity Act in 1996 to permit US terrorist victims to sue state sponsors of terrorism. Role recognized by Second Circuit Court of Appeals. Rein v Socialist People's Libyan Arab Jamahiriya, 568 F.3d 345, 350-1 (2nd Cir. 2009).

Amicus Briefs to US Supreme Court, MacLean v US Dept. of Homeland Security, 13-894, in support of whistle blower statute applying to DHS, position affirmed by Supreme Court 1/15; Schoenebeck v KLM Airlines, 16-670, in support of reversal of 9th Circuit decision refusing to recognize timely filing in another Member State as satisfying the statute of limitations in the Montreal Convention governing all claims against airlines in international travel unless court case also filed within 2 years in a US court.

Petition for intervention to NTSB re Boeing 787 battery fire hazard, 2013.

Appellant in Flyers Rights Education Fund v US Federal Aviation Administration, 16-1101, ___ F.3d ___ (2017 WL 3202638)(D.C. Cir. 2017), successful appeal of denial of rulemaking petition to regulate airliner seat size and legroom; Flyers Rights Education Fund v US Dept. of Transportation 19-1070, 19-1071 509 F3d 593 (D.C. Cir. 2019) appeals of denials of rulemaking petitions to regulate international change fees and mandate notices of delay compensation for international trips.

Hudson v Federal Aviation Administration 192 F.3d 1031 (1999) challenge to FAA ceasing to require full scale emergency evacuation tests without rulemaking due process.

Rulemaking petitions on behalf of airline passengers to DOT and FAA re change fees, notices to passengers of delay compensation rights, restoration of reciprocity rule to reduce delays from flight cancellations, regulation of seat size and legroom, limitation on ETOPS range of Boeing 787; brief in support of Norwegian Air Int. permission to fly to and within US; opposition to US Airways/American Airlines merger. 2013-2016.

Flyers Rights & Paul Hudson v FAA, US DC DC, 19-3749(CKK) FOIA litigation for disclosure of Boeing 737 MAX fix details, so safety for ungrounding can be reviewed by outside experts instead of being kept secret by Boeing and FAA.

Legislative Advocacy

Home Insulation and Energy Conservation Act, NYS law, first state law requiring utilities to offer home insulation and energy audit services to building and home owners, drafted and led successful lobbying effort, 1976.

Son of Sam Laws, drafted model legislation enacted by 40 states to seize media profits of notorious criminals for benefit of their victims 1978-87.

Federal Fair Treatment Standards for Crime Victims, modeled after monograph, law review articles and testimony to Attorney General's Task Force on Violent Crime, 1981-84; drafted about 40 crime victim rights bills in 1980s many of which were enacted.

Funding of State and Local crime victim programs, as counsel to National Association of State Crime Victim Compensation Boards, successfully lobbied for federal law providing for permanent dedicated federal funding to state and local crime victim programs from federal criminal fines and forfeitures, and for establishment of Crime Victims Office in the US Dept. of Justice, 1982.

President's Commission on Aviation Security and Terrorism, led national lobbying effort for creation of commission in 1989 that led to enactment of legislation in 1990.

Aviation Security Improvement Act of 1990, drafted strengthening amendments and played leading role in lobbying effort.

UN Security Council civil aviation sanctions against Libya for aviation and other acts of terrorism in 1992 and 1993, strongest form of UN sanctions, barred for the second time in history any UN member from engaging in air commerce with Libya on pain of same sanctions being applied to any sanction evader, led lobbying effort by terrorist victim groups from US, UK and France. See Paul Lewis, Air Blockade of Libya Goes Into Effect, NY Times, 4/15/92.

Anti-Terrorism and Effective Death Penalty Act of 1996, lobbied successfully for amendments to Foreign Sovereign Immunity Act permitting terrorist victims to sue in US District Courts state sponsors of terrorism, that has allowed thousands of US victims of state sponsored terrorism to sue in US courts and led to billions of dollars in civil recoveries.

Advocated for Federal takeover of aviation security in testimony before Congress after 9/11 Terrorist Attacks and organized coalition to advocate for establishment of the Transportation Security Administration, 9-11/2001.

Advocated successfully for no-fly zone in Libya in 2011, Congressional resolution seeking justice for Libyan terrorist acts in 2012, fair compensation for uncompensated victims of Libyan terrorism in 2012

Airline Passenger Bill of Rights 2.0 2012-present, prepared and advocated for comprehensive reform for airline passengers, 33 legislative proposals.

Passenger protection provisions in FAA Reauthorization Act of 2018 including mandated seat standards.

Repeal of federal regulations blocking major US new airport construction needed to relieve congestion delays, proposals approved by Aviation Rulemaking Advisory Committee and FAA in 2017 and awaiting action by DOT Task Force on Regulatory Reform.

Inflight sexual assault and harassment, successfully advocated for 2018 legislation requiring DOT to empanel task force and make reforms, filed FOIA requests revealing extent of complaints, counseled victims and organized coalition for reform, presentations to FBI, DOJ and DOT Task Force on Inflight Sexual Assault and Harassment re needed reforms, 2019.

Speeches and presentations to Global Business Travel Association (San Diego Convention, 2018) re airline fees, to DOT Advisory Committee on Aviation Consumer Protection (2019) re unilateral airline flight cancelations and schedule changes (2019) ; to GAD Airport Development Conference (Chicago, 2019) re needed airport reforms.