

Bellingham — Investigative Briefing Memorandum

PUBLIC RECORDS ANALYSIS · REAL TRUTH MA · RETRIEVED SEPTEMBER 11, 2026

Bellingham

March 2026 (Revised)

EXECUTIVE SUMMARY

The Town of Bellingham FOIA return represents a high-value document set comprising approximately 98 documents spanning January 2025 through December 2025. This return provides comprehensive documentation of the NFG network's coordinated campaign to advance Nicotine-Free Generation policies in Bellingham, including pre-hearing coordination, external advocate involvement, cross-municipality intelligence sharing, template distribution, and organized youth activism.

The documents reveal that Sigalle Reiss (Director, Brookline Public Health) initiated contact with Bellingham Health Agent Dylan Labonte on January 10, 2025—immediately copying Maureen Buzby (Regional Tobacco Prevention Program Manager, City of Melrose) and identifying a "local ad-hoc group" available to testify at Board meetings. Over the following five months, Buzby served as central coordinator, connecting Bellingham officials with the "MA NFG Team"—including law school professors Mark Gottlieb (Northeastern/PHAI) and Katharine Silbaugh (BU)—providing "elevator speech" scripts, orchestrating expert attendance at the May 28, 2025 Town Meeting, and deploying youth activists from Needham to distribute flyers at the meeting entrance.

Most significantly, these documents reveal the systematic infrastructure of the NFG campaign: a self-identified "MA NFG Team" that holds regular meetings, divides testimony topics among speakers for public hearings, deploys subject matter experts across municipal boundaries, mails postcards to targeted voters, and coordinates youth activists—all while state-funded programs (MTCP) track NFG policy adoption as a program deliverable.

KEY DOCUMENT EXCERPTS

"NFG Team" Reveals Organized Hearing Strategy

From: Buzby, Maureen <mbuzby@CityofMelrose.org>

To: RGilberti@BellinghamMA.org

Date: Friday, May 23, 2025 at 6:43 PM

Subject: FW: Somerville Public Hearing

"When our 'NFG Team' plans for a public hearing we divvy up topics as there is usually a time limit for each speaker. I usually do the reminder about the industry's marketing tactics. Someone else will describe the policy itself. Another will talk about medical conditions caused or exacerbated by smoking. And so on."

"This is a typical two-minute presentation."

SIGNIFICANCE: This email explicitly names the "NFG Team" as an organized group that plans coordinated testimony for public hearings across municipalities. The division of labor—marketing tactics, policy description, medical conditions—reveals a professionalized advocacy operation designed to manufacture the appearance of diverse community support. Buzby's forwarding of this strategy to a Bellingham official confirms this approach was being deployed for Bellingham's proceedings.

Reiss Identifies "Ad-Hoc Group" and Copies Buzby on Initial Contact

From: Sigalle Reiss <sreiss@brooklinema.gov>

To: Dylan Labonte <DLabonte@bellinghamma.org>

Date: Friday, January 10, 2025 at 11:00 AM

Subject: RE: Recent Tobacco Ban

"Excited to hear your Board is interested in the Nicotine Free Generation (NFG) policy. I am attached a recent guide, with sample regulations, to help local boards of health learn about and adopt the policy. I have also cc'd Maureen Buzby. Both of us are involved with a local ad-hoc group that can help testify at Board meeting/hearings and help answer any questions."

SIGNIFICANCE: This is the first documented contact between the NFG network and Bellingham. Reiss's response to a routine inquiry immediately (1) provides template regulations, (2) copies the central network coordinator (Buzby), and (3) identifies a "local ad-hoc group" ready to testify. This demonstrates that the NFG network maintains a standing infrastructure to respond to municipal interest and deploy advocacy resources—nearly five months before any public hearing.

Buzby Activates "MA NFG Team" Legal Experts

From: Buzby, Maureen <mbuzby@cityofmelrose.org>

To: Dylan Labonte; Sigalle Reiss

Date: Wednesday, January 22, 2025 at 1:59 PM

Subject: RE: Recent Tobacco Ban

"I've copied a couple of the MA NFG Team members here as they may be able to help with your request which is above my pay grade. Seriously, they have the appropriate credentials to be of assistance with any legal documents."

"Our team will be meeting Monday evening so if you have any other questions or if there are any other ways in which we can help prior to town meeting please let us know."

SIGNIFICANCE: Buzby explicitly names the "MA NFG Team" and reveals it holds regular meetings ("our team will be meeting Monday evening"). She deploys two law school professors—Mark Gottlieb (Northeastern/PHAI) and Katharine Silbaugh (BU)—to provide legal assistance to a municipal official. This confirms a structured advocacy team with academic legal resources operating across Massachusetts municipalities.

Cross-Municipality Youth Deployment and Voter Targeting

From: Buzby, Maureen <mbuzby@CityofMelrose.org>

To: rgilberti@bellinghamma.org

Date: Wednesday, May 28, 2025 at 3:29 PM

Subject: Re: e-intro

"One more thing. I believe two young people from Needham (NFG youth activists) may be handing out flyers as attendees enter the meeting tonight."

"An adult activist from Belchertown mailed post cards to likely voters."

"Some good grassroots work happening."

SIGNIFICANCE: This email documents youth activists from Needham being deployed to a Bellingham Town Meeting and an adult activist from Belchertown mailing postcards to Bellingham voters—clear evidence of cross-municipality coordination. Buzby's characterization of this organized, multi-town operation as "good grassroots work" reveals the network's strategy of manufacturing the appearance of organic local support through coordinated external mobilization.

Buzby Offers Law Professor for Town Meeting Q&A

From: Buzby, Maureen <mbuzby@cityofmelrose.org>

To: Dylan Labonte <DLabonte@bellinghamma.org>

Date: Friday, May 23, 2025 at 10:54 AM

Subject: RE: Recent Tobacco Ban

"Mark Gottlieb, NU Law School professor and Director of NU PHAI (Public Health Policy Institute) said he is available for Town Meeting if that is helpful. He's so good at answering audience questions. And he worked with Brookline on their town by-law."

"I have a few sample 'elevator speech' scripts if that would be of any help."

SIGNIFICANCE: Buzby deploys an academic legal expert—the same professor who drafted Brookline's by-law—to support Bellingham's Town Meeting. The offer of "elevator speech scripts" confirms the existence of standardized talking points distributed across municipalities. Gottlieb's role in both drafting the original Brookline policy and supporting its replication elsewhere demonstrates the network's strategy of using academic credentials to legitimize coordinated advocacy.

Bellingham Official Credits External Advocates as "Invaluable"

From: Gilberti, Rick <RGilberti@BellinghamMA.org>

To: Maureen Buzby <mbuzby@cityofmelrose.org>

Date: Wednesday, May 28, 2025 at 12:57 PM

Subject: Re: e-intro

"The information you provided me was invaluable. I couldn't have done it without it."

"See you at the high school tonight."

SIGNIFICANCE: A Bellingham municipal official explicitly states he could not have presented the NFG policy without external advocate materials. This confirms that the Town Meeting presentation was substantively dependent on NFG network resources—undermining the premise that the policy reflected locally-driven deliberation. The "see you at the high school tonight" confirms physical attendance by external advocates at the proceedings.

Labonte Requests External Advocates for Town Meeting Support

From: Dylan Labonte <DLabonte@bellinghamma.org>

To: Sigalle Reiss <sreiss@brooklinema.gov>

Date: Thursday, May 22, 2025 at 12:56 PM

Subject: RE: Recent Tobacco Ban

"We're a bit concerned about the town meeting because we don't know what questions to expect from our residents when we get to the 'Comments/Q&A' portion of the night."

"I know it's a big ask, but if either of you are available Wednesday May 28th at 7:30pm, it would be a huge help to have you in attendance to assist us with difficult questions or comments."

SIGNIFICANCE: The Bellingham Health Agent explicitly requests external advocates from Brookline and Melrose to attend a Bellingham Town Meeting and assist with public Q&A. This demonstrates that local officials viewed external network support as essential to navigating resident scrutiny—raising questions about whether the policy reflected genuine local deliberation or externally managed advocacy.

Buzby Provides Cross-Municipality Intelligence and Policy Guidance

From: Buzby, Maureen <mbuzby@cityofmelrose.org>

To: Dylan Labonte <DLabonte@bellinghamma.org>

Date: Thursday, May 22, 2025 at 4:44 PM

Subject: RE: Recent Tobacco Ban

"Hopkinton adopted NFG at their BOH meeting last week. They selected 1/1/2005 as the birthday cutoff and 7/1/2025 as the effective date. Please feel free to add Hopkinton to your list of municipalities that have already adopted NFG."

"I would suggest, if you can at this time, that you change the suggested birthdate restriction to 1/1/2005 so that your regulation will not prohibit anyone who is already 21 on the effective date from purchasing tobacco products."

SIGNIFICANCE: Buzby provides real-time intelligence on other municipalities' NFG adoption progress and actively advises on policy specifics (birthdate cutoff). This demonstrates the network's role in standardizing policy across municipalities and sharing implementation details to normalize adoption. The suggestion to change the birthdate restriction reveals Buzby's influence over the substantive content of Bellingham's regulation.

Labonte Requests Editable Template of Brookline Regulation

From: Dylan Labonte <DLabonte@bellinghamma.org>

To: Sigalle Reiss <sreiss@brooklinema.gov>

Date: Wednesday, January 22, 2025 at 11:25 AM

Subject: RE: Recent Tobacco Ban

"I'm working with our lawyers on the next steps to get the regulation prepared, and I was just wondering if you may have an 'editable' copy of the document I've attached?"

SIGNIFICANCE: This request for an editable copy of the Brookline regulation confirms template-based policy replication. Rather than drafting original legislation reflecting Bellingham's specific community needs, the Health Agent sought to adapt an existing template—demonstrating that NFG policies across municipalities are derivatives of a common model, not independently conceived local initiatives.

PUBLIC HEARING OBSERVATIONS

The following observations are drawn from observation of public Board of Health and City Council meetings in Massachusetts municipalities considering NFG adoption.

"When our 'NFG Team' plans for a public hearing we divvy up topics as there is usually a time limit for each speaker. I usually do the reminder about the industry's marketing tactics. Someone else will describe the policy itself. Another will talk about medical conditions caused or exacerbated by smoking. And so on." — Maureen Buzby, email to Bellingham Tobacco Agent, May 23, 2025

"I believe two young people from Needham (NFG youth activists) may be handing out flyers as attendees enter the meeting tonight. An adult activist from Belchertown mailed post cards to likely voters. Some good grassroots work happening." — Maureen Buzby, email to Bellingham Tobacco Agent, May 28, 2025

KEY FINDINGS

Pre-Hearing Coordination Network Confirmed The documents establish that external advocate contact with Bellingham began on January 10, 2025—approximately four and a half months before the May 28, 2025 Town Meeting where the NFG by-law was voted upon. During this pre-hearing period, the NFG network: provided sample regulations and an NFG guide; activated the "MA NFG Team" including two law professors; held regular team meetings; provided "elevator speech" scripts and preparation materials; coordinated expert attendance at the Town Meeting; and deployed youth activists and postcard campaigns targeting Bellingham voters. Health Agent Dylan Labonte and Tobacco Agent Rick Gilberti both coordinated extensively with external advocates before the public proceedings.

"MA NFG Team" Coordination Documented Buzby explicitly references the "MA NFG Team" and "NFG Team" multiple times across the document set. She reveals that the team holds regular meetings ("Our team will be meeting Monday evening"), divides public hearing testimony among members by topic area, and deploys "subject matter experts" including law school professors and physicians to support municipalities considering NFG. This confirms the existence of an organized advocacy infrastructure operating across Massachusetts.

Template Policy Replication Confirmed Bellingham's NFG regulation was derived directly from the Brookline model. Labonte requested an "editable" copy of the Brookline regulation on January 22, 2025. Reiss provided an "NFG Guide" with "sample regulations." Buzby subsequently provided "elevator speech scripts" and advised on

specific policy parameters (the 1/1/2005 birthdate cutoff). The Warrant Article 19 slide deck presented at Town Meeting listed 15+ municipalities with identical policies—demonstrating systematic replication rather than independent local policy development.

Cross-Municipality Mobilization for Town Meeting For the May 28, 2025 Town Meeting, the NFG network mobilized resources from at least four external municipalities: Buzby (Melrose) provided preparation materials and attended in person; Gottlieb (Northeastern/Boston) was offered for Q&A support; youth activists from Needham distributed flyers at the meeting entrance; and Ken Elstein (Belchertown) mailed postcards to "likely voters." Labonte confirmed to the Town Moderator and Town Administrator that "Maureen Buzby from the city of Melrose will be in attendance to assist us with answering any difficult questions."

MAHB, MHOA, and MTCP Network Integration The documents reveal integration between professional associations and the NFG campaign. Cheryl Sbarra (MAHB) connected Bellingham with MHOA tobacco control resources. Sarah McColgan (MHOA) referred Parivallal Thillaigovindan—a known MTCP regional coordinator—to Bellingham for a tobacco agent position. MHOA hosted an NFG webinar in July 2024 featuring Maureen Buzby and Chris Banthin (PHAI), distributed to Bellingham officials. The NFG Coalition newsletters confirm that "MTCP has included NFG in its Board of Health Work Plan," establishing state program tracking of local NFG adoption.

Coordinated Opposition Response The FOIA return includes opposition emails sent via grassroots advocacy platforms (foradvocacy.com, sendgrassroots.com, forgrassroots.com) with identical templated language opposing NFG. Stephen Helfer from Cambridge Citizens for Smokers' Rights sent opposition emails on March 4, 2025. One opposition email from Emily Wieja explicitly states that "paid tobacco control activists have coordinated this policy proposal, and it will continue to be raised in different communities and towns in Massachusetts"—a characterization that the documentary record substantially corroborates.

NETWORK DATA POINTS AND FUNDING CONNECTIONS

MTCP (Massachusetts Tobacco Cessation and Prevention Program): NFG Coalition newsletters confirm "MTCP has included NFG in its Board of Health Work Plan." This state-funded program tracks local NFG adoption as an apparent deliverable. Buzby identifies herself as a "Regional Tobacco Prevention Program Manager"—a role funded through MTCP infrastructure.

MHOA (Massachusetts Health Officers Association): Hosted July 2024 NFG webinar featuring Buzby and Chris Banthin (PHAI); distributed to Bellingham staff. MHOA's Tobacco Control Program (McColgan) provides enforcement infrastructure through MOUs funded via DPH contract.

MAHB (Massachusetts Association of Health Boards): Cheryl Sbarra (Executive Director/Senior Staff Attorney) served as gateway connecting Bellingham with MHOA tobacco control resources, demonstrating professional association integration with advocacy infrastructure.

PHAI (Public Health Advocacy Institute, Northeastern): Mark Gottlieb (Director) and Chris Banthin (Program Manager/Senior Staff Attorney) both actively supporting NFG adoption—providing legal expertise, public hearing presentations, and template policy language.

The 84 (MA Youth Fighting Tobacco and Vaping): NFG Coalition September 2025 newsletter references The 84 making NFG its "Stipend Project for Fall 2025"—indicating state-connected youth programs actively promoting NFG policy adoption.

City of Melrose: Maureen Buzby operates as "Regional Tobacco Prevention Program Manager" using Melrose municipal email and address while coordinating NFG advocacy across multiple municipalities—raising questions about the use of municipal resources for regional advocacy.

FINANCIAL CONTEXT (IRS FORM 990 ANALYSIS)

The following financial information, derived from IRS Form 990 filings of organizations identified in this municipality's FOIA return, provides context on the institutional funding infrastructure supporting NFG advocacy:

The Public Health Advocacy Institute (PHAI), directed by Mark Gottlieb at Northeastern University School of Law, reported total revenue of \$21.2 million in FY2023—a dramatic increase from approximately \$740,000 in the prior year. Gottlieb's compensation was reported as approximately \$325,000. PHAI provides pro bono legal defense to any municipality adopting NFG.

The Massachusetts Tobacco Cessation and Prevention Program (MTCP), funded by the Department of Public Health, operates through regional collaboratives that serve as the primary pipeline for connecting municipalities with NFG advocacy resources and template regulations.

The Massachusetts Health Officers Association (MHOA) received approximately \$4 million in government grants and reported paying \$1.048 million to BME Strategies. MHOA functions as the professional network through which local health directors receive NFG advocacy materials and template regulations.

The Massachusetts Association of Health Boards (MAHB) received approximately \$2.1 million in government grants. MAHB General Counsel Cheryl Sbarra provides legal guidance to Boards of Health considering NFG and has hosted conferences featuring NFG advocacy content.

EVIDENCE SUMMARY

Evidence Category	Status	Summary
PRE-HEARING COORDINATION	CONFIRMED	External advocate contact began January 10, 2025—four and a half months before the May 28 Town Meeting. Extensive coordination of hearing logistics, expert attendance, and preparation materials documented throughout.
TEMPLATE USAGE	CONFIRMED	Labonte requested editable Brookline regulation. Reiss provided NFG Guide with sample regulations. Buzby provided "elevator speech scripts." Bellingham's final by-law derived from Brookline model with standardized NFG birthdate cutoff.
NETWORK ACTIVITY	CONFIRMED	Buzby explicitly references "MA NFG Team" and "NFG Team" with regular meetings, divided testimony roles, and deployable experts. Multiple known network players appear: Buzby, Reiss, Gottlieb, Silbaugh, Elstein, Sbarra, Thillaigovindan.
CROSS-MUNICIPALITY COORDINATION	CONFIRMED	Advocates from Melrose, Brookline, Belchertown, and Needham actively supported Bellingham's NFG adoption. Buzby provided Hopkinton adoption intelligence. Elstein mailed postcards to Bellingham voters. Needham youth distributed flyers at Town Meeting.
YOUTH RECRUITMENT	CONFIRMED	Buzby documented "two young people from Needham (NFG youth activists)" distributing flyers at the Bellingham Town Meeting entrance. NFG newsletter references The 84 making NFG its youth "Stipend Project."
PREDETERMINED OUTCOME	SUGGESTED	No explicit "committed to passing" statement, but the extensive pre-hearing coordination—including Gilberti's statement that he "couldn't have done it without" Buzby's materials and Labonte's characterization of advocates as needed to handle "difficult questions"—suggests the public process was managed to ensure passage rather than conducted as neutral fact-finding.

Evidence Category	Status	Summary
FUNDING CONNECTION	CONFIRMED	MTCP inclusion of NFG in BOH Work Plan establishes state program tracking. Buzby's title as "Regional Tobacco Prevention Program Manager" indicates MTCP-funded position. MHOA's DPH-funded tobacco control program provided enforcement infrastructure.

What These Documents Demonstrate

A self-identified "MA NFG Team" operates as a structured advocacy organization with regular meetings, divided testimony roles, and deployable academic experts. External advocates contact local officials within hours of initial inquiry and immediately activate network resources—months before any public process. Template regulations, "elevator speech scripts," and NFG guides create standardized policy adoption across municipalities, undermining claims of organic local initiative. Youth activists are recruited and deployed across municipal boundaries to create the appearance of local grassroots support. Local officials function as network participants rather than neutral administrators of public process—explicitly relying on external advocate materials for their own Town Meeting presentations. State-funded programs (MTCP) and professional associations (MAHB, MHOA) are integrated into the NFG advocacy infrastructure, blurring the line between public health administration and policy advocacy.

CONCLUSION

The Town of Bellingham FOIA return constitutes a high-value document set that comprehensively documents the NFG network's coordinated campaign. With approximately 98 documents spanning January through December 2025, this return provides detailed insight into the systematic infrastructure underlying NFG policy adoption in Massachusetts municipalities.

The most significant finding is the explicit documentation of the "MA NFG Team" as a structured advocacy organization that divides public hearing testimony among its members, holds regular meetings, deploys academic legal experts across municipal boundaries, and coordinates youth activists and voter-targeted postcard campaigns—all while a Bellingham official acknowledges he "couldn't have done it without" the network's materials. This establishes that the public process in Bellingham was substantively dependent on external advocacy resources, warranting investigation into whether similar patterns exist across the 21 municipalities that have adopted NFG.

The documents further reveal the integrated nature of the NFG advocacy network: professional associations (MHOA, MAHB) serving local health officials are embedded in the advocacy infrastructure; academic institutions (Northeastern/PHAI, BU) provide legal expertise and policy templates; state-funded programs (MTCP) track NFG adoption as a program metric; and regional coordinators (Buzby) deploy organized teams of advocates to support local adoption—all while local health officials function as network champions rather than neutral administrators of public process. This evidence strongly supports the investigative thesis that NFG policies reflect coordinated advocacy rather than organic local demand.

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