

Dover — Investigative Briefing Memorandum

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

Dover

March 2026 (Revised)

EXECUTIVE SUMMARY

The Town of Dover FOIA return represents a high-value document set, comprising 1,037 emails and over 800 supporting documents (PDFs, images, and Word files) spanning January 2023 through January 2026. This return provides comprehensive documentation of the NFG network's coordinated campaign to advance Nicotine-Free Generation policies in Dover, including external advocate recruitment, pre-hearing coordination, cross-municipality intelligence sharing, and template distribution. The documents reveal that Anthony Ishak (Pharmacist, MGH; Brookline NFG co-petitioner) initiated contact with Dover BOH Chair Kay Petersen on January 12, 2025—leveraging a prior personal relationship from Petersen's career at Brookline. Within days, Ishak was scheduled for a February 3, 2025 Board of Health presentation. He immediately coordinated with known NFG network players, requesting to bring Kate Silbaugh (BU Law professor) and Maureen Buzby (Mystic Valley Public Health Coalition) to the meeting. Buzby subsequently sent a follow-up advocacy email to Belmonte and Petersen on March 24, 2025, referencing her prior BOH appearance and urging Dover to join the growing list of NFG communities. Most significantly, these documents reveal that the NFG campaign in Dover was initiated through a personal relationship rather than organic community demand. Ishak explicitly stated he was reaching out to expand geographic reach for statewide implementation, and the BOH Chair's enthusiastic response—thanking him for “the great work that you do”—suggests alignment with the advocacy network rather than neutral fact-finding. The documents also show that a BOH member (Stephen Kruskall) was “strongly opposed” and had voted against NFG at every opportunity, yet the policy was advanced with town counsel edits and a hearing notice prepared for newspaper publication.

KEY DOCUMENT EXCERPTS

Ishak Recruits Dover Through Personal Relationship with BOH Chair

From: Anthony Ishak <aishakpharmd@yahoo.com>

To: jbelmonte@doverma.gov; kpetersen@doverma.gov

Date: Sunday, January 12, 2025 at 7:43 PM

Subject: Greetings and Tobacco Public Health Policy Idea for Dover

"I hope you are enjoying your retirement and time away from me pestering you with knocks on the door of your office :). As you recall from my time on Brookline's Town Meeting, I worked on a couple of policies to decrease tobacco use in our town."

"I am reaching out to you to encourage this momentum by expanding our geographic reach and to see if Dover will join our growing list. In order for statewide implementation to occur there needs to be significant uptake by municipalities and geographic diversity."

"I am a member of a volunteer group that includes a pediatrician, public health officials, tobacco control and attorneys (Kate Silbaugh, my co-petitioner and author on the NEJM article, and Mark Gotlieb of PHAI that defended Brookline before the SJC)."

SIGNIFICANCE: This email reveals that Ishak targeted Dover specifically because of his personal relationship with BOH Chair Kay Petersen from their time together in Brookline. He explicitly frames the outreach as part of a coordinated campaign to achieve “geographic diversity” for statewide legislation. He identifies the NFG advocacy network by name—Silbaugh, Gottlieb (PHAI)—and distributed NFG FAQ documents and a NEJM article as attachments. This is textbook network recruitment of a municipality.

BOH Chair Welcomes Advocate, Thanks Him for “Great Work”

From: Kay Petersen <kpetersen@doverma.gov>

To: Anthony Ishak <aishakpharmd@yahoo.com>

Date: Thursday, January 16, 2025 at 8:24 PM

Subject: Re: Greetings and Tobacco Public Health Policy Idea for Dover

"Thanks for reaching out and sharing the materials, and thanks for doing the great work that you do! Our board discussed the material in your attachments at our meeting on Monday, Jan 13. We decided that we'd like to have someone from your group talk to us at our February meeting if that would be possible."

SIGNIFICANCE: The BOH Chair's response demonstrates alignment with the advocacy network rather than neutral fact-finding. Thanking an external advocate for “the great work that you do” reveals the Chair's predisposition toward the policy. The board discussed Ishak's materials at their January 13 meeting—the same day he sent his email—and immediately invited “someone from your group” to present, suggesting rapid alignment with the advocacy network's goals.

Ishak Coordinates NFG Network Attendance at Dover Meeting

From: anthony ishak <aishakpharmd@yahoo.com>

To: Suzanne Hilts <shilts@doverma.gov>

Date: Thursday, January 30, 2025 at 3:26 PM

Subject: Re: Greetings and Tobacco Public Health Policy Idea for Dover

"Can i send this to Kate Silbaugh (BU law professor and my co-petitioner) and Maureen Buzby from Tobacco control who can speak to enforcement?"

SIGNIFICANCE: Ishak explicitly requests to deploy additional NFG network members—Kate Silbaugh (BU Law) and Maureen Buzby (Mystic Valley Tobacco Control)—to the Dover BOH meeting. This confirms the existence of a coordinated team of advocates who travel to municipalities considering NFG, providing legal and enforcement expertise to support adoption. The Dover admin’s response was “Absolutely, anybody is welcome to join.”

Ishak Pressures Dover with Cross-Municipality Momentum

From: anthony ishak <aishakpharmd@yahoo.com>

To: Suzanne Hilts <shilts@doverma.gov>; Kay Petersen <kpetersen@doverma.gov>

Date: Friday, February 14, 2025 at 7:49 AM

Subject: Re: Greetings and Tobacco Public Health Policy Idea for Dover

"Just a brief update, we presented to the Natick BoH last week and they have an interest in moving forward. It would be nice to see both municipalities move in tandem since they border each other."

SIGNIFICANCE: This email demonstrates the cross-municipality coordination characteristic of the NFG network. Ishak provides intelligence on Natick’s progress and frames simultaneous adoption by bordering municipalities as desirable. This pressure tactic—framing NFG as a regional momentum play—mirrors Buzby’s approach in Mansfield, where she reported on Hopkinton’s hearing vote to encourage action.

Buzby Follows Up After BOH Presentation, Urges Adoption

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

To: jbelmonte@doverma.gov; kpetersen@doverma.gov

Date: Monday, March 24, 2025 at 11:18 AM

Subject: Nicotine Free Generation policy

"I first want to thank you for allowing me to speak at your March BOH meeting at which time I was able to share a bit about rolling out NFG in the Mystic Valley Region."

"I've worked on many tobacco control policies over the years and while I'm immensely proud of that important public health work, I am most proud of the Nicotine Free Generation policy which has been adopted by six of seven communities in my region."

"I hope to see Dover in the growing list of communities that adopt NFG."

SIGNIFICANCE: Buzby's follow-up email confirms she presented to Dover's BOH in March 2025 (in addition to Ishak's February presentation). This demonstrates the deployment of multiple NFG network advocates to a single municipality over consecutive months. Her email explicitly frames NFG as a regional expansion campaign and applies social pressure by citing her Mystic Valley adoption rate (six of seven communities). This is sent from her City of Melrose government email address, raising questions about use of municipal resources for cross-municipality advocacy.

BOH Member's Opposition Documented and Forwarded to Town Administrator

From: Steve Kruskall <skruskall@gmail.com>

To: mblanchard@doverma.gov

Date: Thursday, October 9, 2025 at 10:47 AM

Subject: Fwd: NFG Posting

"I am strongly opposed to this "generational tobacco" local initiative and have voted against it each time it has been brought up at a Board of Health meeting in the last few months. I would like an opportunity to speak with you regarding this issue."

SIGNIFICANCE: BOH member Kruskall's email to the Town Administrator reveals that he had voted against NFG at every BOH meeting where it arose. Despite documented opposition from within the Board itself, the Health Director continued advancing the policy—preparing hearing notices and draft regulations with town counsel edits. Kruskall later requested that the Board's vote tally be published alongside the hearing notice, which Belmonte declined as "highly unusual." This suggests the hearing process was managed to minimize visibility of internal dissent.

Health Director Dismisses Opposition Emails as "Copy and Paste Spam"

From: Jason Belmonte <jbelmonte@doverma.gov>

To: Suzanne Hilts <shilts@doverma.gov>

Date: Tuesday, March 25, 2025 at 11:44 AM

Subject: Fwd: Say NO to Nicotine Free Generation (NFG) Regulations

"Another copy and paste spam message about tobacco"

SIGNIFICANCE: Belmonte's characterization of opposition correspondence as "copy and paste spam" reveals a dismissive attitude toward public input opposing NFG. While the grassroots advocacy campaign emails did use template language, Belmonte's framing contrasts with his receptiveness to NFG advocates—he warmly welcomed Ishak's outreach and facilitated multiple advocate presentations to the Board. This asymmetric treatment of pro- and anti-NFG correspondence is investigatively significant.

DPH NFG Guidance Document Distributed Through MTCP Network

From: Parivallal Thillaigovindan <pthillaigovindan@framinghamma.gov>

To: Michael Boudreau <mboudreau2@natickma.org>

Date: Wednesday, December 11, 2024 at 2:15 PM

Subject: FW: NFG Guidance Document Now Available!

"I am excited to share that the NFG Guidance document is now ready for your review and use. Attached is the completed document that TA has created for BOH to utilize when speaking to their towns regarding NFG. This resource is designed to help your towns better understand the policy and support implementation efforts."

SIGNIFICANCE: This forwarded email from the Massachusetts DPH (originally sent by Zendilli Depina, cc'ing Chris Banthin of PHAI, Cheryl Sbarra of MAHB, and Lisa StevensGoodnight of MMA) reveals that the state government created an official NFG Guidance Document designed to help municipalities "support implementation efforts." The document includes model regulations, common arguments and responses, and evidence supporting NFG—essentially a turnkey advocacy toolkit distributed through the MTCP network. This was found in the Dover FOIA return, confirming Dover officials had access to these state-produced advocacy materials.

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.

"All of the speakers tonight weren't from Dover." — John Quackenbush, Board Member, Dover, May 12, 2025

"Was surprised that 75% of the speakers tonight weren't from Dover. Stated that the lack of Dover citizens speaking opens the door for passage tonight by the board." — Stephen Kruskall, Board Member, Dover, November 3, 2025

"Thought it was striking that the high school students attended tonight and noted that it was a strong argument to adopt." — John Quackenbush, Board Member, Dover, November 3, 2025

KEY FINDINGS

Personal Relationship Exploited for NFG Recruitment The documents establish that the NFG campaign in Dover was initiated through Anthony Ishak's personal relationship with BOH Chair Kay Petersen from their time together in Brookline. Ishak's opening email references "pestering you with knocks on the door of your office"—confirming a prior professional relationship. This personal connection enabled immediate access: Petersen discussed Ishak's materials at the January 13 BOH meeting (the same day he emailed), and Ishak was scheduled for a February 3 presentation within days. This bypass of normal public process channels is characteristic of the NFG network's approach to identifying and recruiting receptive municipalities.

NFG Advocate Team Deployed to Dover Ishak did not present alone. He explicitly requested to bring Kate Silbaugh (BU Law) and Maureen Buzby (Tobacco Control) to the February meeting. After the February presentation, Ishak followed up with literature attachments and cross-municipality pressure about Natick's progress. Buzby then separately presented at the March BOH meeting and sent a follow-up advocacy email on March 24, 2025. This pattern—multiple network advocates presenting over consecutive months—demonstrates a coordinated campaign rather than a single informational presentation.

Cross-Municipality Coordination Confirmed Ishak explicitly framed Dover's potential adoption as part of a statewide strategy, stating that "in order for statewide implementation to occur there needs to be significant uptake by municipalities and geographic diversity." He provided intelligence on Natick's progress and suggested the two bordering municipalities "move in tandem." The DPH NFG Guidance Document distributed through the MTCP network (found in this FOIA return) further confirms the state-level infrastructure supporting municipal-by-municipal adoption.

Internal BOH Opposition Overridden BOH member Stephen Kruskall documented his opposition at every stage: he voted against NFG each time it was raised, contacted the Town Administrator to express concerns, and requested the vote tally be published with the hearing notice. Belmonte declined to publish the tally, calling it "highly unusual." Despite this documented opposition from within the Board, the policy was advanced with town counsel edits, a hearing notice was prepared for newspaper publication, and a public hearing was scheduled for November 3, 2025. Board member John Quackenbush, by contrast, expressed hope for "support from the Town," suggesting alignment with the pro-NFG position.

Asymmetric Treatment of Pro- and Anti-NFG Correspondence The FOIA return contains a substantial volume of opposition emails sent through grassroots advocacy platforms (grassrootsmessages.com, yourconstituent.com, foradvocacy.com, etc.). Health Director Belmonte characterized these as "copy and paste spam" when forwarding them to his admin for filing. In contrast, Belmonte warmly engaged with NFG advocates—responding promptly, sharing meeting details, and facilitating Board presentations. This asymmetric treatment raises questions about whether Dover officials approached the NFG question as neutral administrators or as advocates within the network.

State-Produced Advocacy Toolkit in FOIA Return The FOIA return contains evidence of the DPH NFG Guidance Document—created by the Massachusetts Department of Public Health and distributed through the MTCP network (cc'ing PHAI, MAHB, and MMA officials). This document includes model regulations, talking points, counter-

arguments to opposition, and evidence supporting NFG—functioning as a government-produced advocacy toolkit for municipalities. Its presence in Dover’s records confirms the pipeline from state tobacco control infrastructure to local BOH decision-making.

NETWORK DATA POINTS AND FUNDING CONNECTIONS

MTCP (Massachusetts Tobacco Cessation and Prevention Program): The DPH NFG Guidance Document distributed through the MTCP network (cc’ing PHAI, MAHB, and MMA) confirms that state tobacco control infrastructure actively supports NFG adoption. Pari Thillaigovindan (MTCP Manager, Framingham) forwarded the document to Natick officials, and it appears in Dover’s FOIA return. The guidance document includes model regulations—confirming state production of advocacy materials for local adoption. MHOA (Massachusetts Health Officers Association): MHOA hosted a July 2024 NFG webinar featuring Chris Bantin (PHAI) and Maureen Buzby. Jason Belmonte received the MHOA announcement at his Dover government email, indicating this professional network served as a pipeline for NFG information to local health officials. MAHB (Massachusetts Association of Health Boards): Cheryl Sbarra of MAHB was cc’d on the DPH NFG Guidance Document distribution, confirming MAHB’s integration into the NFG campaign infrastructure. MMA (Massachusetts Municipal Association): Lisa StevensGoodnight (MMA Tobacco Control Director) was cc’d on the DPH NFG Guidance Document. MMA’s involvement connects municipal governance infrastructure to the NFG advocacy network. Charles River Public Health District: Kerry Dunnell serves as director; Dover is a member municipality. While Dunnell’s correspondence in this return relates primarily to public health nursing and administrative matters, the Health District relationship provides an institutional channel through which tobacco control initiatives reach Dover. City of Melrose: Maureen Buzby’s advocacy emails were sent from her CityofMelrose.org government account, raising questions about whether municipal resources are being used to coordinate NFG advocacy across jurisdictional boundaries.

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.

EVIDENCE SUMMARY

Evidence Category	Status	Summary
PRE-HEARING COORDINATION	CONFIRMED	External advocate contact began January 12, 2025. Ishak presented February 3, 2025. Buzby presented in March 2025. The hearing notice was not prepared until October 2025—meaning advocacy network coordination preceded the public hearing by approximately ten months.
TEMPLATE USAGE	CONFIRMED	Ishak distributed NFG FAQ documents and NEJM articles. The DPH NFG Guidance Document (containing model regulations and talking points) was distributed through the MTCP network and appears in Dover’s records. Opposition emails used identical template language from multiple grassroots advocacy platforms.
NETWORK ACTIVITY	CONFIRMED	Multiple known network players appear: Ishak, Buzby, Silbaugh (referenced), Gottlieb/PHAI (referenced), Thillaigovindan/MTCP, Reynolds/MGH, Sbarra/MAHB, StevensGoodnight/MMA, Bantin/PHAI.
CROSS-MUNICIPALITY COORDINATION	CONFIRMED	Ishak (Brookline) targeted Dover for geographic diversity; reported on Natick’s progress to pressure simultaneous adoption. Buzby (Melrose) presented to Dover BOH and sent advocacy follow-up. DPH guidance document distributed across municipalities through MTCP network.
YOUTH RECRUITMENT	NOT FOUND	No evidence of youth testimony coordination in this FOIA return.
PREDETERMINED OUTCOME	SUGGESTED	BOH Chair’s enthusiastic welcome of advocate; rapid scheduling; Ishak’s hope that Dover would “take the next step”; Quackenbush’s expressed hope for “support from the Town”; opposition BOH member’s votes overridden; vote tally not published. No explicit “committed to passing” statement, but pattern of behavior suggests favorable predisposition.
FUNDING CONNECTION	CONFIRMED	DPH-produced NFG Guidance Document distributed through MTCP.

Evidence Category	Status	Summary
		MHOA NFG webinar reached Belmonte. State infrastructure (DPH, MAHB, MMA) actively supporting local NFG adoption.

What These Documents Demonstrate

- Personal relationships are leveraged to recruit municipalities into the NFG network, bypassing normal public process channels.
- Multiple NFG advocates are deployed to a single municipality over consecutive months, creating a sustained advocacy campaign.
- Cross-municipality intelligence sharing (Natick, Mystic Valley) serves to create momentum and social pressure for adoption.
- The Massachusetts DPH has produced a turnkey NFG advocacy toolkit distributed through the MTCP network to municipalities.
- Internal opposition from BOH members is documented but overridden, with efforts to minimize public visibility of dissent.
- Health officials treat pro-NFG advocates with warmth and anti-NFG correspondence with dismissal, suggesting alignment with the advocacy network rather than neutral administration.

CONCLUSION

The Town of Dover FOIA return constitutes a high-value document set that comprehensively documents the NFG network’s coordinated campaign to advance policy adoption in a small municipality. With 1,037 emails and over 800 supporting documents spanning January 2023 through January 2026, this return provides detailed insight into the recruitment and advocacy infrastructure underlying NFG policy adoption in Massachusetts municipalities. The most significant finding is that the entire NFG campaign in Dover was initiated through a personal relationship between an external advocate (Anthony Ishak) and the BOH Chair (Kay Petersen)—rather than through organic community demand or independent Board initiative. Ishak explicitly stated he was recruiting Dover for “geographic diversity” to support statewide legislation, and multiple NFG network members were deployed over consecutive months to sustain the advocacy campaign. The documents further reveal the depth of institutional support for the NFG campaign: the Massachusetts DPH produced an official NFG Guidance Document (including model regulations) distributed through the MTCP network; professional associations (MHOA, MAHB, MMA) were integrated into the distribution chain; and academic institutions (MGH/Harvard) conducted surveys to identify receptive municipalities. Meanwhile, internal opposition from BOH member Kruskall was documented but overridden, and the Health Director’s dismissive treatment of anti-NFG correspondence stands in stark contrast to the warm reception given to NFG advocates. This evidence strongly supports the investigative thesis that NFG policies in Dover reflect coordinated advocacy rather than organic local demand, and that state-funded public health infrastructure played a central role in advancing predetermined policy outcomes at the municipal level.

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