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File No. 55475.00001

August 8, 2016

VIA E-MAIL TALLAN@OMM.COM

Tad Allan
O'Melveny & Myers LLP
400 South Hope Street
Los Angeles, CA 90071-2899

Re: Notice to OC Jet Center

Dear Mr. Allan:

We represent OC Jet Center and are in receipt of the two letters you sent our client on August 3, 2016 and August 4, 2016. We write in response to your allegations regarding our client's statements: that our client made false and misleading statements, interfered with Atlantic Aviation's contractual relationships, and spoke of a potential outcome of a bidding process.

In response to your letter of August 3, 2016, at no time did OC Jet Center defame or slander Atlantic Aviation or interfere with any of Atlantic Aviation's current business relationships. Our client never made any statements concluding that OC Jet Center would be taking over any facilities at John Wayne Airport. OC Jet Center has requested a competitive process for selecting the next master tenant and concessionaire at the Fixed Based Operations at John Wayne Airport ("FBO"), the objective of which is to seek the best possible General Aviation services for the public in Orange County.

OC Jet Center never encouraged any of Atlantic Aviation's subtenants to violate a contractual relationship. Several individuals have expressed frustration with the conditions that exist at the FBO, and our client has relayed these concerns to the County as a matter of public interest. At no time did OC Jet Center encourage these individuals to violate existing contracts. Additionally, OC Jet Center has never discouraged any of Atlantic's business partners from negotiating with Atlantic Aviation or from working with Atlantic Aviation in the future.

Your letter of August 4, 2016 mischaracterizes the facts. It was Mr. Pepper, Atlantic's CEO, who proposed negotiations with Mr. Daichendt, OC Jet Center's CEO. The conversation that led to the breakfast meeting between Mr. Daichendt and Mr. Pepper was initiated by Mr. Pepper, and not, as your letter claims, by Mr. Daichendt. After receiving your letter on



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August 3, 2016, Mr. Daichendt responded to Mr. Pepper's phone call and agreed to meet in hopes of engaging in constructive dialogue and avoiding your threatened litigation.

At no time did Mr. Daichendt indicate that he had, by any means, "4 out of 5" votes" to make a deal or bring about a similar arrangement. Mr. Daichendt is not aware that the Board of Supervisors has made a final decision on whether and how to hold a public bidding process, nor does our client have any personal knowledge of how the Board views this issue, beyond what is available in the public record.

As you know, your allegations are made in the context of the competitive selection of operators for the use and management of facilities at a publicly-owned County airport. These are matters of public concern. As such, any communications are potentially entitled to elevated protections under the law. While OC Jet Center does not wish to engage in litigation over these matters, our client will use all legal means at their disposal to protect their rights. OC Jet Center has no intention of defaming any existing, prospective, or future vendors at John Wayne, and has not interfered with any of Atlantic Aviation's existing business relationships.

OC Jet Center is open to having a constructive dialogue about the future of General Aviation at John Wayne Airport. We trust that Atlantic Aviation shares our client's interest in an open, honest, and fair discussion about the FBO, and also understands this matter to be one of public importance to the County as well as commerce and tourism in California.

Sincerely,

A handwritten signature in cursive script that reads 'Jacobus M. Vollebregt'.

Jacobus M. Vollebregt
for BEST BEST & KRIEGER LLP

JMV:jef

cc: Steve Baric, General Counsel, OC Jet Center
Joe Daichendt, Chief Executive Officer, OC Jet Center