

ATTORNEY GENERAL
NEVADA DEPARTMENT OF JUSTICE

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Las Vegas, Nevada 89101-1068

GEORGE J. CHANOS
Attorney General



GERALD J. GARDNER
Chief Deputy Attorney General

November 29, 2005

Honorable Bradford R. Jerbic
Las Vegas City Attorney
400 E. Stewart Ave.
Las Vegas, Nevada 89101

Re: Royal Links Golf Course

Dear Mr. Jerbic:

Thank you for speaking with me last week. As you are aware, on approximately November 15, 2005, Attorney General George Chanos commenced an inquiry into matters concerning the leasing, development, and sale of wastewater "buffer land" now known as the Royal Links Golf Course (the "Property"), including activities related to the request for and/or lifting of a deed restriction for the Property. On November 22, 2005, Attorney General Chanos announced that he has retained the law firm of Senn Meulemans to serve as special counsel in the inquiry.

I have told attorneys Catherine Meulemans and Richard Campbell of Senn Meulemans that our office would follow through with the initial request for documents from the City of Las Vegas. Their firm will make arrangements to pick up the documents from your office when the documents are ready.

The documents sought would include all documents related to the Property in the possession of the City Attorney's Office, dating from 1996 to the present. Furthermore, to the extent that your office can facilitate our acquisition of documents in the possession of other City departments, including the Las Vegas City Council, we would be very grateful. We anticipate that such documents would include, but not be limited to, the following:

- All reports, memos, letters, emails, and statements in your possession, provided to your office or created by your office in relation to the Property.
- All deeds, titles, encumbrances, recordings, restrictions, covenants, or other documents relating to the Property.
- All lease and management agreements relating to the Property.
- All amended lease and management agreements relating to the Property
- All appraisals relating to the Property.
- All documents relating to a request to lift a deed restriction on the Property.

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- All documents relating to the November 16, 2005 Las Vegas City Council meeting to reconsider the lifting of the deed restriction, including, but not limited to, all correspondence to persons invited to attend and/or testify at said meeting, and including, but not limited to, any questions and/or outlines prepared for said November 16, 2005 Las Vegas City Council meeting.
- All engineering reports, environmental studies, soil reports, geotechnical feasibility reports, and other similar documents relating to the Property, including, but not limited to, the Kleinfelder geotechnical report.
- All Public Works studies, reports, statements, or documents relating to the Property.
- All requests for proposal, drafts of requests for proposals, and guidelines for requests for proposals relating to the Property.
- All lists of names of persons to whom the requests for proposal relating to Property were sent.
- All responses, proposals, and/or bids in response to the requests for proposal and/or in any way relating to development of the Property.
- All presentations, exhibits, testimony, and/or other documents relating to proposals to develop the Property.
- All cover sheets, fax cover sheets, and/or other documents provided to Assistant City Manager Lynette Boggs by Rick Kohlman in or about 1997.
- All reports, documents, statements, notes, conclusions, and/or other documents relating to an investigation assigned to a Deputy City Attorney in or about 1997 relating to documents provided to Assistant City Manager Lynette Boggs by Rick Kohlman in or about 1997.
- All documents in the possession of the Parks Department related to the Property.
- All reports, recommendations, memoranda, and/or other documents relating to the decision to supply or not to supply water utilities to the Property.
- All agreements, contracts, and/or other documents relating to providing reclaimed water, a conveyance system, retention basins, storage tanks, reservoirs, an/or other water storage facilities to the Property.
- All engineering reports and cost estimates relating to providing, conveying, and/or storing water on or around the Property.
- All datebooks, calendars, and/or other records of meetings ~~between Richard Goecke and any other person~~ relating to the Property.
- All plats, maps, diagrams, utility maps, and/or other similar documents relating to the Property.
- All documents relating to the Western Summit nitrification contract, in or about 1997.
- All memoranda, reports, statements, notes, and/or other documents relating to the \$2.2 million change order authorization request related to the Western Summit nitrification contract, in or about 1997.
- All reports, memoranda, statements, notes, and/or other documents relating to the proposal to supply pressurized water from the Water District to the Property.
- All engineering reports relating to the true cost of providing pressurized water to the Property.
- All documents provided and/or related to the Las Vegas City Council's consideration, approval, and/or rescission of the \$2.2 million change order.

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- All documents relating to the renegotiation of a water agreement for the Property, in or about April of 1998.
- All City Council agendas relating to the Property, dating from approximately November 1996 to present.

Unless otherwise noted, all requests are intended to encompass 1996 to present. We would also ask that you consider all requests relating to the Property to encompass all parcels, sometimes referred to as Parcels 1, 2, 3 and 4, and/or any other parcels relating to the Property.

We realize this is a large request, and we are extremely appreciative of your assistance in this matter. You can reach Richard Campbell at 775-322-7400 to arrange collection of the documents. Please do not hesitate to contact me at 486-3396 with any questions. Again, thank you for your assistance.

Best Regards,

RANDAL MUNN
Assistant Attorney General

By:


GERALD J. GARDNER
Chief Deputy Attorney General

GJG:sjp
