

April 18, 2012

William H. Stallings
Chief, Transportation, Energy and Agriculture Section
Antitrust Division
U.S. Department of Justice
450 Fifth Street, N.W.
Suite 8000
Washington, DC 20530

I am writing in regard to Civil Action No. 12-cv-00395-RPM-MEH.

This is the case involving the leases of mineral rights in Colorado, in the area near Paonia Reservoir.

From the facts that have been presented to me, this seems to be a dereliction of duty by the Department of Justice. We have two companies, Gunnison Energy Corp. and SG Interests, who clearly violated laws relevant to the federal mineral leasing program. Yet this proposed settlement allows them to keep the leases, pay a fine, and admit to no guilt.

This stands in stark contrast with the case of Tim DeChristopher. I am not here to argue that DeChristopher deserved any less punishment than what he got. He broke the law, but he's doing the time.

But what about these companies? They broke the law... and they are getting slapped on the wrist, if that.

This strikes me as a miscarriage of justice.

Unless given more facts to persuade me otherwise, my current opinion is that the U.S. Department of Justice is anything but blind. I urge you to set aside this settlement and pursue a case that more fairly reflects the nature of the crime committed.

I think of DeChristopher, sitting in a federal prison, day after day, week after week. Then I think of these two companies, who just as clearly violated the law. The individuals who perpetrated this fraud on the federal government and its mineral leasing program are free to get in their cars, drive anywhere they want.

Is this justice – or injustice?

Sincerely,

A handwritten signature in black ink, appearing to read "Allen Best". The signature is stylized and cursive.

Allen Best
5705 Yukon St.
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