

RIVER BLUFF RESORT, LLC

Plaintiff,

v.

HARLAN DETTMAN, GREGORY
KOETHER, RONALD KLEINOW
and TIMOTHY MASON

Defendants.

No. LACV007074

04 DEC -3 PM 2:27
CLAYTON COUNTY, IOWA

FILED

PETITION AND JURY DEMAND

COMES NOW, the Plaintiff River Bluff Resort, LLC by and through the undersigned attorneys and for its claims against Defendants Harlan Dettman, Gregory Koether, Ronald Kleinow and Timothy Mason states the following:

04 DEC -3 PM 3:58
SHERIFF'S OFFICE
CLAYTON COUNTY, IOWA

GENERAL ALLEGATIONS

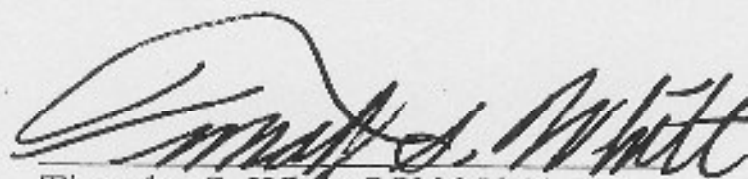
1. Plaintiff River Bluff Resort, LLC [hereinafter "River Bluff Resort"] is a Limited Liability Company organized under the laws of Iowa.
2. Defendants Harlan Dettman, Gregory Koether, Ronald Kleinow and Timothy Mason are residents of Clayton County.
3. The damages resulting from the injuries alleged herein exceed the jurisdictional amount for small claims court and venue is appropriate in this county as the events giving rise to this action occurred largely in Clayton County.
4. On June 25, 2003, Clayton County entered into a development agreement with River Bluff Resort. The agreement provides that TIF Bonds in the amount of \$20,000,000.00 would be issued to River Bluff Resort to develop an 18-hole championship

WHEREFORE, Plaintiff River Bluff Resort, L.L.C. prays for a judgment against the Defendants Harlan Dettman, Gregory Koether, Ronald Kleinow and Timothy Mason in an amount that will fully and fairly compensate Plaintiff for the damages that it has incurred, punitive damages, costs, and any other relief that the Court determines to be just under the premises.

JURY DEMAND

COMES NOW, Plaintiff River Bluff Resort LLC by and through its attorneys, White & Johnson, P.C., and request a trial by jury.

By:



Timothy S. White LI0005941

WHITE & JOHNSON, P.C.

101 Second Street, S.E.

P.O. Box 5878

Cedar Rapids, IA 52406

Phone: (319) 364-0900

Fax: (319) 368-1474

Attorneys for Plaintiff River Bluff
Resort LLC