

**From:** Steve Speyer <[steve.speyer@speyerenvironmental.com](mailto:steve.speyer@speyerenvironmental.com)>

**Sent:** Friday, April 25, 2025 2:00 PM

**To:** Mayor Fenn <[mayor.fenn@dhaz.gov](mailto:mayor.fenn@dhaz.gov)>; CM Barron <[cm.barron@dhaz.gov](mailto:cm.barron@dhaz.gov)>; CM Donovan <[cm.donovan@dhaz.gov](mailto:cm.donovan@dhaz.gov)>; CM Rogers <[cm.rogers@dhaz.gov](mailto:cm.rogers@dhaz.gov)>; CM Nolan <[cm.nolan@dhaz.gov](mailto:cm.nolan@dhaz.gov)>; CM Mallette <[cm.mallette@dhaz.gov](mailto:cm.mallette@dhaz.gov)>; CM Chisholm <[cm.chisholm@dhaz.gov](mailto:cm.chisholm@dhaz.gov)>

**Cc:** James Hamula <[jhamula@clglawaz.com](mailto:jhamula@clglawaz.com)>; [wjsims@simsmackin.com](mailto:wjsims@simsmackin.com) <[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)>; Dan Field <[DanField@dhaz.gov](mailto:DanField@dhaz.gov)>; Ba Beck <[babmineral62@gmail.com](mailto:babmineral62@gmail.com)>; Steve Speyer <[steve.speyer@speyerenvironmental.com](mailto:steve.speyer@speyerenvironmental.com)>

**Subject:** Speyer Environmental | Iron King Mine Remediation

Good afternoon, Mr. Mayor, Members of the Town Council, and Town Attorneys.

I understand that this is a lengthy email. A host of challenges and issues face the Town Council regarding developments that I have prompted and been engaged with on behalf of the Town. I believe that it is prudent if not necessary that the entire governing board of the Town, including attorneys and Town Manager, be made uniformly aware of the professional structure of its Environmental Team so that a path forward may be clearly identified and engaged.

It is my understanding that the circumstances of the Speyer Environmental consultancy for the Town of Dewey-Humboldt are under consideration and are, currently, poorly defined. It is understood that there are questions regarding invoices, project priorities and responsibilities, and on-going involvement. I strongly recommend that if the Town Council has any concerns or issues with Speyer Environmental work product, work time, or work fee schedule, that the Town Council takes these issues and concerns up directly with me, as Principal for Speyer Environmental. Any discussion of these issues or details regarding my invoices that occurs without me being present is unauthorized and likely to be inaccurate.

I was initially retained in July 2022 through the Office of Kay Bigelow, Esq., the Town Attorney at the time. I was retained by the Town to provide expert review and guidance regarding the 2016 Remedial Investigation (RI), pending the release of the 2022 Feasibility Study (FS). My introductory contact was considered and unanimously authorized during the Town Council Meeting held on June 21, 2022. At that time, the Town Council consisted of six (6) members, of whom Mr. Nolan, Mr. Barron, and Ms. Rogers have continued to present. When the FS was released, I was further tasked with reviewing the document, assessing its merits in terms of the RI and providing guidance to the Town regarding release of a Record of Decision. I provided the bulk content of my findings during a Town Meeting held on Valentine's Day in 2023.

Mr. Sims and Mr. Field were retained in March 2023. Mr. Hamula was retained as Town Environmental Attorney at the end of March 2023, and attended EPA's March 29 Public Hearing on its proposed remedial action plan (PRAP) even before he was under contract. Shortly after EPA's Public Hearing and Mr. Hamula's retention by the Town, the volume of work requested and needed by the Town regarding Superfund issues began to accelerate. In addition, it was decided, with Town Attorney and Town Manager concurrence, that my work product and communications needed to be protected by the attorney-client privilege, which necessitated my existing contract with the Town running through Mr. Hamula's contract with the Town.

With the expressed approval of the Town Council, Mr. Hamula and I prepared an extensive technical and legal response to EPA's PRAP for the Town. After reviewing the response with the Town Council, it was unanimously approved by the Council and transmitted to EPA under the signatures of Mayor Hughes and all Council Members (other than Mr. Nolan who was, at this time, recused from the process). From this approved response to EPA, the Town Council considered, developed, and approved a Superfund strategy, with clearly articulated goals and action steps, for managing EPA's future efforts in the Town. Mr. Hamula and I have pursued, with success, specific landmark goals along this path. All our work has been conducted under the express authorization of the Town Council.

Significantly, in November 2023 EPA released a Record of Decision that addressed and incorporated important elements of the Town's comments to the PRAP. For example, EPA's PRAP, which typically serves as a working template for the ROD, made no mention of additional or expanded soil sampling or remediation of residential properties. Yet, in direct response to the Town's PRAP comments, EPA revisited its prior residential soil cleanup efforts, initiated additional residential soil investigations in 2024, and has now allocated significant funding to remediate residential properties within the Town. Remedial costs related strictly to residential properties are estimated by EPA to cost \$100,000,000. This additional investigation and cleanup work on residential properties, which inures wholly to the benefit of the Town and was not previously contemplated by EPA, is directly attributable to my efforts with Mr. Hamula.

I understand that the Mayor, Mr. Hamula, and Brian Beck have a scheduled meeting with Super Leach Exploration (SLE) on May 6, 2025. I also understand that Mayor Fenn has determined that I am not necessary for this meeting and has asked that I not attend. I am content to be debriefed by Mr. Beck, who has been retained by Speyer Environmental for Town environmental work since January 2024. Nonetheless, please understand that the consideration of SLE for remediation of the Iron King Mine properties was initiated at my prompt and Mr. Beck and I subsequently vetted the technology as far as white paper may allow. Once I was convinced of the technical capabilities of the SLE process, I introduced the idea to Mr. Hamula. Mr. Hamula has since reviewed and worked far enough into the necessary and reasonably anticipated legal requirements to agree that the SLE approach might be doable. Since that time, numerous additional potentially interested parties have apparently contacted the Mayor and certain Council Members. I cannot specifically comment on the technical efficacy of any of these other options as I have not been involved in any capacity in these discussions. I do know, however, that the SLE technology is uniquely qualified to serve as an effective remediation technology because of the very high recovery rates it has demonstrated for metals, including Arsenic and Lead. Other technologies, and there are several, typically demonstrate metal recovery rates that are substantially less.

It is my understanding that the Mayor and, perhaps, the Council desire a change in the manner of my work for the Town. I also understand that the Town is considering the idea of SLE as a technology that could (i) remediate contamination at Iron King Mine and (ii) present the prospect of a financial return based on brokering raw metals on the metals commodity market. I agree with this preliminary assessment. For this project to move forward it is important that the Town understands that Mr. Brian Beck is retained by Speyer Environmental and serves the Town under my direction and with my direct involvement only. Mr. Beck serves as the Speyer Environmental

liaison with SLE and, as such, provides the Town with the prospect of an opportunity to implement the SLE technology. The provisions afforded by Speyer Environmental include but are not limited to the planned May 6 meeting. Understanding that the scope of what Speyer Environmental does for the Town is being re-considered and given that a range of tasks that were assigned and authorized by the Town Council are now, apparently, on pause, the Town should clearly understand that all technical evaluations and discussions of SLE involve Speyer Environmental, including Brian Beck, and will be invoiced accordingly to the Town.

Since my engagement with the Town, beginning in 2022, Speyer Environmental fees have not changed. Typically, fee schedules are updated annually, which is the case with many of our other clients. However, I specifically decided to keep Town fees static. So that the Town Council can contemplate all relevant information in its consideration of future Speyer Environmental work for the Town, I wish to advise you of the following adjustments in Speyer Environmental's Fee Schedule for Town work. These changes are effective May 1, 2025:

- Stephen E. Speyer, Ph.D., R.G. | Principal Scientist & Program Manager | \$215/hr
- Brian A. Beck, P.G., C.R.S. (Brian A. Beck Consulting, LLC) | Senior Geologist | \$185/hr
- Drafting | \$90/hr
- ADMIN | \$65/hr
- It is understood that additional professionals may be tasked to complete project objectives in the capacities of Project Scientist and/or Field Scientist. These individuals will be billed at rates equal to \$150/hr and \$105/hr, respectively.

Finally, I believe it is important that discussions with the Town Council and, as appropriate, the Town public, regarding the May 6 meeting with SLE and the potential implications regarding cleanup requirements under Superfund be put into a proper perspective for the Town by the complete Town Environmental Team. Any presentation to the Town Council and, to the public, regarding SLE, the Superfund cleanup, and possible financial opportunities for the Town should involve the Town's legal and technical experts. It should be clear, but I will say it anyway, this endeavor is first and foremost a Superfund project. To imagine otherwise is to predispose the project to failure. The path forward is not straight, it is not simple, it is not cheap, and it will not be easy. But it is possible and has the potential to be enormously rewarding for the Town both environmentally and economically.

The Environmental Project Team, consisting of Mr. Hamula, Mr. Beck, and me, in concert with the SLE technology, can provide the Town with a viable road map to success. Each member of this Team is integral to that plan. The Town's best, most effective and efficient strategy to achieve contamination remediation by metals recovery incorporates the interdisciplinary expertise of the entire Environmental Team (Speyer, Hamula, Beck). In order for the Town Council to best understand the rewards and risks of pursuing an alternative remedial option with SLE, it is absolutely incumbent on the Town Council that the Environmental Team be provided appropriate opportunity with the Town to put the SLE technology into perspective with the requirements that are imposed on a Superfund site, discuss the applicability of the SLE technology at the Iron King Mine property, explain the steps necessary for potential project

success, and answer questions regarding the complex diversity of technical, regulatory, and legal elements of the project.

Mr. Beck will be issuing an email next week that identifies the prerequisite conditions that are necessary to make the next substantive step forward in the Town's pursuit of an alternative remedial option that involves metals recovery.

Respectfully submitted,

Steve

---

Stephen E. Speyer, Ph.D., R.G.  
Principal Scientist | Subject Matter Expert  
602.432.3525

*This electronic mail transmission from **Stephen Speyer** and any files transmitted with it may contain confidential or privileged information intended solely for the individual(s) addressed in the message. Any review, use, distribution, or disclosure of this information by others is strictly prohibited. If you are not the intended recipient, or authorized to receive this transmission for the intended recipient, please contact the sender by reply e-mail and delete all copies of this message and any files transmitted with it from your system.*

**From:** Mayor Fenn <[mayor.fenn@dhaz.gov](mailto:mayor.fenn@dhaz.gov)>

**Sent:** Monday, April 28, 2025 3:45 PM

**To:** Steve Speyer <[steve.speyer@speyerenvironmental.com](mailto:steve.speyer@speyerenvironmental.com)>

**Cc:** James Hamula <[jhamula@clglawaz.com](mailto:jhamula@clglawaz.com)>; [wjsims@simsmackin.com](mailto:wjsims@simsmackin.com); Dan Field <[DanField@dhaz.gov](mailto:DanField@dhaz.gov)>; Ba Beck <[babmineral62@gmail.com](mailto:babmineral62@gmail.com)>

**Subject:** Re: Speyer Environmental | Iron King Mine Remediation

Steve,

I am appalled by this. In my opinion this is another oversell like we saw earlier in this process. Alchemist would be proud.

Below are my responses in red. In short, I am happy to get behind reprocessing if it is truly viable. From what I am aware, it is not possible based on the size of this site and what EPA would be willing to do.

Let's not forget the ultimate goal is to clean up the contamination one way or another.

## **BEGIN RESPONSE IN RED**

Good afternoon, Mr. Mayor, Members of the Town Council, and Town Attorneys.

I understand that this is a lengthy email. A host of challenges and issues face the Town Council regarding developments that I have prompted and been engaged with on behalf of the Town. I believe that it is prudent if not necessary that the entire governing board of the Town, including attorneys and Town Manager, be made uniformly aware of the professional structure of its Environmental Team so that a path forward may be clearly identified and engaged. **Yes, there have been changes with the Town and EPA. It has been made "Crystal Clear" of EPA's position as they stated in their last meeting. We will bring the matter regarding Speyer Environmental up at a Council meeting for input from all councilmembers.**

It is my understanding that the circumstances of the Speyer Environmental consultancy for the Town of Dewey-Humboldt are under consideration and are, currently, poorly defined. It is understood that there are questions regarding invoices, project priorities and responsibilities, and on-going involvement. I strongly recommend that if the Town Council has any concerns or issues with Speyer Environmental work product, work time, or work fee schedule, that the Town Council takes these issues and concerns up directly with me, as Principal for Speyer Environmental. Any discussion of these issues or details regarding my invoices that occurs without me being present is unauthorized and likely to be inaccurate. **You are contracted under Jim at this point. Aware of the contract changes, Speyer was directly under the Attorney contract to circumvent Open Meeting Law and fall under attorney client privilege. That is what has been said and I will report such dodge.**

I was initially retained in July 2022 through the Office of Kay Bigelow, Esq., the Town Attorney at the time. I was retained by the Town to provide expert review and guidance regarding the 2016 Remedial Investigation (RI), pending the release of the 2022 Feasibility Study (FS). My introductory contact was considered and unanimously authorized during the Town Council Meeting held on June 21, 2022. At that time, the Town Council consisted of six (6) members, of whom Mr. Nolan, Mr. Barron, and Ms. Rogers have continued to present. When the FS was released, I was further tasked with reviewing the document, assessing its merits in terms of the RI and providing guidance to the Town regarding release of a Record of Decision. I provided the bulk content of my findings during a Town Meeting held on Valentine's Day in 2023.

Mr. Sims and Mr. Field were retained in March 2023. Mr. Hamula was retained as Town Environmental Attorney at the end of March 2023, and attended EPA's March 29 Public Hearing on its proposed remedial action plan (PRAP) even before he was under contract. Shortly after EPA's Public Hearing and Mr. Hamula's retention by the Town, the volume of work requested and needed by the Town regarding Superfund issues began to accelerate. In addition, it was decided, with Town Attorney and Town Manager concurrence, that my work product and communications needed to be protected by the attorney-client privilege, which necessitated my existing contract with the Town running through Mr. Hamula's contract with the Town. **As stated above, the appearance of OML circumvention is again remarkable. I am not sure how often you contract with entities that are subject to OML. There are legal issues with such circumvention, not to mention the fact that the spending authority for your and Jim's work will likely not pass the financial audit coming up. I cannot in good faith say the appropriation of public funds was spent according to law. You operated on direction that was way too loose.**

With the expressed approval of the Town Council, Mr. Hamula and I prepared an extensive technical and legal response to EPA's PRAP for the Town. After reviewing the response with the Town Council, it was unanimously approved by the Council and transmitted to EPA under the signatures of Mayor Hughes and all Council Members (other than Mr. Nolan who was, at this time, recused from the process). From this approved response to EPA, the Town Council considered, developed, and approved a Superfund strategy, with clearly articulated goals and action steps, for managing EPA's future efforts in the Town. Mr. Hamula and I have pursued, with success, specific landmark goals along this path. All our work has been conducted under the express authorization of the Town Council.

Significantly, in November 2023 EPA released a Record of Decision that addressed and incorporated important elements of the Town's comments to the PRAP. For example, EPA's PRAP, which typically serves as a working template for the ROD, made no mention of additional or expanded soil sampling or remediation of residential properties. Yet, in direct response to the Town's PRAP comments, EPA revisited its prior residential soil cleanup efforts, initiated additional residential soil investigations in 2024, and has now allocated significant funding to remediate residential properties within the Town. Remedial costs related strictly to residential properties are estimated by EPA to cost \$100,000,000. This additional investigation and cleanup work on residential properties, which inures wholly to the benefit of the Town and was not previously contemplated by EPA, is directly attributable to my efforts with Mr. Hamula.

I understand that the Mayor, Mr. Hamula, and Brian Beck have a scheduled meeting with Super Leach Exploration (SLE) on May 6, 2025. I also understand that Mayor Fenn has determined that I am not necessary for this meeting and has asked that I not attend. **In a council meeting you were not at; it was determined that the meeting would have the attendees as determined by the entire Council during open session. Mr. Chisholm asked specifically and it was discussed.** I am content to be debriefed by Mr. Beck, who has been retained by Speyer Environmental for Town environmental work since January 2024. Nonetheless, please understand that the consideration of SLE for remediation of the Iron King Mine properties was initiated at my prompt and Mr. Beck and I subsequently vetted the technology as far as white paper may allow. Once I was convinced of the technical capabilities of the SLE process, I introduced the idea to Mr. Hamula. Mr. Hamula has since reviewed and worked far enough into the necessary and reasonably anticipated legal requirements to agree that the SLE approach might be doable. Since that time, numerous additional potentially interested parties have apparently contacted the Mayor and certain Council Members. **Correction, prior to anything with SLE I had numerous contacts on reprocessing. Under what authority did you begin the SLE communication and what was the Town billed for?** I cannot specifically comment on the technical efficacy of any of these other options as I have not been involved in any capacity in these discussions. I do know, however, that the SLE technology is uniquely qualified to serve as an effective remediation technology because of the very high recovery rates it has demonstrated for metals, including Arsenic and Lead. Other technologies, and there are several, typically demonstrate metal recovery rates that are substantially less. **EPA stated they are unaware of ANY new process that would truly leave inert material behind. All of us are hopeful that new technologies are a possibility for the better of all sites across the country. No one is closing the door to the idea of new opportunities.**

It is my understanding that the Mayor and, perhaps, the Council desire a change in the manner of my work for the Town. I also understand that the Town is considering the idea of SLE as a technology that could (i) remediate contamination at Iron King Mine and (ii) present the prospect of a financial return based on brokering raw metals on the metals commodity market. **Correction, the EPA would be the considering party to such endeavors. The Town would only facilitate help in a political approach if it truly were feasible.** I agree with this preliminary assessment. For this project to move forward it is important that the Town understands that Mr. Brian Beck is retained by Speyer Environmental and serves the Town under my direction and with my direct involvement only. Mr. Beck serves as the Speyer Environmental liaison with SLE and, as such, provides the Town with the prospect of an opportunity to implement the SLE technology. The provisions afforded by Speyer Environmental include but are not limited to the planned May 6 meeting. Understanding that the scope of what Speyer Environmental does for the Town is being re-considered and given that a range of tasks that were assigned and authorized by the Town Council are now, apparently, on pause, the Town should clearly understand that all technical evaluations and discussions of SLE involve Speyer Environmental, including Brian Beck, and will be invoiced accordingly to the Town. **Received loud and clear. This appears to be a direct conflict. Speyer Environmental is claiming to be the procuring cause of SLE and may likely have an interest in SLE projects.**

Since my engagement with the Town, beginning in 2022, Speyer Environmental fees have not changed. Typically, fee schedules are updated annually, which is the case with many of our other clients. However, I specifically decided to keep Town fees static. So that the Town Council can contemplate all relevant information in its consideration of future Speyer Environmental work for the Town, I wish to advise you of the following adjustments in Speyer Environmental's Fee Schedule for Town work. These changes are effective May 1, 2025:

- Stephen E. Speyer, Ph.D., R.G. | Principal Scientist & Program Manager | \$215/hr
- Brian A. Beck, P.G., C.R.S. (Brian A. Beck Consulting, LLC) | Senior Geologist | \$185/hr
- Drafting | \$90/hr
- ADMIN | \$65/hr
- It is understood that additional professionals may be tasked to complete project objectives in the capacities of Project Scientist and/or Field Scientist. These individuals will be billed at rates equal to \$150/hr and \$105/hr, respectively.

Finally, I believe it is important that discussions with the Town Council and, as appropriate, the Town public, regarding the May 6 meeting with SLE and the potential implications regarding cleanup requirements under Superfund be put into a proper perspective for the Town by the complete Town Environmental Team. Any presentation to the Town Council and, to the public, regarding SLE, the Superfund cleanup, and possible financial opportunities for the Town should involve the Town's legal and technical experts. It should be clear, but I will say it anyway, this endeavor is first and foremost a Superfund project. To imagine otherwise is to predispose the project to failure. The path forward is not straight, it is not simple, it is not cheap, and it will not be easy. But it is possible and has the potential to be enormously rewarding for the Town both environmentally and economically. **To be frank, you and the "Team" oversold the entire thing**



from the beginning. From reuse and beyond, you are overselling this “opportunity”. Not completely off the table, EPA has explained the unlikeness of reprocessing on the IKM tailings. We will bring this to the public. Be prepared as much information and evidence as possible will be presented to discredit this charade. I'm not John Hughes or some lady with an LLC.

The Environmental Project Team, consisting of Mr. Hamula, Mr. Beck, and me, in concert with the SLE technology, can provide the Town with a viable road map to success. **Again, you admit to working in concert, a potential conflict of interest.** Each member of this Team is integral to that plan. The Town’s best, most effective and efficient strategy to achieve contamination remediation by metals recovery incorporates the interdisciplinary expertise of the entire Environmental Team (Speyer, Hamula, Beck). **Without EPA’s blessing and a big political push, nothing will happen. You are merely clinging to the wrong client. This must come from a very large company as explained by EPA. If you think as the Town Mayor, I’m going to spearhead a charade, you are wrong. I will expose you.** In order for the Town Council to best understand the rewards and risks of pursuing an alternative remedial option with SLE, it is absolutely incumbent on the Town Council that the Environmental Team be provided appropriate opportunity with the Town to put the SLE technology into perspective with the requirements that are imposed on a Superfund site, discuss the applicability of the SLE technology at the Iron King Mine property, explain the steps necessary for potential project success, and answer questions regarding the complex diversity of technical, regulatory, and legal elements of the project. **Again, this is far larger than a Town decision. For EPA to consider such, EPA would have to start from the beginning. A new feasibility study would have to be done. It would go back to public input. Remember, the public wants this cleaned up.**

Mr. Beck will be issuing an email next week that identifies the prerequisite conditions that are necessary to make the next substantive step forward in the Town’s pursuit of an alternative remedial option that involves metals recovery. **This is not a Town’s pursuit of remedial options.** This is a matter of the Town getting behind another party only if the option is feasible and EPA is willing to amend their ROD.

Respectfully submitted,

Steve

**END RESPONSES**

Thank You,

***Matthew Fenn***  
***Mayor***

***Town of Dewey-Humboldt***  
***2735 South Highway 69, Suite 12***  
***Humboldt, AZ 86329***



602-809-4053

[www.dhaz.gov](http://www.dhaz.gov)

\*\*\*NOTICE\*\*\*

*~The information contained in this email may be confidential and subject to legal privilege. If you are not the intended recipient, please do not read, use, or disseminate any information contained herein. Please immediately notify the sender if you have received this email in error.*

\*\*\*OPEN MEETING LAW COMPLIANCE\*\*\*

*~To ensure compliance with the Arizona Open Meeting Law, recipients of this message who are members of a public body should not forward it to other members of the public body. Members of the public body may reply to this message, but they should not send a copy of the reply to other members.*

**From:** Steve Speyer <[steve.speyer@speyerenvironmental.com](mailto:steve.speyer@speyerenvironmental.com)>

**Sent:** Wednesday, April 30, 2025 4:37 PM

**To:** Mayor Fenn <[mayor.fenn@dhaz.gov](mailto:mayor.fenn@dhaz.gov)>; CM Barron <[cm.barron@dhaz.gov](mailto:cm.barron@dhaz.gov)>; CM Rogers <[cm.rogers@dhaz.gov](mailto:cm.rogers@dhaz.gov)>; CM Mallette <[cm.mallette@dhaz.gov](mailto:cm.mallette@dhaz.gov)>; CM Donovan <[cm.donovan@dhaz.gov](mailto:cm.donovan@dhaz.gov)>; CM Nolan <[CM.Nolan@dhaz.gov](mailto:CM.Nolan@dhaz.gov)>; CM Chisholm <[cm.chisholm@dhaz.gov](mailto:cm.chisholm@dhaz.gov)>  
**Cc:** James Hamula <[jhamula@clglawaz.com](mailto:jhamula@clglawaz.com)>; Bill Sims <[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)>; Dan Field <[DanField@dhaz.gov](mailto:DanField@dhaz.gov)>; Ba Beck <[babmineral62@gmail.com](mailto:babmineral62@gmail.com)>; Steve Speyer <[steve.speyer@speyerenvironmental.com](mailto:steve.speyer@speyerenvironmental.com)>

**Subject:** RE: Speyer Environmental | Iron King Mine Remediation

Dear Mayor, Town Council Members, Town Attorneys, and Town Manager...

In my email dated April 25, 2025, I stated that Brian Beck, P.G. would be issuing a summary of critical path elements that are necessary to a serious consideration of metals recovery as a possible, alternative Superfund remedial plan.

Considering the mayor's response to my message I have cancelled Mr. Beck's email. Please note that I corrected the mayor's incomplete red-line representation of his commentary with yellow highlighting. It is understood from the mayor's words that the Town has no interest in pursuing any alternative remedial option unless that option has already gained EPA acceptance.

It is my understanding that the mayor's meeting with SLE remains on the calendar for Tuesday, May 6, 2025, at 9 am, as scheduled.

Respectfully,

Steve

---

Stephen E. Speyer, Ph.D., R.G.

Principal Scientist | Subject Matter Expert  
602.432.3525

**From:** Bill Sims <[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)>  
**Sent:** Tuesday, May 13, 2025 10:39 AM  
**To:** [marc.harris@azag.gov](mailto:marc.harris@azag.gov)  
**Subject:** FW: Open Meeting Law Self Report

Mr. Harris:

Thank you so much for returning my call. As you suggested I got on the AG's website and located the OML Complaint form. That form is not really written in a way to transmit a self-report to the AG's in this matter. The form requires information concerning (i) the name of public entity that is the subject of the complaint and (ii) the identity of council members who violated the open meeting. Neither of those apply to this case. No elected officials were involved in what is likely an Open Meeting Law violation.

A consultant forwarded the email thread below to the entire Town council. The email thread involved a discussion about a matter pending before the Town Council. In the past when this occurs, I quickly report. Ratification in this instance is not applicable because no action was taken. Making sure that the public becomes aware of this email thread would be an appropriate way to rectify the situation. That is what I propose, but I also want to support possible other remedial steps that your office deems appropriate.

Again, thank you for returning my call.

William J. Sims III  
Sims Mackin, Ltd.  
2100 N. Central Avenue, Suite 220  
Phoenix AZ 85004  
Direct: 602-772-5501  
Fax: 602-772-5509  
Cell: 602-524-0575  
Legal Assistant: 602-772-5502  
[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)

The information contained in this email may be confidential and subject to a legal privilege. If you are not the intended recipient, please do not read, use or disseminate any information contained herein. Please immediately notify the sender if you have received this email in error.

**From:** Bill Sims <[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)>  
**Sent:** Tuesday, May 13, 2025 10:41 AM  
**To:** Dan Field <[DanField@dhaz.gov](mailto:DanField@dhaz.gov)>; Beth Evans <[BethEvans@dhaz.gov](mailto:BethEvans@dhaz.gov)>; Chelsea Varney

[<ChelseaVarney@dhaz.gov>](mailto:ChelseaVarney@dhaz.gov)

**Subject:** FW: Open Meeting Law Self Report

Please forward to the Mayor and Council using the bcc method of distribution

William J. Sims III  
Sims Mackin, Ltd.  
2100 N. Central Avenue, Suite 220  
Phoenix AZ 85004  
Direct: 602-772-5501  
Fax: 602-772-5509  
Cell: 602-524-0575  
Legal Assistant: 602-772-5502  
[wjsims@simsmackin.com](mailto:wjsims@simsmackin.com)

The information contained in this email may be confidential and subject to a legal privilege. If you are not the intended recipient, please do not read, use or disseminate any information contained herein. Please immediately notify the sender if you have received this email in error.

**From:** Chelsea Varney

**Sent:** Tuesday, May 13, 2025 11:15:28 AM

**Cc:** Dan Field [<DanField@dhaz.gov>](mailto:DanField@dhaz.gov); Beth Evans [<BethEvans@dhaz.gov>](mailto:BethEvans@dhaz.gov); Bill Sims [<wjsims@simsmackin.com>](mailto:wjsims@simsmackin.com)

**Subject:** FW: Open Meeting Law Self Report

See below communication.

Thank you,

Chelsea Varney, Executive Assistant

“Arizona’s Country Town”

2735 S. Hwy 69; PO Box 69  
Humboldt, AZ 86329  
928-632-7362

\*\*\*\*NOTICE\*\*\*\*

*Open Meetings Compliance*

*Notice: To ensure compliance with the Open Meeting Law, recipients of this message who are members of a public body should not forward it to other members of the public body. Members of the public body may reply to this message, but they should not send a copy of the reply to other members.*