

To all IOC members

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Olympic Winter Games 2018

«RecipientGreeting»

In Durban (South Africa) on July 6, 2011, you will decide on the allocation of the 2018 Winter Olympic Games.

In anticipation of this event, and in consideration of the report by the Evaluation Commission of the 2018 Winter Olympic Games submitted on May 10, 2011, we ask that you please take the following into consideration (cf. also our letters to President Jacques Rogge on December 23, 2010 and to Evaluation Commission Chairwoman Gunilla Lindberg on March 1, 2011):

1.

The Bid-Book submitted to the IOC on January 11, 2011 as part of the German application asserts – **untruthfully** – that these three sports sites located in Garmisch-Partenkirchen are serviceable:

- Kandahar
- Hausberg
- Olympic Ski Stadium

(Bid-Book section 9.8, pages 36-37).

The extensive land holdings of the 63 landowners in Garmisch-Partenkirchen we represent lies within the **core areas of these three sports sites** and within the security zone stipulated by the IOC.

12 landowners with 16 plots of land amounting to a total of 55,000 m² are affected.

These plots of land are by no means available; the **functional operability** of the Kandahar, Hausberg and Olympic Ski Stadium is, therewith, **not given**.

2.

The remaining landowners are not willing to provide their plots of land for the extension and/or construction of streets, paths, parking lots, etc.

This is especially the case regarding plans to build connections between the Olympic Village on Klamm-street and the three sports sites, which would damage the green belt that runs between the residential area of Garmisch-Partenkirchen and the mountain massif.

3.

In the evaluation committee's report of May 10, 2011, the following statement was made with regard to the needed plots of land:

"Munich 2018 expressed confidence that an adequate solution would be found."

We would like to emphasize that:

Alternative solutions inevitably fail – already simply due to the topography of the land and the unwillingness of neighbouring landowners to participate.

4.

According to German legal order, ownership and title of inheritance are safeguarded under constitutional law (Art 14, ¶ 1 of constitution).

4.1.

Our clients find themselves unable to make the needed land available.

These land holdings have been continuously family-owned for centuries.

These plots of land are not open for speculation; they should be preserved and spared from the usage intended for the 2018 Winter Olympic Games.

4.2.

We are confident that the Olympic Committee will not ignore but rather respect the constitutional rights of our clients.

To clarify:

Should you award Munich and Garmisch-Partenkirchen the 2018 Olympic Winter Games on July 6, 2011, the consequence would be:

That the parliamentary legislative authority of Federal Republic of Germany (German Federal Parliament or Bavarian State Parliament) must enact a special **Olympic expropriation law** with the intention of **compulsorily** dispossessing landowners of their title and property rights.

Today, we would like to provide this notice: in response to an Olympic expropriation law, we will submit a constitutional complaint to the Federal Constitutional Court of the Federal Republic of Germany.

Sincerely,

Ludwig O. Seitz
Attorney at law
Specialist solicitor for administrative law