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Of Counsel

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Sent Via Facsimile Only to: 702-486-2577

Francisco V. Aguilar, Chairman
Nevada State Athletic Commission
555 East Washington Avenue, Ste. 3200
Las Vegas, Nevada 89101

Re: *Chael Sonnen/Metamoris 4*

Dear Chairman Aguilar:

I have reviewed your letter dated July 30, 2014 which indicates that Mr. Sonnen will be in breach of the NSAC Order if he competes in a previously scheduled jiu-jitsu competition in California on August 9, 2014. Please note that the Order does not define or specifically reference what is intended by the term “fighting.” As a result, the NSAC now seeks on an after-the-fact basis to define or interpret “fighting” to include any discipline *even if outside* of the statutory definition of unarmed combat.

Absent any specific definition of “fighting,” it is reasonable to presume that the NSAC intended only to limit Mr. Sonnen’s 2 year suspension to MMA, boxing and other forms of unarmed combat for which NSAC is vested with jurisdiction. Specifically, the NSAC is vested under NRS 467.070 with “management, control and jurisdiction over all contests or exhibitions of *unarmed combat* to be conducted.” The term “unarmed combat” is defined in NRS 467.0107 as “boxing or any form of competition in which a blow is usually struck which may reasonably be expected to inflict injury.” There is no dispute that the NSAC has no jurisdiction or authority to regulate, license or sanction jiu-jitsu and other forms of grappling. Moreover, jiu-jitsu does not fall within the Nevada definition of unarmed combat because it does not involve “blows” of any kind. Likewise, it would be a violation of due process to expand the interpretation of “fighting” broader than the statutory definition of unarmed combat. In our view, there could be no violation under NRS 467.885 as any interpretation to include jiu-jitsu or grappling would be outside of the NSAC’s jurisdiction and constitute an invalid order.

Further, Mr. Sonnen is headlining Metamoris 4 on August 9, 2014 which has been promoted and marketed almost 1 month *before* the July 23, 2014 hearing. Mr. Sonnen’s due process rights certainly mandated that any discussion by the NSAC precluding Mr. Sonnen from

participating in this jiu-jitsu competition should have been addressed at the hearing. In light of the short notice raised by your letter, we respectfully request that you reconsider the NSAC's position relating to the expanded definition of "fighting" which precludes Mr. Sonnen from fulfilling his contractual obligation with Metamoris 4. Any breach of this contract by Mr. Sonnen would certainly result in future litigation for loss of revenue sales.

Very truly yours,



Ross C. Goodman, Esq.