

Holland & Knight

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October 5, 2022

Via E-Mail

The Honorable Carolyn B. Maloney
Chairwoman, Committee on Oversight and Reform
2157 Rayburn House Office Building
Washington, D.C. 20515-6143

Re: *Investigation into the Workplace Culture at the Washington Commanders*

Dear Chairwoman Maloney:

I understand that the investigation into the Washington Commanders' workplace may be reaching its conclusion and am writing to raise some concerns about the manner in which this investigation has been pursued and the purported evidence that the Committee has collected. To the extent that the Committee intends to issue a report, I believe that, in the interest of fundamental fairness, there is certain important evidence that must be considered and included.

As you know, I represented the Washington, DC suburbs of Fairfax County, Virginia, in Congress for fourteen years, from 1994 to 2008, and held local political office in Fairfax County for the fourteen years prior to that. The Washington Commanders were always important to me and my constituents, and they still are. During my service in Congress, I worked in bipartisan fashion with my fellow representatives, and I understood that the American people were best served by following the facts wherever they might lead, regardless of the political ramifications. My track record shows it: I served as chair of the Select Committee to Investigate the Preparation for and Response to Hurricane Katrina. Even though my Democratic colleagues objected to the Select Committee and did not participate, the Select Committee nevertheless investigated the manner thoroughly and fairly, and produced a report extremely critical of the Republican administration's handling of the disaster.

For four years, I also served as chair of the Committee you now lead. In 2005, I oversaw this Committee's investigation into rampant and illegal steroid use in professional baseball. Our investigation and public hearings, under my leadership and later under Chairman Henry Waxman, were fair, truth-seeking and thorough. We sought testimony from all relevant witnesses and refused to target individuals for political gain. The bipartisan baseball hearings showed that Congress, despite its many differences, could work together when its members acted with integrity and remain focused on uncovering the truth. As Chairman Waxman stated, on January 15, 2008, during a hearing on illegal steroid use, "I want to now recognize Mr. Davis who, as the chairman of

this committee, held that important hearing and investigation, got us started. It's an effort that we've worked closely together on, and I'm pleased to continue that role with him in this year's hearing."

It has been nearly a full year since the Committee began its investigation into the Washington Commanders. The investigation is nothing like the one Chairman Waxman and I led regarding steroids in baseball. In the course of the investigation, the Committee has not requested a single document from the Commanders, other than some *ad hoc* requests during the deposition of Mr. Snyder. The Committee has not requested to interview any current employees of the Team. The Committee has made certain highly publicized allegations, including allegations of sexual harassment by Mr. Snyder, without undertaking even basic investigative steps to assess the credibility of its witnesses or to determine whether the incidents, as described, are even plausible, much less consistent with documentary evidence in the possession of the Team—evidence which, again, the Committee has never requested. In addition, the Committee has made highly publicized allegations that Mr. Snyder interfered with the earlier NFL investigation by conducting his own "shadow investigation," without acknowledging the evidence provided by the NFL that: (1) the efforts of Mr. Snyder and the Team to uncover evidence of unlawful conduct directed against him and his family were proper and separate from the NFL's workplace investigation; (2) the NFL was contemporaneously aware of those efforts; and (3) the NFL (and its investigator, former U.S. Attorney General Loretta Lynch) ultimately found that there was in fact misconduct directed against Mr. Snyder. This misconduct resulted in a lifetime prohibition on one of Mr. Snyder's former minority-share partners from ever again possessing an ownership interest in an NFL team.

All the evidence described above could have been easily obtained by the Committee, but so far it has chosen not to. I believe that the public has a right to know the truth about this NFL franchise and why the Committee has decided to insulate itself from highly relevant information that has been available from the inception of the investigation, and that runs counter to the Committee's preconceived narrative. I expect that the Committee will address, in any report it releases, why such evidence was deemed unworthy of even being requested in the course of the Committee's so-called "investigation."

I. Evidence Regarding the Team's Turnaround and the Current State of Its Workplace

As you are aware, a nationally renowned consulting firm, Vestry Laight, was retained, with the NFL's blessing, to monitor the Team's workplace culture on an ongoing basis. The semi-annual reports issued by Vestry Laight document a remarkable turnaround at the Team, with each successive report detailing the steps the Team has taken to eradicate the culture that previously prevailed and replace it with a culture in which each Team employee is treated with respect, dignity, and inclusiveness. Indeed, the most recent Vestry Laight report concludes that "[a]n empowered leadership team is intentionally and holistically driving a culture that is inclusive, high-performing and accountable."

Remarkably, given the stated purpose of this investigation, the Committee has shown little interest in the current state of the Team's workplace, or how the Team's ownership and new management, including President Jason Wright, drove this remarkable reform. In fact, one of your staff attorneys objected to Mr. Snyder's testimony highlighting the lasting changes at the Commanders' workplace, complaining that Mr. Snyder had "cited the Vestry reports ad nauseam." Incredibly, not a single current employee of the Commanders organization has been interviewed by the Committee in connection with its yearlong investigation to discuss the Team's impressive about-face. The American people have the right to know why the Committee has remained so resolutely opposed to informing itself as to the Commanders' commendable progress over the past two years.

That progress has not been easy. Indeed, it has involved terminating many longtime employees who did not embody the culture that the new management team is attempting to foster. Those terminated individuals are, in many cases, resentful about their departure from the Team.

II. Disregarded Evidence

What is most striking about the Committee's investigation is that it has embraced and protected some of those most embittered by their enforced separation from the Team—the same people who were responsible for the toxic workplace culture—and has given them a platform to settle old scores. With all the talented, dedicated, and high-integrity individuals who work, and have worked, for the Washington Commanders franchise over the years, it has been a truly bizarre experience to watch the Committee build its narrative around the following cast of characters:

- A. *Jason Friedman*** – Mr. Friedman was terminated from the Team by President Jason Wright for his abusive treatment of subordinates. It was learned, after his termination, that Mr. Friedman had concealed a lengthy sexual relationship with one of his female interns, 15 years his junior, had advanced her career without disclosing their relationship, and had even lied to his own mother about it. The Committee has shown no interest in pursuing evidence, in the possession of the Team, including highly inappropriate photographs stored on Mr. Friedman's company e-mail account, which reflects on Mr. Friedman's character. Mr. Friedman admitted to the Committee, in the course of his (unsworn) testimony, that he had previously perjured himself in connection with an unrelated federal court case. Following his termination from the Team, Mr. Friedman wrote a series of more than a dozen obsequious letters, e-mails, and text messages to Mr. Wright and other Team executives trying to get his job back. Just weeks after Mr. Wright informed Mr. Friedman definitively that he would not be rehired, Mr. Friedman appeared as a witness for the Committee.
- B. *Melanie Coburn*** – Ms. Coburn testified during the Committee's Roundtable Hearing on February 3, 2022. During her (unsworn) testimony, the Committee allowed Ms. Coburn to reinvent herself as the "conscience" of the Redskins cheerleader program when, in fact,

contemporaneous e-mails show she was one of the key individuals pushing the “sexualization” of the cheerleaders. Indeed, Team documents reveal Ms. Coburn, in her role as supervisor of the cheerleading program, belittling the concerns of the wife of a member of the U.S. military, who objected to inappropriate sexual advances made towards her husband while he was deployed in a combat area. Upon leaving the Team, Ms. Coburn told her fellow cheerleaders that she was “proud to have been able to contribute to helping you all get to the level of ‘Hottest in the NFL!’” Again, the Committee has demonstrated no interest in reviewing the records of the Team demonstrating these facts. We attach them hereto as Exhibit A.

- C. **David Pauken** – Mr. Pauken quit the Team in a rage, over 15 years ago, after Mr. Snyder denied his unprecedented request for an equity or stock-option stake in the Team as part of his compensation package. It was learned, after his departure, that Mr. Pauken used contractors involved in a multimillion-dollar renovation project at FedEx Field to work on construction projects at his own home. His failure to disclose this arrangement constituted a material conflict of interest. He also used Team stadium employees and the Team’s stadium architect for a construction project at his home. Documentary evidence of Mr. Pauken’s unethical business practices, and resulting bias against Mr. Snyder, were offered to the Committee. The Committee declined to ask Mr. Pauken any questions about his hostility against the Team and Mr. Snyder and refused the opportunity to review the evidence of his bias. While we have little confidence that the Committee will be interested in evidence, such as this, that undercuts the Committee’s preconceived narrative, we attach evidence of Mr. Pauken’s misconduct as Exhibit B.
- D. **Bruce Allen** – It is widely acknowledged that the single most significant step the Team took to remedy its toxic workplace was to rid itself of Mr. Allen. The fraternity-house culture that Mr. Allen instilled in the Commanders organization is the principal reason that the Commanders came under investigation in the first place. If the Committee had desired, it could have interviewed any of the current employees of the Commanders whose tenure extended back to the Allen years. Those employees would, almost universally, have identified Mr. Allen’s departure as the date that the Team culture began to turn around. Prior to Mr. Allen’s deposition, my law firm provided the Committee with a small sample of his workplace communications. That the Committee would nevertheless choose to sponsor such a witness, in full awareness of the racist, misogynistic, and homophobic beliefs he tolerated and espoused in his e-mail conversations with his friends, is truly astounding. I was informed that, when confronted with these e-mails at his deposition, Mr. Allen’s lawyer questioned their authenticity—despite the fact that these e-mails had been relied upon by the NFL in its investigation of the Team, and despite the fact that a frequent participant in these conversations, former Raiders head coach Jon Gruden, immediately resigned when even a tiny sample of them was leaked to the media.

If these were not sufficient reasons to disqualify Mr. Allen as a credible witness, I am informed that at his deposition, Mr. Allen attempted to dispute his own signed employment contract, which provided that he had responsibility for both the football and the business operations at the Team. As we advised the Committee prior to Mr. Allen's deposition, the Team has literally thousands of documents showing Mr. Allen's intimate involvement in the Team's business decisions. I am advised that the Committee neglected to ask Mr. Allen any questions about this glaring inconsistency.

If the Committee chooses to write a report that makes purported findings consistent with the materials it has already publicly released, it should be prepared to answer why it has chosen to rely on the very individuals whose separation from the Team has coincided with the remarkable turnaround in the Team's culture. It should be prepared to answer the following questions: Why is the Committee willing to sponsor, embrace, and protect witnesses who mistreated women and espoused vile beliefs? Why is the Committee willing to ignore these witnesses' role in contributing to the toxic workplace, if the Committee is indeed committed to fostering an improved workplace culture? Why is the Committee comfortable relying on the testimony of these witnesses exclusively, when there are dozens of witnesses available to the Committee who were not fired for cause, or did not otherwise leave the Team under acrimonious circumstances? How does the Committee feel it is in a position to critique the NFL's earlier yearlong investigation conducted by Beth Wilkinson, in which more than 150 current and former Commanders' employees were interviewed, when the Committee has apparently interviewed less than 20 witnesses (none of whom have worked for the Team since 2019)?

III. Evidence Showing the Falsity of Accusations Against Mr. Snyder

The Committee's most publicized allegation is that of Tiffani Johnston. Ms. Johnston alleged that at on an undetermined date (at least sixteen years ago), at an undetermined location (she cannot recall), at an undetermined event (she cannot recall), in front of undetermined persons (she cannot recall), Mr. Snyder allegedly put his hand on her leg and then attempted to guide her into his limousine.

For reasons the Committee has refused to share publicly, Ms. Johnston was not required to take an oath prior to presenting her story. By contrast, Mr. Snyder was required to provide sworn testimony, and sternly admonished by Committee counsel of the criminal consequences of providing false testimony. Mr. Snyder testified that he did not recall ever meeting Ms. Johnston and certainly did not recall ever dining with her. Mr. Snyder, and numerous other current and former employees of the Commanders organization are prepared to testify that they do not recall Mr. Snyder ever dining with any cheerleader in a setting such as that portrayed by Ms. Johnston.

These exculpatory statements would be easily disprovable if untrue. If Mr. Snyder made a practice of dining with cheerleaders, surely there would have been a photograph taken at one such event, memorializing the gathering. No such photograph has ever surfaced. If Mr. Snyder

had any kind of contact, even strictly professional, with Ms. Johnston, surely there would be some document to reflect that fact. No such document has come to light. Ms. Johnston testified that she was allegedly saved from Mr. Snyder's unwanted advances by Mr. Snyder's "attorney." There are two individuals who could have been that "attorney," and both have stated unequivocally that no such incident occurred involving them. Similarly, Mr. Snyder's driver has no recollection of the alleged incident. Despite being the only individuals Ms. Johnston suggested might have been present during the alleged incident, the Committee has made no effort to interview these witnesses.

The fact that Ms. Johnston cannot, now more than eight months after levelling her accusations, even identify the year that this supposed incident occurred would make it difficult for any person to even begin to mount a defense. Remarkably, however, as he informed the Committee at his deposition, Mr. Snyder has preserved his personal calendars from over 15 years ago. A review of those calendars reveals no event even resembling the event described by Ms. Johnston. Tellingly, the Committee has shown no interest in obtaining and reviewing that evidence.

Even Ms. Johnston's own social media undermines the credibility of her allegation. In February 2021, approximately a year before her testimony to this Committee, Ms. Johnston posted on Facebook, "I have [twice] experienced sexual harassment . . . Both times it was by the men I worked with and trusted." This evidence is attached as Exhibit C. Whatever the Committee is inclined to believe about Mr. Snyder's sworn testimony that he has never met Ms. Johnston (and the Committee has never adduced any evidence to undermine that statement), it can hardly be said that Ms. Johnston "worked with" Mr. Snyder, or had any pre-existing reason to trust or mistrust him. Ms. Johnston, as is her right, has never chosen to share the details of the instances of harassment she referenced in 2021, and, in fact, declined on two occasions to cooperate with the NFL's investigation. The only thing that is clear, based on her description of her harassers, is that neither of those individuals can possibly be Dan Snyder.

Also, the former senior club executives who provided testimony to the Committee—Brian Lafemina, Bruce Allen, and David Pauken—none of whom are favorably disposed to Mr. Snyder, all testified that they never witnessed Mr. Snyder sexually harass or assault anyone. Unlike the witnesses the Committee is apparently inclined to rely on to support its false narrative, each of these former executives had regular and extensive dealings in person with Mr. Snyder.

Finally, it should come as no surprise that the only corroboration of Ms. Johnston's account comes from the ubiquitous Jason Friedman—after the two talked immediately prior to the Roundtable Hearing. Mr. Friedman's general aversion to the truth is documented elsewhere, but he has even more problems related to his specific testimony on this issue. The limited details of his account differ markedly from the limited details of Ms. Johnston's account, and he himself gave differing versions of the alleged incident even during the same interview. Like her, he cannot remember when or where the incident occurred, or who else was present. Unlike her, he elected to participate in the NFL's investigation, at which he declined to mention anything about this incident.

Should the Committee venture an opinion as to Ms. Johnston's credibility, it should be prepared to address why it declined to speak to Mr. Snyder's driver or either of his two attorneys. It should be prepared to address why it declined to review Mr. Snyder's contemporaneous personal calendars. It should be prepared to address why it is willing to overlook the inability of Ms. Johnston or Mr. Friedman to recall the time and location, as well as other basic aspects of this alleged incident, and why their accounts of the incident are materially different. It should be prepared to address why it is willing to overlook Ms. Johnston's inconsistent Facebook posting and explain why it has chosen to credit Mr. Friedman on this issue, when the overwhelming majority of information he has provided in this proceeding, and others, has proven to be false and, on at least one prior occasion, knowingly perjurious.

IV. Evidence Countering the Committee's False Claim of a "Shadow Investigation"

The evening before Commissioner Goodell's public testimony in June, the Committee leaked to the press an internal memorandum prepared by the majority staff alleging that Mr. Snyder had conducted a so-called "shadow investigation," contemporaneous with the Wilkinson investigation, in a supposed attempt to "intimidate" and "silence" potential witnesses. In support of that allegation the Committee publicized a PowerPoint presentation, prepared by lawyers for the Team, which purported to show Mr. Snyder "targeting" various "enemies," including reporters at the *Washington Post*.

The Committee majority could only get away with its knowingly false narrative of a "shadow investigation" by redacting over 60% of the PowerPoint presentation. What the full, unredacted PowerPoint presentation showed was that the document was prepared for an entirely different purpose, separate and apart from the matters covered by the Wilkinson investigation. The PowerPoint—which reflected a presentation made by Mr. Snyder's lawyers to the NFL—summarized the lawyers' efforts to ascertain who was responsible for a false and despicable attack on Mr. Snyder and his family, emanating from a foreign media company, and promulgated by automated "bot" accounts on social media, that spewed out a series of completely baseless stories about Mr. Snyder, such as that he was a frequent traveler on the private plane of pedophile Jeffrey Epstein (a man he had never met), that he was a drug addict, and that he bribed NFL referees. Pages redacted from the PowerPoint presentation included references to sworn affidavits from Mr. Snyder's personal staff—his driver, his pilot, his wife's executive—who were approached with an offer of money to make up false and outlandish stories about him.

Also redacted by the Committee majority from the original PowerPoint presentation was a summary of telephone records, lawfully obtained by Mr. Snyder's lawyers. Those records demonstrated that agents of his former minority-share partners—including an investment banker and a former executive assistant employed by the Team (the individual who had approached Mr. Snyder's personal staff with an offer of money)—were responsible for the communication of disparaging information about Mr. Snyder to the media, including the *Washington Post*, in violation

of the rules of the NFL arbitration proceedings between Mr. Snyder and his former minority-share partners. By heavily redacting the document in this misleading manner (but leaving in references to the *Washington Post* reporters), the Committee majority was able to intentionally create and publicize the completely false narrative that (1) the efforts of Mr. Snyder's lawyers were designed to influence or undermine the separate Wilkinson investigation; and (2) as part of these efforts, Mr. Snyder's lawyers were targeting the reporters.

And, as your staff well knows, Mr. Snyder's efforts to identify the source of these false and malicious stories were open and transparent. Mr. Snyder and his lawyers advised the NFL of their intention to try to determine the source of the defamatory stories, and received the NFL's blessing to proceed. Mr. Snyder and his lawyers briefed the NFL at various times about the progress of their investigation. All information about the source of the defamatory stories and the illicit communications with the media was shared with the NFL and with former U.S. Attorney General Loretta Lynch, who investigated the source of the media stories at the direction of the NFL's arbitrator. The Committee is aware, because Ranking Member Comer asked the NFL, that, as a result of the NFL's review of the evidence, one of Mr. Snyder's former ownership partners is now precluded for life from holding any future ownership interests in any NFL franchise. This evidence is attached as Exhibit D. The Committee gave Mr. Snyder and the Commanders no notice of its false "shadow investigation" allegation, and no opportunity to respond, prior to releasing it to the media hours before Commissioner Goodell's testimony. In a staggering display of bad faith, the Committee has never retracted the allegation, now that it has demonstrably been shown to have no basis in fact.

If the Committee declines to retract its "shadow investigation" allegation, it should publish the entire PowerPoint presentation, explain to the American public why it found it necessary to redact out over 60% of the document that demonstrated the real purpose of the presentation, and publish the NFL's communications with the Committee, demonstrating that, as a result of Mr. Snyder's legitimate investigation, the League took action against Mr. Snyder's former minority-share owner, who had perpetrated significant harm against Mr. Snyder and his family.

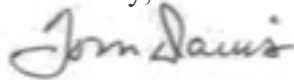
* * *

The investigation of the Washington Commanders has not been fair, thorough, or bipartisan, and it certainly hasn't sought the truth. From the beginning, the Committee set out with a singular purpose—to destroy Dan Snyder and his family and attempt, with deception, innuendo, and half-truths, to drive him from the National Football League. This investigation reeks of the lowest form of politics and its only purpose is personal destruction. Rather than seeking the truth, the Committee has ignored exculpatory evidence and buried favorable witnesses. And this Committee has embraced individuals whose lack of integrity and decency would under normal circumstances universally prohibit them from ever being relied on by a Congressional committee. Although I believe the Committee will fail in its effort to push Mr. Snyder from the NFL—principally

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because Mr. Snyder is innocent of the allegations against him—I harbor no illusions that this Committee will change its present course or behavior. My only hope is that the American people—who are the ultimate judges—will see this investigation for what it is, a politically inspired hatchet job, and begin the process of removing the stain this investigation has placed on the Committee that I so respect and love.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Davis". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Davis".

Tom Davis
Stuart Nash
John Brownlee
Counsel for the Washington Commanders

cc: The Honorable James Comer, Ranking Member
Committee on Oversight and Reform

EXHIBIT A



From: [REDACTED]
To: Melanie Treanor; Donald Wells
Cc: [REDACTED]
Subject: RE: visit to the Troops on the Middle East
Date: Friday, September 23, 2005 10:50:57 AM

i'd actually like to come up iwth a nice email...

From: Melanie Treanor
Sent: Thursday, September 22, 2005 11:33 PM
To: Donald Wells
Cc: [REDACTED]
Subject: FW: visit to the Troops on the Middle East

Who wants this one? NOT ME! Can't even spell...we make SO much \$\$\$ too! HA!

From: Wife of Military Serviceman
Sent:
To: Cheerleading Information
Cc: Melanie Treanor
Subject: visit to the Troops on the Middle East

I!

I just want to say that my husband has been deployed since march,2005. And i just found out you all were there- there was a picture emailed out to a few of the wives. The girls must love all of the men!!!

I think it is so disgusting that you all go over there, and flirt and hang all over our husbands. It really makes me angry and upset!!!!!! And you stupid girls half naked go and have the nerve to hang all over the men over in the Middle East who are fighting for our country! You can tell them all that were there thanks alot!! You have no idea what it is like to be separated from your husband during wartime, not knowing if he will return or not. Being home here, working 3 parttime jobs for hardly any money at all, raising 3 children while he is gone!!! And I bet those flooseys get quite a big paycheck--more then my husband and I make together!!! Send us some of the money to help out instead of the girls going over to the bases and being a damn sex goddess or something like that!

How come the wives are unable to see their husbands for a year or more, but oh! You are a dumb cheerleader- you can go hang all over my husband!!! Well stop it!!!!!!!

Thanks for tempting our husbands, when they already have enough on their plate. I hate all of you, and I think you should not be doing what you are doing. And great, you have to have a half naked calender out too! I do not like any of you !!!

I never will again!! make sure all the girls get to hear this email. None of them know what us military families go through just to make the US a safer place.

I support all of the troops!!
I DO NOT support you all at all!!!

Stay on the football game sidelines, where you belong!!!

Sent via the WebMail system at [REDACTED]

From: Donald Wells
To: Melanie Treanor
Cc: [REDACTED]
Subject: VIP's
Date: Monday, May 19, 2008 3:35:01 PM

Mel,

Did you ever get to talk to anyone about ^{Person 1} coming this year? I am SOOO UPSET about girls smoking Pot with him last year that I can't believe we are letting him come back. If I knew more details as to who they were I would kick them off before we left this year. Then to hear he got [REDACTED] last year because of the trip and when I heard [REDACTED] say to another girl, "I guess if you pay enough money you can fuck any cheerleaders you want". I just hate thinking that girls feel that way about us taking guys like him on the calendar trip. It opened the door or a girl like [REDACTED] and lord knows who is going to follow in her foot steps this year.

We have worked so hard for so many years to start getting a reputation that our girls are up for the highest bidder. I know several girls feel that way and they have mentioned this to me. There comes a point when we have to ask our selves how important is a few thousand dollars when we have so many young girls that are hearing these things about us. I never thought the calendar would turn into something like this.

I know you feel the same way about all this, just want to see if we can do anything to fix it before something bigger happens.

Thanks,

D

From: Melanie Coburn
To: Person 1
Cc: ; Melanie Coburn
Subject: You're Invited!
Date: Thursday, April 30, 2009 7:10:24 PM

Person 1

Thank you for always supporting the Washington Redskins Cheerleaders! Here is the information for our calendar shoot at the fabulous Marco Island Marriott! Please see the attached invite. If you are interested, please fill out the attached credit card authorization form and email or fax it back to me to reserve your spot on the trip with us. Once I receive your booking information, I will email you the discount codes to the Hotel and Transfer Company. You will be responsible for booking your own airfare and hotel, but all events listed in the attachment will be included.

2 Guests: Person 1 ,

\$500 x 2 (VIP Package with Golf, \$400 x 2 without)
+ \$75 x 2 (Transfers with Group)
+ \$163.80 x 2 (\$327.60 for 2 Flights)
= \$1477.60 total (with golf) , OR = \$1,277.60 total (without golf)

Email: coburnm@redskins.com

Fax: (301) 276-6266

Please let me know if you have any questions! Looking forward to FUN in FL later this month!

Cheers,

Melanie

Melanie (Treanor) Coburn

Director of Marketing

Washington Redskins Cheerleaders

coburnm@redskins.com

www.redskins.com

From: Melanie Coburn
To: Person 1
Subject: RE: Have fun this weekend!!! :)
Date: Tuesday, February 15, 2011 6:13:05 PM

Miss you too! ☺ Lunch one day soon? Or drinks?

Hope it's SOON!

xo

From: Person 1
Sent: Tuesday, February 15, 2011 9:52 AM
To: Melanie Coburn
Subject: RE: Have fun this weekend!!! :)

Same to you sexy lady. I miss you. Need to see that smile of yours ☺

Person 1

From: Melanie Coburn [mailto:treanorm@redskins.com]
Sent: Monday, February 14, 2011 4:19 PM
To: Person 1
Subject: RE: Have fun this weekend!!! :)

Glad to hear it! ☺

HAPPY VALENTINE'S DAY! ☺

xoxo

From: Person 1
Sent: Friday, February 11, 2011 12:22 PM
To: Melanie Coburn
Subject: Re: Have fun this weekend!!! :)

Major

From: Melanie Coburn <treanorm@redskins.com>
To: Person 1
Sent: Thu Feb 10 22:49:04 2011
Subject: RE: Have fun this weekend!!! :)

Sooooo, heard you all had some FUN! ;-)

-----Original Message-----

From: Person 1

Sent: Wed 2/2/2011 3:09 PM
To: Melanie Coburn
Subject: Re: Have fun this weekend!!! :)

I will take care of your girls

From: Melanie Coburn <treanorm@redskins.com>
To: Person 1
Sent: Wed Feb 02 15:07:59 2011
Subject: Have fun this weekend!!! :)

Hello friend! I hope it's a great weekend and that you all have a BLAST! (of course you will!)

GO Packers! J

Hugs,
Mel

PS - ladies are visiting Walter Reed for a Super Bowl party and taking t-shirts/photos/calendars and we have a tour lined up to Iraq in March! J Mark your calendar for the Friends/Family show on March 9th! J

Melanie (Treanor) Coburn

Director of Marketing

Washington Redskins Cheerleaders

[REDACTED]

coburnm@redskins.com <<mailto:coburnm@redskins.com>>

http://portal.mxlogic.com/redir/?kXL8Tpd7dTCjqTnMV4QsECzBYS02zW52IEkVv3t-hojuv78I9CzATsTefX2Ilg17Qa5pgFOVJVYsMrhjd7bzwUsCqem3qoUS5Zc-q87mU6y2pel3h0o_OLMgd49Exd49Ewid59KvxYY1NJ4SyrjK-e78CzCXOpIHky5d1q

To: [redacted]
[redacted]
Cc: [redacted]
From: Melanie Coburn [/O=REDSKINS/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=TREANORM]
Sent: Wed 3/2/2011 12:19:41 AM (UTC)
Subject: Farewell First Ladies

FYI ☐ I am moving on ☐ ☐ miss you ladies, but hope to see you around, at alumni events, etc.! ☺ LOVE YOU!

Ladies,

If you missed the meeting tonight, I have an announcement to make. It is with a heavy heart that I am leaving my WRC family as the full-time Marketing Director. After 10 incredible years with the Washington Redskins organization, I feel it is time for me to move on and start a new chapter in my life, professionally. I have made life long friendships and will always cherish my relationships with each and every one of you. I have truly enjoyed being a part of the First Ladies of Football program. (I can't lie...it's been tough being a Skins fan the last 14+ years!)

From the "Kiss a Pig" promos, to the tours to Iraq...from the ice skating uniforms, to the HOT beaded skirts and "Very Sexy" bra tops...and from the days of our Reebok Classics, to the modern day promo boots & MakeUpForEver kits, I am proud to have been able to contribute to helping you all get to the level of "Hottest in the NFL!" You really are the best in the league and I hope that you continue to get the recognition you deserve!

I wish each and every one of you **ALL** of the best in your cheering days, throughout your careers and with your families. I will always be cheering you on and will find comfort in knowing that *"once a Redskins Cheerleader, always a Redskins Cheerleader"* ☐ Hope to see you on the field for halftime (as an Alumni) in 2012 for our **FIFTIETH** anniversary!

Much love & thanks,
Melanie

Keep in touch! :)
[redacted]
[redacted]

Melanie (Treanor) Coburn
Director of Marketing
Washington Redskins Cheerleaders
[redacted]
coburnm@redskins.com
www.redskins.com

EXHIBIT B

FedEx Field Project Payments to Vendors Used by Pauken

Payment Details

Vendor		Amount Spent	Time period
Carlson Construction	\$	374,321.31	2004
Power Solutions		342,513.12	2004 - Feb 2006 (Pauken departure Feb 06)
Datawatch		44,028.93	2004 - Feb 2006 (Pauken departure Feb 06)
Total	\$	760,863.36	
Carlson Construction	\$	374,321.31	2004
Power Solutions		428,235.64	2004 - 2013
Datawatch		772,516.36	2004 - current
Total	\$	1,575,073.31	

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Mobile Site

Permit Status by Address

Permit information for [REDACTED]

Permit #: [REDACTED]

Plan #: [REDACTED]

Permit Name: NA

Site Location: [REDACTED]

Permit Type: DETACHED STRUCTURE RESIDENTIAL

Permit Description: PERMIT ADMINISTRATIVELY ARCHIVED ON 12/03/2019 WITHOUT ALL REQUIRED INSPECTIONS
PERFORMED. THIS ACTION DOES NOT GUARANTEE EXISTING CONSTRUCTION IS CODE COMPLIANT AND
DOES NOT ELIMINATE THE POSSIBILITY OF FUTURE ENFORCEMENT OF VIOLATIONS. SFD/BLD
DETACHED SHED PER PLANS S1 PLN# [REDACTED] BPDRSEE PAGE 1 S1P2"PROBLEM SOILS"

Occupancy Type: SINGLE FAMILY DWELLING

Declared Valuation: 10000

Building Information:

Group	Type of Construction
R4	5B

Fixture Units: 0

Credit Fixture Units: 0

Permit Stage: Finalized

Date Processed: 03/14/2003, Date Applied: 03/17/2006

Date Issued: 03/14/2003

Applicant/Contact: [REDACTED]

Additional Contacts: PAUKEN DAVID B

Additional Contractors: CARLSON CONST
015811 CRABBS BRANCH WY
ROCKVILLE, MD 20855

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Permit Status by Address

Permit Information for: [REDACTED]

Permit #: [REDACTED]

Plan #: [REDACTED]

Permit Name: NA

Site Location: [REDACTED]

Permit Type: ELECTRIC RESIDENTIAL

Permit Description: PERMIT ADMINISTRATIVELY ARCHIVED ON 12/04/2019 WITHOUT ALL REQUIRED INSPECTIONS PERFORMED. THIS ACTION DOES NOT GUARANTEE EXISTING CONSTRUCTION IS CODE COMPLIANT AND DOES NOT ELIMINATE THE POSSIBILITY OF FUTURE ENFORCEMENT OF VIOLATIONS. SFD/INST ALARM SYS//EDF

Occupancy Type: SINGLE FAMILY DWELLING

Building Information:

Group	Type of Construction
R4	5B

Fixture Units: 0

Credit Fixture Units: 0

Permit Stage: Finalized

Date Processed: 05/19/2003, Date Applied: 03/17/2006

Date Issued: 05/19/2003

Applicant/Contact: [REDACTED]

Additional Contacts: PAUKEN DAVID B [REDACTED]

Additional Contractors: DATAWATCH SYSTEMS
 04401 EAST WEST #500 HY
 BETHESDA, MD 20814



Mobile Site

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Mobile Site

Permit Status by Address

Permit information for:

Permit #: [REDACTED]

Plan #: [REDACTED]

Permit Name: NA

Site Location: [REDACTED]

Permit Type: ELECTRIC RESIDENTIAL

Permit Description: PERMIT ADMINISTRATIVELY ARCHIVED ON 12/06/2019 WITHOUT ALL REQUIRED INSPECTIONS
PERFORMED. THIS ACTION DOES NOT GUARANTEE EXISTING CONSTRUCTION IS CODE COMPLIANT AND
DOES NOT ELIMINATE THE POSSIBILITY OF FUTURE ENFORCEMENT OF VIOLATIONS. SFD/INSTALL ELEC
FOR NEW SFD/IJM

Occupancy Type: SINGLE FAMILY DWELLING

Building Information:

Group	Type of Construction
R4	5B

Fixture Units: 0

Credit Fixture Units: 0

Permit Stage: Finalized

Date Processed: 04/17/2003, Date Applied: 03/17/2006

Date Issued: 04/17/2003

Applicant/Contact: [REDACTED]

Additional Contacts: PAUKEN DAVID B. [REDACTED]

Additional Contractors: POWER SOLUTIONS LLC
11179 HOPSON RD SUITE 5 XX
ASHLAND, VA 23005

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Mobile Site

Permit Status by Address

Permit information for [REDACTED]

Permit #: [REDACTED]

Plan #: [REDACTED]

Permit Name: NA

Site Location: [REDACTED]

Permit Type: ELECTRIC RESIDENTIAL

Permit Description: PERMIT ADMINISTRATIVELY ARCHIVED ON 12/07/2019 WITHOUT ALL REQUIRED INSPECTIONS
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DOES NOT ELIMINATE THE POSSIBILITY OF FUTURE ENFORCEMENT OF VIOLATIONS. SFD/INSTL
CIR/FIX/MM

Associated Permit #: [REDACTED]

Occupancy Type: SINGLE FAMILY DWELLING

Building Information:	Group	Type of Construction
	ISIS	ISIS

Fixture Units: 0

Credit Fixture Units: 0

Permit Stage: Finalized

Date Processed: 08/07/2003, Date Applied: 03/17/2006

Date Issued: 08/07/2003

Applicant/Contact: [REDACTED]

Additional Contacts: PAUKEN DAVID B

Additional Contractors: POWER SOLUTIONS LLC OF VA
04221 FORBES BV
LANHAM, MD 20706

Stadium Employee 2

From: Stadium Employee 1
Sent: Friday, September 23, 2005 11:13 AM
To: Stadium Employee 2
Subject: FW: From Dave Pauken's Office

Attachments: Gate1.jpg; Gate2.jpg



Gate1.jpg (1 MB)



Gate2.jpg (1 MB)

Please print in color.

Make a file:

Dave Pauken
Gate

-----Original Message-----

From: Stadium Employee 1
Sent: Friday, September 23, 2005 10:57 AM
To: Dave Pauken
Subject: FW: From Dave Pauken's Office

For whatever it is worth, I think gate #2 looks great.

-----Original Message-----

From: John Reid
Sent: Friday, September 23, 2005 10:16 AM
To: paul_griesemer@ellerbebeck.com; Stadium Employee 1
Cc: Dave Pauken
Subject: From Dave Pauken's Office

See Attached

Stadium Employee 2

From: Stadium Employee 1
Sent: Tuesday, October 25, 2005 9:04 AM
To: Dave Pauken; 'Paul Griesemer@ellerbebecket.com'
Cc: Stadium Employee 2
Subject: FW: Pauken Gate drawing

Attachments: A401 A2 (1).pdf; Pauken gate ftg.pdf

Stadium Employee 2

Please print the attachments and have them delivered to the Sporting Clays event via Stadium Employee 4's guys this morning.

Paul:

I will be off-site most of the day, but will be available on my cell for a call this morning.

Dave is fine either way with respect to the steel post being encased in the stone or set just outside the stone column. We need to speak with Amber today and come to a conclusion on this issue, which will allow us to finalize the plan.

We also need to understand, and reflect on a drawing, all of Amber's equipment, wiring, loops, sensors, etc.

Dave will provide us with the actual width of the asphalt portion of the driveway at the columns. We will need to add 13 inches to both sides of the asphalt for the cobble stone border. Once we locate the steel post, and then account for the gate hardware, we can determine the length of each gate leaf. As far as Dave is concerned, as long as he has at least 15 feet of clear opening he will be happy. If the final layout results in a slightly larger opening that is no problem.

Dave wants to be in a position to pour the foundation, including the setting of the steel later this week. We want Amber's crew to be on-site for the setting of the steel post as she recommended.

Let's talk this morning and I can fill you in on any additional details prior to a call with Amber later today.

Stadium Employee 1

Sent from my BlackBerry Wireless Handheld

-----Original Message-----

From: Paul Griesemer@ellerbebecket.com <Paul_Griesemer@ellerbebecket.com>
To: Stadium Employee 1; @redskins.com>
Sent: Tue Oct 25 08:22:04 2005
Subject: Pauken Gate drawing

Stadium Architect

Stadium Employee 1



Pauken gate
ftg.pdf (3 MB)

I got your message ate as I got out of meetings. Did you get anything from the stone mason on the layout of the footing? The drawing follows our last discussion and keeps the steel post separate from the stone. Your message seemed to say that the post would be incorporated into the stone?

The post needs a footing that will be four feet deep. See the ftg drawing for a direction for the footing. The contractor should review this and take ownership for the overall design.

(See attached file: A401 A2 (1).pdf)(See attached file: Pauken gate ftg.pdf)

Paul **Stadium Architect**

This e-mail and any attachments are strictly proprietary and confidential,
and are not to be disclosed to third parties, distributed or reproduced
without the express written consent of
Ellerbe Becket.

Stadium Employee 3

Pauken Gate

From: Stadium Employee 3
Sent: Wednesday, November 09, 2005 2:34 PM
To: Stadium Employee 1
Cc: Stadium Employee 4
Subject: Bricks for Mr. Pauken

Stadium Employee 1

The bricks arrived at Mr. Pauken's residence at approximately 2:30 p.m.

I spoke with Ken (on-site Lead Mason) and confirmed that they match and are the correct type (Robinson/Cambridge/Solids product #ROB001S).

Installation will begin tomorrow.

The total cost charged to Mr. Pauken's credit card was \$795, receipt to follow (600 @ \$1.25 ea. plus tax @ \$45).

Thanks and please let me know if you have any questions or require additional information.

Stadium Employee 3

Stadium Employee 1

*Receipts attached for your / Mr. Pauken's
records.*

[Signature]

AURORA SERVICES, INC.

P.O. Box 90
AMISSVILLE, VA 20106

(540) 937-2400, (888)5AURORA
(540) 937-8958 Facsimile

linfo@auroraservicesinc.com
www.auroraservicesinc.com

TRANSMITTAL PAGE

TO: Dave Pauken/**Stadium Employee 3**
FROM: Amber Isham
DATE: February 17, 2006
SUBJECT: Cancellation of October 12, 2005 Gate System Proposal

Gentlemen ~

I have calculated work performed, to date, in accord with the gate system proposal. Aurora Services has installed the vehicle sensing device for free exit within the driveway as well as providing steel gate posts to the site for insertion within the masonry columns.

The Proposal Total as agreed not to include
steel required for the gate

\$10,135.00

Deposit Received

\$ 5,100.00

Less installation of the Vehicle Sensing Device

<\$1,650.00>

Less steel gate posts

<\$1,345.50>

Less 15% cancellation fee (as agreed to on the
Proposal under Cancellation section)

<\$1,520.25>

Balance Due to Mr. Pauken:

\$ 584.25

I will issue a refund check payable to Mr. Pauken next week to be mailed directly to his home.

EXHIBIT C



Tiffani Ann Johnston

February 11, 2021 · 🌐

Melanie found the words I have been struggling to find for the last 48 hours. This is NOT OK!! This is the exact OPPOSITE of what the Washington Football Team should be doing. Jason Wright, please explain how this makes ANY sense at all?!? Truly, I cannot, for the life of me, understand this.

Melanie and I both have unique perspectives, we are former cheerleaders as well as former employees. These accusations, made by so many victims, are TRUE!! She and I saw it first hand, often, unfortunately, and for the first time, I am saying out loud, I have experienced sexual harassment in both positions. Both times, it was by the men I worked with and trusted. I am not saying this for sympathy and definitely not for attention, I am saying this because again, these accusations are TRUE!!! These men need to be held accountable; not shaming, blaming and canceling the victims 🙄 I was asked yesterday..."are these accusations really true", it made me realize, people are still questioning the facts 🙄🙄

The First Ladies of Football do so much more to represent the organization that goes far beyond Gameday. Supporting our troops overseas, charitable events in the DMV community as well as serving as role models for young women are just the tip of the iceberg with the amazing things the First Ladies of Football have always done and continue to do. We are part of the thread of this one time great organization and canceling the program is the cowardly way out.

The WFT and Jason Wright are clearly not addressing the disease that plagues the organization. REAL improvements need to be made and should have been made a very long time ago.

From Melanie -

I've been searching for the right words for a few days now, but I think it all boils down to this: the Washington Football Team is an organization that will continue to have a black cloud of karma over its head until the NFL gets to the root cause of their issues. The men (or man!) responsible for the lewd videos created from footage of the calendar shoots, and the men who harassed and disrespected women in the organization for decades, should be held responsible and removed from the organization. It's that simple.

There have been too many fall guys over the years (Dennis Greene, Mitch Gershman, Larry Michael, etc.), but we all know the truth. They were pawns in the big game of Mr. Snyder, and they most likely got paid handsomely to take the fall.

Do you know the definition of victim-blaming? Victim-blaming is the attitude which suggests that the victim rather than the perpetrator bears responsibility for the assault. Victim-blaming occurs when it is assumed that an individual did something to provoke the violence by actions, words, or dress.

Removing the cheerleaders IS an example of victim-blaming, and only cowards would make this move. Rather than put in the work to improve and evolve the team together, they cancel the program that they abused for so long. So, the power women on those sidelines pay for the weakness of the men in the front office? It's bullshit and I will not spend another penny or minute with the NFL until this is resolved.

To the Washington Football Team: Not only are you crushing the passion and dreams of the 40 women you canceled, you are also terminating the opportunities for young girls and boys (my sons performed as flag runners with several other boys during one halftime show!), and future First Ladies of Football, to grace the sidelines. The Washington Cheerleaders' youth programs brought hundreds of local young people into our game day experience, all the while lining your pockets.

You are also hurting the legacy of the Washington Football Team Cheerleaders (aka Washington Redskins Cheerleaders & Redskinettes)! We have the largest, most active alumni association in the NFL, and we helped create the NFL Cheerleader Alumni Association as well. These powerful women support various team events and charities throughout the year. They enthusiastically show up and lift up your team at every opportunity. What about them?

On and off the field, the First Ladies of Football spent countless hours as ambassadors for the team, representing them in the community at various events, fundraisers and even across the globe entertaining our troops. How many times did the players do that? I, personally, only saw them show up at the high-profile media events or Fight Night. Certainly not at the Fisher House or NIH Children's Inn on the regular. Most of the events that the cheerleaders attended were pro-bono. You even made us deduct 50% of the per diem from the Armed Forces Entertainment tours for your bottom line. Seriously.

Also, to Jason Wright: I appreciate your motivation to "elevate the off-the-field product," but those words right there demean and disrespect the women who have worked their entire lives to become the professional badasses on the sidelines you so hastily write off. The ladies on the most recent squad are some of the most talented dancers I've ever seen on this level. Not only can they dance circles around the league, but they are also professional women, college students and successful entrepreneurs. I cheered with a woman who was in law school during her tenure and eventually became Assistant General Counsel for the (then) Redskins! These ladies embody what a strong woman should look like, and your statement makes it seem that they weren't up to par, when in reality, they have outperformed the on-the-field product for DECADES. In my 14 years (1997-2011) with the team, we had ONE home playoff game. That is an embarrassment. It was a common joke among the fans of the (then) Redskins fans that "at least the Cheerleaders win every game!"

And lastly, don't we have enough men in the NFL? I'm happy to see recent hires in your organization that include more women and BIPOC representation, but I also feel like it very conveniently came after last summer's report in The Washington Post detailing the long history of sexual harassment in the workplace. It doesn't feel authentic and it also seems like "too little, too late" to me.** At least Tampa Bay seems to have their culture going in the right direction (women coaches, nutritionists, etc.). Perhaps, THAT is why they won the Super Bowl!? Go Bucs!

I love my sisterhood and am grateful that our bond is one thing they can NEVER take from us. Let's all support [REDACTED] and send her love and strength!

** As a reference, according to ESPN in 2018, all of the NFL franchises combined employ a workforce that was only 28 percent women in 2018, which halted progress since having an all-time high of 30 percent in 2017. At the vice-president-and-higher level, the teams have only 18 percent of the positions filled by women, albeit a slight improvement from 17.3 percent in 2017.



EXHIBIT D

Hearing

Examining the NFL's Handling of Workplace Misconduct at the Washington Commanders

**Post-Hearing Questions from Rep. James Comer, Ranking Member,
to National Football League Commissioner Roger Goodell**

1. *It's been reported that you retained former U.S. Attorney General Loretta Lynch to investigate a former minority shareholder for his involvement in manufacturing false allegations about Mr. Snyder. Is that true?*

A: The engagement of Loretta Lynch, a partner at Paul, Weiss, Rifkind, Wharton & Garrison LLP, was in connection with an ownership dispute that was pending before the Wilkinson firm's investigation began. The ownership group of the Washington Commanders, Dan Snyder and his three limited partners, certified their dispute to the NFL Commissioner for binding arbitration, and the Commissioner appointed Brad Karp, Chairman of Paul Weiss, as the arbitrator. In the course of the arbitration, claims arose regarding improper leaking and public disparagement of Mr. Snyder that would have violated the Commissioner's confidentiality directive. On August 12, 2020, the NFL retained Loretta Lynch to investigate these claims. She finished her work in late 2020, and found that one of the limited partners had engaged in prohibited conduct.

2. *It has also been reported that, after reviewing Attorney General Lynch's investigation, you permanently banned that minority shareholder from ever owning an NFL team or otherwise participating in business relationships with the NFL. Is that true?*

A: Upon the conclusion of the investigation, one of the limited partners agreed that he would not seek to own an interest in an NFL club in the future.