



**Excerpts from the Deposition of
Daniel M. Snyder**

July 28, 2022

Committee on Oversight and Reform
U.S. House of Representatives
December 2022
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On July 28, 2022, the Committee conducted a deposition of Daniel M. Snyder, co-owner and co-Chief Executive Officer of the Washington Commanders. Below are key excerpts from the deposition.

Mr. Snyder Could Not Explain Why the Dossier Created for His Shadow Investigation Focused on *Washington Post* Journalists Who Investigated Sexual Misconduct at the Team (pp. 75-76)

- Q: And if you look at the following pages, Pages 3 through 12, do you agree that those pages in this presentation are about Liz Clarke, Will Hobson and Beth Reinhart, journalists at The Washington Post who wrote stories that the judge in Colorado described as “embarrassing for the Washington football organization and to Mr. Snyder.” Is that correct?
- A: Yes.
- Q: Mr. Snyder, what did these Washington Post journalists, Liz Clarke, Will Hobson and Beth Reinhart, have to do with a news story that was posted on a blog in India on the website of MEAWW?
- A: Well, all I can tell you is that we delivered the facts, unredacted facts to former Attorney General Lynch, shared the phone records that are actually in this document that are unredacted. You can see what was presented was telephone records and just facts. Had no involvement with -- they just delivered the facts. And they were the attorneys delivering the evidence, and that’s it.
- Q: What are the facts, Mr. Snyder, about these three journalists?
- A: I believe they just coincided with the July 16 exact date of the India -- India defamation. And they were those facts.
- Q: Mr. Snyder, have you filed any defamation suits against the Washington Post or against these three journalists for the exposés they wrote on your team?
- A: No.

Mr. Snyder Claimed His Shadow Investigation Had Nothing to Do with the Wilkinson Investigation Even Though He Made Presentations to the League and Ms. Wilkinson During the Wilkinson Investigation (pp. 45, 273-274)

- A: There was no shadow investigation.
- Q: So walk me through that. So they’ve accused you of creating this about what actually occurred during – or what you actually used these slides for and what this investigation was actually about, and respond to that claim.
- A: Around that time -- this is November 23 on the redacted C I’m looking at. Around that time, we were presenting to our lawyers -- or presenting to former Attorney Lynch, as well as the NFL and Beth Wilkinson just the facts, the information of [Former Staff 1], which has been redacted here in this version. In D, it says [Former Staff 1]. And it shows in the unredacted version that on July 4 is when she -- and they started the activities of reaching out to my employees, trying to defame us, et cetera. So all we did was present these facts to the Attorney General -- former Attorney General.

Q: So the purpose of this slide deck, was it to further your investigation into this minority shareholder and the disparagement investigation, or did it have anything to do with the workplace investigation by the Wilkinson team?

A: No. Nothing to do with the workplace investigation. That was completely independent and done by Ms. Wilkinson.

This was solely for the purpose of having connectivity to the defamatory information, the defaming stories, the bots, the devastating things that were also coinciding with the Washington Post story of July 16.

So we presented just the facts, just the evidence, the telephone records themselves, starting shortly after August 12, [Former Staff 1] received a burner phone as well, and those facts were presented to Attorney General Lynch and the NFL as well.

Mr. Snyder Claimed That He Could Not Recall Basic Facts About His Tenure as Team Owner or the Wilkinson Investigation

Actions Taken by the Team After Learning About the Lewd Videos of Cheerleaders (pp. 88-89)

Q: What did you do in response to learning about these lewd videos?

A: **I can't recall** what was done. **I can't recall**.

Q: You don't have any recollection of what you did after learning that your team was making lewd videos with unauthorized naked shots of members of your cheerleaders?

A: **I can't recall** what the team did.

Q: I'm asking what you did, Mr. Snyder.

A: What I did is just tell the truth and deny this, about me.

Q: You told the truth and denied it, meaning denying that these videos exist?

A: Denying that anything—that I've ever seen these purported videos, and I have no knowledge of them.

Q: Is it your testimony, sir, that you read these allegations and the one thing you did was deny them?

A: No, no. I'm just—you know, **I can't recall** what the organization did.

Q: And are you saying, Mr. Snyder, that you have no information about what the organization did in response to this?

A: **I can't recall**.

Q: Are you not here today, Mr. Snyder, to testify on behalf of the organization of which you are the owner and the co-CEO?

A: Yes.

Q: Yet you cannot tell me what the team did in response to these allegations regarding lewd videos?

A: **I can't recall**.

Q: You can't even tell me whether the team ascertained whether or not these were authentic videos?

A: I don't want to guess. **I just can't recall**.

The Team's Multi-million Dollar Settlement of Claims Involving Lewd Videos of Cheerleaders (pp. 89-90)

- Q: Mr. Snyder, can you confirm that a settlement was reached with regard to these videos in February 2021?
- A: I know we settled some claims from cheerleaders. **I don't know** the particulars. That's it.
- Q: So you know that the team settled some claims from the cheerleaders in February 2021. Do I have that right?
- A: I believe so.
- Q: Were the Commanders a party to this settlement?
- A: Yes.
- Q: Were you a party to this settlement?
- A: **I'm unaware.**
- Q: You're unaware whether or not you were a party to this settlement?
- A: Yes.
- Q: Were the cheerleaders featured on these lewd videos parties to the settlement?
- A: **I'm unaware** of what – the settlements we had.
- Q: You said cheerleaders were part of the settlement. What cheerleaders were part of the settlement?
- A: **I don't know.**
- Q: Did your team randomly pick cheerleaders with whom to enter into a settlement?
- A: No.
- Q: How did they pick the cheerleaders with whom they entered into a settlement?
- A: It was a claim with a group of cheerleaders, with Katz and Banks, and I just know that it was settled.
- Q: What was their complaint?
- A: **I don't remember** the particulars.

Individuals Whose Homes Were Visited by Private Investigators (pp. 150-152)

- Q: Did Reed Smith send private investigators to the home of Bruce Allen?
- A: **I'm not sure. I'm unaware.**
- Q: So it's your testimony today that you did not have any conversations with your Reed Smith counsel about private investigators and Bruce Allen, your former team president?
- A: **I don't remember** conversations about which investigations, what they were looking into. They were just conducting an investigation, and those results or facts were presented to Attorney General Lynch.
- Q: Did your attorneys send private investigators to the home of John Moag?
- A: **I'm not sure.**
- Q: So it's your testimony today that you never had conversations with your Reed Smith lawyers about private investigators and John Moag?
- A: **I'm not sure** if they did or what have you.

- Q: Did you send private investigators to the home of Brad Baker's ex-wife? Or did someone on your behalf, Reed Smith specifically, send private investigators to Brad Baker's ex-wife's home?
- A: **I'm not sure.** You know, I gave it to the attorneys, and the attorneys followed whatever leads they were looking into. It was all regarding India. It was all regarding the defamation, and they were just looking—searching for the facts.
- Q: So is it your testimony today that you did not have any conversations with your lawyers at Reed Smith about Brad Baker and private investigators?
- A: **I don't remember** Brad Baker. **I don't know** Brad Baker.

His Lawyers' Offer of Hush Money to Former Employees in Exchange for Signing Non-disclosure Agreements During the Wilkinson Investigation (pp. 229-230)

- Q: Outside of that settlement agreement, did you or anyone on your behalf or on behalf of the team approach any client of Katz, Marshall, Banks to offer them additional money in exchange for entering into a nondisclosure agreement?
- A: **I'm unaware** of that.
- Q: You're unaware. Does that mean it did not happen, or it may have happened, and you just don't know?
- A: **I'm unaware.**
- Q: Mr. Snyder, is it your testimony that you do not know if people acting on your behalf offered hush money to clients of the Katz, Marshall, Banks law firm?
- A: **I'm just unaware.**

The Need for Training for Senior Management and Sexual Harassment Allegations Against a Former Team Executive (pp. 206-207)

- Q: Do you recollect Mr. Lafemina coming to you and telling you that it was important to hire Sageview to conduct immediate "respect in the workplace" training?
- A: **I don't recall** this document.
- Q: Do you recall a conversation with Mr. Lafemina about the urgent need for training for senior management at the company?
- A: **I don't recall** that conversation.
- Q: You have no recollection of that conversation?
- A: **I don't.** He was only there, I think, seven or eight months.
- Q: Well, in his deposition, Mr. Lafemina said that because of the Rachel Engelson allegations coming to light, he felt the need to make sure that this happened immediately, and that he brought those allegations to your attention. Do you have any recollection of that?
- A: **I don't have a recollection** of the conversation, no.
- Q: You don't have a recollection of Mr. Lafemina bringing to your attention the fact that Larry Michael, one of your longstanding executives, the voice of the Redskins, was sexually harassing Ms. Engelson?
- A: Not that conversation, no.

Q: You don't remember that in response to that, you told him Larry is a sweetheart and Larry wouldn't hurt anybody?

A: **No, I do not.**

Mr. Snyder Acknowledged Making Presentations to the NFL About Former Team President Bruce Allen and His Role in the Team's Toxic Work Culture (pp. 273-274)

Q: Did you make presentations to the NFL -- did you or anyone acting on your behalf make presentations to the NFL regarding Bruce Allen and his role in the toxic work environment, as you've described it?

A: I believe we did.

Q: Do you recall how many presentations you made to the NFL?

A: No. I do not.

Q: Did you participate in those presentations?

A: I don't recall if I did. I think I participated in one -- I know I -- I met Attorney General Lynch once or twice.

Mr. Snyder Claimed That He Fired Mr. Allen Because of Concerns with the Team's Culture (pp. 266-268)

Q: Why do you believe that Mr. Allen, who was in his role after Mr. Lafemina was terminated, was the wrong guy to have retained, and why do you believe you made the right decision to let him go when Mr. Lafemina was no longer employed with your organization?

A: Because of the discovery -- discoveries, and our workplace culture. And as I mentioned, I think, earlier in this meeting, I talked about the statement of October of 2019 when he said we have -- someone in the media asked him at a press conference if he fired Jay Gruden, and he said, "we have a damned good culture." I think I've said that my wife and I said, "no, we don't," that very night.

Q: You said the reason why you think you made the wrong decision by firing Mr. Lafemina and holding on to Mr. Allen was because of the discoveries. What do you mean by "discoveries"?

A: The workplace environment culturally needed to be fixed, and that was fixed. And he was president of both sides, football and business, and ran the whole organization.

Q: You terminated Mr. Allen in December 2019. Is that correct?

A: Yes.

Q: And I believe you testified earlier that you were unaware of the allegations that were detailed in The Washington Post report, but was not published until July 16, 2020. Is that correct?

A: That's correct.

Q: So what culture are you referring to when you say that there was a workplace culture and you're suggesting that Mr. Allen was responsible for it in 2019?

A: I believe it's four or five days prior to termination of Jay Gruden, who was on TMZ smoking marijuana. And we knew we had a problem, obviously. He was the head coach.

- Q: Mr. Allen was the head coach?
- A: No. I'm referring to four or five days prior to the termination of Jay Gruden at a press conference where Bruce Allen said, we have a damned good culture, it was on TMZ, Coach Jay Gruden was smoking marijuana on a sidewalk somewhere. Crazy video. And we knew that it was an obvious signal there was a culture problem.
- Q: The culture problem that you're referring to is Mr. Gruden smoking marijuana on TV?
- A: No. I'm referring to, as I said, when Bruce Allen said -- answered the question, a damned good culture, we just didn't believe him.
- Q: So what did you believe the culture to be when Mr. Allen defended the culture of your organization?
- A: Not what he was saying.
- Q: And why did you not think it was what he was saying?
- A: Well, his head coach was on TMZ four or five days earlier. So we were doubting whatever he was saying.

Mr. Snyder Could Not Provide a Clear Explanation of Why He Believed Mr. Allen Was Responsible for the Commanders' Toxic Work Culture (pp. 269-271)

- Q: Would you hire Mr. Allen back?
- A: No.
- Q: Why not?
- A: I think for the obvious reasons. And the changes since he's been gone have been drastic, and we're proud.
- Q: Respectfully, I don't know that the reasons are that obvious. So I'm asking you to indulge me by explaining what specifically you would point to as reasons not to hire Mr. Allen back to the Commanders.
- A: It would be a long list. Substantial list. I think myself, Tanya Snyder, Jason Wright, Coach Rivera. It would be a big list. It's pretty obvious.
- Q: Are you unable to give me any reasons as to why you would not hire Mr. Allen back for now?
- A: Obviously we entrusted our franchise with him. We were, as I said earlier, not often around. And trusting him was a bad decision. And hiring the right people is critical, and we've done that.
- Q: Do you believe Mr. Allen is responsible for the allegations that were detailed in the July 16, 2020 report regarding the toxic workplace culture?
- A: We talked about -- I think you mentioned Alex Santos, Richard Mann, different scouts that were in that story. It was based on that story. So he hired them.
- Q: So because he hired them, you blamed him; is that correct?
- A: I'm not -- let me be clear. As I've said, we take responsibility in ownership of the franchise. We're not avoiding that. But he was -- he hired the coach with the TMZ thing. So obviously a lot of poor decisions. The only other thing I'd add in, obviously, is having learned well afterwards about all the homophobic, misogynistic emails that Bruce Allen participated in

with Jon Gruden and others we did not know about and, obviously, those were rather shocking.

Contrary to the Testimony of Commissioner Roger Goodell, Mr. Snyder Claimed that, in 2009, He Notified the NFL of the Sexual Assault Allegations Against Him (pp. 193-194)

- Q: So The Washington Post reported about this 2009 incident and settlement in which you allegedly sexually assaulted a former employee. Did you, in fact, assault the person who accused you of this in 2009?
- A: No.
- Q: When did you learn of her allegations?
- A: A week or two afterwards.
- Q: How did you learn about these allegations?
- A: The general counsel told me about them.
- Q: The general counsel at the time was?
- A: David Donovan.
- Q: David Donovan, okay. When you were informed of these allegations, do you remember your reaction?
- A: Yes. I was unbelievably upset. And he told me that he would follow the procedures of hiring an outside law firm. And I said, "Great." And that's what he did.
- Q: Was the NFL informed of these allegations at the time?
- A: Yes.
- Q: How do you know that the NFL was informed?
- A: Because he emailed the general counsel of the National Football League, Jeff Pash, and the outside counsel also communicated with Jeff Pash of the NFL.

Contrary to the Testimony of Commissioner Goodell, Mr. Snyder Has Remained Involved with the Operations of the Washington Commanders (pp. 252-255)

- Q: Do you trust Coach Rivera?
- A: Yes.
- Q: How often do you speak to him?
- A: Once or so a week.
- Q: What do you speak to Coach Rivera about?
- A: He calls, updates me. Went to his son's wedding this summer in Europe, my wife and I, with his family. And...
- Q: Are you aware that Coach Rivera stated that he sat with you and Tanya for an end-of-the-season meeting in January?
- A: Yes.
- Q: What was that end-of-the-season meeting about?
- A: He came over, talked about the end of the season and just his positivity for the future.
-
- Q: Were you involved in any way in unveiling the rebranding or the planning and the lead-up to?

- A: Kept informed completely.
- Q: How often?
- A: Often. It was a big decision.
- Q: What does “often” mean to you?
- A: A few times a week.
- Q: By whom?
- A: Jason Wright, Tanya and whoever called.
- Q: Can you give us an example of a day-to-day activity that you used to be involved in that you no longer are?
- A: I can give you examples of what Tanya is doing day to day, if that’s what you’re asking for.
- Q: Are those things things that you used to be involved in that you no longer are involved in?
- A: As I said during all of this meeting, prior to Jason Wright, I was only there a certain amount of days, et cetera. And, in turn, after hiring Jason, we’ve obviously given our organization a great place. Can you repeat that question, though?
- Q: The question is what day-to-day activities are you no longer involved in today that you were involved in a year ago when you were the sole CEO?
- A: Oh. It’s funny you say that, because I think if you asked Jason Wright, he would tell you that Tanya was sort of co-owner, co-CEO from the moment we met. And I think they always saw us together in the beginning and throughout the process of recruiting and hiring.
And I can tell you what Tanya is doing today, things that I didn’t do in the past, relying solely on the president of the club [Zoom audio interference] for a decade before Jason, and now we’ve got more of a leadership team, and Tanya is an important part of that, and we’re doing some great, great things.

Mr. Snyder Did Not “Have an Opinion” On Whether Ms. Wilkinson Should Have Completed a Written Report (pp. 161-162)

- Q: Do you believe a report should have been completed by the -- a written report by the Wilkinson law firm after she completed her investigation?
- A: Can you repeat the question?
- Q: Do you believe that Ms. Wilkinson should have drafted a report upon the completion of her investigation?
- A: It wasn’t up to me.
- Q: My question is a bit different. Do you believe that she should have drafted a report in connection with an investigation that you supported and you wanted to be thorough and you suggested that the NFL take over in order to make sure that the public had confidence in the investigation, did you believe that that should have culminated in a written report?
- A: I wasn’t involved. We weren’t involved in the investigation, so I didn’t have an opinion. We just went through -- I did two interviews, answering all the questions.

- Q: Sitting here today, do you think she should have written a report after she concluded her investigation?
- A: I don't have an opinion.

Mr. Snyder Refused to Tell the Committee Why a Recently Hired Female Senior Executive Abruptly Left His Leadership Team (pp. 257-258)

- Q: You also announced that Julie Jensen would be joining the executive team. Does that sound right?
- A: Yes.
- Q: Is Ms. Jensen still employed with the team?
- A: No.
- Q: Why not?
- A: I think the best person to ask would be Jason Wright.
- Q: Do you need me to repeat my question?
- A: I'm sorry, I didn't hear your question.
- Q: My question for you is, why is Julie Jensen no longer with the team?
- A: I would not be qualified to tell you based on my...
- Q: Do you know why she's not employed with the team?
- A: Not the particulars, no.
- Q: Putting aside the particulars, what can you share with me about her departure?
- A: I just know it didn't work out.
- Q: What do you know about why it didn't work out, Mr. Snyder?
- A: I don't have the details. I didn't work with her.
- Q: Mr. Snyder, you committed to the Committee in advance of this deposition to provide full and complete testimony. So I'm going to ask you again, what can you tell me about the circumstances surrounding Ms. Jensen's departure?
- A: I actually wasn't involved in her departure. So you need to ask Jason -- Jason Wright that question.
- Q: You're refusing to tell me and refusing to answer the question?
- A: I'm not refusing.

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COMMITTEE ON OVERSIGHT AND REFORM

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THE NATIONAL FOOTBALL LEAGUE INVESTIGATION

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U.S. HOUSE OF REPRESENTATIVES

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WASHINGTON, D.C.

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DEPOSITION OF: DANIEL SNYDER

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THURSDAY, JULY 28, 2022

13 APPEARANCES:

14 FOR THE MAJORITY:

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 FOR THE MINORITY:

24 [REDACTED]
25 [REDACTED]
26 [REDACTED]

27

28 FOR THE WITNESS:

29 KAREN SEYMOUR, ESQ.
30 NICOLE FRIEDLANDER, ESQ.
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37 JOHN BROWNLEE, ESQ.
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41 Washington, D.C. 20006

42 DANIEL SNYDER testified as follows:

43 EXAMINATION BY

44 [REDACTED]

45 [REDACTED] This is the deposition of Daniel M.
46 Snyder, conducted by the House Committee on Oversight and
47 Reform. This deposition is occurring as part of the
48 Committee's investigation into the Washington Commanders'
49 toxic work environment and the NFL's handling of that
50 matter.

51 This investigation was launched to inform the
52 Committee legislative effort to strengthen protections for
53 employees across all workplaces, including legislative
54 efforts to prevent and address toxic work environments and
55 workplace investigation processes; strength protections for
56 workers experiencing misconduct in the workplace; and
57 address the use of nondisclosure agreements to prevent the
58 disclosure of unlawful employment practices, including
59 sexual harassment.

60 The Committee invited Mr. Snyder to a hearing on June
61 22nd; however, he failed to appear. As a result, we are
62 holding today's deposition. The person transcribing this
63 deposition is a House stenographer and a notary public
64 authorized to administer oaths. The stenographer will now
65 place you under oath.

66 [Whereupon, DANIEL MARC SNYDER, having been duly sworn

67 by the Notary Public, was examined and testified as
68 follows:]

69 Will The Witness please state his full name and spell
70 his last name for the record?

71 The Witness. Daniel Marc Snyder, S-n-y-d-e-r.

72 [REDACTED] Mr. Snyder, my name is [REDACTED] and
73 I have been designated Majority counsel for this
74 deposition. I am accompanied by [REDACTED] and he is
75 also Majority counsel for the Committee.

76 At this time, I will ask additional individuals on the
77 Zoom and in the room to introduce themselves for the
78 record, starting with Majority staff.

79 [REDACTED] [REDACTED], Oversight Majority
80 staff.

81 [REDACTED] [REDACTED], Oversight Majority
82 staff.

83 [REDACTED] [REDACTED], Oversight Majority
84 staff.

85 [REDACTED] [REDACTED], Oversight Majority
86 staff.

87 [REDACTED] [REDACTED], Majority staff.

88 [REDACTED] [REDACTED], Majority staff intern.

89 [REDACTED] [REDACTED], Minority counsel.

90 [REDACTED] [REDACTED], Minority staff.

91 [REDACTED] [REDACTED], Minority staff.

92 [REDACTED] We are operating pursuant to Committee
93 rules, specifically Rules 15 and 16, which cover the
94 guidelines for today's deposition. We previously
95 provided Mr. Snyder's personal counsel with a copy of
96 these Rules. I will now briefly review the ground rules
97 for today's deposition.

98 The way the questioning will proceed today is as
99 follows: The deposition will begin with the Majority
100 asking questions of you for up to one hour. Thereafter,
101 the Minority will have the opportunity to question you
102 for an equal period of time. We will rotate back and
103 forth, one hour per side, until we are out of questions.

104 If you need to take a break at any time, please do
105 let us know. We are happy to accommodate you. Ordinarily,
106 we take a 5-minute break at the end of each hour of
107 questioning, but if you need a break before that, please
108 let us know. To the extent there is a pending question,
109 I would just ask that you finish answering the question
110 before you take a break. Do you understand?

111 A Yes, thank you.

112 Q Under the Committee's Rules, you are allowed
113 to have an attorney present to advise you. Mr. Snyder,
114 do you have an attorney present with you today?

115 A Yes.

116 [REDACTED] Would counsel for Mr. Snyder please

117 identify yourself?

118 Ms. Seymour. Yes, good morning, it's Karen
119 Seymour from Sullivan & Cromwell. I'm here with my
120 colleagues, and I'll let them introduce themselves.
121 (Attorneys stated their appearances for the record.)

122 [REDACTED] As you can see, the stenographer is
123 taking down everything I say and everything you say to
124 make a written record of this deposition. For the record
125 to be clear, please wait until I finish each question
126 before you begin your answer, and I will wait until you
127 finish your response before asking you the next
128 question. The stenographer cannot record non-verbal
129 answers, such as shaking your head, so it is important
130 that you answer each question with an audible, verbal
131 answer. Do you understand?

132 A Yes.

133 Q You are required to answer all questions
134 unless you are asserting a privilege. To the extent you
135 or your counsel object to a question to assert a
136 privilege, you must clearly state the specific privilege
137 being asserted and the reason for the assertion on or
138 before the scheduled date of testimony. Objections must
139 be made in a non-suggestive and non-argumentative manner.
140 Members of Committee staff are not permitted to raise
141 objections.

142 You may only refuse to answer a question to preserve a
143 privilege recognized by the Committee and not for any other
144 reason. For example, it is improper to object to questions
145 on the basis of confidentiality and/or concurrent litigation
146 interests. Do you understand?

147 A Yes, I do.

148 Q The House of Representatives and the Committee
149 do not recognize any common law nondisclosure
150 privileges, including, but not limited to, deliberative-
151 process privilege, attorney-client privilege, attorney-
152 work product protection, and any purported contractual
153 privileges, such as nondisclosure agreements.

154 Mr. Snyder, do you understand?

155 A Yes.

156 Q The only assertions of executive privilege
157 that the Chair of the Committee will consider are those
158 made in writing by an executive branch official
159 authorized to assert the privilege. Do you understand?

160 A Yes.

161 Q If you refuse to answer a question on the basis
162 of privilege, the Majority staff may either proceed with
163 the deposition or seek a ruling from the Chair on the
164 objection, by telephone or otherwise, during the
165 deposition at a time of the Majority staff's choosing.
166 If the chair overrules any such objection during the

167 deposition, you are required to answer the question. Do
168 you understand?

169 A Yes.

170 Q If you refuse to answer a question after being
171 directed by the chair in writing or orally during the
172 deposition, as reflected in the record, you may be subject
173 to sanction. Do you understand, Mr. Snyder?

174 A Yes.

175 Q We want you to answer our questions in the most
176 complete and truthful manner possible, so we're going to take
177 our time. If you have any questions or do not understand
178 any of the question, please do let us know. We will be happy
179 to clarify or rephrase our questions. Do you understand?

180 A Yes, I do.

181 Q If I ask you about conversation or events in the
182 past and you are unable to recall the exact words or details,
183 you should testify to the substance of those conversations
184 or events to the best of your recollection. If you only
185 recall a part of the conversation or events, you should give
186 us your best recollections of those events or parts of the
187 conversations that you do recall. Do you understand?

188 A Yes.

189 Q Mr. Snyder, because you have been placed under
190 oath, your testimony here today has the same force and
191 effect as if you were testifying before the Committee.

192 If you knowingly provide false testimony, you could be
193 subject to criminal prosecution for perjury, making false
194 statements, or other related offenses. Do you understand?

195 A Yes.

196 Q Have you consumed anything, including medications,
197 alcoholic beverages or other substances that would impair
198 your ability to testify truthfully today?

199 A No.

200 Q Is there any reason that you are unable to testify
201 truthfully today, Mr. Snyder?

202 A No.

203 Q Do you have any questions before we begin?

204 A No. Thank you.

205 Q Mr. Snyder, why did you purchase the Washington
206 Redskins, now the Washington Commanders, in 1999?

207 A My father, Gerald Snyder, and I loved the team,
208 grew up with it. He took me to my first games when I was
209 six years old at RFK and -- long time ago now.
210 And in 1998, he called me and told me that the team was for
211 sale. I was excited and said, okay, I'll look into it,
212 that sounds like -- and it was a lifelong dream for both of
213 us, my father and me.

214 Q At the time of your purchase, did you have any
215 experience with owning or managing a professional sports
216 team?

217 A No, I did not.

218 Q After you purchased the Washington Commanders,
219 what was your title?

220 A Owner.

221 Q Just owner?

222 A Called myself owner.

223 Q Pardon me?

224 A Called myself owner, yes.

225 Q Were you also considered the CEO of the
226 Commanders?

227 A Sure.

228 Q Now, what does job of the owner/CEO for the
229 Commanders entail?

230 A A long time ago, 1999, but to own the franchise,
231 care for the franchise. Obviously, win. Build great
232 organizations. And win the Super Bowl and -- always is,
233 obviously.

234 Q What would you say your favorite aspect is of
235 being the owner of the Washington Commanders?

236 A Haven't done it, yet, but made the playoffs I
237 think last 10 years, so three division titles, but haven't
238 made it to the promised land of the Super Bowl. That's
239 obviously the number one goal on the field.

240 Q Do you also -- as the CEO, now co-CEO, do you
241 oversee the daily operations of the team?

242 A I own the team. My wife and I are co-owners, co-
243 CEOs from that standpoint. But the head of the football
244 side is Coach Ron Rivera, and the head of the business side
245 is Jason Wright, and they run the day-to-day of the
246 organization.

247 Q How does your role interact, if at all, with
248 Coach Rivera and Mr. Wright?

249 Ms. Seymour. Today, [REDACTED]

250 [REDACTED] I'm sorry?

251 Ms. Seymour. It's Karen Seymour. I just want to make
252 sure we have the timeline today. You're asking how --
253 [Zoom audio distortion]. I just wanted to catch the time
254 frame.

255 [REDACTED] Sure. I would certainly appreciate,
256 Mr. Snyder, if you have a question, any uncertainty about
257 what I'm asking, please feel free to ask. But, yes, I'm
258 asking about how the role interacts today. And maybe you
259 can go from there.

260 The Witness. I think that Tanya, who is my wife, co-
261 owner, is more hands-on from the standpoint of the stadium
262 and the day-to-day fan experience. And I'm there always
263 for guidance and help in any way I can with both Jason and
264 Ron Rivera, supporting and encouraging and whatever they
265 need to help.

266 By [REDACTED]

267 Q How does your role today differ from your role
268 for example, from five years ago as a CEO?

269 A Really as owner, from the standpoint of the
270 previous -- Jason Wright's predecessor there for 10 years
271 had both the football side and the business side, and we
272 have broken it -- two and a half years ago, we decided that
273 the best way to run this would be to hire a coach like Ron
274 Rivera.

275 And my wife and I interviewed him five times or so and --
276 off campus and spent time with his family and my family,
277 and we hired him to kickstart our football organization
278 side. And then if it wasn't for COVID, we would have gone
279 faster on the business side.

280 And we met Jason Wright and recruited him from a company
281 called McKinsey Consulting, that's about two years ago now.
282 And it's been great. We really have taken this
283 organization to a first-class place.

284 Q Who was the president of the Commanders before
285 Jason Wright?

286 A Bruce Allen.

287 Q Is Bruce Allen the individual who you mentioned
288 ran both the business and the football operations?

289 A Yes.

290 Q When Mr. Allen was in his role running both the
291 business operations and the football operations, what, if

292 any, interactions did you have with Mr. Allen in the course
293 of his job duties?

294 A Back over the course of the decade prior to Jason
295 Wright and Coach Rivera, we were not very present at the
296 team offices much. My wife and I homeschooled our kids,
297 and was probably there 30 days a year or so. There was a
298 lot of phone conversations, family, a lot of check-in
299 calls. Jason would speak to the head coach as well.

300 Q What do you mean by a lot of check-in calls?

301 A He would call me; update.

302 Q How often would he call you?

303 A Pretty frequently.

304 Q What does that mean to you, if you were to
305 estimate?

306 A I'd be guessing, but once every couple days.

307 Q When you say he was calling you for updates, what
308 kind of updates was he calling you with?

309 A Football updates, injury, some of the information
310 on the business side. General business, like that.

311 Q When you say football updates, what do you mean
312 by that?

313 A I would get a very quick call with injuries and
314 things like that. Players injured.

315 Q Why would he be calling you about a player
316 injury?

317 A To keep me informed; to keep us informed.

318 Q Was it important that he kept you informed?

319 A Yes.

320 Q And why is that?

321 A We own the franchise.

322 Q You also mentioned that he would call you on the
323 business side. What do you mean by that?

324 A Updates, league updates and, you know,
325 information updates in terms of event sponsors and what
326 have you.

327 Q What do you mean by "league updates"?

328 A I'm sorry?

329 Q What do you mean by "league updates"?

330 A If there was a league memo issued on a new rule
331 or something, something that would be of interest, then he
332 would call me.

333 Q Of interest to whom?

334 A Of interest regarding the game.

335 Q Of interest to you?

336 A Yes.

337 Q How often would Mr. Allen call you with league
338 updates?

339 A Periodically.

340 Q What does that mean?

341 A If the league issued a new memorandum about a new

342 rule or whatever the particulars are, try to keep us
343 informed.

344 Q Was that weekly?

345 A I'd be guessing how often the league memos
346 circulate.

347 Q Did the league issue memos regularly enough that
348 you knew that they would be coming? Did you anticipate
349 that there would be updates from Mr. Allen related to these
350 league updates?

351 A Not - more. Not anticipate. More he would -- if
352 it was a rule change or modification to something or, you
353 know, a new rule at stadiums and what have you, we would
354 get the updates.

355 Q What other kind of information did Mr. Allen call
356 you about?

357 A Just general day-to-day, regular updates.

358 Q What do you mean by that specifically?

359 A If he was going to promote someone or something
360 like that, just normal update, normal information.

361 Q When you say "promote someone," are you talking
362 about a Commanders employee?

363 A Yes. Yes.

364 Q Are you talking about on the business side?

365 A Both.

366 Q Both business and football?

367 A Yes, yes. For example, he would say in the
368 offseason, this particular coach is retiring or leaving,
369 and can we add a coach, and just wanted to keep me
370 informed.

371 Q Why would he call you to let you know if he was
372 promoting somebody?

373 Ms. Seymour. You can answer if you know why.

374 The Witness. Just to keep us informed.

375 By [REDACTED]

376 Q What, if anything, would you do with the
377 information he would provide?

378 A If a coach was getting promoted, sometimes I'd
379 call and congratulate the coach and say congratulations,
380 and I'll leave a voice mail or what have you.

381 Q Did you ever weigh in or assess his determination
382 as to who would be promoted?

383 A No. No.

384 Q Did you ever provide him any feedback on any of
385 the decisions he made to promote individuals?

386 A I don't recall.

387 Q I'm sorry, I couldn't hear you.

388 A I don't recall.

389 Q To be clear, you don't recall if you would
390 provide Mr. Allen any feedback on individuals that he would
391 call you about promoting?

392 A I don't recall anything in particular.

393 Q Would Mr. Allen call you about people he wanted
394 to fire, for example? You mentioned promotion or personnel
395 decision. But now my question is about terminating.

396 A I'm sure he would, but I don't recall any
397 particular instance.

398 Q Why are you sure that he would?

399 A It would be the right thing to do.

400 Q Why is that?

401 A I'm sorry?

402 Q Why is that? Why is that the right thing to do?

403 A Just to keep us informed.

404 Q Did you ever provide Mr. Allen any feedback or
405 weigh in or assess any information he provided you with
406 respect to termination decisions?

407 A I don't recall any particular instance. I think
408 from time to time, the coach would retire, we would discuss
409 that, maybe do a retirement -- a going-away lunch or
410 something, things like that.

411 Q When you say that Mr. Allen would "call us," what
412 specifically are you referring to?

413 A That would be myself, and my wife is usually with
414 me, Tanya Snyder, so he would be calling us.

415 Q Did he call your phone?

416 A Yes.

417 Q What was Ms. Snyder's role on the Commanders five
418 years ago?

419 A She would have charitable -- charitable community
420 areas and work closely on projects, and her -- my wife's
421 passion, which is Think Pink, fight against breast cancer.
422 And she would spend the month of October absolutely
423 consumed with it and working with the team and at the
424 stadium and things with the fans and community, as well as
425 many, many other programs. And she would have input into
426 areas that she -- we felt like she grew, things like retail
427 and things like that.

428 Q Now, going back to Mr. Allen and these updates,
429 as you called it, did he ever call you about updates
430 regarding player contract negotiations?

431 A I'm sorry, can you repeat the question, please.

432 Q Did he ever call you about player contract
433 negotiations?

434 A Sure. If he was in the midst of a major player,
435 a contract, he would keep me really informed on this,
436 especially when he was dealing with the agents. And
437 negotiating, he would tell me things like where these
438 numbers fit in a particular area; for example, in the
439 offensive line or whatever it was, here's the comps and
440 really tell me here's what we're offering, and try to keep
441 me informed on this stuff.

442 Q What about setting salaries for employees? Was
443 that something he would call you about?

444 A I can't recall exactly, but he would keep us
445 informed. I can't recall particulars.

446 Q And when you say you can't recall particulars, I
447 want to make sure that I understand what you're saying.
448 Are you saying that it happened but you can't recall an
449 incident that you can share or are you saying that you
450 don't know if it happened at all?

451 A Can you repeat the question, please.

452 (Record read)

453 Q Would it be helpful to go back to the prior
454 question?

455 A Yes, that would be great. Thank you.

456 (Discussion held off the record.)

457 Q So, Mr. Snyder, I'm trying to understand when you
458 say "I can't recall" if you are saying that that, in fact,
459 did not happen, you can't recall if it happened at all, or
460 that you can't recall a specific instance. So we were
461 talking about salaries being set and Mr. Allen calling you.

462 A Yes. Now, he would call from time to time. And
463 I remember, you know, a player -- excuse me, coaches'
464 salary increases, coaches' contract extensions, some salary
465 increase. Normal things that he would call and keep us
466 updated on.

467 He would say, I'm going to extend XYZ Coach's contract for
468 a year or two years or what have you. I'd say great, or
469 I'd ask a question to make sure.

470 Q Was it the same for the business side?

471 A Yes, it was.

472 Q We talked a bit about termination, but I'm
473 curious what your role was, if anything, and Mr. Allen's
474 role was, if anything, when it came to employee discipline.

475 A I don't understand the question.

476 Q What was your role when it came to employee
477 discipline?

478 A I don't understand the actual question.

479 Q Did you have a role in disciplining employees?

480 A In disciplining of employees?

481 Q Discipline.

482 A No.

483 Q You had no role?

484 A No.

485 Q When complaints were brought to your attention,
486 what, if anything, was your role in responding to the
487 complaints?

488 A Bruce Allen, you mentioned, he was responsible
489 for keeping us informed. He would tell us if there was an
490 issue that he was dealing or whatever. It was -- I can't
491 remember the particulars.

492 Q Did you provide him any feedback, guidance or
493 assessments about what he would bring to your attention?

494 A I can't recall particular -- an exact one or what
495 have you, if there was an issue -- you know, a coach issue
496 or what have you. I'm sure he would keep us informed.

497 Q I'd like to show you a document, a document that
498 has been shared with your counsel. For purposes and ease
499 of reference, the document is labeled AA.

500 Ms. Seymour. This is Karen Seymour. For the record,
501 some of these documents may take longer for Mr. Snyder to
502 review than others. We received more than a thousand pages
503 of documents less than seven hours before this hearing.
504 There were 48 individual exhibits, and, of course, we were
505 not able to review these in advance with Mr. Snyder.

506 So please accept the fact that he may need to take
507 some time to review them, but we haven't had the
508 opportunity to cover them with him, just for the record.
509 Thank you.

510 By [REDACTED]

511 Q Mr. Snyder?

512 A Yes.

513 Q What your counsel handed you, what we've marked
514 as Exhibit 1 for identification purposes, please take a few
515 minutes to review it and let me know when you're done.

516 (Exhibit Exhibit 1, Code of Conduct, was marked for

517 identification.)

518 A (Witness complies with request.)

519 Okay, thank you.

520 Q Do you recognize this document?

521 A No, I do not.

522 Q This document is a Code of Conduct for Employees
523 with the Redskins Organization, Pro-Football, Inc. and WFI
524 Stadium, Inc.

525 Pro-Football, Inc. and WFI Stadium are in the organization,
526 Mr. Snyder?

527 A Yes.

528 Q This document was produced to the Committee by
529 the NFL. According to the document, it was last revised on
530 May 6, 2003.

531 Mr. Snyder, I want to direct your attention to the third
532 page where it says "Part III - Conduct and Fraternization,"
533 do you see that?

534 A Yes.

535 Q I want to direct your attention to the fourth
536 paragraph, the sentence that begins "Additionally,
537 nonfootball employees may not."

538 Do you see that?

539 A Yes, I do. Yes.

540 Q The sentence reads, "Additionally, nonfootball
541 employees may not date, flirt, socialize or fraternize with

542 any member of the football team, coaching staff,
543 cheerleading squad or football-related personnel either on
544 or off the Redskins premises."

545 Mr. Snyder, do you recall having a policy that prohibited
546 fraternization between football players and employees and
547 nonfootball employees?

548 A That's what it says.

549 Q My question is different. My question is: Do
550 you recall having a policy that prohibited fraternization?

551 A Yes.

552 Q According to documents produced by the NFL to the
553 Committee, the Commanders had a fraternization policy much
554 like the one in front of you as recently as 2018.
555 Sitting here today, Mr. Snyder, do you know if the
556 Commanders have a fraternization policy currently in place?

557 A I believe so.

558 Q Do you have any reason to believe that the policy
559 was changed from the language that you're seeing in this
560 2003 policy to present day?

561 A I know we've changed a lot under Jason Wright and
562 Ron Rivera, so I would expect a far superior document than
563 anything done in 2003 out of Jason and the team.

564 Q But it is your understanding that there, in fact,
565 is a fraternization policy still in place?

566 A I believe so.

567 Q Now, during the Committee's deposition of Dave
568 Pauken, a former Commanders' chief operating officer,
569 Mr. Pauken testified under oath that you were personally
570 involved in and, in fact, instructed him to terminate one
571 of his subordinates for violating the fraternization
572 policy.
573 Specifically, he testified you that personally directed the
574 termination of a former Commanders employee, [REDACTED],
575 who had been engaged in a consensual sexual relationship
576 with a member of your former coaching staff, [REDACTED]
577 Mr. Pauken testified that [REDACTED] was never disciplined.
578 Mr. Snyder, did you ever direct or otherwise authorize the
579 termination of an employee named [REDACTED]
580 Ms. Seymour. This is Karen Seymour. I would ask as
581 we refer to the testimony if you have the transcript
582 citations so we can follow along.

583 [REDACTED] Yes. Can we go off the record?

584 Ms. Seymour. Yes.

585 (Discussion held off the record.)

586 By [REDACTED]

587 Q This would be page 129 of Mr. Pauken's deposition
588 transcript.

589 Ms. Seymour. [REDACTED] could I ask just the court
590 reporter to read back what you read, your question, so I
591 can follow along with the transcript?

592 (Record read)

593 Ms. Seymour. I'm sorry, I don't see a reference to
594 [REDACTED] in the testimony at page 129. Perhaps I'm
595 missing it.

596 [REDACTED] That's the beginning. There's quite a
597 long discussion. Her name is on page 132 of the
598 transcript.

599 Ms. Seymour. Got it. Thank you very much.

600 By [REDACTED]

601 Q Mr. Snyder, if you will?

602 A I don't recall what he's talking about there, but
603 I do recall [REDACTED] because my wife and I went [REDACTED]
604 [REDACTED] and I don't
605 remember the particular year, but I remember [REDACTED]
606 [REDACTED]

607 Q Do you recall -- do you recall an incident -- you
608 testified as to whether or not you directed [REDACTED]
609 termination, but do you recall an incident that [REDACTED]
610 and [REDACTED] were having a consensual sexual relationship
611 that was brought to your attention by Mr. Pauken?

612 A No, I do not recall. I just remember going with
613 my wife [REDACTED]. It was very sad. My wife was
614 obviously upset, [REDACTED] is everything to her, to
615 solve that.

616 Q Now, Mr. Pauken also testified he that the team

617 had a similar policy that prohibited cheerleaders, who I
618 understand are not technically employees, prohibited them
619 from fraternizing with football players, coaching staff and
620 other personnel.

621 Mr. Snyder, do you recall having a policy in place that
622 prohibited cheerleaders from fraternizing with football
623 staff, coaching staff and football players?

624 A I believe that's covered as Part III of the
625 document from '03 that you gave me. So, yes.

626 Q In Mr. Pauken's deposition, beginning on page --
627 the bottom of 94 going to page 98, that's where he
628 testified about the incident I'm going to ask about.
629 Mr. Pauken testified that during the 2005 season, he
630 personally ordered the firing of two cheerleaders, [REDACTED]
631 [REDACTED], for engaging in sexual
632 relationships with then-tight end Chris Cooley. Do you
633 know who Chris Cooley is?

634 A Yes. He played H-back for the franchise for
635 quite some time, probably seven years ago or so, eight
636 years ago. Played for [REDACTED]. I believe he was
637 drafted by [REDACTED].

638 Q Did you direct or otherwise authorize the
639 termination of [REDACTED]

640 A I don't recall any of that. I don't know who
641 those names are.

642 Q Did you direct or otherwise authorize the
643 termination of [REDACTED]

644 A I don't know who that is. I don't recall any of
645 these names.

646 Q Did you direct or otherwise authorize the
647 termination of cheerleaders for engaging in a consensual
648 sexual relationship with former tight end Chris Cooley?

649 A I don't recall any of this.

650 Q Mr. Snyder, was Mr. Cooley cut from the team
651 prior to the 2013 season?

652 A I don't remember exactly when he was -- he may
653 have retired. I can't remember exactly.

654 Q Do you recall ever authorizing him being cut from
655 the team?

656 A I wasn't -- I'm not involved in who gets cut from
657 the team. That's up to the coaches and the head coach and
658 the player personnel. And in those particular years, it
659 was up to Bruce Allen.

660 Q Did Bruce Allen or anyone else bring to your
661 attention that Mr. Cooley was being cut from the roster?

662 A If a player that had played for a long time and
663 was very successful was being either retired or cut, he
664 would -- they would generally call me, the head coach would
665 call me, and I'd call the player and thank the player for
666 the years of great effort.

667 Q Did you eventually hire Chris Cooley to work as
668 part of the radio broadcast team after he ended his playing
669 career in 2013?

670 A The team hired him at some point in the future, I
671 believe, to do the game day radio -- I believe game day
672 radio show. I can't remember exactly.

673 Q Mr. Cooley separated from the Commanders in 2020;
674 is that correct?

675 A I'm sorry, can you repeat the question.

676 Q Separated -- Mr. Cooley from the Commanders in
677 2020, is that correct?

678 A I believe so.

679 Q Sitting here today, do you think it's
680 appropriate, Mr. Snyder, to have a policy that punishes
681 women for engaging in the same behavior, similar behavior,
682 that men do where the men face no punishment but the women
683 do?

684 A I don't understand the question.

685 Q Do you think it's fair to have a policy that
686 subjects women to harsher punishment than men for engaging
687 in the same behavior?

688 A Of course.

689 Q Of course what?

690 A Everyone should be treated equally and fairly and
691 with respect and appreciation.

692 Q So is it your testimony that having a policy that
693 subjects women to harsher punishment than men for engaging
694 in similar behavior, that that is unfair and inappropriate?

695 A Of course, yes.

696 Q Directing you to Pages 166 and 167 of
697 Mr. Pauken's deposition. During Mr. Pauken's deposition,
698 he testified that in 2002, he was made aware of a complaint
699 that a member of the coaching staff, [REDACTED] coach [REDACTED]
700 [REDACTED], groped a member of the public relations team,
701 [REDACTED]
702 Mr. Pauken discussed the complaint with you, and together
703 the two of you decided not to confront and otherwise
704 reprimand [REDACTED] and, instead, you agreed that the
705 employee, [REDACTED] should be kept away from him.
706 Mr. Snyder, do you recall the incident that I'm referring
707 to?

708 A No, I'm sorry. I don't recall.

709 Q Do you recall ever disciplining or recommending
710 discipline for [REDACTED] for engaging in any kind of
711 inappropriate sexual misconduct against an employee?

712 A No, I don't recall.

713 Q Do you recall who [REDACTED] is?

714 A Yes. [REDACTED]
715 [REDACTED]
716 [REDACTED]

717 [REDACTED] [REDACTED] [REDACTED]

718 [REDACTED]

719 Q Would it have been your expectation that an
720 incident like the one I just mentioned involving [REDACTED]
721 [REDACTED] [REDACTED] would it have been your
722 expectation that the president of the Commanders or the
723 leader of the business side at the time bring that to your
724 attention?

725 A Sure, yes.

726 Q And the other incidents that I mentioned
727 involving Chris Cooley and the cheerleaders [REDACTED]
728 and [REDACTED] as well as [REDACTED] do you
729 believe that that is information that should have been
730 brought to your attention, as the owner?

731 A Can you repeat the question?

732 (Record read)

733 A I'm sorry. Did you respond to that question? I
734 think you --

735 Q My question is for you, Mr. Snyder.

736 A Yes, I think it should be brought to the owner's
737 attention. Ownership. Any important matters.

738 Q Outside of the fraternization policy that we
739 discussed, are there any other Commanders policies or
740 practices that you're aware of that attempted to --
741 attempted to or prevented women from engaging in consensual

742 relationships with male staff?

743 A I'm not -- I don't have our current policies in
744 front of us, but I think we can send those to you, and I
745 think you'd be quite impressed that we are -- I believe we
746 produced another report on our organization, and I would
747 just encourage everyone to read it. I think it's quite
748 impressive, the accomplishments, our turnaround in the last
749 two years, and it's reflected in there.

750 But I think if you'd like, we can send you all of our
751 policies and what have you.

752 Q Mr. Snyder, did you ever direct Mitch Gershman to
753 instruct Jason Friedman, one of your longest-serving former
754 employees, to fire Commanders employees who had raised
755 concerns about overtime violations?

756 A I don't recall. I couldn't answer that question.

757 Q Do you think it's appropriate to fire employees
758 who raise concerns about workplace conditions such as
759 overtime violations?

760 A Yes.

761 Q And why is that?

762 A Well, if employees raise concerns about any
763 conditions, we want to know. We want to fix any problems,
764 eliminate any bad apples, and we want to do what's in the
765 best interest of the organization and our employees.

766 Ms. Seymour. Would the court reporter please read

767 back Mr. Snyder's answer. He may have misspoken. And the
768 question.

769 [REDACTED] Karen, Mr. Snyder is the person who is
770 testifying, and so I will ask him the questions to elicit
771 his responses, not yours or your interpretation of whether
772 or not he provided an answer that's consistent with your
773 understanding of what he should have responded.

774 Ms. Seymour. It's fine. I do believe, and I think
775 other participants would -- the plain meaning was -- I
776 think he may have misstated his answer. You do not have to
777 do it, but I believe he misstated his answer. And we can
778 move on. I think to be fair to the witness, it's
779 appropriate to read it back. If he's comfortable, he's
780 comfortable.

781 The Witness. Thank you. Can you read it, please?
782 Thank you.

783 By [REDACTED]

784 Q No. What I would like to do is to ask you a
785 follow-up question -- that's how these depositions
786 typically work -- so that I can understand what it is,
787 Mr. Snyder, that you are trying to say.

788 A Thank you.

789 Q My question for you is if you think it's
790 appropriate to terminate employees who raise concerns about
791 workplace conditions such as overtime violations.

792 A To terminate employees about -- if they raise
793 concerns? No.

794 Q And why is that not okay?

795 A Because we need to understand and they are to be
796 paid overtime and we follow all the rules and procedures
797 and laws and what have you. So if someone raised a
798 concern, we need to address any concern.

799 Q Well, Mr. Snyder, are there any employees that
800 you recall participating in their termination?

801 A First that comes to mind is Bruce Allen.

802 Q Anyone else?

803 A That I terminated?

804 Q You were involved in the termination, whether you
805 made the decision directly or otherwise.

806 A Bruce Allen comes to mind.

807 Q That's the only person you recall terminating in
808 the course of your ownership of the Commanders?

809 A Coach Jay Gruden.

810 Q Anyone else?

811 A Not off the top of my head.

812 Q 2020 was a pretty significant year of turnover
813 for the Commanders. Do you recall that?

814 A Yes.

815 Q What, if anything, was your involvement in the
816 separation of those employees who left the organization?

817 A Once Coach Ron Rivera came in, we encouraged
818 him -- when I say we, Tanya Snyder and I encouraged him to
819 make the changes to improve our culture, improve our
820 organization.

821 And then upon hiring Jason Wright, he was empowered to do
822 the same, and he has done an unbelievably great job at
823 turning our organization into what I consider a leadership
824 position.

825 Q Is it your testimony, Mr. Snyder, that you don't
826 recall being involved in the termination of anyone who left
827 in 2020 outside of individuals that you mentioned, if they
828 were, in fact, terminated in 2020?

829 A That's what I remember.

830 Q Earlier you testified that Mr. Allen called you
831 to provide you updates. Outside of calling you, were there
832 any other methods of communication between you and
833 Mr. Allen; and, if so, what were they?

834 A I would meet with him from time to time. I would
835 see him obviously at practice when I came to the facility
836 and then I would see him on game day. And also the night
837 before, my family and I would have a dinner at away games,
838 and he would stop by and update us on, you know, who is
839 playing this week, injuries, those types of things that,
840 you know, tomorrow, the next day, game day, and keep us
841 informed.

842 Q Did you and Mr. Allen ever exchange emails in the
843 course of his employment with the Commanders?

844 A No, I did not.

845 Q And that is to say you never exchanged emails
846 with Mr. Allen?

847 A I don't have email.

848 Q What do you mean by you don't have email?

849 A I don't have an email account.

850 Q Meaning that you don't use it or there is not one
851 that exists that belongs to you?

852 A One doesn't exist that belongs to me.

853 Q Why don't you have an email account?

854 A I have an email account for the executive office
855 to receive league materials, things like that mailed to me,
856 but I do not have email. I didn't have one at my public
857 companies either.

858 Q So that the record is clear, you have an email
859 with the Commanders organization, which is to receive
860 executive communication. You do not have a personal email
861 account, and you did not have email accounts at your prior
862 company that you worked for or owned?

863 A I'm sorry. Can you repeat the question? I
864 couldn't hear you.

865 Q Why don't I ask you the question? Because I'm
866 trying to make sure I understand the email accounts you

867 have.

868 It sounds like you have one email account with the
869 Commanders organization; is that correct?

870 A I don't have any email. This is the executive
871 office that comes in to Tanya and I, Tanya Snyder and I,
872 league memos, et cetera, and updates from the NFL.

873 Q Who has access to that?

874 A That would be -- the executive office would have
875 access.

876 Q What does "executive office" mean?

877 A The executive assistant.

878 Q Anyone else?

879 A No.

880 Q You have access; correct?

881 A I'm sorry?

882 Q You have access; correct?

883 A Me personally, no, I do not.

884 Q Does Ms. Snyder have access?

885 A I don't believe so.

886 [REDACTED] That's the end of my questions at this
887 time. Off the record.

888 (Discussion held off the record.)

889 (Recess)

890 EXAMINATION BY

891 [REDACTED]

892 Q Mr. Snyder, my name is [REDACTED] [REDACTED] I'm
893 counsel for the Minority, and I'll be handling the
894 questions for this hour.

895 Before we begin our questions, I want to reiterate Ranking
896 Member Comer's concerns with this so-called investigation.
897 This is an investigation of a single private organization
898 for workplace misconduct that took place years ago. The
899 House Oversight Committee is not the proper forum for this
900 investigation.

901 While Mr. Comer and the Committee's Minority members agree
902 this alleged behavior is troubling, there's no relief for
903 any of the aggrieved parties before this Committee. The
904 primary mission of the House Oversight and Reform Committee
905 is to root out waste, fraud, abuse and mismanagement in the
906 federal government, but this entire Congress, Democrats
907 have been completely derelict in this core responsibility.
908 This Committee has not conducted any oversight over the
909 Biden Administration. Instead, it has focused on the
910 American private sector.

911 While Mr. Comer agrees bad actors must be held accountable,
912 the workplace misconduct that is the topic of today's
913 transcribed interview, deposition, has already been subject
914 to investigations, fines, settlements and intense media
915 scrutiny.

916 New leadership has been installed and improved workplace

917 policies implemented, all without Congressional
918 involvement. No new punishments have levied against the
919 Commanders due to this investigation because they have
920 already faced consequences for its previously hostile
921 workplace.

922 No new relief has been granted to any of the aggrieved
923 parties because Congress has no authority to provide relief
924 in any of these instances.

925 This Committee is using valuable resources pursuing a
926 private company to investigate alleged wrongs for which we
927 can offer no remedy or redress.

928 Further, as Mr. Comer pointed out in his letter to the
929 chairwoman, this investigation has lacked basic
930 investigatory standards, and some members have even used
931 this investigation as a fundraising tool.

932 Meanwhile, the American people are suffering. Inflation
933 continues to spiral. In fact, we learned just this morning
934 that the U.S. economy has shrunk for a second straight
935 quarter, a sure sign of recession.

936 On top of that, desperate parents cannot find baby formula
937 on store shelves. Guns are killing our teenagers, and our
938 southern border is beyond broken. As the cover of the New
939 York Times pointed out on Tuesday, drug and sex traffickers
940 are making money hand over fist to the detriment of
941 vulnerable women and children.

942 This Committee has the jurisdiction to examine all of these
943 pressing crises, but we are not. Instead, we are here
944 today interviewing an NFL football owner over matters that
945 have no connection to the federal government or the current
946 crises facing our nation.

947 With that, I'll go ahead and get started with our questions
948 for this hour. Thank you for your patience, Mr. Snyder.

949 A Thank you.

950 By [REDACTED]

951 Q So at the end of the June 22nd hearing of this
952 year, Mr. Comer asked Commissioner Roger Goodell two
953 questions. And so to start off this hour, I think I want
954 to read the responses which you received from the NFL to
955 Mr. Comer's outstanding questions.

956 So the first question was:

957 "It has been reported that you retained former U.S.
958 Attorney General Loretta Lynch to investigate a former
959 minority shareholder for his involvement in manufacturing
960 false allegations about Mr. Snyder. Is that true?"

961 And the NFL's response, which we received, like I said, on
962 Tuesday, and I'm going to go ahead and introduce into the
963 record as Minority Exhibit A, which you should all have at
964 this point, their answer was, and I quote:

965 "The engagement of Loretta Lynch, a partner at Paul, Weiss,
966 Rifkind, Wharton & Garrison, LLP, was in connection with an

967 ownership dispute that was pending before the Wilkinson
968 firm's investigation began. The ownership group of the
969 Washington Commanders, Dan Snyder, and his three limited
970 partners certified their dispute to the NFL commissioner,
971 providing arbitration, and the commissioner appointed Brad
972 Karp, chairman of Paul Weiss, as the arbitrator.

973 "In the course of the arbitration, claims arose regarding
974 improper leaking and public disparagement of Mr. Snyder
975 that would have violated the commissioner's confidentiality
976 directive.

977 "On August 12, 2020, the NFL retained Loretta Lynch to
978 investigate these claims. She finished her work in late
979 2020, and found that one of the limited partners had
980 engaged in prohibited conduct."

981 The second question which was submitted by Mr. Comer at the
982 end of the hearing in June was:

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

988 The NFL responded:

989 "Upon the conclusion of the investigation, one of the
990 limited partners agreed that he would not seek to own an
991 interest with in the NFL club in the future."

992 Mr. Snyder, back in 2020, you retained attorneys who
993 investigated the claims related to a minority shareholder
994 who was referenced in the questions and answers I just
995 reiterated. Is that right?

996 A Yes.

997 Q Can you tell me more about the situation which
998 led you to retain those lawyers to investigate?

999 A Yes. On July 16, 2020, [REDACTED]
1000 [REDACTED] there obviously was a campaign, a disparagement
1001 campaign with a laws- -- excuse me, articles appearing in
1002 India that refer to me -- there were bots -- being
1003 affiliated with Jeffrey Epstein, being on his airplane,
1004 being on his list, all these things about a person I've
1005 never met in my life, but, yet incredibly damaging to me
1006 and my family, my children.
1007 There was a campaign -- this coincided exactly with the
1008 timing of this -- the Washington Post story of July 16,
1009 2020. And we were devastated. The kids -- my son was the
1010 target of a bot campaign with Epstein. I mean, just
1011 atrocious, atrocious, the most heinous things ever, just
1012 completely disparaging and devastating.
1013 So we -- then on August 1, we got back to our home in
1014 [REDACTED]. Upon getting back, we discovered
1015 ourselves that members of our personal staff, my wife's
1016 long-time household executive, been with her 20 years, told

1017 my wife, "I was attempted to be bribed to say defamatory
1018 information about your husband, about Dan, and saying he
1019 was a drug addict."

1020 My [REDACTED], when we met and talked to my [REDACTED], said that
1021 he was also attempted to be paid off for anything he would
1022 say, willing to say anything. And this was done by a
1023 former executive assistant of the franchise that had left
1024 three years earlier named **Former Staff 1**.

1025 And we presented this evidence to the National Football
1026 League. They knew we were going to conduct investigations
1027 and sue India, which we sued a company called MEAWW, which
1028 we tracked it to. We were going to also look for
1029 discovery.

1030 And on August 12th, the National Football League retained
1031 former Attorney General Lynch to look into any findings and
1032 other discoveries. And what you read is the results of the
1033 findings.

1034 And this false narrative of a shadow investigation is just
1035 untrue. That is exactly what we did. We gave all that
1036 information -- presented information to the National
1037 Football League to former Attorney General Lynch, to Beth
1038 Wilkinson. And we presented just the facts.

1039 Q So you said that you got back on August 1, and
1040 then when did you speak to the NFL about this issue? When
1041 did you first speak to them?

1042 A Probably within days later, we presented facts,
1043 affidavits from the three I just mentioned. The [REDACTED] was
1044 the third. And then we pursued discovery regarding the
1045 defamatory and any linkage to the defamation.
1046 This was done solely for the purpose of understanding who
1047 is behind the slander, the defamatory -- it was devastating
1048 to my kids. My kids still have -- it's hurt them
1049 tremendously. And my wife has been through a lot from
1050 there.

1051 And what we did was simply do the right thing by finding
1052 out who did this to -- how was this done and who did this.

1053 Q So you presented evidence to the NFL, and you
1054 said on August 12, they went ahead and retained former AG
1055 Lynch.

1056 During the course of your discovery process and looking
1057 into who did this, did you keep the NFL apprised of what
1058 you were doing?

1059 A Completely. We kept everyone apprised of it, and
1060 all we did was present facts to everyone as we unfolded
1061 discoveries such as phone records, et cetera.

1062 Q So the NFL knew everything that you were doing,
1063 and did they ever express concerns with any of your actions
1064 as you pursued this investigation?

1065 A No, they approved us to -- for example, to pursue
1066 our filing against **Former Staff 1**, the person that

1067 perpetrated the bribery attempts on those three
1068 individuals.

1069 And we pursued that, and through the Eastern District of
1070 Virginia Court, and we won that motion and received as that
1071 information was presented to the National Football League
1072 and former Attorney General Lynch and everyone presented
1073 openly and just factually.

1074 Q I would like to take this time to introduce
1075 what's been previously marked as Exhibits B, C and D. I
1076 realize that's a lot. So I'll give you guys a minute.
1077 Exhibit B is the June 22, 2022, Democrat memorandum which
1078 they released in conjunction with Exhibit C, which is a
1079 redacted slide deck. And then Exhibit D is just the
1080 unredacted version of that slide deck.
1081 I'm going to use these three exhibits as we go through the
1082 rest of the section of the questions.
1083 So, Mr. Snyder, if you could get Exhibit B in front of you.
1084 It's the June 22, 2022 Democrat memo. It's Minority
1085 Exhibit B. Sorry. I didn't realize that the Majority also
1086 used letters.

1087 A Yes, I have it. Thank you.

1088 Q Great. So on this first page, the memo reads
1089 that "Commanders owner Daniel Snyder launched a shadow
1090 investigation in an apparent effort to discredit his
1091 accusers."

1092 What do you understand this to be referring to, this shadow
1093 investigation?

1094 A There was no shadow investigation.

1095 Q So walk me through that. So they've accused you
1096 of creating this about what actually occurred during -- or
1097 what you actually used these slides for and what this
1098 investigation was actually about, and respond to that
1099 claim.

1100 A Around that time -- this is November 23 on the
1101 redacted C I'm looking at. Around that time, we were
1102 presenting to our lawyers -- or presenting to former
1103 Attorney Lynch, as well as the NFL and Beth Wilkinson just
1104 the facts, the information of **Former Staff 1**, which has
1105 been redacted here in this version.

1106 In D, it says **Former Staff 1**. And it shows in the
1107 unredacted version that on July 4 is when she -- and they
1108 started the activities of reaching out to my employees,
1109 trying to defame us, et cetera.

1110 So all we did was present these facts to the Attorney
1111 General -- former Attorney General.

1112 Q Do you think that the unredacted version of the
1113 slides that was released was a fair representation of the
1114 slides that you used for this investigation?

1115 Ms. Seymour. It's Karen Seymour. I just wanted to
1116 clarify. The redacted is a fair version or the unredacted?

1117 I just wasn't clear, sorry.

1118 [REDACTED] I apologize.

1119 By [REDACTED]

1120 Q Was the redacted version a fair representation of
1121 what you put in these slides and what you used them for?

1122 A No. It was misleading.

1123 Q How so?

1124 A It did not include the telephone records and all
1125 the information that's in here that really ties together
1126 the full picture. When you redact two-thirds of the
1127 document, it is incredibly misleading. All we did was
1128 pursue the facts and deliver the facts. That's it.

1129 Q So the purpose of this slide deck, was it to
1130 further your investigation into this minority shareholder
1131 and the disparagement investigation, or did it have
1132 anything to do with the workplace investigation by the
1133 Wilkinson team?

1134 A No. Nothing to do with the workplace
1135 investigation. That was completely independent and done by
1136 Ms. Wilkinson.

1137 This was solely for the purpose of having connectivity to
1138 the defamatory information, the defaming stories, the bots,
1139 the devastating things that were also coinciding with the
1140 Washington Post story of July 16.

1141 So we presented just the facts, just the evidence, the

1142 telephone records themselves, starting shortly after
1143 August 12, **Former Staff 1** received a burner phone as
1144 well, and those facts were presented to Attorney General
1145 Lynch and the NFL as well.

1146 Q So there was nothing nefarious about this slide
1147 deck. Is that fair to say?

1148 A Completely, yes. Thank you.

1149 Q So to be clear, you got permission from the NFL
1150 to conduct this investigation into the disparagement
1151 claimants, is that right?

1152 A Yes.

1153 Q And you kept them apprised of everything you did
1154 pursuant to that investigation?

1155 A Yes.

1156 Q And then your lawyers presented the findings of
1157 your investigation to the NFL?

1158 A To the NFL, to attorney -- the former Attorney
1159 General Loretta Lynch, yes.

1160 Q You mentioned when we first started talking about
1161 this that your family went through a lot when these
1162 articles came out. You specifically mentioned that your
1163 son was targeted.

1164 Can you describe some of the things that your family went
1165 through as a result of this disparaging information that
1166 was released online?

1167 A Well, at the time, my son was 17 and he was in
1168 high school, and the bots would target to say his father
1169 was with Jeffrey Epstein and devastating stuff.
1170 They used a lot of media outlets to push these stories.
1171 And just the -- I think the most atrocious, heinous things
1172 that -- actions that someone would do to a family, are
1173 crooked and still are. It's very -- [Zoom audio
1174 distortion].

1175 Q I know you spoke a little bit with the Democrats
1176 in the first hour about your background and how you came to
1177 own the team, but as far as I understand it, you grew up in
1178 Maryland; is that right?

1179 A Yes. In Silver Spring, Maryland, White Oak. [REDACTED]
1180 [REDACTED] I remember that.

1181 Q So you've been a resident of the DMV for your
1182 entire life, followed the local teams?

1183 A Yes, we -- my father moved us down to the DMV
1184 when I was two. And he worked at National Geographic as a
1185 writer, National Geographic Society.

1186 Q And what did your mother do?

1187 A My mother worked at the World Bank. She was a
1188 writer and translator. That's why I'm in Israel here.
1189 It's my mom's one-year anniversary of the Yahrzeit passing,
1190 and we dedicated a Torah to her. And she spoke seven
1191 languages and was very, very special. And great, great

1192 parents. My father passed away too young at 69.

1193 Q And I imagine that was very difficult.

1194 A I lost my best friend, lost my mentor.

1195 Q Yeah. I cannot imagine. Is it fair to say that
1196 you grew up in a middle class family in the area?

1197 A Not quite middle class. We grew up -- we ended
1198 up in Rockville, Maryland, lived in an apartment. My
1199 father struggled as a writer, and my mom ended up providing
1200 more for the family when she worked at the World Bank.
1201 And we had a great family. Great family. We grew up quite
1202 some time, not poor, but we were still this unbelievably
1203 great family and a bigtime Washington football, Redskins,
1204 Commanders fans from very young. But I always maintained a
1205 great family, great family.

1206 Q And you have one sister; is that right?

1207 A Yes. Yes. Yes.

1208 Q I imagine you two are close. Is that fair to
1209 say?

1210 A Very close. She's here in Israel today, and she
1211 took the rest of the family yesterday with our rabbi,
1212 because I had to meet with the attorneys here, and she
1213 spent the day in honor of my mom and went to the events
1214 that had been scheduled here.

1215 And she's really stepped up since my mom passed. She also
1216 owns part of the team and goes way back with me in business

1217 and has always been a great...

1218 Q Talk to me about some of the other business
1219 ventures that either you and Michelle did together or
1220 things that you have done as you became this self-made
1221 businessman over the last few decades.

1222 A Back when -- I graduated high school and I went
1223 to Montgomery College and then I spent a year at University
1224 of Maryland. And when I spent time at the University of
1225 Maryland, I had an entrepreneurial feeling.
1226 And my sister was an architectural -- getting an
1227 architectural degree at the University of Maryland at the
1228 same time. And I came up with the idea of doing sporting
1229 tours and taking people to sporting events.
1230 And I remember my father trying to help me write -- I'm not
1231 a very good writer, and he had written some brochures. And
1232 I tried to make it work, and it didn't work.
1233 And then shortly after, I said, well, why don't we focus on
1234 college campuses, and maybe I'll do something with the
1235 spring break and we'll take kids and bring them on buses to
1236 spring break and package it up. And it actually worked.
1237 It actually was a small success and the beginning of my
1238 entrepreneurial drive.
1239 And then it went from there to -- expanded to the next year
1240 doing it with jets flying up from hundreds of campuses
1241 around the country and taking them on spring break.

1242 I remember using -- going up to La Guardia airport,
1243 something called New York Air, I don't know if you remember
1244 that, I may be aging myself, dating myself, but something
1245 with New York Air. I remember it so much because I
1246 borrowed a suit from my friend, Tony Roberts. My mother
1247 hemmed it because he's much taller than I am. And I went
1248 up and convinced them to lease the airplanes and let us use
1249 their logos. And didn't have the money yet, but I said,
1250 I'm going to go sell all this stuff to college campuses
1251 across the northeastern seaboard, and we did that.
1252 So it was the beginning of an entrepreneur. And then when
1253 we started -- from there, I had a lot of passion for
1254 publishing through my father being a writer, created a
1255 magazine business. And that was a real struggle. It was
1256 exciting, but a real struggle.
1257 Raised some money from a gentleman named Mort Zuckerman,
1258 Mort Zuckerman in New York. He owned U.S. News and World
1259 Report. I said -- at the time, I said, you need college
1260 students, you need a younger audience. And he actually
1261 helped fund us.
1262 It was a struggle for some years, and then we caught on
1263 with some other businesses, product sampling at college
1264 campuses, and it just snowballed and we grew and grew.
1265 I convinced my sister with the magazine, I said take a year
1266 off architecture. And she said, okay, I'm only going to

1267 take a year off. But she actually ended up being the chief
1268 operating officer and vice chair of the company and she
1269 ended up on the New York Stock Exchange.

1270 Q That's very impressive. You have a pretty good
1271 sister, it sounds like.

1272 As far as -- so that was the magazine business, is that
1273 right? Did you and your sister do any other businesses
1274 together?

1275 A The magazine business transformed by listening to
1276 our clients. I was at Kellogg's, and I'll never forget, in
1277 Battle Creek, Michigan, trying to sell ad pages to the
1278 magazine that wasn't doing well financially. And one of
1279 the account supervisors at the time said, Can you do
1280 product sampling at college campuses? And I said, Sure.
1281 And we started product sampling, ended up being the largest
1282 product sampling company for doctors' offices and hospitals
1283 and all over the world from that original conversation at
1284 Kellogg's.

1285 And we focused on targeted marketing and advertising. And
1286 my sister never looked back. She was unbelievable. She is
1287 a true world-class businessperson.

1288 But we went public with that company in the mid-'90s, a
1289 long time ago now, on the New York Stock Exchange.

1290 Q Which company was that?

1291 A Snyder Communications. We had three agencies

1292 underneath it, and -- a traditional agency, a product
1293 sampling area, and we had a targeted marketing business.
1294 And we ended up when we sold the business with 12,000
1295 employees from just a couple of us.

1296 Q And what year did you sell that business?

1297 A 2000. In the beginning of 2000, we sold it to a
1298 French company called Vivendi Havas, which still exists.
1299 Arnold Worldwide was the traditional agency, and they are
1300 still very, very successful. Most of it is very
1301 successful.

1302 Q When did you meet Mrs. Snyder?

1303 A We -- gosh. Probably 30 years ago. A friend of
1304 mine who was a New Yorker, named [REDACTED], and his wife [REDACTED], I
1305 went to dinner with them. She was from the south. I
1306 remember saying, I need to meet a nice, southern -- you
1307 guys just got married. A week later, they called and --
1308 they called again and said, Would you like to meet my
1309 friend Tanya? And I said, Sure.

1310 And we met and fell in love and never looked back. And
1311 we've been fortunate and blessed to have a great family and
1312 to honor the tradition of our families.

1313 And she's here, obviously, in Israel with some of the kids.
1314 And my new son-in-law is here as well. And we've been very
1315 fortunate. She's amazing.

1316 At the time when I met her -- this is prior to having a

1317 family -- she was an entrepreneur and ran her own business.
1318 Her and her partner ran a business in fashion, in retail
1319 fashion business out of the Atlanta area. She's always
1320 been an entrepreneur and always will.

1321 Q You said that you were able to honor the
1322 traditions of your family. I think your lawyers have
1323 written in letters about celebration of your mom's life and
1324 having your whole family there.

1325 Can you tell us about how religion has played a role in
1326 both you and Ms. Snyder's life and your kids' lives and how
1327 impactful this trip has been for you all.

1328 A Well, it's a special place to come to the Holy
1329 Land, to come to Israel for all religions. It's very
1330 special for us personally.
1331 My father and mother brought me here to be bar mitzvahed at
1332 the wall in Israel, and we did the same for our son [REDACTED]
1333 And because my mom passed July 2nd in the American
1334 calendar, there's what's called a Hebrew calendar, which is
1335 a different date of passing, and that's July 21st. So we
1336 met with her rabbi and scheduled about a year ago now,
1337 let's honor my mom.
1338 Probably one of the most precious things you can do to
1339 honor in the Jewish faith is a Torah for my mom's
1340 synagogue. And we did that, I believe, on July 25th here
1341 as a family. And it was very emotional. Really emotional,

1342 really special.

1343 My faith, my family has meant everything to us. Tanya, not
1344 only -- she's obviously taken incredible leadership in her
1345 role in the last two and a half years with the team once we
1346 became empty nesters, but she takes a leadership role in so
1347 many other things.

1348 Q So you said that you sold Snyder Communications
1349 in 2000. When did you come to own the Redskins Commanders
1350 franchise?

1351 A In 1999, we bought it with some other partners,
1352 our family, and we acquired the franchise in '99, and I was
1353 running two public companies.

1354 There was also a healthcare company we spun off in the late
1355 '90s with Goldman Sachs called inVentiv Health [REDACTED]
1356 [REDACTED] named [REDACTED].

1357 And it's one of the things that I found when we were
1358 talking to McKinsey, I Zoomed with many McKinsey partners,
1359 Jason Wright stuck out to us as, wow, what a charisma,
1360 dynamic, caring individual. And I wrote [REDACTED] a
1361 notepad and sent it to my wife. And afterwards, she said,
1362 What's the correlation? I said, [REDACTED] came out of
1363 the Boston consulting group, consulting company where my
1364 sister and I hired him. And I said, Jason Wright is going
1365 to be a big success story for us. Let's go recruit. Tanya
1366 was eager. And that's how we met Jason.

1367 Q I certainly have more questions about
1368 Mr. Wright's role in the organization, but before we get to
1369 those, can you talk to us a little bit about how acquiring
1370 and owning this team in particular made a difference and
1371 was so impactful for you and your family.

1372 A It means everything to us. We care. Obviously,
1373 with workplace issues in the past, we were, you know,
1374 incredibly apologetic. And we want everyone to feel great
1375 who works there and aspire for greatness.
1376 And this franchise means everything to us. On the field,
1377 we're desperate to win that Super Bowl. We're desperate.
1378 We are getting better on the field. We're looking forward
1379 to a great season shortly, hopefully. We have a new
1380 quarterback, so -- and great leadership out of Coach Ron
1381 Rivera.
1382 We're very, very passionate about the community, about what
1383 we can do to be part of everything. Our whole family loves
1384 this organization.

1385 Q Was owning the team the fulfillment of a dream
1386 for your family?

1387 A Yes, yes. It was a fulfillment of probably
1388 dreams of -- beyond future entrepreneur at the time. My
1389 dad, I think I probably mentioned, took me to my first game
1390 when I was six years old. He got tickets through the
1391 National Geographic Society.

1392 From there on out, it was our life-long bond. No matter
1393 where we were, we would listen to a game, wherever -- we
1394 would attend. We always loved this organization, this
1395 team, this organization, and we are looking forward to
1396 making the DMV proud of us overall.

1397 Q Why do you believe that you and Ms. Tanya Snyder
1398 are the best people to own this team?

1399 A Because we care. We love this organization. You
1400 can see it in the last two years, this Committee's name is
1401 reform. And one of the things we've done is we've reformed
1402 our organization to be the best of the class.
1403 We really believe we can be in a leadership position in all
1404 sports, not just National Football League. And when it
1405 comes to diversity, inclusion, we want to be the best. And
1406 we are trying to establish that every day and trying to
1407 show through action some leadership. And I think we've
1408 shown a lot of that in the last two-plus years.

1409 I know the Vestry report just came out, the latest one. I
1410 believe it's also highly reflective of the continued
1411 success we've been having in the last few years.

1412 Q Absolutely. And over the duration of your
1413 ownership of this team, there's been a number of
1414 investigations into you as a person, into your team.
1415 There's been a lot of media scrutiny, public scrutiny,
1416 which, perhaps, is typical of an NFL owner.

1417 But can you talk to us about why it's important for you to
1418 keep this team, even amidst all of the bad press and the
1419 public scrutiny?

1420 A It's important because if you look at what we're
1421 doing and look at the reform we've made in the last two and
1422 a half years with Coach Rivera, with Jason Wright, we are
1423 creating something very special.

1424 We're very proud of where we're going. We are not --
1425 obviously, we're incredibly apologetic for some of the
1426 actions by some of the former executives and team members,
1427 but the key is really, from our perspective, is to -- and I
1428 see Vestry as -- you talk about oversight, it's an outside
1429 firm giving some oversight and guidance and help. And
1430 we're really trying to do the right things through
1431 leadership as an overall organization.

1432 Q You mentioned just a few minutes ago Jason
1433 Wright. Can you give us a little bit more background? You
1434 said you were really enamored with Mr. Wright. You thought
1435 he had a lot of good qualities. Can you talk to us about
1436 the hiring process and how that came about?

1437 A Sure. Well, it starts way back in October.
1438 2019, his predecessor gave a press conference, I'll never
1439 forget, that said "we have a damned good culture", and my
1440 wife and I talked that night and said, I bet we don't.
1441 So we went about starting on the football side and looking

1442 for a culture-setting coach, a coach that had similar --
1443 Jason had passion, the traits we were looking for, and
1444 that's how we found Ron Rivera, Coach Ron Rivera of
1445 December of 2019, hired him the beginning -- I think the
1446 first day or second day of January of 2020.
1447 If it weren't for COVID, we would have gotten on the
1448 business side even faster. And we were fortunate in our
1449 journey to hire a head of the business side to have met
1450 Jason. We were targeting candidates, et cetera. And when
1451 we met him, we -- I said to [REDACTED], very successful
1452 consultant, transferring the business that went public and
1453 did very, very well, with thousands of employees, and I
1454 said, this guy is going to be special. He was passionate.
1455 He was a really great, eager person, true leader.
1456 And I would encourage this Committee to spend time with --
1457 and see what we've done here, to hear directly from folks
1458 like Jason, our chief people officer, Andre Chambers.
1459 Amina Bulman. We have a great group of leadership that is
1460 still empowered and encouraged.
1461 And on the football side, we've done some things that are
1462 really forward-thinking and looking at best in class. And
1463 I would encourage this Committee to have a look and read
1464 the Vestry report and potentially meet with folks. Because
1465 we do want to lead by example.
1466 We do -- you know, we talk about the word "change." Well,

1467 change is difficult. And sometimes if you don't
1468 acknowledge change, then others won't change. And I think
1469 that we've had the opportunity to lead by example, and
1470 that's what we're trying to do.

1471 Q You said Coach Ron Rivera was hired the very
1472 beginning of January 2020; right?

1473 A Yes.

1474 Q And then Jason Wright was brought on -- what day
1475 was it again?

1476 A It was two years from -- two years from now, but
1477 he had started a little prior to that. He was wrapping up
1478 at McKinsey, but he's been with us two years now.

1479 Q So that would have been July of 2020?

1480 A August. August. Official announcement in August
1481 of 2020.

1482 Q August of 2020. And so at that time -- sorry.
1483 Was Mr. Wright hired prior to the Wilkinson investigation?

1484 A No. We retained Beth Wilkinson in -- earlier in
1485 July of 2020.

1486 Q Okay. So he had come on pretty early on in the
1487 investigation. Is that fair to say?

1488 A He joined while it was already underway, yes.

1489 Q While it was underway. How did Jason Wright's
1490 hiring start this cultural shift, this cultural change that
1491 you said has been going on for the last two years?

1492 A Well, I think as he -- I don't want to put words
1493 in his mouth -- and he would tell you we gave him a mandate
1494 to work on the cultural, the business side. He did hands-
1495 on. He would look into every single area and make it best
1496 of class. Make it the most -- the most inclusive
1497 organization. And to hire the best people. And we
1498 empowered him to do that and encouraged him and helped him.

1499 Q Can you talk to us about who Jason Wright -- who
1500 else Jason Wright brought on, how he changed the culture,
1501 how he effectively reworked the organization?

1502 A Sure. He added -- I think his first to join was
1503 Amina Bulman from McKinsey. She's been great, got a
1504 promotion recently as senior vice president. She is -- I
1505 consider her a rock star. I told my wife, she's going to
1506 run a Fortune 100 some day as CEO. She's amazing.
1507 And then we brought in an HR chief people officer named
1508 Andre Chambers. Brought in a COO, CFO is Greg Resh. We
1509 work together almost as a team. It really transformed our
1510 organization over the last two-plus years to be something
1511 special. We really think we have a future, very bright,
1512 going for us.

1513 Q Would you say that your organization leadership
1514 looks entirely different than it did two, three years ago?

1515 A Yes. When we -- at the end of 2019, the
1516 beginning of 2020, I terminated the employment of Jason's

1517 predecessor, and we made the right choices. No pun on his
1518 name, Wright, but we made the right choices, and we're
1519 very, very proud. I think he's taken a leadership position
1520 not only with our team but in the community and within the
1521 NFL itself.

1522 Q What would you describe as Jason Wright's most
1523 important accomplishment over the last two years?

1524 A People. He is -- he has a great way with people.
1525 He's a very compassionate person. Very caring. Cares
1526 about the team. Tanya and him do -- he does them and calls
1527 them AMAs, which is "Ask Me Anything." And it's a very
1528 transparent organization. An organization that is set up
1529 for decades of success.

1530 Q I want to talk a little bit more about Coach Ron
1531 Rivera. Can you describe to us how his role as the head
1532 coach of your team has impacted the team side of the
1533 Commanders?

1534 A Ron joined us for the 2020 -- beginning of 2020.
1535 And we gave him the same mandate, he would tell you. He's
1536 done public interviews. We may have mentioned the word
1537 "culture" 20 times to him because we want to focus on a
1538 great culture because we believe it would lead to a great
1539 success.

1540 And his approach has been nothing but that. It's focused
1541 on hiring the best people. And we've got a lot of people

1542 within our organization, whether it be football, whether it
1543 be business, that we really believe are going to be -- we
1544 hope now, would be coaches for us from other organizations.
1545 We have VP of player personnel, Eric Stokes. He's probably
1546 going to be a general manager in the next few years.
1547 We have hired Martin Mayhew, who played for Washington many
1548 years ago and was a general manager at a team, didn't do
1549 very well, went to San Francisco, learned so much, he talks
1550 about it himself about how he's now ready. And he's the
1551 general manager of our football team.
1552 But overseeing the guidance and the vision is Coach Ron
1553 Rivera. He also had cancer, by the way, in August of 2020.
1554 So he's -- he's, like myself and my wife, we're all cancer
1555 survivors. So seeing him coach through and never miss a
1556 game during chemotherapy is quite remarkable. He has a lot
1557 of courage.

1558 Q That's incredibly impressive. As you just said,
1559 both you, your wife and also the head coach of your team
1560 have all experienced this horrible disease. How has that
1561 influenced your and Ms. Snyder's community outreach?

1562 A Well, I'm a survivor of thyroid cancer, which I
1563 had in mid-2001. Put me out of appearance and out of --
1564 probably for a couple years. There was so many different
1565 surgeries and procedures and things that have happened for
1566 mine, and it's a very humbling experience.

1567 And then my wife in 2008 was diagnosed, even though she had
1568 started in 1999 the NFL's breast cancer awareness program.
1569 She was, with Zeta, first to give out these pink ribbons
1570 and do all this. And all that pink that you see in the
1571 National Football League started with Tanya Snyder. And
1572 she's very, very proud of it and very focused on someday
1573 getting a cure for that terrible disease. She had breast
1574 cancer in 2008 and multiple surgeries. Tough for the kids
1575 back then as well.

1576 Q Ms. Snyder, she's now the co-CEO and responsible
1577 for the team's day-to-day operations. How important is it
1578 for our country for us to see female leaders in those kind
1579 of roles in the NFL?

1580 A I'm very proud. She's priceless, the way she's
1581 -- as I mentioned, when we first met, she was an
1582 entrepreneur back then. She's business-minded and really
1583 super sharp.
1584 And she's been representing the club at the NFL meetings.
1585 And one of the owners came up at the Super Bowl at an event
1586 prior to this year's Super Bowl, I think it was Arthur
1587 Blank, the owner of the Atlanta Falcons and Home Depot, and
1588 he said your wife is great at these meetings, she's
1589 unbelievable.
1590 And I was -- she gets embarrassed. But I was so thrilled
1591 to hear that from Arthur and several of the owners.

1592 I think that she has also spent some time with some of the
1593 other female owners in the NFL, including Amy Strunk and
1594 Kim Pegula and Ms. Benson in New Orleans.

1595 I think that they have the opportunity to have quite the
1596 impact on sports overall, not just the National Football
1597 League but sports overall.

1598 Q It's been reported that the Commanders is now --
1599 has one of the most diverse leadership teams in the NFL.
1600 Can you talk to us about what that means for this
1601 organization?

1602 A It means we're doing it the right way. It means
1603 we're establishing the leadership position that we said we
1604 would do when we hired Coach Rivera and brought in Jason.
1605 And everything we've done has really set a gold standard,
1606 set an organization of best in class. And it's gotten
1607 great business results already, we're doing quite well in
1608 so many different areas. Jason's team suites, he's number
1609 one in the National Football League in selling suites now.
1610 We're up 20-something percent sponsorship. And as he jokes
1611 around, don't believe the media. The facts are on our
1612 side. But I think we're doing quite well now.

1613 Q You said that you have this new -- it's basically
1614 you're the new gold standard in the NFL for what
1615 organizations should look like as far as leadership,
1616 diversity.

1617 How do you think other NFL teams could model their
1618 leadership after yours?

1619 A I think all sports -- and there's many that are
1620 doing a great job at this, but there could be more. And I
1621 think that what we've done is in all our vision of how we
1622 see this franchise for the future, I believe we're building
1623 so much talent that many of our executives will be running
1624 other clubs not only in the NFL, but in other sports.
1625 We had a fabulous general counsel named Damon who left to
1626 become the number two at the Los Angeles Dodgers. We
1627 always tease each other. I love football and he loves
1628 baseball, and he's gone on to and he's aspiring to be a
1629 team president. I think they call it manager or whatever
1630 in baseball. But he's the number two there at the Dodgers
1631 now, and we're proud of him.

1632 We think we'll have more folks that leave us to run other
1633 organizations. We want to -- we want to make a difference
1634 in our community to really do something special here.

1635 Q As far as the human resources and kind of
1636 internal functions go of the team, how has the new
1637 personnel and the new structure impacted how human
1638 resources functions in the Commanders organization?

1639 A We have a first-class human resources headed by
1640 Andre Chambers, who is the chief people officer, and has a
1641 solid staff underneath. We also have a lot of things that

1642 go beyond. And I would encourage the Committee to look at
1643 not only, obviously, the Vestry report, but also the other
1644 things we're doing above and beyond traditional HR in terms
1645 of organizations within our franchise.

1646 We have a woman's organization. We have a black
1647 empowerment organization. We have organizations that will
1648 help lead and help really the future. So I'd encourage the
1649 Committee to -- we can send plenty of materials to show
1650 what we're doing.

1651 Q Has the implementation of these new policies and
1652 procedures for human resources, has that impacted the team
1653 members' morale?

1654 A Yes, I think Vestry Laight, who is helping to not
1655 only really monitor, but really helps us overall, and we've
1656 welcomed them and we feel like we can always get better.
1657 And we really believe that all organizations can. And I
1658 think that the results are -- speak for themselves.

1659 Q So there's been a lot of internal improvements.
1660 How has the engagement with the community changed over the
1661 last few years?

1662 A We just been doing more and more with the
1663 community. We do so many different things. During COVID,
1664 Tanya did a community touring program. There's a viral
1665 video that brings tears to your eyes of a young boy getting
1666 a PlayStation and buying - Tanya and his mother was very

1667 emotional. I think there was 4,000 children during that.
1668 We've done recently a USO drive which we did all employees,
1669 all of us helped pack gear for the troops going abroad.
1670 And there's so many different things that we've done
1671 overall that we're very proud of.

1672 Q Do you think that these community outreach
1673 programs have had a positive impact on the community?

1674 A They've had a great impact on the community and
1675 also a great impact on our organization.

1676 Q Can you describe a little bit for us what those
1677 impacts are?

1678 A The response from our employees is proud, very,
1679 very proud. And the response from the community is -- has
1680 been overwhelming. The amount of letters and things that
1681 Tanya and I get and Jason gets and Coach Rivera, it's
1682 heartening.

1683 [REDACTED] Thank you, Mr. Snyder. I think I'm at my
1684 hour.

1685 We can go ahead and go off the record, [REDACTED]. We
1686 can take a five-minute break and then we'll go back to the
1687 Majority.

1688 (Recess)

1689

1690 EXAMINATION BY

1691 [REDACTED]

1692 Q Good morning, Mr. Snyder. I guess good morning
1693 for us here in Washington, D.C. Good afternoon for you in
1694 Israel.

1695 My name is [REDACTED] I'll be doing questions on
1696 behalf of the Majority for this hour.

1697 To start off, I'd like to go back to a topic that you
1698 addressed with my colleague from the Minority. You
1699 described presentations that you made to the NFL and that
1700 you had explained were solely for -- about the defamation
1701 action that you were bringing against an Indian website.

1702 Do I have that right?

1703 A Yes.

1704 Q Now, as part of your presentation to the NFL with
1705 regard to the defamation action, is it fair, Mr. Snyder,
1706 that you and your attorneys used the courts here in the
1707 United States to issue subpoenas for the emails, texts,
1708 phone records and other communications of former Commanders
1709 employees and others associated with the team here in the
1710 United States?

1711 A Can you repeat the question?

1712 Q Certainly. You described your presentation to
1713 the NFL. I assume that that presentation was based on an
1714 investigation done by you and your attorneys. Is that
1715 correct?

1716 A It was done by finding the facts and then

1717 presenting facts.

1718 Q And that was done on your behalf, Mr. Snyder, is
1719 that correct?

1720 A Yes, the lawyers did it, yes.

1721 Q And as part of that investigation, is it correct
1722 that your lawyers used the federal courts here in the
1723 United States to issue subpoenas for the emails, texts,
1724 phone records and other communications of at least half a
1725 dozen former Commanders employees and other individuals
1726 associated with the team here in the United States?

1727 A I don't think it was a half dozen former. Just a
1728 few former employees. Many of these folks never worked for
1729 us that discovery was to obtain.

1730 Q Now, your testimony, Mr. Snyder, is that these
1731 efforts were solely about the defamation case that you
1732 brought against the Indian website, is that correct?

1733 A The filings, yes.

1734 Q Well, Mr. Snyder, I'd like to read to you what a
1735 federal judge in Colorado who presided over one of these
1736 matters in the United States District Court for the
1737 District of Colorado had to say about your investigation.
1738 And for that, I'd like to direct you to document reference
1739 Number BE that was provided to your attorney and that I
1740 will mark for the purposes of this deposition as Exhibit
1741 Number 2 for the Majority.

1742 Ms. Seymour. It's Karen Seymour. If you can give us
1743 just one moment to find the exhibit. Just to clarify, it's
1744 D as in dog?

1745 ██████████ B as in Bernard, E as in Edward.

1746 Ms. Seymour. It is a B. I can't read my filings.

1747 By ██████████

1748 Q Do you have that document, Mr. Snyder?

1749 A Yes, I do. I'm just looking at it.

1750 Q Looking at the first page of this document,
1751 Mr. Snyder, do you see that it is an order of the United
1752 States Magistrate Judge N. Reid Neureiter in the matter of
1753 In Re: Application of Daniel Snyder for an Order Directing
1754 Discovery from Jessica McCloughan and Friday Night Lights,
1755 LLC, pursuant to 28 United States Code Section 1782 filed
1756 March 5, 2021?

1757 A Yes, I have it, yes. Thank you.

1758 Q Now, turning to page 7 of this document, in the
1759 second -- in the first full paragraph, second sentence
1760 begins with the word "petitioner." Do you see that,
1761 Mr. Snyder?

1762 A Yes.

1763 Q Petitioner, that's you, Mr. Snyder. You were the
1764 one petitioning the Court for a subpoena targeting
1765 Ms. McCloughan and Friday Night Lights, LLC; is that
1766 correct?

1767 A I'm not a lawyer, but --

1768 Q Well, do you agree, Mr. Snyder, that you were the
1769 one petitioning the Court for a subpoena?

1770 A We were, yes.

1771 Q And Ms. McCloughan, who is that?

1772 A She was -- is -- I don't know -- Scott
1773 McCloughan, our former general manager's, wife.

1774 Q So this opinion reads -- and I'm reading to you
1775 here from the opinion -- "Petitioner" -- and we established
1776 that that's you, Mr. Snyder -- "proposed 58 ESI search
1777 terms which, in the Court's view, go far beyond anything
1778 related to the defamatory MEAWW article and appears instead
1779 to be seeking, for example, any references to Mr. Snyder
1780 and sexual harassment, the Washington Football Team and sex
1781 discrimination and former coach Jay Gruden and sex or sex
1782 discrimination.

1783 "In addition, petitioner wants an exhaustive list of all --
1784 of telephone toll records and emails, including any
1785 communications with the Washington Post or its reporter.
1786 Again, these documents seem not to have any direct
1787 relevance to the India action, as The Washington Post
1788 article, while it may have been embarrassing to the
1789 Washington Football Team's organization and to Mr. Snyder,
1790 is not alleged to be untrue in any respect and is not the
1791 subject of litigation either in India or in the United

1792 States.

1793 "Indeed, the breadth of the search terms proposed, coupled
1794 with the professed desire to obtain evidence of any
1795 communications between Ms. McCloughan and The Washington
1796 Post's reporters, indicates that the subpoenas directed at
1797 Ms. McCloughan may be less of a bona fide effort to obtain
1798 evidence supportive of the claimants brought in the Indian
1799 action than they are an effort to burden and harass
1800 individuals formally associated with the Washington
1801 Football Team who may have acted as sources for The
1802 Washington Post story."

1803 Do you agree that that is what the United States magistrate
1804 judge wrote in this opinion?

1805 A Yes.

1806 Q Mr. Snyder, do you agree that it was the Court's
1807 finding that your subpoenas were not aimed at getting
1808 information relevant to your defamation suit in India and,
1809 instead, had other aims, including, in particular,
1810 obtaining the source -- getting at the sources of
1811 embarrassing Washington Post articles?

1812 A On page 7, it refers to former coach Jay Gruden
1813 and sex and all of that. That was part of the India's --
1814 some of the defaming information was not just Jeffrey
1815 Epstein, but made claims about me and Jay Gruden having
1816 crazy -- I mean, this was -- I'm not a lawyer and I wasn't

1817 obviously doing the filings and what have you, but the
1818 obvious intent, very simple, was to find out the
1819 connectivity as we uncovered more and more information.

1820 Q Mr. Snyder, was it the purpose of this
1821 investigation and these subpoenas to determine who the
1822 sources of The Washington Post stories were?

1823 A No. We wanted to find out who else was involved.
1824 This -- in this India defamation, I mentioned Jeffrey
1825 Epstein as sort of the main headline, but there was so much
1826 else in India, such as paying millions of dollars to
1827 referees, to sex and Gruden -- Jay Gruden, et cetera.
1828 And our findings and facts were all transparent and given
1829 to former Attorney General Lynch and the National Football
1830 League, and that's it.

1831 Q And, Mr. Snyder, you described when you were
1832 talking to my colleague from the Minority that based on
1833 this investigation, you and your attorneys put together
1834 presentations for the NFL, is that right?

1835 A Yes.

1836 Q Now, I'm showing you one of the -- I'd like to
1837 show you one of these presentations, document reference
1838 Number BM, Bernard Madeline, which I will mark for the
1839 purposes of this deposition as Majority Exhibit Number 3.

1840 (Exhibit 3, Presentation, was marked for
1841 identification.)

1842 By [REDACTED]

1843 Q Do you have that document in front of you?

1844 A Yes, I do.

1845 Q This is a presentation that you and your
1846 attorneys made to the NFL on November 23, 2020. Is that
1847 correct?

1848 A The attorneys, yes.

1849 Q I'd like to turn to page 2, the page immediately
1850 after the title page. Can you tell me what the title is on
1851 page 2?

1852 A "Journalists."

1853 Q And if you look at the following pages, Pages 3
1854 through 12, do you agree that those pages in this
1855 presentation are about Liz Clarke, Will Hobson and Beth
1856 Reinhart, journalists at The Washington Post who wrote
1857 stories that the judge in Colorado described as
1858 "embarrassing for the Washington football organization and
1859 to Mr. Snyder." Is that correct?

1860 A Yes.

1861 Q Mr. Snyder, what did these Washington Post
1862 journalists, Liz Clarke, Will Hobson and Beth Reinhart,
1863 have to do with a news story that was posted on a blog in
1864 India on the website of MEAWW?

1865 A Well, all I can tell you is that we delivered the
1866 facts, unredacted facts to former Attorney General Lynch,

1867 shared the phone records that are actually in this document
1868 that are unredacted. You can see what was presented was
1869 telephone records and just facts. Had no involvement
1870 with -- they just delivered the facts. And they were the
1871 attorneys delivering the evidence, and that's it.

1872 Q What are the facts, Mr. Snyder, about these three
1873 journalists?

1874 A I believe they just coincided with the July 16
1875 exact date of the India -- India defamation. And they were
1876 those facts.

1877 Q Mr. Snyder, have you filed any defamation suits
1878 against the Washington Post or against these three
1879 journalists for the exposés they wrote on your team?

1880 A No.

1881 Q If you turn to page 5, Mr. Snyder, do you see how
1882 it describes Liz Clarke's social media connections with a
1883 number of individuals?

1884 A Yes.

1885 Q Those included Megan Imbert, Rachel Engelson,
1886 [REDACTED] is that right?

1887 A I see it, yes.

1888 Q Those are individuals who were quoted in The
1889 Washington Post articles who came forward with information
1890 about the toxic workplace at the Commanders, and for two of
1891 them who have testified before the Committee's roundtable

1892 on February 3, 2022; is that right?

1893 A I believe so.

1894 Q And turning to page 16 of this presentation, can
1895 you tell me what file appears on that page of the
1896 presentation?

1897 A "Former WFT Employees."

1898 Q There's an additional word, isn't there?

1899 A "Accusers."

1900 Q So in this section about accusers, can you tell
1901 us who is featured on the very next page? Page 17.

1902 A It says Emily Applegate.

1903 Q Do you see how there's a picture on the right
1904 side of that page? Can you tell us what that is a picture
1905 of?

1906 A I believe it's The Washington Post.

1907 Q And Emily Applegate was the main source for the
1908 first Washington Post story in July that exposed the toxic
1909 workplace culture of the Commanders. Isn't that right?

1910 A I don't know.

1911 Q Mr. Snyder, you mentioned earlier a coincidence
1912 about the date of publication of this article by The
1913 Washington Post and the MEAWW post. Did you believe that
1914 these events were linked?

1915 A I think that if you look at the entire
1916 presentation, which you had redacted probably two-thirds of

1917 it, you would see that **Former Staff 1**, not only have we
1918 discovered and it's in here that she was attempting to pay
1919 personal employees of ours to say defamatory things, you
1920 would see that it tells a more complete picture.

1921 This information was simply delivered from the facts
1922 perspective to Attorney General Lynch.

1923 Q Mr. Snyder, what does that have to do with the
1924 facts that were published in The Washington Post, told by
1925 the women who came forward to The Washington Post?

1926 A The lawyers made this presentation of facts and
1927 it was presented. That's all I know.

1928 Q So it sounds like you're saying that there's no
1929 connection between these allegations you made about **Form**
1930 **Former Staff 1** and about The Washington Post's reporting about
1931 the toxic workplace culture at the Commanders.

1932 A All I know is that they delivered the facts.

1933 Q Well, Mr. Snyder, this presentation contains
1934 information about accusers, which is the term that you used
1935 to refer to the women who came forward in The Washington
1936 Post about the journalists, The Washington Post journalist
1937 who published these stories about you. And in the words of
1938 the U.S. District Court in Colorado, your subpoenas
1939 appeared to be aimed at getting at the sources of The
1940 Washington Post article.

1941 So given all of this, Mr. Snyder, I have to ask you, is it

1942 fair to say that while Ms. Wilkinson was running her
1943 investigation, you and your lawyers were running your own
1944 investigation to determine the sources of The Washington
1945 Post articles about you and your team?

1946 A No. What is fair to say is that these are in the
1947 unredacted telephone records of **Former Staff 1** showing
1948 connectivity to many people, including the three affidavits
1949 that were in the actual document showing the attempted
1950 payment, bribery, "you can make a lot of money to say bad
1951 things," to our employees for the last 20 years to defame
1952 and say that I was a drug addict.

1953 So all they were doing is simply giving this information
1954 that was discovered in the Court in Virginia where the
1955 judge said motion granted when -- I remember hearing about
1956 it afterwards, and **Former Staff 1** attorneys, Katz and Banks,
1957 said this was a fishing expedition. And the judge's quote,
1958 I believe, was "This is no fishing expedition. Motion
1959 granted."

1960 Q Mr. Snyder, are you saying **Former Staff 1**
1961 bribed the journalists at The Washington Post to run these
1962 stories?

1963 A No, I did not say that.

1964 Q Mr. Snyder, did you tell Ms. Wilkinson that you
1965 and your lawyers were sending subpoenas attempting to
1966 uncover the sources of The Washington Post while she was

1967 running her investigation?

1968 A As I said, that's not what we were doing. So let
1969 me clarify one more time. All we were doing was simply
1970 delivering facts to the NFL and all the parties. The NFL
1971 knew that we were delivering facts to former Attorney
1972 General Lynch, all of the records in their entirety. And
1973 we were just presenting the facts. That's it.

1974 Q Did you tell Ms. Wilkinson about any of these
1975 subpoenas that you sent?

1976 A We told the National Football League along the
1977 way and obviously gave the facts and information to former
1978 Attorney General Lynch that was retained by the NFL on
1979 August 12.

1980 Q Did you tell Ms. Wilkinson that you and your
1981 attorneys were sending out private investigators to talk to
1982 former employees while she was running her investigation?

1983 A I'm not sure exactly how the attorneys handled
1984 the actual investigation. I just know the facts were
1985 delivered to former Attorney General Lynch.

1986 Q Mr. Snyder, you pledged full cooperation with
1987 Ms. Wilkinson's investigation, is that right?

1988 A And we did, yes.

1989 Q So is sending subpoenas that, according to the
1990 Court, were designed to uncover sources from The Washington
1991 Post, sending private investigators to talk to witnesses,

1992 and sending presentations to the NFL in which you described
1993 whistleblowers and victims of the Commanders as accusers,
1994 is that what you mean by full cooperation with
1995 Ms. Wilkinson's investigation?

1996 A I can just tell you that we fully cooperated and
1997 gave Ms. Wilkinson access to everything. And the NFL and
1998 everyone was fully informed of the investigation regarding
1999 India. And all we delivered were the facts to Attorney
2000 General Lynch and I believe the answers to Congressman
2001 Comer's questions reflect that.

2002 Q Mr. Snyder, this Exhibit Number 3 was one of the
2003 presentations to the NFL. Did your attorneys make other
2004 presentations to the NFL?

2005 A I believe so, yes.

2006 Q Now, Mr. Snyder, what were those other
2007 presentations?

2008 A Again, just facts. Facts from discovery and
2009 facts from any findings of -- from the -- from the
2010 findings.

2011 Q Mr. Snyder, your testimony here is that you
2012 weren't doing this behind Ms. Wilkinson's back. You were
2013 open and transparent about these investigations you were
2014 running, is that fair?

2015 A Yes.

2016 Q In that case, Mr. Snyder, will you commit here on

2017 the record to providing us with all the presentations that
2018 you and your attorneys made to the NFL during the course of
2019 the Wilkinson investigation?

2020 Ms. Seymour. This is Karen Seymour. We'll take that
2021 request under advisement and let you know.

2022 We are not, in fact, clear on what exactly the NFL has
2023 previously produced on the League's behalf. But we'll take
2024 that under advisement.

2025 By [REDACTED]

2026 Q Mr. Snyder, I'm not asking you to produce anew
2027 anything that the NFL has already given us. I'm just
2028 asking you to tell us, what did you tell the NFL during the
2029 course of this investigation?

2030 You said that it was entirely about the defamation action
2031 and that it was entirely related to the defamation action
2032 in India. So it seems to me you should have no problem
2033 showing your receipts, showing us the presentations that
2034 you made to the NFL.

2035 A I'm not an attorney. I'll talk to my attorney.

2036 Q So am I understanding correctly, Mr. Snyder, that
2037 at this time, you are refusing to commit to providing those
2038 presentations to the NFL to this Committee?

2039 Ms. Seymour. That's not at all accurate. This is
2040 Karen Seymour. There is no refusal. This is a new
2041 request. We don't actually know here today if there's

2042 anything that you don't have.

2043 We're not clear on what has been produced in terms of
2044 presentation, so I'm just asking you for the professional
2045 courtesy, what we believe is appropriate under all of the
2046 circumstances, to allow us to take it back. And we'll
2047 provide you with an answer on behalf of Mr. Snyder.

2048 By [REDACTED]

2049 Q Mr. Snyder, you're unable to commit to providing
2050 those to us today?

2051 A I think Karen answered.

2052 Q In that case, Mr. Snyder, can you at least tell
2053 us what you remember about those other presentations.

2054 A It was just presentations of facts and findings.
2055 And are you talking about former Attorney General Lynch?

2056 Q And the NFL.

2057 A I don't want to be guessing. I was not --

2058 Q How many of these presentations were there?

2059 A I'm not sure.

2060 Q Do you remember any facts that were presented to
2061 the NFL and Ms. Lynch?

2062 A A lot of phone records. I remember that.

2063 Q Mr. Snyder, you've committed to being -- to
2064 cooperating with this Committee and its investigation. We
2065 talked about all these presentations to the NFL, yet you're
2066 unable to tell us how many there were, what kind of facts

2067 they contained. I sincerely hope that you will be
2068 providing those to us shortly.

2069 And with that, I would like to move on from this topic and
2070 talk about The Washington Post exposès that we have been
2071 discussing.

2072 In particular, in August of 2020, The Washington Post
2073 published a story entitled "Lewd cheerleader videos, sexist
2074 rules: Ex-employees decry Washington's NFL team
2075 workplace."

2076 That article contained allegations involving you directly,
2077 including one involving a 2004 charity event called Fight
2078 Night and another involving lewd outtakes from videos
2079 chronicling the making of the team's cheerleader swimsuit
2080 calendar.

2081 Mr. Snyder, if you would please look at reference document
2082 BJ, which we'll mark as Exhibit Number 4 for the Majority
2083 for the purposes of this department.

2084 Do you have that article in front of you, Mr. Snyder?

2085 A Yes, I have it in front of me.

2086 (Exhibit 4, Article, was marked for identification.)

2087 By [REDACTED]

2088 Q Mr. Snyder, are you familiar with this article?

2089 A Yes.

2090 Q Mr. Snyder, I'd like to start by asking you to
2091 turn to page 33 of this article. Before we get into the

2092 allegations I previewed, I want to ask you about another
2093 allegation in this article.

2094 The article states, "Shortly after reporting for their
2095 first day of work at team headquarters in Ashburn, dozens
2096 of employees" --

2097 Ms. Seymour. What page are you on? And,
2098 regrettably --

2099 [REDACTED] 33.

2100 Ms. Seymour. So it's going to take us a moment to
2101 find the right page.

2102 [REDACTED] It starts with "led by fear" in big
2103 bold letters.

2104 By [REDACTED]

2105 Q Do you have that, Mr. Snyder?

2106 A Yes.

2107 Q That first paragraph talks about how there were
2108 several unwritten rules that your employees learned.

2109 "Always call the owner 'Mr. Snyder' or 'sir,' never 'Dan.'
2110 Never look him in the eye. And if he comes walking your
2111 way, turn around and head in another direction."

2112 Do you see that, Mr. Snyder?

2113 A Yes.

2114 Q Mr. Snyder, are you aware that your employees
2115 were instructed to never to look you in the eyes, to always
2116 call you, "sir," and to walk away whenever you are walking

2117 in their direction?

2118 A The reality is it's quite the opposite. I have
2119 people call me "Dan," and these -- this is just not true.
2120 And, in fact, if you ask Ron Rivera how many times I told
2121 him, Stop calling me Mr. Snyder at the press conferences,
2122 call me Dan, he said, No, I won't. And I said -- we kid
2123 ourselves about it. Talk to any employee who works for us,
2124 and you'll find it's not true.

2125 Q This is what your junior employees have to say
2126 about you. Do you have any idea why your junior employees
2127 seem to be so afraid of you, Mr. Snyder?

2128 A I don't know anything about this. I can just
2129 tell you the reality.

2130 Q I'd like to move on to the second allegation,
2131 Mr. Snyder, the allegation regarding the lewd videos.
2132 Those allegations begin on page 24 of the article. Give
2133 you a second to turn to that page.

2134 Ms. Seymour. Is there a headline or something just to
2135 help us?

2136 [REDACTED] "For Executive Meeting."

2137 By [REDACTED]

2138 Q Mr. Snyder, I'm sure you're familiar with these
2139 allegations, but just so we're on the same page, this
2140 article describes how in 2008 Larry Michael, a senior vice
2141 president and the team's lead broadcaster, ordered members

2142 of the video editing staff to use lewd footage from the
2143 team's 2008 swimsuit calendar, in which cheerleaders'
2144 private body parts were inadvertently exposed when they
2145 shifted positions or adjusted props to create a 10-minute
2146 video of what Mr. Michael called "the good bits."
2147 Mr. Michael told the video editing staff the video was
2148 being made for you, Mr. Snyder.

2149 The article went on to describe that this was not an
2150 isolated incident and that Mr. Michael ordered that a
2151 similar video be made based on the 2010 cheerleader
2152 calendar photo shoot which took place in the Dominican
2153 Republic.

2154 Mr. Snyder, as you sit here today, do you acknowledge that
2155 these two videos of lewd outtakes from the cheerleader
2156 calendar photo shoot exist?

2157 A I've never seen any videos or had anything
2158 produced for me. That's all I can tell you.

2159 Q Mr. Snyder, my question was whether you know, you
2160 can say today whether or not these videos exist.

2161 A I can just tell you what I know, which is I know
2162 nothing about these purported videos, period.

2163 Q Do you know whether your -- you or anyone on your
2164 team was offered an opportunity to examine and authenticate
2165 these videos?

2166 A I don't know.

2167 Q You don't know. Mr. Snyder, when did you first
2168 learn that these videos existed?

2169 A I just know from this article.

2170 Q This article is the first time you learned about
2171 lewd videos made from outtakes of the cheerleader calendar
2172 photo shoot?

2173 A Yes.

2174 Q What did you do in response to learning about
2175 these lewd videos?

2176 A I can't recall what was done. I can't recall.

2177 Q You don't have any recollection of what you did
2178 after learning that your team was making lewd videos with
2179 unauthorized naked shots of members of your cheerleaders?

2180 A I can't recall what the team did.

2181 Q I'm asking what you did, Mr. Snyder.

2182 A What I did is just tell the truth and deny this,
2183 about me.

2184 Q You told the truth and denied it, meaning denying
2185 that these videos exist?

2186 A Denying that anything -- that I've ever seen
2187 these purported videos, and I have no knowledge of them.

2188 Q Is it your testimony, sir, that you read these
2189 allegations and the one thing you did was deny them?

2190 A No, no. I'm just -- you know, I can't recall
2191 what the organization did.

2192 Q And are you saying, Mr. Snyder, that you have no
2193 information about what the organization did in response to
2194 this?

2195 A I can't recall.

2196 Q Are you not here today, Mr. Snyder, to testify on
2197 behalf of the organization of which you are the owner and
2198 the co-CEO?

2199 A Yes.

2200 Q Yet you cannot tell me what the team did in
2201 response to these allegations regarding lewd videos?

2202 A I can't recall.

2203 Q You can't even tell me whether the team
2204 ascertained whether or not these were authentic videos?

2205 A I don't want to guess. I just can't recall.

2206 Q You can't even tell me whether or not you know --
2207 whether or not you know that these videos exist?

2208 A I just know that I've never seen these videos and
2209 didn't know anything about the videos until this article.

2210 Q Mr. Snyder, can you confirm that a settlement was
2211 reached with regard to these videos in February 2021?

2212 A I know we settled some claims from cheerleaders.
2213 I don't know the particulars. That's it.

2214 Q So you know that the team settled some claims
2215 from the cheerleaders in February 2021. Do I have that
2216 right?

2217 A I believe so.

2218 Q Were the Commanders a party to this settlement?

2219 A Yes.

2220 Q Were you a party to this settlement?

2221 A I'm unaware.

2222 Q You're unaware whether or not you were a party to

2223 this settlement?

2224 A Yes.

2225 Q Were the cheerleaders featured on these lewd

2226 videos parties to the settlement?

2227 A I'm unaware of what -- the settlements we had.

2228 Q You said cheerleaders were part of the

2229 settlement. What cheerleaders were part of the settlement?

2230 A I don't know.

2231 Q Did your team randomly pick cheerleaders with

2232 whom to enter into a settlement?

2233 A No.

2234 Q How did they pick the cheerleaders with whom they

2235 entered into a settlement?

2236 A It was a claim with a group of cheerleaders, with

2237 Katz and Banks, and I just know that it was settled.

2238 Q What was their complaint?

2239 A I don't remember the particulars.

2240 Q It wasn't notable to you that you and your team

2241 were being sued by members -- multiple members of the

2242 cheerleading squad?

2243 A I think it was mediated, I believe, with them.

2244 Q But you don't know what the claims are?

2245 A I don't think the particulars of the claim, no.

2246 Q Is this a regular occurrence that cheerleaders

2247 sue the Washington Commanders?

2248 A No.

2249 Q So it was notable?

2250 A Yes.

2251 Q But you don't know why they were doing it?

2252 A I'm sorry?

2253 Q You don't know why they were doing it?

2254 A I don't know the exact claims, no.

2255 Q What do you know, even if you don't know the

2256 exact details? What are the details you do know?

2257 A I know the details of Katz and Banks came with a

2258 group of cheerleaders. We mediated and settled. That's

2259 what.

2260 Q About what? What was the grievance?

2261 A I'm sure there was different grievance,

2262 et cetera. I'm not aware of the details.

2263 Q Did the Commanders pay money as part of the

2264 settlement?

2265 A Yes.

2266 Q How much money?

2267 A I think it was a couple million dollars.

2268 Q A couple million dollars?

2269 A I believe so. I believe.

2270 Q Why did the team pay a couple million dollars to
2271 former cheerleaders?

2272 A They mediated and settled. That's what I know.

2273 Q So you don't know what claims were presented
2274 against the team that caused the team to pay out
2275 \$2 million?

2276 A I think there were many different claims under
2277 it.

2278 Q Can you name one?

2279 A I don't recall.

2280 Q Well, there are people who do know about this
2281 settlement, I believe, Mr. Snyder. As part of its
2282 investigation, the Committee interviewed Ms. Abigail Welch,
2283 who was a cheerleader and a captain of the cheerleading
2284 team between 2005 and 2012, so including the years when
2285 these lewd videos were made.

2286 During her interview, however, she stated she was legally
2287 unable to answer certain questions about the hostile
2288 workplace, the Commanders, the lewd videos and the
2289 Wilkinson investigation, and provided that her inability to
2290 answer these questions was related to the resolution of the
2291 lewd videos dispute.

2292 Mr. Snyder, on the record here today, are you willing, on
2293 behalf of yourself and your team, to release Ms. Welch and
2294 all other cheerleaders who are parties to this settlement
2295 from any NDA or confidentiality clause they are bound by so
2296 that they can speak freely with the Committee about this
2297 settlement?

2298 Ms. Seymour. This is Karen Seymour. And any of these
2299 requests for forward-looking production or releases, we're
2300 happy to take back. These are new requests. We have never
2301 heard a request from Ms. Welch prior -- from the Committee,
2302 at least.

2303 I would say that we did receive a letter very, very
2304 recently from counsel for many, if not all of the
2305 cheerleaders, and requesting that we waive an NDA.

2306 And we're happy to take it as a request from the
2307 Oversight Committee. We're happy to take that back and
2308 have an opportunity to respond, and we're happy to take a
2309 look at that issue and report back.

2310 By [REDACTED]

2311 Q Mr. Snyder, you agree that this was a notable
2312 settlement. It was an important settlement. Can you agree
2313 with me that these lewd video allegations are shocking and
2314 disturbing?

2315 A Yes.

2316 Q And so, you know, you don't seem to have any

2317 information to provide the Committee about this -- about
2318 this settlement. And so I would ask that you -- that you
2319 allow those who do have information to freely come forward
2320 and talk to the Committee about these shocking and
2321 disturbing allegations.

2322 And I sincerely hope that you will abide by your commitment
2323 to cooperate with the Committee's investigation and that
2324 you will do so shortly.

2325 I want to turn now to another allegation in this article,
2326 the Fight Night allegation in 2004. Ms. Scourby, a former
2327 cheerleader, is quoted in The Washington Post article and
2328 describes a 2,000-person charity event in the Washington
2329 Hilton ballroom which raised money for children's charity.
2330 She was 26 years old at the time. Ms. Scourby had just
2331 finished dancing in the ring with fellow Commanders
2332 cheerleaders doing her dance in a dance outfit, you called
2333 her over to your table and introduced her to your longtime
2334 friend and the team ophthalmologist Tony Roberts.

2335 After a brief conversation, you reportedly told her, "We
2336 have a hotel room. Why don't you and Tony go upstairs and
2337 get to know each other better."

2338 Ms. Scourby told several individuals about this incident
2339 that night and in the days following, including Donald
2340 Wells, the Commanders' then cheerleader director. Those
2341 are the allegations in the article.

2342 Mr. Snyder, my first question to you about this is were you
2343 and Mr. Roberts at Fight Night in 2004?

2344 A We attended Fight Night once. Not sure if it was
2345 necessarily '04. But I don't know this person, and this --

2346 Q You don't know Mr. Roberts?

2347 A Not -- this Tiffany person, I don't know this
2348 person. I believe even Tony Roberts was interviewed by
2349 Beth Wilkinson --

2350 Q Mr. Snyder, my question was whether you and
2351 Mr. Roberts were at Fight Night in 2004. Is it your
2352 testimony that you don't remember whether you were at Fight
2353 Night in 2004?

2354 A We were at Fight Night one time.

2355 Q You don't remember whether it was in 2004?

2356 A It could have been '04.

2357 Q Did either you or Mr. Roberts have a room at the
2358 Hilton the night of Fight Night?

2359 A No.

2360 Q You didn't have a hotel room?

2361 A No. We lived locally in the DMV, both of us.

2362 No.

2363 Q Did either of you have access to a hotel room?

2364 A No.

2365 Q A hospitality suite, the room of a friend, anyone
2366 whose room key you could get?

2367 A No. I only remember I was at Fight Night, I
2368 believe, once with Tony. We came together and left
2369 together. And it was a charitable event.

2370 Q Mr. Snyder, did you do a lot of drinking at Fight
2371 Night?

2372 A I don't recall the details of Fight Night. I was
2373 a social drinker.

2374 Q Were you drinking at Fight Night? It was a
2375 social occasion.

2376 A I don't recall.

2377 Q You don't recall. You don't recall whether it
2378 was in 2004. You don't recall whether you were drinking.
2379 Is that right?

2380 A No.

2381 Q But you do recall that you did not have a hotel
2382 room. That's your testimony?

2383 A Yes.

2384 Q Do you recall talking to Ms. Scourby on Fight
2385 Night in 2004?

2386 A No.

2387 Q You don't recall whether or not you talked to
2388 Ms. Scourby in 2004?

2389 A No. I don't know that person.

2390 Q Do you recall whether or not you introduced
2391 Ms. Scourby to Mr. Roberts that night?

2392 A I did not.

2393 Q Mr. Snyder, isn't it possible that you said these
2394 things that Ms. Scourby alleges you said, but you just
2395 don't remember them?

2396 A No, because I don't know this person. So no.

2397 Q It's not possible that this happened and you just
2398 don't remember it?

2399 A Sorry, but I don't know this person.

2400 Q Now, Mr. Snyder, in July 2020, The Washington
2401 Post had previously published an exposé regarding the
2402 Washington Redskins entitled "From Dream Job to Nightmare"
2403 on July 16, 2020, and you talked about it with my
2404 colleague, [REDACTED] during her questioning.
2405 It contained allegations of harassment and misconduct
2406 leveled by Emily Applegate and 14 other Commanders
2407 employees against three of the team's top executives, Larry
2408 Michael, Alex Santos and Richard Mann.
2409 In response to that July 16, 2020 article, you sent an
2410 email to the team staff; is that correct?

2411 A I don't recall.

2412 Q Mr. Snyder, would you pull document AL, which I
2413 will mark as Exhibit Number 5 for the purposes of this
2414 deposition.

2415 (Exhibit 5, email, was marked for identification.)

2416 By [REDACTED]

2417 Q Mr. Snyder, do you recognize this document?

2418 A Yes.

2419 Q Do you see how it is an email from July 17, 2020,
2420 "Subject: A message from Dan and Tanya Snyder"?

2421 A Yes.

2422 Q Mr. Snyder, can you read for us the first two
2423 sentences of that email.

2424 A "We are sad and disappointed, as you all are,
2425 after reading the story in The Washington Post yesterday.
2426 On behalf of the organization, we want to apologize to each
2427 of you and to everyone affected by this situation.
2428 "The actions in the story have no place in our franchise or
2429 in society."

2430 Q Thank you, Mr. Snyder.
2431 So after reading the July 17, 2020, article, the one that
2432 contained allegations against three of your top executives,
2433 you and your spouse, Ms. Snyder, sent an email apologizing
2434 to the organization. Is that right?

2435 A Yes.

2436 Q Now, the next month, in August 2020, The
2437 Washington Post published a second exposé which you were
2438 talking about which contains the allegations against you.
2439 After that August article, you released another statement;
2440 is that correct?

2441 A I believe so.

2442 Q Would you please, Mr. Snyder, pick out document
2443 AE, which I will mark for the purposes of this exhibit as
2444 Majority Exhibit Number 6.

2445 (Exhibit 6, statement, was marked for
2446 identification.)

2447 By [REDACTED]

2448 Q Do you see that, Mr. Snyder?

2449 A Yes.

2450 Q Now, Mr. Snyder, in the first paragraph, do you
2451 see how it says, "The behavior described in The Washington
2452 Post latest story has no place in our franchise or in our
2453 society. While I was unaware of these allegations until
2454 they surfaced, I take full responsibility for the culture
2455 of our organization"?

2456 Do you see that, Mr. Snyder?

2457 A Yes.

2458 Q What did you mean when you said "the behavior
2459 described in The Washington Post article"?

2460 A Well, any behavior of such is inappropriate, and
2461 we wanted to let everyone understand clearly and -- what we
2462 said.

2463 Q Now, the third paragraph starts, "The Washington
2464 Post article reads like a hit job, relying on unnamed
2465 sources and allegations that are largely 10 to 20 years
2466 old."

2467 Do you see that, Mr. Snyder?

2468 A Yes.

2469 Q Is that what you mean when you say taking full
2470 responsibility?

2471 A I believe it was regarding the next paragraph.

2472 Q So is your definition of taking responsibility
2473 attacking your accusers --

2474 A Of course not.

2475 Q -- and labeling them as taking out hit jobs
2476 against you?

2477 A No, of course not. I think you have to read the
2478 next paragraph.

2479 Q Well, you say that this article relies on unnamed
2480 sources and allegations, but this article includes
2481 allegations and quotes from many employees, including
2482 Rachel Engelson, Tiffany Bacon Scourby, Megan Imbert,
2483 Donald Wells, Brad Baker, [REDACTED], [REDACTED],
2484 [REDACTED], [REDACTED] and yet in response to this
2485 article, you said it relies on unnamed sources and
2486 allegations, whereas the previous article which contained
2487 only one named source, you immediately apologized for.
2488 Why is that, Mr. Snyder?

2489 A I think that this was in response to the
2490 allegation by this -- Ms. Scourby, and that's what this was
2491 in response to, I believe.

2492 Q So then do you agree that all the other
2493 allegations are true and are allegations that you should
2494 apologize for?

2495 A No. What I was saying is that this refers to
2496 Ms. Scourby's allegation from '04. And that's what it
2497 refers to.

2498 Q Now, at the bottom, that paragraph states, "It is
2499 clear that there are other negative agendas at work in this
2500 reporting."

2501 Do you see that, Mr. Snyder? Last sentence of Paragraph 3.

2502 A Yes.

2503 Q Okay. What negative agendas did you believe The
2504 Washington Post and its journalists were serving?

2505 A I think it refers to the next paragraph about
2506 Ms. Scourby, I think you have to read it in context. And
2507 that accusation is false, and it was referring to that.

2508 Q Well, the paragraph starts with you complaining
2509 about unnamed sources and allegations. Ms. Scourby is
2510 named in this article. She alleges you. Her name is
2511 printed, her picture is printed.

2512 So surely that can't be who you are referring to in this
2513 paragraph that starts, "The Washington Post article reads
2514 like a hit job, relying on unnamed sources and
2515 allegations."

2516 Ms. Seymour. This is Karen Seymour. The article says

2517 what it says. And I think he's answered the question, but
2518 you may proceed.

2519 By [REDACTED]

2520 Q Mr. Snyder, the question is, what agenda did you
2521 believe The Washington Post and its journalists were
2522 serving?

2523 A I don't understand the question.

2524 Q You say there "other negative agendas at work in
2525 this reporting." What are the negative agendas at work in
2526 the reporting of The Washington Post?

2527 A I think I'm referring -- we're referring this
2528 Scourby accusation, false accusation is what we're
2529 referring to.

2530 Q What are these negative agendas? These are your
2531 words, Mr. Snyder. "Statement by Dan Snyder in response to
2532 Washington Post allegation."

2533 Mr. Snyder, do you believe that there -- that this -- what
2534 are these negative agendas?

2535 A I believe what I'm referring to is Ms. Scourby's
2536 false accusations against me and Tony Roberts.

2537 Q Mr. Snyder, do you believe that there are
2538 negative agendas that continue to be at work today?

2539 A I don't understand the question. Can you repeat
2540 that?

2541 Q Mr. Snyder, do you believe that these -- these

2542 negative agenda is the reason you're being deposed today by
2543 a Committee of the United States House of Representatives?

2544 A By the way, let me clarify something, as I read
2545 this further. The negative agenda is "Snyder is also
2546 accusing" -- this is the article -- "accusing a former
2547 employee, **Former Staff 1**, and her landlord in helping to
2548 orchestrate and bankroll stories."

2549 Q So are you alleging that **Former Staff 1** was
2550 behind the story published by The Washington Post?

2551 A Possibly.

2552 Q Do you believe **Former Staff 1** is orchestrating
2553 publications in The Washington Post, the newspaper of
2554 reference of your hometown?

2555 A Well, you have the phone records that reflect the
2556 numerous conversations with **Former Staff 1** starting on
2557 July 4 of 2020 that reflect that. And those facts and that
2558 evidence were presented to Attorney General Loretta Lynch.
2559 And the outcome that was read you to by Congressman's
2560 Comer's question directed to the commissioner of the
2561 National Football League were presented today in those two
2562 answers.

2563 So to answer the question back to specifically -- to answer
2564 the question that links to this, now that I have it in
2565 front of me, it links to, I'll read it again, "Snyder is
2566 also accusing a former employee, **Former Staff 1**, and her

2567 landlord of helping to orchestrate these stories."
2568 So that's the answer to your question. And I think clearly
2569 the facts speak for themselves, the telephone records speak
2570 for themselves.

2571 Q Excuse me, Mr. Snyder. Do you believe that **Form**
2572 **Former Staff 1** has a negative agenda behind dozens of
2573 Washington Commanders employees coming forward about the
2574 toxic workplace culture at the Commanders and The
2575 Washington Post publishing multiple exposés about the toxic
2576 workplace culture?

2577 A I just know that **Former Staff 1** attempted to
2578 pay three of our personal employees, including a 20-year
2579 employee of my wife, Tanya, attempting to get her to lie
2580 and defame me and my family; and say I was a drug addict.
2581 I know that the affidavits from the -- from my **██████████** of a
2582 long time, who was attempted to be paid -- to make a lot of
2583 money by saying very bad things about Dan Snyder, untruths
2584 about Dan Snyder. So I think I just know the facts and we
2585 can look at the facts.

2586 **██████████** Thank you, Mr. Snyder. My time is up.
2587 And I appreciate my colleagues' indulgence. With that, I
2588 will turn it over to the Minority staff after we take a
2589 five-minute break.

2590 THE WITNESS. Thank you.

2591 (Recess)

2592 EXAMINATION BY

2593 [REDACTED]

2594 Q Hi, Mr. Snyder, my name is [REDACTED]. I'm
2595 general counsel for the Minority staff, and I will be
2596 conducting this hour of questions.

2597 The first topic I want to revisit, which you have spent a
2598 little bit time on last hour and the hour before, was the
2599 investigation relating to the former minority owners of the
2600 team.

2601 As we discussed, it has been characterized by folks as --
2602 by the Majority as a shadow investigation. And I think
2603 you've already asked -- you know, answered this, but was
2604 it, in fact, a shadow investigation into the workplace at
2605 your team's organization?

2606 A No.

2607 Q In fact, what it was, was looking at basically,
2608 like, efforts of defamation that originated out of India?
2609 That was what the purpose of the investigation was;
2610 correct?

2611 A Yes, it was an activity of starting with the fact
2612 that we learned that three of our employees, [REDACTED], my
2613 [REDACTED], and a 20-year employee of my wife, another [REDACTED],
2614 were attempted to be bribed for -- to say more defamatory
2615 stuff about me and my family.

2616 It was the fact that we were following through with suing

2617 in India, MEAWW, and then -- that was obviously terrible,
2618 terrible stuff. Shocking. And it was pure defamation.
2619 And from our standpoint, we were simply following and
2620 developing all the facts and the leads and the three
2621 attempted -- folks that were attempted to be bribed, and it
2622 led us to follow more discovery.

2623 And we just delivered the facts to former Attorney General
2624 Lynch along the way and the NFL and everyone. And that was
2625 it.

2626 It was nothing to do with workplace whatsoever. It had to
2627 do with the fact that we were defamed. And that's what it
2628 was about.

2629 Q So the slide decks that were prepared were a
2630 collection of, like, facts that were collected as part of
2631 this, those were all turned over to the NFL and then also
2632 to former Attorney General Loretta Lynch?

2633 A Yes, they were -- all the information, the facts
2634 were turned over. As Congressman Comer had those answered,
2635 questions reflecting the results of those facts.

2636 Q The results being that one of the minority owners
2637 was -- is not permitted to own -- or own any shares in any
2638 NFL team for the future; correct?

2639 A Yes.

2640 Q As part of that effort, your attorneys filed
2641 1782s. In the last hour, the Majority referenced one of

2642 the 1782 orders entered in by a magistrate judge in
2643 Colorado.

2644 But there were several 17- -- to the extent you are aware,
2645 you know, did your attorneys, I believe, to understand,
2646 like, file many 1782s just connected with the defamation
2647 action in India?

2648 A I believe they filed around 10. And most of them
2649 were granted.

2650 Q So the majority of those 1782 actions were
2651 granted in the federal courts in this country?

2652 A I believe so.

2653 Q And I think it's kind of worth just re-asking,
2654 then, all of this information that was collected was
2655 provided to the NFL and to Loretta Lynch, but subsequent,
2656 as we saw at the hearing last month, last June, there was
2657 -- one of these decks was produced, but it was
2658 substantively redacted.

2659 Were you aware or did you know that it had gotten
2660 substantively redacted in association with last month's
2661 hearing?

2662 A No.

2663 Q A huge portion of that slide deck was redacted,
2664 and it is kind of unclear, you know, why it was so redacted
2665 because there was a lot of different elements to the slide
2666 deck.

2667 Moving, again, to the current culture at the team, there's
2668 obviously been a number of personnel changes over the past
2669 couple of years, ones that have really affected a lot of
2670 positive changes, as you have testified to today.

2671 Wondering if you're able to speak at all to what the --
2672 what some of those changes look like on the human resource
2673 side; if there's any -- you know, what kind of improvements
2674 were made within the organization's human resources.

2675 A I think we have probably one of the largest HR
2676 organizations -- encompassing organizations in that area in
2677 all of sports. One that has a lot of touchpoints, has
2678 mentorship programs, has so many different areas that we've
2679 expanded and we think it will make tremendous more progress
2680 for the years to come within the franchise.

2681 Q Toward that vein, the team hired an outside firm,
2682 the Vestry Laight. Are you familiar with Vestry Laight?

2683 A Yes.

2684 Q What were they hired to do, or why did the team
2685 contract with them? What was their purpose?

2686 A We wanted to see how we were doing and make sure
2687 we're monitored. And the league then asked for us to do
2688 this for years and we made sure, we thought they were that
2689 good at helping to improve any nuances and anything that we
2690 can do to be best of class.

2691 And I believe they just issued their latest report -- their

2692 latest six-month report yesterday. And I have not
2693 personally read it, yet, but I've heard it's quite well.

2694 Q When did -- do you know when the team retained
2695 Vestry Laight?

2696 A I believe in May or June of 2021.

2697 Q At this point, I'm going to enter into the
2698 record -- as far as we understand, there's been so far
2699 three reports from Vestry Laight, dated, the first one,
2700 August 2, 2021, the first one, the second one being
2701 January 29, 2022. As you just mentioned, the third one
2702 issued yesterday, July 27. So three so far.

2703 They are going to go in as Exhibits J, K and L in order of
2704 time. So Exhibit J is the August 2, 2021. And Exhibit --
2705 labeled as Exhibit K is January 29, 2022. And the most
2706 recent one is Exhibit L, July 27.

2707 So according, as you mentioned, to these reports, the team
2708 has undergone significant changes during this time frame.

2709 I'm going to focus in on the most recent one from --
2710 released yesterday to the conclusion on page 15.

2711 Let me know when you're ready with that.

2712 A Okay. I've read it, thank you.

2713 Q You're welcome. So at the top of this
2714 conclusion, first paragraph, page 15, second sentence
2715 reads, "Our confidential interviews confirm trends seen in
2716 the fall annual engagement survey. Under the leadership of

2717 coach and his team, football operations has established a
2718 strong values-driven culture and creating what many
2719 describe as a family with his staff."
2720 And then further down in the beginning of the third
2721 paragraph, it reads, "The improvements and diversity and
2722 culture on the football operations side mirror those of the
2723 team as a whole, which has seen a remarkable uptick since
2724 July 2020 in the representation of women and people of
2725 color, including in leadership positions."
2726 It goes on to say, "An empowered leadership team is
2727 intentionally and holistically driving a culture that is
2728 inclusive, high-performing and accountable."
2729 Would you agree with that assessment, based on your
2730 observation?

2731 A Yes, a hundred percent.

2732 Q So, notably, in this first paragraph or this --
2733 the third paragraph, first line, you know, references
2734 July 2020. And July 2020 was when some of these personnel
2735 changes began; correct?

2736 A Actually, the personnel, the football side began
2737 in January of 2020. But the overall organization really is
2738 July 2020.

2739 Q That's right. That's when -- around the summer
2740 of 2020 was when Jason Wright began with the organization?

2741 A That's right.

2742 Q And then Coach Rivera began the beginning of
2743 2020?

2744 A Yes.

2745 Q How -- if you can, describe how this improvement
2746 as outlined in this conclusion of this most recent report
2747 affect the culture of the team.

2748 A I think people were incredibly motivated and
2749 driven to not only continue but even get better. And we're
2750 very proud of the work and accomplishments. And we don't
2751 see these reports prior to them coming out. They are done
2752 independently. So we are personally anxious to read the
2753 whole thing, as this conclusion is great and really want to
2754 read the entire detail. And we appreciate very much the
2755 fact that they are seeing what we're doing.

2756 Q Did anybody in Congress direct you, the
2757 organization, to make these personnel changes?

2758 A No.

2759 Q Were any personnel changes made as a result of
2760 any congressional investigation?

2761 A No.

2762 Q Do you believe that any of the improvements in
2763 the culture of the organization as a whole, you know, were
2764 affected or were changed in a positive direction by
2765 congressional investigation?

2766 A No.

2767 Q There's one more quote, since you haven't had an
2768 opportunity to delve into the report. Page 8, could you
2769 turn to page 8. Specifically, the third paragraph on that
2770 page.

2771 This has some quotes in it from some of the confidential
2772 interviews that the Vestry Laight -- from their interviews
2773 took.

2774 The paragraph begins, "In tandem with the substantial
2775 increase in diversity, there's also the improvement in
2776 culture. Several interviewees from Commanders Park
2777 described it as like 'night and day,' 'we're better through
2778 and through,' the organization is more professional, and
2779 many reports feeling more respected and like they have a
2780 voice. It is truly more of a family than it has ever
2781 been."

2782 It appears that morale has dramatically increased at the
2783 organization based on some of those excerpts. Would you
2784 agree?

2785 A Yes.

2786 Q And as the team owner, how does that make you
2787 feel about the decisions that were made over the past
2788 couple of years?

2789 A Both Tanya and I and Coach Rivera, Jason Wright,
2790 are extremely proud. We all talk about how much has been
2791 accomplished and much, much more to accomplish, but we're

2792 all excited to read this and excited that the recognition
2793 that -- the transformation of this organization has made
2794 great, great progress, and we're looking forward to even
2795 more.

2796 Q Do you know, how much longer will Vestry Laight
2797 be monitoring the team?

2798 A Not exactly, but we appreciate them. We respect
2799 them. We actually think they can help us into the future,
2800 because we want to be as good as we can.

2801 Q What other steps are you taking, is the
2802 organization taking to make sure that progress continues as
2803 the type of progress that Vestry Laight has, you know,
2804 obviously observed?

2805 A Well, I think we're doing so many more areas
2806 beyond just HR, and we're working on -- we have guest
2807 speakers and mentorship programs and so many different
2808 programs that we just have begun.
2809 And my wife came back from one recently, I can't remember
2810 the gentleman's name, but she was blown away. Said I have
2811 to read his book. And very impressive. So we're doing a
2812 lot of things about camaraderie and fellowship and so many
2813 different areas. We are really focused on creating the
2814 best.

2815 Q I'm going to turn back just a little bit in time.
2816 This began, as I understand it, right about the time, like,

2817 a lot of these improvements were happening with the
2818 organization.

2819 But the NFL had began an investigation. If I understand
2820 correctly, it was around July 2020. Does that sound right
2821 to you?

2822 A We started -- we wanted to look into our culture.
2823 So we started in 2020, July of 2020, looking into it.

2824 Q And this investigation is the one that was led by
2825 Beth Wilkinson; correct?

2826 A Yes.

2827 Q Did you fully cooperate with Beth Wilkinson in
2828 her investigation?

2829 A Yes. I personally interviewed also twice with
2830 her.

2831 Q How many hours did you spend being interviewed by
2832 her during the course of the investigation?

2833 A Probably eight or nine or 10.

2834 Q Did you provide any instructions to your team
2835 about the Wilkinson investigation and how to cooperate?

2836 A Yes. We sent out multiple times emails to all
2837 members of the organization, feel free to speak to her.
2838 Jason Wright, I believe, also sent out as well.

2839 Q So the message you gave to the organization is to
2840 fully cooperate with Beth Wilkinson's investigation?

2841 A Yes.

2842 Q Did you waive NDA provisions for anybody that
2843 entered into an NDA or any type of confidentiality
2844 agreement with the team so that they can feel free to speak
2845 with Ms. Wilkinson without fear of repercussion?

2846 A Yes.

2847 Q Why did you decide to enter into this waiver of
2848 the NDA provisions?

2849 A We wanted to be open and transparent, and we also
2850 gave her access -- gave her and her team access to our
2851 complete email databases.

2852 Q Are you aware of any person who wasn't able to
2853 speak with Ms. Wilkinson and had wanted to do so but did
2854 not because of an existing NDA with you or with the team?

2855 A No. I do not.

2856 Q Why do you think it was important to have your
2857 organization fully cooperate with Beth Wilkinson's
2858 investigation?

2859 A Because we wanted her to be thorough and have
2860 access to everything as we did and have access to our
2861 employees and data, et cetera. And we -- obviously, we
2862 wanted and have worked on our transformation as our goal.

2863 Q Did you do anything to prevent or discourage
2864 anybody within the organization from speaking freely and
2865 openly with Ms. Wilkinson, her and her team?

2866 A No.

2867 Q Did you ever use any -- take any action that
2868 would either -- with the intent to prevent anybody from
2869 speaking with her and her team such as, you know, attempts
2870 at intimidation or hiring private investigators?

2871 A No.

2872 Q Other than the information that the NFL released
2873 to you, have you ever been informed of all the findings of
2874 Beth Wilkinson's investigation?

2875 A No.

2876 Q Do you know how many documents the team provided
2877 her and her team as part of this investigation?

2878 A Whatever she asked for.

2879 Q The Majority has referred to a "common interest
2880 agreement" between the team and the NFL. Did you
2881 understand that you were entering into a common interest
2882 agreement with the NFL?

2883 A I'm not an attorney.

2884 Q Let's put it this way: Since -- did you ever
2885 rely on this agreement or -- to influence the
2886 investigation, but maybe you're not even really, like,
2887 fully aware of the agreement itself?

2888 A No. We never did anything except fully
2889 cooperate.

2890 Q So basically there has been no efforts taken by
2891 you or the team to try to, first, stop the investigation or

2892 block or deny any information to Beth Wilkinson and her
2893 team; correct?

2894 A Correct.

2895 Q And then was there any efforts made to discourage
2896 or prevent a written report by Beth Wilkinson?

2897 A No.

2898 Q Or block the release of her -- you know, the
2899 findings from her investigation?

2900 A No.

2901 Q So Ms. Wilkinson did not provide a written report
2902 in connection with her investigation. And you're aware
2903 that that was the case?

2904 A Yes.

2905 Q Do you know who decided that the Wilkinson report
2906 would be an oral report?

2907 A No.

2908 Q From your perspective, were the -- was the oral
2909 report sufficient for the purposes of what she did in her
2910 investigation?

2911 A I believe that the 10 -- 10 points that came out
2912 of the investigation, we accomplished I believe about nine
2913 of them or partially on nine of them. And now all 10
2914 and...

2915 Q So at this point in time, the 10 points that stem
2916 from her investigation, the team has accomplished all 10?

2917 A Yes, some time ago now.

2918 Q Some time ago?

2919 A Yes.

2920 Q How quickly did you accomplish those initial nine
2921 that you just mentioned?

2922 A The leadership team accomplished probably nine
2923 prior to the issue of the 10, not -- maybe not in the
2924 whole, but were working on already a majority of them.

2925 Q Did any congressional investigation spur you to
2926 implement Beth Wilkinson's recommendations?

2927 A No.

2928 Q Those efforts to implement those recommendations
2929 were independent of any effort by a congressional
2930 investigation?

2931 A Yes.

2932 Q Were you personally briefed on the final
2933 recommendations stemming from her report, her
2934 investigation?

2935 A On the 10 points, yeah, yes.

2936 Q Yes.

2937 A Yes.

2938 Q Of those 10 points, what's a couple of the ones
2939 that you think have been made the most -- have spurred the
2940 most positive change for the organization?

2941 A There's so many. I'm going to go to -- I'll go

2942 to the last one, which is the Vestry Laight reports that
2943 show in detail the third-party validation of the
2944 transformation and positivity, and I think I just -- as you
2945 read through it, I'm looking forward to reading the whole
2946 document. And I think that sort of summarizes, I believe,
2947 where we are.

2948 Q Now, also as a part of the Beth Wilkinson
2949 investigation, the NFL levied a fine against the team;
2950 correct?

2951 A Yes.

2952 Q And how much was that fine?

2953 A \$10 million.

2954 Q This was the largest fine ever imposed by the
2955 NFL?

2956 A Yes, it was.

2957 Q Did you have any concerns about the fine?

2958 A It's a lot of money, and I think that -- I
2959 believe it's going to good causes and positive change.
2960 And -- but we're moving forward.

2961 Q So one of the changes stemming from the Wilkinson
2962 investigation was handing over day-to-day management to
2963 your wife, Ms. Snyder; correct?

2964 A She had already been involved day-to-day and was
2965 integral in bringing in Jason Wright and Coach Rivera.
2966 As I said earlier, being empty nesters and her having an

2967 entrepreneurial background and the leadership skills she
2968 has and the detail skills she has, she's currently working
2969 on a lot of fan experience, things at the stadium and a lot
2970 of great stuff regarding the rebranding and retail and so
2971 many different areas.

2972 So I think that it was a natural thing to do. We've been
2973 life partners as well.

2974 Q You've touched on this a little bit, but just
2975 trying to understand what her responsibilities are in this
2976 role over the past couple of years. If you can describe
2977 some of -- again, you've touched on this a little bit, but
2978 just if you can describe some of her responsibilities in
2979 this management role she's taken on.

2980 A I'll give you a detailed response, the one that
2981 Jason Wright likes to brag about all the time. He says
2982 he's never met anyone that's visited every area, including
2983 every single restroom in the stadium, to make sure it's as
2984 clean as it can be. That's Tanya. But she's a detailed
2985 individual.

2986 We hired a new head of the stadium, I believe the end of
2987 last year, November of last year, and -- named [REDACTED], who
2988 also is into every detail with Tanya.

2989 And she's -- beyond that, Tanya actually has been
2990 representing the club at ownership meetings. And I'm
2991 grateful to her and the NFL overall. And she gets more and

2992 more entrenched in driving positive changes across the
2993 league.

2994 Q What does your current role look like with the
2995 team and your responsibilities?

2996 A I help give guidance when asked, but I'm very,
2997 very focused personally on building us a new venue, a
2998 stadium, new entertainment complex somewhere in the DMV in
2999 the future. And it's quite a substantial project that I've
3000 been working on, and hope in the near future to deliver
3001 something special for the entire community and our fans.

3002 Q So your focus is on that, but you have taken a
3003 step back from the daily management in your new role?

3004 A Yes. Sometimes I get overwhelmed just by the
3005 amount of stuff with the architects and plans and things
3006 we're doing. It's quite time-consuming, but I am available
3007 and I believe I'm helpful to -- whenever asked.

3008 Q Do you attend ownership meetings?

3009 A No.

3010 No. I think it's important also that Tanya, as she learns
3011 the ropes, delve in it. And she's done that.
3012 I mentioned earlier a compliment by an owner and -- several
3013 owners that said she's quite remarkable, as well as -- I
3014 think it's important for her to play an important role.
3015 She's enjoying every minute of it.

3016 Q At some point, are you going to resume your role

3017 as co-CEO of the team? I mean, I guess is that what you
3018 are now or not? Will that resume at some point?

3019 A I am a co-owner and co-CEO with her, but between
3020 all of the things going on, I think there's so much going
3021 on in terms of the new venue and those areas that it's a
3022 substantial project that will need a lot of dedication.
3023 I do believe when it comes to Tanya's leadership skills --
3024 I always make jokes around -- when Tanya and Jason are
3025 talking together, I say you're going to have a T&J radio
3026 show because you guys are really funny. And all this stuff.
3027 You guys are working on -- and it's been a pleasure. So I
3028 think we're going to continue as it is, and it's doing
3029 quite well.

3030 Q To the best of your knowledge, have the
3031 Commanders complied with every requirement after the
3032 Wilkinson investigation findings?

3033 A Yes, we have.

3034 Q So I know we've touched on this, but kind of the
3035 timeline of some of the stuff is that, like, there were
3036 changes already being made when the Wilkinson investigation
3037 began. But since the allegations that led to the Wilkinson
3038 investigation came to light, what changes have you made to
3039 address those?

3040 You touched on a couple of them, but were there ones like
3041 -- you know, Coach Rivera was already there. You were

3042 already bringing on Jason Wright. There were already these
3043 changes that were being made.

3044 But what is another example of something that you and your
3045 team have done to address issues specifically identified by
3046 Wilkinson apart from what you've already just described a
3047 little bit ago?

3048 A Well, I'll tell you about it as to what we've
3049 done going back to football. After Coach Rivera's first
3050 season, we got together and really solidified the
3051 additional staff and additional leadership there with a new
3052 general manager, Martin Mayhew, which joined at the
3053 beginning of 2021. And so we are continuing at all times
3054 to make improvements on the leadership team.
3055 But on the business side we're doing that as well. There's
3056 so much going on with fan experience and improvements at
3057 the stadium and improvements overall, across the board.

3058 Q Has the NFL in any way, directly or indirectly,
3059 suggested or told you and the team that you have not
3060 complied with any of the requirements or changes that were
3061 expected to be made?

3062 A No.

3063 Q Moving to this Committee's role, when did you
3064 first learn that the -- that this Committee was going to
3065 investigate your franchise?

3066 A I believe it was the end of October of 2021.

3067 Q Is the Washington Commanders, as far as you
3068 understand, a government agency?

3069 A No, not at all.

3070 Q Do you receive any federal funding?

3071 A No, none.

3072 Q Are you -- or have you ever been a government
3073 official?

3074 A No.

3075 Q So to be clear that, you know, we have this
3076 deposition today with you, at all times, we're discussing
3077 private citizens and a private business. Is that your
3078 understanding?

3079 A Yes.

3080 Q What, if any, reaction did you have when you
3081 found out that Congress was going to be investigating the
3082 Washington Football Team?

3083 A Gosh, I can't remember what my reaction was, but
3084 I would encourage members of the Oversight and Reform to
3085 read the oversight Vestry report and to look at the report
3086 and read the reform of our organization.

3087 I would encourage all members of the Committee to spend
3088 time -- I would be happy to set up a leadership team
3089 meeting with Jason Wright, with Tanya, with Amina, Greg,
3090 Andre Chambers and Coach Rivera, Martin Mayhew, Eric
3091 Stokes, it goes on and on and on. I think as a Committee

3092 entitled Oversight and Reform, I think we really could help
3093 potentially if the facts were looked at.

3094 Q Before now, have you tried to make that offer to
3095 the Committee members?

3096 A I don't believe the Committee has called us one
3097 time for anything.

3098 Q Has the team or you even directly received a
3099 document request before today?

3100 A No.

3101 Q A congressional investigation is an extraordinary
3102 tool that Congress has. How has this congressional
3103 investigation affected your life?

3104 A I think it's affected the leadership team, and
3105 they would like to talk to the Committee and talk about the
3106 transformation, talk about the culture change over the last
3107 two-plus years.

3108 And I think what I would ask is if the Committee listen to
3109 what they're doing, and I think they'd be quite impressed
3110 with not only, using the Committee's name, Oversight and
3111 Reform, but it is a reality of where we are as a franchise.

3112 Q So as we understand it, we're here today, in
3113 part, because you were unable to testify before the
3114 Committee on June 22, 2022. Is that your understanding?

3115 A I'm sorry, could you repeat the question?

3116 Q So it's our understanding that a big reason we're

3117 here today doing this deposition with you is because you
3118 were unable to come and testify before the Committee in the
3119 hearing on June 22, 2022. Is that your understanding?

3120 A Yes. That week of June-- we did a rebranding,
3121 which took us over a year and change to do, rebranding the
3122 name of the franchise from Redskins to Commanders.
3123 And towards the end of that journey, we thought that we did
3124 such a detailed, successful job that we would enter in the
3125 Cannes Lions, the biggest marketing event in the world.
3126 We were in four categories up for the awards, very
3127 difficult to win, but we were very proud of the
3128 accomplishments of the team. And that was scheduled six
3129 months prior, approximately, to the June 22nd request.
3130 I believe there were 10 of us from the organization that
3131 went in total, including Jason Wright, obviously, and [REDACTED]
3132 Resh and numerous others; [REDACTED]
3133 et cetera.

3134 Q So you had a prior commitment that had been set
3135 months in advance for June 22nd?

3136 A Yes.

3137 Q And that event was out of the country?

3138 A Out of the country with the Commanders, some of
3139 the members of the leadership team and the Commanders.

3140 Q Were you offered any other date to come and
3141 testify?

3142 A No, I was not.

3143 Q So they did not offer another date to come and
3144 testify before any hearing?

3145 A No, they did not.

3146 Q Just one moment. I'm going to mute real quick.

3147 Are you aware that there was a piece in Politico, actually,
3148 about subcommittee chairman Raja Krishnamoorthi who was
3149 planning to hold a fundraiser promoting an opportunity to
3150 -- to support the "one person in Washington who may have
3151 found a path of getting rid of Snyder"? Are you aware of
3152 that Politico piece?

3153 A Yes, I read that.

3154 Q Now, it's our understanding that the fundraising
3155 did get canceled after Politico ran this piece, but it was
3156 being hosted by a lobbyist who runs a website called
3157 FireDanSnyder.com. Are you familiar with that website at
3158 all?

3159 A Yes, I am.

3160 Q What are your thoughts about a website just
3161 dedicated to trying to fire you?

3162 A I think it would be inappropriate, all of that
3163 would be inappropriate.

3164 Q It appears that the event was promoted with a
3165 subject line of "Help us get rid of Dan Snyder!"

3166 A I think that would be a completely inappropriate

3167 thing for -- to take place. To actually put that out would
3168 be inappropriate.

3169 Q So you do have concerns about a subcommittee
3170 chairman on this Committee putting out fundraising
3171 materials that seems to be connected to this investigation
3172 that -- with the purpose of trying to get you fired as, it
3173 appears, the owner of the Washington Commanders. Is that
3174 your understanding?

3175 A Yes.

3176 Q What do you think of that?

3177 A I think it would be -- it's inappropriate.

3178 Q Why do you think it's inappropriate?

3179 A I'm not a lawyer, so -- but it just seems
3180 incredibly inappropriate to me.

3181 Q I'm going to turn to some of the allegations that
3182 were raised in the last hour. One of those allegations
3183 comes -- regarding the fight -- Fight Night. I think this
3184 was about 2004. Is that your recollection?

3185 A That's what the article says, yes.

3186 Q What is Fight Night?

3187 A Charitable -- I only attended it, I believe,
3188 once. So I can't remember if it was for children. A
3189 charitable event.

3190 Q It happens here, or does it happen elsewhere in
3191 the country? "Here" being, I'm sorry, Washington, D.C.

3192 area.

3193 A I'm not sure where they are and how it works.

3194 It's charitable.

3195 Q So this allegation is coming from Tiffany Bacon

3196 Scourby. Could you tell us what you know about

3197 Ms. Scourby?

3198 A I don't know her. I don't know anything about

3199 her.

3200 Q Prior to you reading about this allegation or

3201 learning about it in The Washington Post, had you ever

3202 heard Ms. Scourby's claims before?

3203 A I had never heard of her name.

3204 Q To your knowledge, did anyone at the team have

3205 knowledge of her claims prior to The Washington Post story?

3206 A I don't think anyone.

3207 Q So did you actually learn about these allegations

3208 from The Washington Post?

3209 A Yes.

3210 Q So how many years had elapsed before Ms. Scourby,

3211 you know, came forth with these allegations, if you know?

3212 A I guess it would be seven, eight, something like

3213 that.

3214 Q Seven to eight years?

3215 A '17.

3216 Q Oh, this was 2017?

3217 A No. The article came out in 2020, so that would
3218 be 16 years-plus.

3219 Q Okay. So 16 to 17 years.

3220 A Yes. Yes.

3221 Q You deny the allegations; correct?

3222 A Yes.

3223 Q Do you stand by that denial?

3224 A Yes.

3225 Q Turning to the "Beauties on the Beach" videos,
3226 these were videos created featuring cheerleaders in
3227 revealing wearing outfits. Do you know whose idea it was
3228 to create these videos?

3229 A I have no idea.

3230 Q Were you involved in the preparation of the
3231 videos?

3232 A No.

3233 Q Were you involved in picking the photographers
3234 for the videos?

3235 A No.

3236 Q What about the stylists, makeup artists or
3237 assistants or whoever, the infrastructure of folks to make
3238 these videos?

3239 A No.

3240 Q Did you ever go to the location of the shoots for
3241 these videos?

3242 A Never.

3243 Q Are you aware if any of the cheerleaders ever
3244 featured and participated in these videos that -- had
3245 complained about participating in them?

3246 A No, I'm not.

3247 Q Did you hear any complaints or recall any
3248 complaints by anyone who participated in these videos at
3249 any time?

3250 A No.

3251 Q There are allegations that you requested to view
3252 certain outtakes from these videos. Are you aware of those
3253 allegations?

3254 A Yes.

3255 Q Have you ever seen the outtake videos that are
3256 those allegations?

3257 A No.

3258 Q Did you request the outtakes be created?

3259 A No.

3260 Q So when was the first time that you learned about
3261 the outtakes?

3262 A In the story in The Washington Post, I believe
3263 it's August of 2020.

3264 Q Is that the same Washington Post piece that
3265 discussed the Ms. Scourby allegations?

3266 A Yes.

3267 (Discussion held off the record.)

3268 Q We're going to turn and pivot real quick.

3269 (Discussion held off the record.)

3270 Q We're going to turn very quickly -- we may not
3271 cover this topic in the rest of our hour, but I think
3272 you're aware because there were a bunch of letters
3273 associated with this, but there's been allegations about
3274 how on the financial side of the ledger of the team, how
3275 financial matters were handled, including, you know,
3276 audits.

3277 I don't know in the past -- what's been your, I guess,
3278 involvement with how the team undergoes audits of the
3279 financials?

3280 Ms. Seymour. It's Karen Seymour. This is one of the
3281 areas that I understood was not the subject of today's
3282 testimony, that the subject of today's testimony would be
3283 on the workplace conduct issues, not on any financial
3284 issues, in particular, related to the allegations by
3285 Mr. Friedman related to the financials and the subsequent
3286 FTC referral. That's what I had understood was the topic.
3287 So at this point, you know, we weren't actually prepared to
3288 go into any discussions like that.

3289 [REDACTED] Okay. The scoping wasn't directly
3290 communicated with us, so we were obviously not a part of
3291 the scoping conversations between you and the Majority

3292 counterpart. So this investigation has encompassed a lot
3293 of different aspects of the Washington Football Team. So
3294 that's why I thought it was -- be prepared for that, not
3295 knowing that this was not a part of today's discussion.

3296 I'm going to mute real quick and just see if we have
3297 any quick follow-up questions, but just give me a moment.

3298 (Discussion held off the record.)

3299 [REDACTED] We'll go off the record now and stop our
3300 hour of questions and do the quick break or defer to my
3301 Majority colleagues about what they want to do with the
3302 time.

3303 (Discussion held off the record.)

3304 (Recess)

3305 [REDACTED]

3306 Q Mr. Snyder, prior to the July 16 Washington Post
3307 report publication, were you aware that the allegations
3308 were being examined by Washington Post reporters?

3309 A I think the Post told us probably five days
3310 before, so I can't remember exactly. But I believe The
3311 Post told us a few days before.

3312 Q When you say "us," who are you referring to?

3313 A The team, not me.

3314 Q And who specifically on the team?

3315 A I can't remember.

3316 Q How -- please finish.

3317 A I said I think it was two days. I can't remember
3318 exactly.

3319 Q How were you made aware that The Washington Post
3320 was in touch with people from the team?

3321 A I got a call, I can't remember from who, but I
3322 remember a couple days before. It could be four or five.
3323 I can't remember exact.

3324 Q And what happened on the call that you received?

3325 A I think they just told us that they were writing
3326 a team -- they were writing a story and wanted comments. I
3327 don't remember the details.

3328 Q When you say that you received a call, are you
3329 talking about from The Washington Post directly or from
3330 members of your team reporting up to you?

3331 A I got it from members of the team.

3332 Q And on the call with members of your team, what
3333 did you discuss?

3334 A I just listened.

3335 Q What specifically were you listening to?

3336 A Whatever they told us at the time they were going
3337 to report.

3338 Q What was that?

3339 A I'm sorry?

3340 Q What was that?

3341 A Can you --

3342 Ms. Seymour. "What was that?" Is that right?

3343 Correct.

3344 The Witness. The story that came out, the July 16
3345 story.

3346 By

3347 Q Do you recall what you did after you had a
3348 conversation with your team about the allegations that were
3349 contained in the July 16th story?

3350 A I called the NFL and asked -- told them about it.
3351 And then shortly thereafter, we were given a list of
3352 attorneys. I think we outreached to Beth Wilkinson.

3353 Q Who did you call at the NFL?

3354 A I called Roger Goodell.

3355 Q Directly?

3356 A Directly.

3357 Q Why did you call him?

3358 A I wanted him to know about this story, and I
3359 asked him what he thought I should do.

3360 Q Why did you want him to know about the story
3361 specifically?

3362 A Because I wanted his advice on what I should do.

3363 Q Would you routinely seek Commissioner Goodell's
3364 advice on things you should do as the owner of the
3365 Washington Commanders?

3366 A Pertaining to this story, obviously it made sense

3367 to call and ask.

3368 Q When you say that it makes sense, why is it that
3369 it makes sense as it relates to this story?

3370 A Seemed like the right thing to do, to ask what I
3371 should do in terms of -- and he said, talk to [Zoom audio
3372 interference] -- and I wanted to investigate.

3373 Q Are you required to report allegations of
3374 misconduct that affects your club to the NFL?

3375 A Yes.

3376 Q At the time when you made the call to
3377 Commissioner Goodell, were you aware of that requirement?

3378 A Yes.

3379 Q So is it your testimony that you were complying
3380 with the requirement to report those allegations to
3381 Commissioner Goodell once you were made aware?

3382 A Yes.

3383 Q Do you recall what Commissioner Goodell said when
3384 you reported the allegations to him?

3385 A I don't remember the exact conversation.

3386 Q Do you remember generalities about the
3387 conversation?

3388 A Probably talked about hiring an outside law firm
3389 to investigate.

3390 Q Did Commissioner Goodell explain to you that it
3391 is the NFL's position that clubs that have these types of

3392 allegations should hire outside law firms to investigate?

3393 A I can't remember the conversation, the details.

3394 I know we retained shortly thereafter Beth Wilkinson, or

3395 her firm.

3396 Q So putting aside the details, did Commissioner

3397 Goodell recommend to you to retain an outside law firm to

3398 investigate the allegations that you understood were

3399 forthcoming?

3400 A I believe so.

3401 Q I believe you testified that after he made the

3402 recommendation that you should hire an outside law firm

3403 that he provided you a list of attorneys; is that correct?

3404 A Yes.

3405 Q On that list of attorneys, Beth Wilkinson and her

3406 law firm was listed. Is that accurate?

3407 A Yes.

3408 Q Do you recall if you consulted any of the other

3409 attorneys on that list?

3410 A I don't recall.

3411 Q Why did you select Beth Wilkinson and her law

3412 firm?

3413 A I think she's based in D.C. Has a great

3414 reputation. That's it.

3415 Q How soon after you received a list of law firms

3416 from the NFL did you call or reach out to the Beth

3417 Wilkinson law firm? At the time, it was Wilkinson Walsh.

3418 A I don't recall.

3419 Q Was it the same week?

3420 A Probably, yes.

3421 Q Is it fair to say it was within days?

3422 A Sure.

3423 Q In fact, you announced on July 16, the day that
3424 the allegations were made public, that you had retained an
3425 outside law firm to conduct an independent investigation.
3426 Do you recall that?

3427 A Sounds right.

3428 Q Did you ever meet with Ms. Wilkinson in person?

3429 A In person, no.

3430 Q Did you speak to her by phone?

3431 A Sorry?

3432 Q Did you speak to her by phone?

3433 A Yes, yes.

3434 Q How many times did you speak with her before you
3435 retained her?

3436 A Once or twice, I believe. I can't remember
3437 exactly.

3438 Q Did you speak to Ms. Wilkinson about the scope of
3439 her investigation and what she would be examining were she
3440 to be retained by the Washington Commanders?

3441 A I think the attorneys spoke to her, I believe,

3442 about that.

3443 Q When you spoke to Ms. Wilkinson, were your
3444 attorneys present?

3445 A I don't believe -- I think I had one
3446 conversation. I can't remember exactly if it was
3447 afterwards or before, what happened.

3448 Q Why did you have a conversation with
3449 Ms. Wilkinson outside of the presence of your counsel?

3450 A I don't understand the question.

3451 Q Why did you speak to Ms. Wilkinson directly?

3452 A Maybe I welcomed her. I can't remember.

3453 Q When you said "counsel," who are you referring to
3454 specifically?

3455 A I'd be guessing if there was an attorney. I
3456 don't want to be guessing. I just know lawyers spoke to
3457 her.

3458 Q How many lawyers did the Washington Redskins have
3459 in 2020?

3460 A At that point, I think three.

3461 Q Is it your testimony that you can't recall which
3462 of the three lawyers that you had working for you two years
3463 ago spoke to Ms. Wilkinson about the allegations in The
3464 Washington Post story?

3465 A I just -- to my recollection, I can't remember
3466 which lawyer spoke to her. I know lawyers spoke to her. I

3467 just do not know which lawyer.

3468 Q Does the name Will Rawson sound familiar?

3469 A Yes.

3470 Q Who is he?

3471 A I'm sorry?

3472 Q Who is he?

3473 A He was the assistant general counsel and then
3474 interim general counsel for a while.

3475 Q Do you recall if Mr. Rawson was the individual
3476 from your legal team who spoke to Ms. Wilkinson?

3477 A I can't remember if it was him. I know a lawyer
3478 spoke to her. I don't want to say it was Will Rawson. I'm
3479 just not sure.

3480 Q Do you know if the NFL spoke with Ms. Wilkinson
3481 at or around the time that you retained her in July 2020?

3482 A No, I don't.

3483 Q No, you don't know; or, no, they did not?

3484 A I don't know.

3485 Q At the time that you retained Ms. Wilkinson, did
3486 you have separate counsel representing you in the Indian
3487 defamation lawsuit?

3488 A I don't even know if we had counsel on that yet.
3489 That didn't come out until July 16, the same day as The
3490 Washington Post article.

3491 Q So my question to you is whether you had retained

3492 counsel, do you recall, at the time that you also retained
3493 Ms. Wilkinson?

3494 A We didn't retain the counsel for India until the
3495 India stories came out on July 16.

3496 Q The Washington Post exposé, the first one, came
3497 out on July 16, 2020; correct?

3498 A Same day, yes.

3499 Q We've established that you retained Ms. Wilkinson
3500 at least by July 16, since she made a public announcement;
3501 correct?

3502 A Yes.

3503 Q But do you recall if you had retained counsel to
3504 represent you in the Indian defamation lawsuit on the same
3505 date that the Indian defamation stories were published on
3506 July 16, 2020?

3507 A I had no knowledge of the India story until
3508 July 16, so no. We didn't know about it until afterwards.

3509 Q In addition to the allegations that were detailed
3510 in the July 16, 2020, Washington Post exposé, were you made
3511 aware of any other allegations regarding any other part of
3512 the Washington Commanders that The Washington Post was also
3513 looking into?

3514 A No.

3515 Q I believe you shared your thoughts on this
3516 earlier, but I'd like to ask you again so the record is

3517 clear, when The Washington Post exposé became public on the
3518 16th and you read the allegations for the first time, how
3519 did that affect you, if at all?

3520 A Obviously, it did. And we wrote a response, I
3521 believe your colleague put in the record, on July 17 to our
3522 employees. So I think our response clearly states how we
3523 felt, my wife and I felt.

3524 Q Were you angry at those allegations or details in
3525 The Washington Post in the way that they were presented on
3526 July 16, 2020?

3527 A I don't understand the question.

3528 Q I'm asking you about your state of emotion. Were
3529 you angry when you read those allegations in The Washington
3530 Post about your organization that people said you were
3531 responsible for?

3532 A I think our statement on July 17 that your
3533 colleague presented into evidence speaks for how we felt.

3534 Q Are you unwilling to answer the question before
3535 you, Mr. Snyder?

3536 A No, I was not angry. But our statement speaks
3537 for itself, how we felt.

3538 Q After you retained Wilkinson Stekloff to
3539 investigate the allegations, I believe you testified in the
3540 last hour that there were emails sent to your staff
3541 regarding efforts to cooperate and make them available. Is

3542 that correct?

3543 A Yes.

3544 Q I believe you also testified that you provided
3545 Ms. Wilkinson full access to your staff's email account?

3546 Is that correct?

3547 A Yes.

3548 Q What else, if anything, did you do to cooperate
3549 with the Wilkinson investigation and give her access to the
3550 records that she needed to conduct a thorough and
3551 independent investigation?

3552 A We gave her whatever records she asked for.

3553 Q By "whatever records," do you mean including
3554 nonelectronic records?

3555 A I don't recall.

3556 Q Do you recall who was in charge of providing
3557 Ms. Wilkinson records that she asked for?

3558 A I don't want to assume.

3559 Q It's your testimony that you don't recall who was
3560 in charge of providing Ms. Wilkinson the information that
3561 she needed to conduct the investigation?

3562 A I think Will Rawson gave her materials of --
3563 whatever she asked materials from -- gave her whatever
3564 materials she asked for.

3565 Q Did Ms. Wilkinson ever collect electronic
3566 devices, to your knowledge, from Commanders employees? And

3567 by "electronic devices," I mean, cellular phones, pagers,
3568 to the extent they exist, tablets?

3569 A I'm unaware.

3570 Q Was your phone collected by Ms. Wilkinson as part
3571 of her investigation?

3572 A I don't believe so.

3573 Q Were any of your devices collected by
3574 Ms. Wilkinson and examined as part of her investigation?

3575 A I'm unaware.

3576 Q When you say you're unaware, does that mean you
3577 don't recall or does that mean that you would not have
3578 known because someone else would have provided her that
3579 access?

3580 A I don't know. I'm unaware.

3581 Q After you retained Ms. Wilkinson, how often did
3582 you speak with her regarding updates on the status of her
3583 investigation?

3584 A Well, the beginning, a few times. Whatever she
3585 asked for to deliver.

3586 Q And so the record is clear, you were meeting with
3587 Ms. Wilkinson in the beginning for a few times to give her
3588 whatever she asked for. Is that correct?

3589 A A telephone call.

3590 Q You were speaking with Ms. Wilkinson by phone;
3591 correct?

3592 A I believe so.

3593 Q And after the beginning faded and you moved to
3594 the middle stage of her investigation, how often were you
3595 speaking to Ms. Wilkinson regarding the investigation?

3596 A I did not.

3597 Q Why is that?

3598 A Once the NFL got involved, I did not speak to her
3599 anymore.

3600 Q The NFL assumed responsibility for the Wilkinson
3601 investigation on or around August 31. Is that correct?

3602 A Yes.

3603 Q So your testimony is between July 16 and
3604 August 31, you were receiving updates from Ms. Wilkinson
3605 directly, but did not receive updates from her thereafter.
3606 Is that correct?

3607 A I think she had not really begun much yet. So it
3608 wasn't necessarily updates. I just spoke to her a few
3609 times.

3610 Q If it wasn't updates, then what was it?

3611 A If she had a question of who a particular
3612 employee is, or -- I think I introduced her to Jason Wright
3613 at one point in August.

3614 Q Why did she call upon you to ask who particular
3615 employees were?

3616 A I don't recall.

3617 Q Did you find it odd that she would call you to
3618 ask you about your employees?

3619 A No, I think what I do remember is introducing her
3620 to Jason Wright and sending his contact information.
3621 That's about it.

3622 Q So the only thing you recall about your
3623 conversation with Ms. Wilkinson is introducing her to Jason
3624 Wright. Is that your testimony?

3625 A Specifically, yes. Otherwise, we spoke a few
3626 times. It wasn't -- we were, quite frankly, very, very
3627 busy with trying to figure out this India situation, trying
3628 to access this and trying to understand what had happened.

3629 Q When you say "we were very busy," who are you
3630 referring to?

3631 A Me, my wife.

3632 Q And why did you find yourself busy?

3633 A We wanted to hire a law firm and look into this,
3634 because it was the most defamatory, vile, foul, hideous
3635 thing that had been done, and we wanted to look into it.

3636 Q Do you recall when you ended up finding a law
3637 firm to represent you in that matter?

3638 A Yes.

3639 Q When?

3640 A I'm sorry. You asked when or who? I couldn't
3641 hear you, I'm sorry. Could you repeat the question?

3642 Q The question was when.

3643 A Oh. Shortly after July 16.

3644 Q And who did you end up identifying to represent
3645 you in that matter?

3646 A Reed Smith.

3647 Q Do you recall who from Reed Smith?

3648 A I believe it was Jordan Siev.

3649 Q Is Jordan Siev still your attorney?

3650 A Yes.

3651 Q Is the Indian defamation lawsuit underway?

3652 A We actually won the case, but the other side is
3653 appealing.

3654 Q So that's a "yes"?

3655 A I'm not an attorney, but I guess that's a "yes."

3656 Q A moment ago you testified that the Indian
3657 defamation articles were keeping you and Tanya busy in
3658 light of the egregious nature of what disclosed in those
3659 articles.

3660 Did you have a similar reaction when you read The
3661 Washington Post article on the same day? Did The
3662 Washington Post article also keep you busy in the same way
3663 that the Indian defamation lawsuit kept you busy?

3664 A I think they are two separate things. Being
3665 labeled with Jeffrey Epstein was something that we were
3666 obviously incredibly hurt, troubled and very, very anxious

3667 to find out who had done that.

3668 Q So in light of the 15 women that have come
3669 forward and the fact that there were more that were
3670 unwilling to come forward because they were concerned about
3671 credible retaliation, you don't think that that is on par
3672 or even perhaps more concerning than allegations that are
3673 posted on an obscure website in India that was taken down
3674 shortly after it was brought to their attention?

3675 A They are two different things. Number one, it
3676 wasn't just a website in India. They pushed it everywhere.
3677 I was trending number one in the world with "Dan Snyder and
3678 Jeffrey Epstein" on Twitter. And they bot -- I learned
3679 about bots. They put bots everywhere and put this
3680 slanderous, defamatory information out about me. Then they
3681 proceeded to follow up with about our children. And this
3682 malicious activity was overwhelming to us.
3683 Obviously, we stand by our statement on July 17, how we
3684 responded regarding the July 16 story in The Washington
3685 Post. And we continue to always apologize. We always
3686 continue to apologize, but they are two separate things.
3687 The Jeffrey Epstein defamation, hit job.

3688 Q I note that you also called the August -- the
3689 July 16 article allegations a hit job.

3690 A At that time, we'd learned about **Former Staff 1**
3691 and her attempts to seek defamatory, false allegations from

3692 three of our staff that I mentioned here today and, you
3693 know, including that I was a drug addict. So I think
3694 that's clear that's what we talked about.

3695 Q Given your suspicions about **Former Staff 1**, did
3696 you ever collect employee emails to see who was talking to
3697 the press, leaking stories to The Washington Post about you
3698 and your organization?

3699 A I don't believe so.

3700 Q When you say you don't believe so, can you
3701 explain what you mean by that?

3702 A I don't know where the lawyers went. I just know
3703 that we hired Reed Smith, and they sued in India. So I
3704 don't know what the legal -- we basically said, hey, let's
3705 find out who did this terrible, heinous act. And we
3706 started to look in to them.

3707 Q Did you give your Reed Smith attorneys the same
3708 level of access as you gave Ms. Wilkinson to employee
3709 email?

3710 A I'm not sure. I don't believe so. I don't
3711 even -- two different things.

3712 Q Just so the record is clear, is your testimony
3713 that you did not give Reed Smith access to employee emails?

3714 A I don't know what they ended up with access to or
3715 not. They were simply searching for the individuals behind
3716 what took place in India and beyond.

3717 Q Did Reed Smith ever discuss with you their plans
3718 to send private investigators to your current and former
3719 employees' homes?

3720 A No. Reed Smith, all they did was they hired
3721 investigators to look at the linkage to understand -- look
3722 into this situation with -- that had developed in India.

3723 Q So your testimony today is that you were aware
3724 that your lawyer's firm, Reed Smith, were sending private
3725 investigators to the homes of former employees?

3726 A No, no. I did not state that. They were not
3727 obstructing the employees. I'm talking about **Former Staff 1**
3728 **Former**. And let me clarify to you. They were -- once we
3729 had the evidence of the three attempted bribes is when they
3730 started to look into this **Former Staff 1** situation.

3731 Q Is **Former Staff 1** the only individual whose
3732 home was visited by a private investigator, by Reed Smith?

3733 A I don't know where -- exactly what they did. I
3734 know they were pursuing the facts, and, obviously, the
3735 facts were presented to Attorney General Lynch sometime, I
3736 believe, in November.

3737 Q Did Reed Smith send private investigators to the
3738 home of Bruce Allen?

3739 A I'm not sure. I'm unaware.

3740 Q So it's your testimony today that you did not
3741 have any conversations with your Reed Smith counsel about

3742 private investigators and Bruce Allen, your former team
3743 president?

3744 A I don't remember conversations about which
3745 investigations, what they were looking into. They were
3746 just conducting an investigation, and those results or
3747 facts were presented to Attorney General Lynch.

3748 Q Did your attorneys send private investigators to
3749 the home of John Moag?

3750 A I'm not sure.

3751 Q So it's your testimony today that you never had
3752 conversations with your Reed Smith lawyers about private
3753 investigators and John Moag?

3754 A I'm not sure if they did or what have you.

3755 Q Did you send private investigators to the home of
3756 Brad Baker's ex-wife? Or did someone on your behalf, Reed
3757 Smith specifically, send private investigators to Brad
3758 Baker's ex-wife's home?

3759 A I'm not sure. You know, I gave it to the
3760 attorneys, and the attorneys followed whatever leads they
3761 were looking into. It was all regarding India. It was all
3762 regarding the defamation, and they were just looking --
3763 searching for the facts.

3764 Q So is it your testimony today that you did not
3765 have any conversations with your lawyers at Reed Smith
3766 about Brad Baker and private investigators?

3767 A I don't remember Brad Baker. I don't know Brad
3768 Baker.

3769 Q Did the NFL ever tell to you stand down from
3770 sending private investigators or using private
3771 investigators to approach people in their homes or other
3772 places of business?

3773 A Our attorneys spoke with their attorneys, I
3774 think, from time to time.

3775 Q Is that a "yes"?

3776 A I wasn't on those calls.

3777 Q Did your lawyers at Reed Smith ever express to
3778 you that the NFL had instructed, suggested, advised, that
3779 you stop using the services of private investigators to go
3780 to the homes of current or former employees or go to other
3781 places of business where your current or former employees
3782 were?

3783 A The NFL knew that we were filing against **Form**
3784 **Former Staff 1** was well aware of that. And the NFL was
3785 informed, up to speed on whatever facts we found, and they
3786 were delivered in stacks to the NFL and Attorney General
3787 Lynch after August 12 when she was hired by the NFL.

3788 Q Mr. Snyder, your response is nonresponsive. I'm
3789 asking you a very specific question about what the NFL
3790 instructed, advised or suggested regarding the use of
3791 private investigators.

3792 I understand you had a separate matter, defamation lawsuit
3793 in India. I'm not asking about that.

3794 I'm asking specifically about whether the NFL advised you,
3795 suggested, warned, instructed that you stop using private
3796 investigators in connection either with The Washington Post
3797 investigation leaks and/or the Indian defamation lawsuit.
3798 Did the NFL tell you to stand down and stop using private
3799 investigators, yes or no?

3800 A I recall speaking to the league, and the league
3801 was fully advised of what we were doing with Reed Smith.
3802 And so was Attorney General Lynch, who was retained on
3803 August 12.

3804 Q So you're unwilling and refusing to answer the
3805 Committee's question?

3806 A I'm not refusing to tell you what I know.

3807 Ms. Seymour. I think that's unfair. He's trying to
3808 answer the question.

3809 Karen, he's absolutely not trying to
3810 answer the question. The question is a very simple one.
3811 But if he's unwilling to answer, I'm happy to move on.

3812 Ms. Seymour. He's not unwilling. Perhaps you can
3813 reword it, and he'll try his best to answer your question.

3814 BY

3815 Q Mr. Snyder, did you send private investigators
3816 through your agents, meaning Reed Smith, after August 2020

3817 when the NFL took over the Beth Wilkinson investigation?

3818 A Did we send --

3819 Ms. Seymour. Where?

3820 By [REDACTED]

3821 Q Did you continue to use private investigators in
3822 connection with the Indian defamation lawsuit and/or any
3823 investigation into the leaks to the Washington Post
3824 regarding the exposé, the July 16 and/or the August 26
3825 exposé?

3826 A We used investigators regarding the India
3827 lawsuits. And, obviously, if the investigators made a
3828 mistake and went somewhere wrong, I apologize to anyone for
3829 that behavior. But our intention was very, very clear.
3830 And as I told the Committee, our entire focus was on this
3831 situation. The NFL retained Attorney General Lynch
3832 regarding this subject, and the facts were given to
3833 Attorney General Lynch.

3834 Q So you did continue using private investigators
3835 after August 26, 2020; correct?

3836 A I'm not completely sure of the dates or what have
3837 you, but we were just following the leads that we
3838 discovered in the facts.

3839 Q It's fair to say you did not stop using private
3840 investigators in 2020 and/or 2021; is that correct?

3841 A I'm not sure. I'd be guessing. I think that we

3842 obviously -- that litigation, as you said, is still
3843 continuing in India. And that was -- the scope versus
3844 defamatory misinformation. And what we did was we
3845 delivered those facts to Attorney General Lynch.

3846 Q The NFL took over your -- the Beth Wilkinson
3847 investigation in August 2020. How did that decision come
3848 to be?

3849 A It was a lot of outside pressure from the
3850 standpoint of making sure that we had an independent
3851 investigation. So we called the National Football League
3852 and suggested that they take it over.

3853 Q What were the concerns about independence at that
3854 early time and during the investigation? What were you
3855 hearing?

3856 A Just media. And we thought it was best to do it.

3857 Q What were you hearing from the media?

3858 A I can't recall exactly, but we called the NFL and
3859 they took it over.

3860 Q Whatever you were hearing from the media caused
3861 you to believe that there needed to be a takeover; is that
3862 correct?

3863 So the record is clear, please tell me what it is you're
3864 trying to say. How did the media reports that you were
3865 hearing about the concern about independence, how did that
3866 affect you in your next steps?

3867 A We just thought it was best for the NFL to take
3868 it over.

3869 Q And you thought it was best because of what you
3870 were reading in the media; correct?

3871 A Yes.

3872 Q Did you feel that what you were reading in the
3873 media was unfair?

3874 Ms. Seymour. At what point? Which media are we
3875 talking about? The media that led him to contact the NFL
3876 and suggest they take it over or other media?

3877 By [REDACTED]

3878 Q Mr. Snyder, did you believe that what you were
3879 reading in the media regarding the independence concerns,
3880 did you think that that was unfair?

3881 A I didn't really think about it. We just called
3882 the NFL and said that -- asked if they could take it over
3883 for us.

3884 Q Were you concerned about what you were reading in
3885 the media?

3886 A I don't recall the details.

3887 Q You don't know the details about how you felt?

3888 A I'm sorry?

3889 Q You don't know the details about how you felt
3890 personally?

3891 A I don't remember at the time.

3892 Q So is it your testimony that you called the NFL
3893 and you suggested to them that they take over the
3894 investigation that they recommended to you?

3895 A Yes.

3896 Q Prior to calling the NFL to have that
3897 conversation about takeover, had you had any previous
3898 conversations with the NFL about potentially taking over
3899 the investigation?

3900 A I don't believe so.

3901 Q So the first discussion that you had with the NFL
3902 about takeover was you suggesting to them that they take
3903 over?

3904 A Yes.

3905 Q Just so the record is clear, is it your testimony
3906 that it was not the NFL's idea, that the NFL is not the one
3907 who suggested that they take over the investigation?

3908 Ms. Seymour. I think he's answered to the best of his
3909 memory.

3910 The Witness. No.

3911 By [REDACTED]

3912 Q No, what?

3913 A I'm sorry?

3914 Q You said "no." I'm asking what are you
3915 responding to specifically?

3916 A Can you repeat the question?

3917 Q What were you responding to when you said "no"?

3918 You said "no." I'm asking you, what do you mean by "no"?

3919 A Can you repeat the question?

3920 Q Mr. Snyder, I note that you keep looking around.

3921 Are you confused by the question that I posed?

3922 A Yes.

3923 Q Is it your testimony that -- is it your testimony

3924 that the NFL did not suggest to you that they take over the

3925 investigation, that it was not the NFL's idea, but it was

3926 your idea? Is that your testimony today?

3927 A I think Roger Goodell sent out a press release

3928 right afterwards, which said we had called them and they

3929 agreed to take over the investigation.

3930 Q So you testified here today that it was your idea

3931 and not the NFL's idea for the NFL to take over your

3932 investigation.

3933 After the NFL, in fact, took over the investigation, what,

3934 if anything, was the response by the media, the same people

3935 you were initially concerned by their responses in the

3936 press, if you recall?

3937 A I don't recall.

3938 Q Do you recall if you had the same concerns after

3939 the NFL, in fact, took over the investigation that you did

3940 before they took over the investigation?

3941 A I don't believe so.

3942 Q Why is that?

3943 A We did the right thing.

3944 Q What was the right thing in that instance?

3945 A To let the NFL take over the investigation.

3946 Q After the NFL took over the investigation, what,
3947 if anything, was your role in the Beth Wilkinson
3948 investigation? And by "your," I mean you and the
3949 Commanders.

3950 A None.

3951 Q So what, if anything, changed? If you had
3952 stopped receiving updates from Ms. Wilkinson and you
3953 weren't speaking to her as frequently when she was retained
3954 by the Commanders directly, what, if anything, changed
3955 other than those --

3956 Ms. Seymour. I think the testimony was that he did
3957 not recall receiving updates but, rather, that she had
3958 inquiries of him.

3959 By [REDACTED]

3960 Q My question is what, if anything, changed between
3961 your relationship with Ms. Wilkinson?

3962 A I don't understand the question.

3963 Q After the NFL took over, how did your
3964 relationship with Ms. Wilkinson change? The nature of the
3965 retainer agreement that you had with her, how did that
3966 relationship change?

3967 A I didn't talk to her anymore, and she did her
3968 investigation.

3969 Q Did you or anyone on your behalf receive updates
3970 from the NFL regarding the Wilkinson investigation?

3971 A No.

3972 Q Did lawyers on your behalf, to your knowledge,
3973 discuss with the NFL any matters relating to the Wilkinson
3974 investigation up to and including the July 1 announcement?

3975 A I don't know.

3976 Ms. Seymour. The question is, to your knowledge.

3977 The Witness. To my knowledge, no.

3978 By [REDACTED]

3979 Q Were you aware that Ms. Wilkinson was collecting
3980 emails and storing them with a third-party vendor?

3981 A At that time? No. We gave her access to
3982 whatever she wanted.

3983 Q Were you ever made aware that she had collected
3984 staff emails and stored them with a third-party vendor?

3985 A I've learned that after. After July 1.

3986 Q When did you learn that?

3987 A Down the road.

3988 Q How far down the road?

3989 A I'd be guessing.

3990 Q Was it -- it sounds like you're saying it was
3991 after the Wilkinson investigation concluded. Correct?

3992 A Yes.

3993 Q Was it after the Committee commenced its
3994 investigation?

3995 A I don't want to be speculating, guessing. I'm
3996 not certain.

3997 Q You're not sure if you learned that Ms. Wilkinson
3998 had documents collected from your email accounts stored at
3999 a vendor within the last 12 months?

4000 A I said I did learn that, but I didn't know
4001 anything about it.

4002 Q With respect to the Wilkinson investigation,
4003 after you retained her, was it your understanding that
4004 Ms. Wilkinson was going to draft a report upon completion
4005 of her investigation?

4006 A I don't remember.

4007 Q Did you ever have an understanding of whether
4008 Ms. Wilkinson was contemplating drafting a report in
4009 connection with the investigation into The Washington Post
4010 article?

4011 A Can you repeat the question? I couldn't hear
4012 you.

4013 (Record read)

4014 A I don't recall what the attorneys did with the
4015 documents.

4016 Q Do you believe a report should have been

4017 completed by the -- a written report by the Wilkinson law
4018 firm after she completed her investigation?

4019 A Can you repeat the question?

4020 Q Do you believe that Ms. Wilkinson should have
4021 drafted a report upon the completion of her investigation?

4022 A It wasn't up to me.

4023 Q My question is a bit different. Do you believe
4024 that she should have drafted a report in connection with an
4025 investigation that you supported and you wanted to be
4026 thorough and you suggested that the NFL take over in order
4027 to make sure that the public had confidence in the
4028 investigation, did you believe that that should have
4029 culminated in a written report?

4030 A I wasn't involved. We weren't involved in the
4031 investigation, so I didn't have an opinion. We just went
4032 through -- I did two interviews, answering all the
4033 questions.

4034 Q Sitting here today, do you think she should have
4035 written a report after she concluded her investigation?

4036 A I don't have an opinion.

4037 Q It's not lost on me that you have cited the
4038 Vestry reports ad nauseam during this deposition because
4039 you understand the importance of a report and the
4040 reflection of work that is done.

4041 So I'm trying to reconcile, and I hope you can assist me,

4042 how you don't have an opinion about the utility of
4043 directing a report in an investigation that lasted 10
4044 months, 150 witness interviews, and made specific
4045 recommendations with which you apparently agreed, and you
4046 can't tell me whether or not you think Ms. Wilkinson should
4047 have drafted a report?

4048 Ms. Seymour. Objection. This is Karen Seymour, and I
4049 regret that the Vestry Laight reports have caused you
4050 nausea and the recitation about them. We do believe they
4051 are important, but you can ask my client again, if you
4052 insist, his view about whether there should be a written
4053 report.

4054 I think that it's clearly been asked and answered,
4055 but, of course, you control this and if you'd like to ask
4056 him again, you may.

4057 By [REDACTED]

4058 Q Mr. Snyder.

4059 A Can you repeat the question? Sorry.

4060 Q Do you believe a report should have been drafted
4061 by Ms. Wilkinson at the conclusion of her investigation?

4062 A I simply believe that the 10 critical findings
4063 that we executed and were fined for the record \$10 million
4064 was -- I'm very proud of the fact of what we've done with
4065 the Vestry report -- excuse me, the Vestry report is
4066 actually the findings from the standpoint of drafting on a

4067 six-month basis over a long, long period of time. And
4068 while I think it's important, it's really important because
4069 the leadership team, it's validation of the work they've
4070 done. So that's what...

4071 Q You're unwilling to answer the question?

4072 A I'm not unwilling to answer the question. I
4073 thought I just answered it.

4074 Q You paid \$10 million after the July 1
4075 announcement was made public. I believe that money went to
4076 charity. Is that correct?

4077 A Yes.

4078 Q What charities received the funding?

4079 A 5 million of it in the DMV area, 26 charities, I
4080 believe. I don't have the list. I'm sure we can get it to
4081 you.

4082 Q 26 charities received 5 million. Is that what
4083 you said?

4084 A Yes.

4085 Q Okay. What about the other five?

4086 A I'm sorry?

4087 Q What about the other five?

4088 A The NFL controlled where that went.

4089 Q I see. So the Commanders identified 26
4090 charities, and the NFL identified the other portion?

4091 A Yes. We'll get you the list if you want.

4092 Q I appreciate that.

4093 Are you aware of the charities that received the funding
4094 through the NFL, the portion that the NFL controlled?

4095 A No.

4096 Q When did you give the money to the NFL, the
4097 5 million?

4098 A Shortly thereafter of July 1. Specifically? I
4099 don't know specifically, but shortly after.

4100 Q So in the summertime, you think?

4101 A I believe so.

4102 Q Did any of the money that you -- the 5 million
4103 that you contributed to local charities, did any of them go
4104 into your charity?

4105 A No, none.

4106 Q Is your charity still in existence?

4107 A Yes.

4108 [REDACTED] Off the record.

4109 (Discussion held off the record.)

4110 (Recess)

4111 EXAMINATION BY

4112 [REDACTED]

4113 Q I'm going to start this hour by entering a couple
4114 of exhibits into the record, which we did send to the
4115 Majority counsel about an hour ago.

4116 These are two 1782 orders that were filed. One was in the

4117 District Court of Maryland. We're going to mark that as
4118 Exhibit N. And the second one is in the Eastern District
4119 of Virginia. We're going to mark that as Minority Exhibit
4120 O.

4121 Now, Mr. Snyder, the Majority counsel questioned you about
4122 a 1782 order from the State of Colorado. Do you remember
4123 that?

4124 A Yes.

4125 Q Okay.

4126 In these two orders which I just introduced into the
4127 record, I want to look at what the judge said in these two
4128 orders as a counterexample to the one that was introduced
4129 from the Colorado court.

4130 On page 2 of Exhibit N, it reads, "I find that after
4131 carefully reviewing the pleadings in this case, the
4132 information sought regarding the production of phone
4133 records, text messages and other communications as
4134 described in Petitioner's proposed order, especially with
4135 respect to the named persons, to be within the scope of
4136 discoverable information and within the order of this
4137 Court."

4138 Similarly, I'm going to read from Exhibit O that I just
4139 introduced from the judge in the Virginia case, which
4140 states, "It is also clear that Mr. Snyder apparently
4141 appears to be currently at odds with the minority investor

4142 whose father is also on the board of directors of Comstock
4143 Holdings, and his son-in-law is the CEO and founder of
4144 Comstock Holdings. So I find that there is more than --
4145 this is more than a mere fishing expedition, and there is
4146 some justification -- there is justification for the
4147 questioning as to what is going on here. I think that it
4148 is relevant to the India proceedings. And although they
4149 may be able to get some information from the India
4150 proceedings, it is -- I think what they're directing as far
4151 as their discovery requests here are not something they can
4152 get in the India proceedings."

4153 So, Mr. Snyder, can you tell us why you filed a series of
4154 these 1782 actions in multiple courts?

4155 A Yes. Thank you. The one in Virginia, I believe,
4156 was first, which was the **Former Staff 1**, where the judge
4157 granted the motion because we had obviously affidavits
4158 already from the three employees that I mentioned earlier
4159 to the Committee that were attempted to be paid to say
4160 misinformation and lies and defamatory information.
4161 That led to a lot of the documents that were given to
4162 former Attorney General Lynch, presented to -- and I
4163 believe the one in Maryland, I believe was John Moag. We
4164 found it, and I think the judge found it very, very odd
4165 that my former executive assistant would be speaking to
4166 John Moag in her telephone records. And that's why,

4167 obviously, that information was granted as well.

4168 Q And so in the Maryland case, could you tell us
4169 what the results of that suit was?

4170 A A lot of discovery information, telephone
4171 records, et cetera.

4172 Q And how about for the Virginia one?

4173 A Yes. Very similar. Lots and lots of telephone
4174 records of everything, all the facts, most importantly,
4175 were presented to former Attorney General Loretta Lynch.

4176 Q Through the course of these lawsuits, what did
4177 you learn about Dwight Schar's involvement?

4178 A I'm going to let the Commissioner's answers to
4179 Congressman Comer's questions stand for themselves.

4180 Q And when you say the Commissioner's response to
4181 Mr. Comer's questions, that's what we introduced as
4182 Minority Exhibit A five or six hours ago?

4183 A Yes.

4184 Q I'm going to switch gears a little bit and go
4185 back into the Vestry Laight reports that we have been
4186 discussing and apparently causing some nausea for our
4187 colleagues over. But I do think it's important that we
4188 discuss these.

4189 As I understand this investigation, we are here to figure
4190 out how to make workplace more safe for individuals and
4191 make it an environment where they can go to HR with

4192 complaints and find resolution.

4193 Is that your understanding of what the scope of this
4194 investigation is supposed to be?

4195 A Yes. And tremendous amount of guidance. I think
4196 an organization like Vestry Laight, as credible as they
4197 are, and understanding how detailed they are and thorough
4198 in their work, I think -- I don't know if they would be
4199 willing, but I think they, you know, could speak to
4200 Congress, this Committee, about how things can be reformed
4201 properly.

4202 And whether they can talk to you guys directly, I think it
4203 would be quite interesting to hear their perspectives.

4204 Obviously, they were written in these three reports,
4205 including yesterday's Vestry report.

4206 Q Thank you. And I want to take some time to go
4207 through some of the more -- some more of the details in
4208 these reports. And as we've discussed, there were 10
4209 recommendations that came out of the Wilkinson
4210 investigation; is that right?

4211 A Yes.

4212 Q So these 10 recommendations are discussed in each
4213 of the Vestry Laight reports. I'm going to use, for the
4214 most part, the July 2022 one, which was marked as Minority
4215 Exhibit L and the January 2022 one, which is marked as
4216 Minority Exhibit K. Do you have those in front of you?

4217 A Yes, I do. Yes.

4218 Q Wonderful. Minority Exhibit K, the report from
4219 this past January, I'm looking on page 5 and the first
4220 point reflects the first recommendation from the Wilkinson
4221 investigation findings. It's entitled "Protocols for
4222 Reporting Harassment." And it directs the team to develop
4223 a formal protocol for reporting allegations of harassment
4224 and misconduct that allows victims to report anonymously
4225 and without fear of retaliation.

4226 Do you see that where I'm looking?

4227 A Yes.

4228 Q Okay. Great. Underneath that, it outlines five
4229 steps in the new process. Would you mind reading the
4230 process on page 5.

4231 A "Report of complaint or concern, review of
4232 complaint, investigation, review of the facts and
4233 investigation results, determination and follow-up action
4234 plan."

4235 Q So as you understand it, this is the process
4236 that's currently in place for your organization to handle
4237 any kind of complaint?

4238 A Yes.

4239 Q And if you'll turn to Minority Exhibit L, that is
4240 the report that was released yesterday by Vestry Laight.
4241 I'm on page 3, which is reporting on the progress of this

4242 first recommendation from Wilkinson.

4243 And it states, and I quote, "Employees located in
4244 Commanders' Park, whether working on business or football
4245 operations, confirm that they have received training
4246 regarding harassment and that they are aware of how to
4247 report misconduct and that they would feel comfortable
4248 reporting misconduct."

4249 Is that how you see your organization handling complaints
4250 now? Do you see --

4251 A Yes.

4252 Q Do you see these changes reflected?

4253 A Yes.

4254 Q If you'll turn to Minority Exhibit K, the earlier
4255 report from January to page 6, we can look at the second
4256 bullet point. And this was the second recommendation by
4257 the Wilkinson investigation.

4258 It's entitled "Disciplinary Action Plan," and the text
4259 reads, "Develop a formal disciplinary action plan with
4260 clear protocols and processes for documenting, evaluating
4261 and adjusting -- and adjudicating," excuse me, "misconduct.
4262 Apply those protocols and processes consistently in a
4263 prompt and proportionate manner across the organization.
4264 This includes holding executives and other supervisors
4265 accountable for addressing misconduct in the organization,
4266 including by requiring that the supervisory-level employees

4267 formally report any misconduct for which they become aware
4268 and disciplining for the failure to report such
4269 misconduct."

4270 In the text below, it describes -- the Vestry Laight
4271 report, it describes how the organization has started to
4272 implement this disciplinary action plan. And then if we
4273 turn over to Minority Exhibit L under -- on page 4, under
4274 Number 2, which is the corresponding recommendation, could
4275 you read that first paragraph underneath Number 2 on page 4
4276 of the report that was released yesterday? It starts with
4277 "our review of the complaints."

4278 A "Our review of the complaints received,
4279 investigated in the last six-month period shows that any
4280 disciplinary measures implemented were proportionately at
4281 issue and includes a range of measures such as training,
4282 placement and performance improve plan, temporary
4283 suspension and issuance of a final warning. The wishes and
4284 concerns of the complainant were taken into consideration
4285 in evaluating any disciplinary action."

4286 Q Thank you. Can you talk about how the leadership
4287 changes that have been enacted over the last two years,
4288 including with Jason Wright, have furthered this
4289 recommendation?

4290 A I think that everything we're trying to do goes
4291 above and beyond. And we're really focused on being

4292 proactive. We have policies now expanding to so many
4293 different programs and mentorship and guidance and
4294 speakers. We've really grown this to be the start of
4295 something special. So we're -- we obviously -- you know,
4296 we obviously are incorporating these results and -- but we
4297 are not stopping there.

4298 Q When you say you have speakers come in and
4299 different trainings, can you describe what some of those
4300 look like.

4301 A We have had primarily folks that have written
4302 books, psychologists and speakers that speak to the
4303 organization and focus on areas, like, across the board.
4304 And it's really a variety. We have beefed up so many of
4305 these areas, so it's ongoing and keeps getting better.

4306 Q And have the employees made positive comments
4307 about these experiences? Do they find them helpful?

4308 A Extremely. As I mentioned earlier to Tanya, I
4309 think she would want the speakers booked.

4310 Q So if we turn to page 7 of the January report, it
4311 talks about regular culture surveys. These are ways to
4312 check in with the employees and check on how they're
4313 feeling about the workplace culture, and it also describes
4314 sexual harassment climate surveys to track the club's
4315 process in addressing -- or progress, excuse me, in
4316 addressing these issues.

4317 Can you tell us a little bit more about the engagement
4318 surveys and how employees are surveyed anonymously so that
4319 they can be honest and what that has done to inform some of
4320 the changes at the organization?

4321 A I think that one of the keys for us is that it is
4322 anonymous, so we're able to make changes. And I believe
4323 Jason Wright, he uses it for improvement at all times. And
4324 it's great feedback so we can strengthen areas further.

4325 Q Recommendation Number 4 talks about regular
4326 trainings. I think we touched on that already just a few
4327 minutes ago. So we can go ahead and move over to
4328 recommendation Number 5, which is on page 12 of the January
4329 report and on page 5 of yesterday's report. If you want to
4330 flip to those.

4331 The recommendation from Ms. Wilkinson was a more diverse
4332 workforce, meaning to increase the number of women and
4333 minorities throughout the organization, particularly in
4334 leadership and supervisory positions that have decision-
4335 making authority.

4336 And I know that we talked about this in my first hour of
4337 questioning. But let's look at yesterday's Vestry Laight
4338 report, and it provides an update for us on how the
4339 organization is doing with this recommendation.

4340 And I'll just read, and this is page 5. It says, "Since
4341 our last report, the team has announced internal

4342 promotions, hired externally, and continued to expand its
4343 diversity and inclusion initiatives. The promotions and
4344 hires continue to expand the team's representation of
4345 people of color and women, including women of color.
4346 Representation alone is not sufficient. However, through
4347 its DEI-related trainings and activities and a holistic
4348 approach to talent management, the team is also driving a
4349 culture of inclusion. The demographics, DEI activities and
4350 insights relating to inclusion from employee interviews are
4351 shared below."

4352 So then they go into a lot of these excerpts about
4353 diversity, inclusion-related initiatives. And I think you
4354 touched on this briefly sometime in the last six hours.
4355 But can you talk more about the diversity and inclusion-
4356 related initiatives that are going on for the employees and
4357 also externally facing.

4358 A We're trying to -- it's -- our view is simple.
4359 Lead by example. I think on page 6, these numbers are
4360 facts, just like everything, it always produces facts.
4361 We are really in the top echelon in sports, the whole area.
4362 And it's working great. And it has a tremendous effect on
4363 the culture, tremendous effect the employees, the
4364 camaraderie.
4365 And it doesn't stop there. It translates into great
4366 results. Also just from the business perspective across

4367 the board.

4368 And I think that -- I had a chance to look at the -- more
4369 at yesterday's Vestry report between all the breaks here,
4370 and there's a focus on some of the quotes from anonymous
4371 within the football side of it, and they feel pretty
4372 fantastic. And I think it hopefully translates to -- for
4373 most of the team. I think it all ties together.

4374 Q Absolutely. And just for the record, you
4375 mentioned the numbers on page 6. Could you go ahead and
4376 read the numbers that you were talking about into the
4377 record.

4378 A "Women comprise 31 percent of workforce and
4379 people of color comprise 39 percent. More specifically,
4380 24 percent of employees are black, 9 percent are Latino,
4381 3 percent Asian-American. 3 percent are two or more races.
4382 "These numbers represent an uptick from both a year ago, as
4383 well as two years previously before the current leadership
4384 team was in place. Year over year, the team has continued
4385 to expand its representation of women and diverse
4386 employees."

4387 Q As the report notes, this is a dramatically
4388 different leadership team and makeup of your employees than
4389 even just two years ago?

4390 A Yes.

4391 Q All right. So we'll move on into recommendation

4392 Number 6 and 7, which sort of go hand in hand. So I'm
4393 going to read them both quickly.

4394 Six is establish clear lines of authority, implement clear
4395 organizational structure and clear lines of authority for
4396 club executives to eliminate influence of informal or
4397 unaffiliated advisers on the club's business operation.

4398 And then to expand and empower HR and legal is number
4399 seven. Expand and empower the in-house HR and legal
4400 departments, particularly with respect to their ability to
4401 investigate and address allegations of misconduct at all
4402 levels without interference from club executives.

4403 So these two recommendations together really speak to the
4404 reorganization and reshuffling of the executives within
4405 your organization.

4406 We talked about this, again, a little bit in my first line
4407 of questioning, but could you discuss how the expansion and
4408 empowerment of HR and the legal department have changed in
4409 the last two years?

4410 A Well, we -- regarding the legal department -- we
4411 experienced our first to leave and go to a bigger role
4412 onwards in his career, and that's Damon, the former general
4413 counsel who is now at the Los Angeles Dodgers. Loves
4414 baseball. And he sent me a text recently, and he's doing
4415 great. He's moving into his new house.

4416 But we replaced him with Mali Friedman, who is doing a

4417 great job. She's working on a lot of sponsored contracts,
4418 so she's very busy right now and doing quite well.
4419 The HR team is driven, as I mentioned, by Andre Chambers.
4420 Substantial. It's got a lot of programs in development
4421 which we're excited about, and hopefully we'll read the
4422 next Vestry report that talks about some of the things
4423 we're doing.

4424 Q One of the comments I want to highlight is on
4425 page 9 of yesterday's report, and I think my colleague ██████████
4426 touched on this a little bit in her hour, but it states,
4427 "Much like their colleagues in business operations,
4428 employees in football operations have a remarkably
4429 consistent and positive view of the changes in people,
4430 operations and its increased presence and accessibility."
4431 And a quote from one of the employees is "HR is like night
4432 and day better than in the past." Another stated, "Now we
4433 have a real HR program. HR has gone from one to more than
4434 one, and now it's an actual department."
4435 Can you talk about what went into the changes of expanding
4436 the HR department to include more than one individual?

4437 A Well, it's really about making it the best of
4438 class. So what you're trying to do is have the bench be
4439 beefed up. So underneath Andre is a rock-solid team of
4440 professionals, and some developing new programs, some
4441 dealing with day-to-day.

4442 And you're really developing an area in the organization
4443 that folks can go to for help, for potential promotion,
4444 what have you, and really talk about their futures. And I
4445 think it's becoming -- to me, what I like about it is it's
4446 going to be more than just day-to-day. It's going to help
4447 grow the team.

4448 Q The final sentence under Number 7 in the report
4449 from yesterday states, "Our review of the investigations of
4450 the complaints received during this reporting period did
4451 not show any interference by club executives or others into
4452 how those investigations were handled."

4453 Can you tell me why it's important to have these processes
4454 and procedures separate from club executive interference?

4455 A Because you need to have a substantial staff
4456 within this area that feels their independence, that can
4457 make the right decisions. And that's what Jason Wright --
4458 we brought in Andre and Jason to do.

4459 So here we are two years later discussing results. And I
4460 think, you know, hats off to Andre and the team.

4461 Q So we have just three more recommendations left
4462 to walk through in these reports. Number 8 from
4463 Ms. Wilkinson's investigation says, "To develop formal
4464 onboarding performance management and compensation system
4465 and exit interview processes."

4466 Do you think that this kind of step-by-step very

4467 transparent process for people coming into the team who are
4468 working for the team for a number of years is important?

4469 A It's very important. As you can read here in the
4470 new Vestry report, you can see that they really said how we
4471 tried to put our values to the team up front in an
4472 onboarding process.

4473 And I don't want to get it wrong, her slogan, but if I say
4474 each one, we get each one wrong, but if we have a formula,
4475 every -- there's words in there. I don't want to get it
4476 wrong, but we start to get onboarded.

4477 Q Okay. As you mentioned in yesterday's report --
4478 I'm on page 10 now -- it discusses that these processes
4479 have been put into place.
4480 The last paragraph on page 10 discusses the formal
4481 confidential exit interviews of employees and it discusses
4482 the number of those that have occurred and really goes into
4483 some significant detail about how that process has been
4484 implemented.

4485 So it seems that this recommendation has been taken, it's
4486 been implemented, there is a process by which people are
4487 able to see this organization in a transparent way. Do you
4488 agree with that?

4489 A Yes.

4490 Q And moving into number 9, it's talking about the
4491 cheerleading team. Just first let's discuss, is there

4492 still a cheerleading team for the Commanders?

4493 A It's a co-ed dance team. Actually, they're
4494 really good. And I think -- I know Tanya and the new head
4495 of retail, Miles, are working on a wonderful, apparently,
4496 fashion line and are really expanding and it's growing, and
4497 we have -- we launched a band and these awesome new
4498 uniforms. Two different uniforms for different games.
4499 It's making a lot of progress.

4500 Q Can you talk to us about what initiated that
4501 change from a cheerleading team to a co-ed dance squad or
4502 dance team?

4503 A Sure. We want to be forward-thinking in
4504 everything we've done. For the last few years, we wanted
4505 to be thinking about what's the future look like, and
4506 athletics and dance -- and they are super talented. It's
4507 pretty cool. And we hired Tetra -- I always get her name
4508 wrong -- Petra. And she's leading that area and doing
4509 great stuff. She previously did a lot of basketball in the
4510 NBA. And we developed a lot of new -- gained the
4511 experience from that.

4512 Q Has there been a positive community response to
4513 the new dance team?

4514 A Very. The community loves it. We didn't know
4515 what to expect from the fans, but they really embraced it.
4516 Its popularity has grown.

4517 Q So on page 11 of yesterday's Vestry Laight
4518 report, it states -- sorry -- "Vestry Laight interviewed
4519 the coaches and reviewed a full survey that was given to
4520 the dancers in March. The interviews and survey results
4521 continue to show a positive and supportive environment for
4522 the members of the entertainment team.
4523 Can you talk about how this new team, this new culture, has
4524 created a more positive environment for the dancers?

4525 A I think it's really a scenario that we embraced
4526 the change, embraced the new way it's presented to the
4527 fans, and they've embraced it. So it's really a scenario
4528 that you're embracing change.

4529 Q Even in the January report, which is on page 19
4530 where it discusses some of the ninth recommendation, stuff
4531 about the dancers, it says, "All of the dancers we spoke
4532 with are aware of the reporting options and said they felt
4533 very comfortable going to their coach or HR with any
4534 concerns."

4535 Is that important for that team to be able to know the
4536 reporting options, know how to go there and then also feel
4537 comfortable making any reports of problems they face?

4538 A Absolutely.

4539 Q And then the final recommendation, Number 10 from
4540 Ms. Wilkinson's investigation, it says, "A regular
4541 assessment of the policies require the club to retain an

4542 independent professional consultant selected by the team
4543 and approved by the league office to conduct an annual
4544 assessment of all employee policies to ensure they are both
4545 consistent with best practices and being implemented in
4546 practice. The league office will have full access to the
4547 consultant."

4548 So in this final recommendation, how has that been
4549 implemented in the Commanders organization?

4550 A It's implemented throughout. One of the things
4551 we've done, I think Tanya has been very vocal on suggesting
4552 to other sports organizations to use an organization like
4553 Vestry Laight and effectively look within and take
4554 advantage of the opportunity to have an outsider's
4555 viewpoint and monitor things.

4556 Q And you and the Commanders, you guys selected
4557 Vestry Laight; right?

4558 A Originally, yes.

4559 Q Originally. And -- but they were signed off on
4560 by the NFL?

4561 A Yes.

4562 Q And Vestry Laight was -- why did you choose them?
4563 What made you select them to be the reviewers?

4564 A Their reputation is the gold standard. And as I
4565 mentioned earlier, when you talk about change, they are
4566 experienced and experts in change, and I think they would

4567 be interesting folks to speak to.

4568 Q So we've just spent a not insignificant amount of
4569 time going through all of the recommendations and all of
4570 the really marked change that has been seen by a third
4571 party of your organization.

4572 And I know that in prior questioning, my Majority
4573 colleagues mentioned that they didn't really want to talk
4574 about the Vestry Laight reports anymore. I think it's
4575 interesting that we wouldn't be focusing on the solution
4576 and, instead, continuing to focus on the problems.

4577 So, Mr. Snyder, would it be fair to say that at this point
4578 in the investigation, the Majority counsel seem to be
4579 focusing on only the negative instead of the positive and
4580 the successful efforts to transform the team culture?

4581 A I think that change is difficult. And we've
4582 embraced change. And I think it would be great to
4583 acknowledge the changes and maybe learn from our changes
4584 for other organizations.

4585 Q And you've never come out and said that the
4586 culture at the team 10 years ago, five years ago, was
4587 something that you -- was something that was good. You've
4588 acknowledged that it's been poor in the past; is that
4589 right?

4590 A Yes. As I mentioned earlier, starting October of
4591 2019, we thought we would have some cultural issues, and we

4592 wanted to fix whatever we find and we want to reform
4593 things. We want to be in a position to lead by example.
4594 And we really believe we've chosen the right leadership
4595 team, assembled the right leadership team and embraced
4596 them, and we're making these substantial changes,
4597 meaningful change. As I mentioned, change is difficult,
4598 and I encourage other organizations to look to the future.

4599 Q I'm going to switch gears again and talk a little
4600 bit about nondisclosure agreements. And I know that this
4601 has been a topic a couple of different times throughout the
4602 course of today. But as a businessman over, you know, the
4603 last couple of decades, are NDAs or nondisclosure
4604 agreements used regularly at many different types of
4605 businesses?

4606 A I think they are used throughout the United
4607 States.

4608 Q In what context are they helpful for businesses,
4609 during settlements or during hiring?

4610 A In the case of coaches, disclosing our playbooks
4611 and our information about our football and what we do,
4612 things like that.
4613 Other than that, I'm not a lawyer, so I wouldn't have
4614 necessarily an opinion on NDAs or what have you.

4615 Q As far as you understand, like, understanding
4616 you're not an attorney, but as far as you understand

4617 nondisclosure agreements, they are used in other
4618 businesses. Is that fair to say?

4619 A Yes.

4620 Q Okay. And in the context of the Wilkinson
4621 investigation and the congressional investigation, I
4622 believe your attorney interjected at some point today and
4623 said, well, no one asked to waive their NDAs for this
4624 congressional investigation, and that's why Abby Diamond
4625 Welsh never requested -- or she never asked you to waive an
4626 NDA, so how could you have enabled her to testify.
4627 But as far as the Wilkinson investigation goes, you and the
4628 Commanders never prevented anyone about speaking with Beth
4629 Wilkinson during the course of her investigation and, in
4630 fact, you encouraged those individuals to speak with Beth
4631 Wilkinson; is that right?

4632 A She spoke, yes, to everyone she wanted to speak
4633 to. And she spoke to me.

4634 Q I'm going to move now into some discussion about
4635 a person by the name of Tiffani Johnston, who testified at
4636 a roundtable before our Committee back in February. Do you
4637 know who Tiffani Johnston is, Mr. Snyder?

4638 A Only since the roundtable.

4639 Q Just since the roundtable. Okay.

4640 Do you know what she did at the team or how she was part of
4641 the organization?

4642 A I believe a cheerleader.

4643 Q And at the roundtable, which I understand was how
4644 you now know who she is, she alleged that you put your
4645 hands on her thigh while sitting next to her at a dinner
4646 and then later that same evening tried to pull her into
4647 your limousine, and stated that this happened in maybe 2005
4648 or 2006.

4649 Had you heard of these allegations prior to the roundtable?

4650 A No.

4651 Q Do you recall attending a team dinner in either
4652 2005 or 2006 at which Ms. Johnston was in attendance?

4653 A No.

4654 Q Part of Ms. Johnston's allegation was that the
4655 team's counsel -- which at that time I believe was David
4656 Donovan; is that right?

4657 A I think in those two years, there might have been
4658 two. '05 would be Chirite and I believe '06 would be David
4659 Donovan in the years.

4660 Q Yes, I understand. So Ms. Johnston said that at
4661 the time the team's counsel, so it was either one of those
4662 two individuals, stopped you from pulling her into your
4663 limousine. Do you have any recollection of that occurring?

4664 A No. I don't have a limousine.

4665 Q To the best of your knowledge, did David Donovan
4666 ever respond to the allegation that it could have been him

4667 that prevented this instance from occurring?

4668 A Excuse me? Will you repeat the question?

4669 Q Yes, of course. So let's say -- we'll talk in
4670 the 2006 time frame. So David Donovan was the general
4671 counsel then. Did he -- after these allegations came out
4672 in 2021, did he ever respond or make any comment about this
4673 instance, like recalling this instance, denying this
4674 instance or any comment about it at all that you're aware
4675 of?

4676 A I haven't talked to David Donovan in quite some
4677 time since.

4678 Q And as you mentioned, we're not sure when this
4679 instance occurred. So as you sit here today, are you aware
4680 of the date or location of this alleged event?

4681 A No.

4682 Q Knowing that you waived the NDAs and enabled all
4683 of your employees full access to Ms. Wilkinson and her
4684 team, do you have any idea why this claim would not have
4685 come out earlier in the Wilkinson investigation?

4686 A I have no idea.

4687 Q We learned from the last eight months of this
4688 investigation that this allegation was likely not brought
4689 to Ms. Wilkinson's investigation, and we're not sure why.
4690 And I think there's been a few letters to that effect back
4691 and forth surrounding this allegation. And one of those

4692 letters comes from a Mr. Jason Friedman. Do you know who
4693 Jason Friedman is?

4694 A I do.

4695 Q Can you tell me how you know him?

4696 A He ran ticket sales until 2020 when Jason Wright
4697 fired him.

4698 Q So did you know him while he was an employee, or
4699 have you come to learn who he is throughout the course of
4700 this investigation?

4701 A I knew of him as a ticket guy at the stadium. My
4702 office is in Virginia. The stadium is located in Maryland.
4703 And I would see him -- my wife and I would see him on game
4704 days when we would do a rah-rah when we would walk by him.
4705 And I would say hello to whoever, whatever person, agent.
4706 I'm sure we probably saw him at charitable events too, some
4707 of the events, 500,000 people, go team go and, you know.

4708 Q Do you recall being at a dinner in 2005 or 2006
4709 at which he and Ms. Johnston were present?

4710 A No, I've never had dinner with Jason. To my
4711 recollection, I never had dinner with Jason Friedman or a
4712 meeting with Jason Friedman.

4713 Q The chairwoman got a letter from Mr. Friedman
4714 corroborating or attempting to corroborate Ms. Johnston's
4715 allegation against this incident.

4716 The two accounts seem to differ a bit. Mr. Friedman tried

4717 to explain those differences during his transcribed
4718 interview or deposition a few months ago in front of this
4719 Committee.

4720 Other than Mr. Friedman's account before this Committee,
4721 are you aware of anyone else attempting to corroborate
4722 Ms. Johnston's story?

4723 A No.

4724 Q Are you aware that Mr. Friedman was also
4725 interviewed by Beth Wilkinson and failed to tell her about
4726 this allegation?

4727 A Yes.

4728 Q Are you aware that Mr. Friedman was terminated by
4729 Mr. Jason Wright well before he made any of these
4730 allegations or came before this Committee?

4731 A Yes.

4732 Q Can you describe for us some of the conduct that
4733 you became aware of that led to Mr. Friedman's termination?

4734 A Jason Wright, it was one of his first
4735 terminations. He told us in one of our update leadership
4736 team calls that this is not the type of person that we need
4737 to change the culture of this organization and they need to
4738 leave, and I'm firing him. And we all did. And he did.
4739 And, by the way, that area now has improved unbelievably.
4740 Unbelievable improvement.

4741 Q So after Mr. Friedman was terminated by Jason

4742 Wright, were you notified by the team that they discovered
4743 Mr. Friedman had an affair with a team intern who was 15
4744 years younger than him while he worked for the team?

4745 A I had heard that going on afterwards, yes.

4746 Q You heard it afterwards?

4747 A Yes.

4748 Q Were you also informed that Mr. Friedman took
4749 affirmative steps to conceal this affair with this intern?

4750 A Yes, I had heard that, yes.

4751 Q Would this affair have been grounds for firing
4752 Mr. Friedman?

4753 A Yes.

4754 Q It has also come to light that perhaps
4755 Mr. Friedman used unkind language when dealing with people
4756 who worked with him and for him. Were you made aware of
4757 that?

4758 A I was made aware by Jason Wright, yes.

4759 Q And was that another reason for Mr. Friedman's
4760 termination, as you understand it?

4761 A Yes.

4762 Q And this kind of language, this kind of
4763 treatment, this kind of sexual affair within the
4764 organization, are these all things that Jason Wright and
4765 the team are now trying to and seem to have successfully
4766 worked out of the culture of this organization?

4767 A Yes.

4768 Q One of the other things that came up in the last
4769 hour, you were questioned by my colleagues about the use of
4770 private investigators.

4771 Was there anything that you wanted to add to your testimony
4772 regarding the private investigators or the use of them and
4773 any association with you or the team?

4774 A Just that we did from the standpoint of following
4775 the defamatory, most terrible things ever written, and we
4776 followed through and just followed the facts and delivered
4777 the facts to the Attorney General -- former Attorney
4778 General Lynch. And I don't know if they did or didn't, but
4779 if they made any mistakes, went to the wrong person here or
4780 there, I deeply apologize for that.

4781 Q And so this use of private investigators was
4782 strictly related to your lawsuits and investigation into
4783 the slander and libel cases regarding the India articles?

4784 A Yes.

4785 Q So it had nothing to do with Beth Wilkinson?

4786 A Nothing.

4787 Q Nothing to do with the NFL and Wilkinson's
4788 investigation?

4789 A Nothing.

4790 Q One of the other allegations against you stems
4791 from a 2009 settlement. Do you know what I'm referring to

4792 when I say 2009 settlement?

4793 A Yes.

4794 Q So The Washington Post reported about this 2009
4795 incident and settlement in which you allegedly sexually
4796 assaulted a former employee. Did you, in fact, assault the
4797 person who accused you of this in 2009?

4798 A No.

4799 Q When did you learn of her allegations?

4800 A A week or two afterwards.

4801 Q How did you learn about these allegations?

4802 A The general counsel told me about them.

4803 Q The general counsel at the time was?

4804 A David Donovan.

4805 Q David Donovan, okay. When you were informed of
4806 these allegations, do you remember your reaction?

4807 A Yes. I was unbelievably upset. And he told me
4808 that he would follow the procedures of hiring an outside
4809 law firm. And I said, "Great." And that's what he did.

4810 Q Was the NFL informed of these allegations at the
4811 time?

4812 A Yes.

4813 Q How do you know that the NFL was informed?

4814 A Because he emailed the general counsel of the
4815 National Football League, Jeff Pash, and the outside
4816 counsel also communicated with Jeff Pash of the NFL.

4817 Q And the outside counsel, can you tell us who that
4818 was?

4819 A Wilmer Hale.

4820 Q When do you recall was the NFL informed of these
4821 allegations?

4822 A Sometime shortly after.

4823 Q Did Wilmer & Hale conduct an investigation into
4824 the allegations?

4825 A Yes, and the general counsel, yes.

4826 Q So the outside counsel worked with your general
4827 counsel. Was the NFL involved as well?

4828 A I don't know.

4829 Q The Washington Post has reported on these
4830 allegations on several occasions. Do you know how these
4831 allegations became public?

4832 A No, I would be speculating.

4833 Q Can you tell us what the result of the
4834 investigation was?

4835 A That I didn't do anything.

4836 Q And so how did you resolve this dispute?

4837 A The insurance company made a settlement -- made
4838 the decision, and I approved it, to pay a settlement, and
4839 that's it.

4840 Q So as you said, the investigation concluded that
4841 you did not do anything wrong, and yet you still chose to

4842 pay the settlement. Can you tell us what went into that
4843 decision?

4844 A I believe we were going to arbitrate at a great
4845 expense, and I'm sure a great legal expense, and the
4846 insurance company said that that was going to be very, very
4847 expensive, what have you. And they made a decision, and I
4848 approved it.

4849 Q That makes sense.

4850 So I just have a few minutes left. So I'm going to maybe
4851 start this line of questioning and we might not get to the
4852 end of it, and I apologize if we have to stop in the
4853 middle.

4854 I want to talk about some of the other allegations that
4855 have been brought against you throughout the duration of
4856 this investigation.

4857 It's been conveyed to the Committee that you own a house in
4858 Aspen that you would often or sometimes go to with other
4859 team executives. Is that true?

4860 A Primarily with executives and their spouses for
4861 some retreats. Not often, no.

4862 Q Not often. What were the purpose of those trips?

4863 A I think the trips you're referring to is probably
4864 2000 or something. I can't remember much about it other
4865 than that the accusations are untrue, I can tell you that.
4866 Other than that, I can't remember much about 20 years ago.

4867 Q That's reasonable. It has been a significant
4868 amount of time.

4869 So as you said, one of the allegations is that prostitutes
4870 were brought into your home in Aspen, Colorado, during
4871 these kinds of business trips.

4872 I'm just going to read some of the testimony that we've
4873 received throughout the duration of this investigation in
4874 regards to this incident. Mr. David Pauken stated, "I
4875 never saw them, but people on that trip told me about that
4876 trip and after that trip, but I never saw it." And he
4877 stated -- end quote. And he stated that he couldn't
4878 remember who had told him that.

4879 Melanie Coburn also brought up this allegation during our
4880 roundtable, I believe it was. She said, and I quote, "I
4881 returned to Dan Snyder's house only to be sent to my room
4882 in the basement and told to stay there, and later learned
4883 from a colleague who was there, that it was because men had
4884 invited prostitutes back."

4885 Again, she was not there, she did not see it firsthand.

4886 And then finally Jason Friedman also spoke about these
4887 allegations in his interview. "I heard here recently some
4888 things that might have happened while I was asleep in my
4889 room."

4890 And he said generally that this was based on what Melanie
4891 Coburn had told him. So he couldn't corroborate her story.

4892 But in these examples of testimony that we've received, all
4893 of this -- none of this is a firsthand account. Is that
4894 right?

4895 A That's right.

4896 Q So why do you think people would claim that you
4897 brought prostitutes back to your home?

4898 A I don't know why people would do some of the
4899 things they do, make allegations, false allegations. But
4900 all I know is the truth. And I don't know what their
4901 motives are or what have you, but I just know the truth.
4902 And that's not true, plain and simple.

4903 Q To the best of your knowledge, invited by you or
4904 someone else, there were no prostitutes invited back to
4905 your home during that trip in Aspen -- or that trip to
4906 Aspen?

4907 A It's not to the best of my knowledge, but fact.
4908 That is untrue.

4909 Q Are you aware of any statement from any person
4910 who was on that trip that they, actually, themselves,
4911 firsthand knowledge, saw prostitutes in your home?

4912 A No.

4913 Q And your testimony here today is that this did
4914 not occur on this business trip or any business trip to
4915 Aspen in the last two decades that you've been bringing
4916 people back to your Aspen house?

4917 A Ever. My home in Aspen is my family home. It's
4918 ridiculous.

4919 [REDACTED] I'm going to go ahead and stop there.
4920 I've got a minute left. But we'll go ahead and go off the
4921 record. We can take a five-minute break, and then Majority
4922 should be ready to roll.

4923 (Recess)

4924 EXAMINATION BY

4925 [REDACTED]

4926 Q Hi, Mr. Snyder. Back on the record. I want to
4927 ask you a few questions about the allegation of Tiffani
4928 Johnston, which she made at the Committee's February 3,
4929 2022, roundtable that you talked about with my colleague,
4930 [REDACTED].

4931 As you discussed, Ms. Johnston accused you of placing your
4932 hand on her thigh at a work dinner and later at the end of
4933 the evening that you attempted to push her into your car.
4934 Did I understand you correctly to say that you have no
4935 recollection of this evening?

4936 A None.

4937 Q And the one definitive fact that I heard you say
4938 was that you don't have a limousine. Is that right?

4939 A No, I don't.

4940 Q And are you sometimes chauffeured in black
4941 sedans, black cars?

4942 A I have the same driver and -- or it just changed
4943 to a Cadillac Escalade. Not in a limo.

4944 Q But you do drive -- ride around in a chauffeured
4945 black car, is that fair?

4946 Ms. Seymour. At what point in time?

4947 By [REDACTED]

4948 Q In 2004-2005.

4949 A I think it was gray.

4950 Q Fair enough. Now, I'm somewhat puzzled, because
4951 after these allegations came out, you announced that the
4952 Washington Commanders were hiring the Pallas Group to
4953 conduct an investigation into these -- Ms. Johnston's
4954 claims; is that right?

4955 A I think so. I think so.

4956 Q Now, earlier when my colleague [REDACTED] [REDACTED] was
4957 asking you questions, you explained that you turned over --
4958 you are the one who turned over the Wilkinson investigation
4959 to the NFL out of a concern for the integrity of the
4960 investigation.

4961 Ms. Johnston's claim involves, you know, conduct by you.

4962 Help me understand, why was it appropriate for the

4963 Commanders to oversee an investigation into Ms. Johnston's

4964 claim when you felt the Commanders were -- it was not

4965 appropriate for the Commanders to oversee Ms. Wilkinson's

4966 investigation?

4967 A I think Mary Jo White is doing that.

4968 Q I understand, but right after the allegations,
4969 your team announced that it would be running the
4970 investigation and hiring Pallas Group to do that
4971 investigation.

4972 So why did you feel it was appropriate for your team to
4973 oversee that investigation when you felt it was not
4974 appropriate for your team to oversee the Wilkinson
4975 investigation?

4976 A All I know is that Mary Jo White is
4977 investigating.

4978 Q Did you have any conversations with the NFL about
4979 who was going to oversee the investigation?

4980 A They called to tell me Mary Jo White.

4981 Q Who called?

4982 A I can't remember who called us. I think that we
4983 issued a statement regarding it.

4984 Q Did someone call you, Mr. Snyder?

4985 A I can't remember who called. We learned about
4986 Mary Jo White and issued a statement.

4987 Q Did the NFL tell you to back off and not hire the
4988 Pallas Group and let it do the investigation?

4989 A The NFL, once they established that they were
4990 hiring Mary Jo White, we said fine and issued a statement.

4991 Q Did they instruct you to stand down?

4992 A I don't recall.

4993 Q Now, immediately after the allegations were
4994 leveled, you stated you that Ms. Johnston's allegations
4995 were outright lies. Is that fair?

4996 A I just know the truth, that didn't happen.

4997 Q Well, Mr. Snyder, I thought your statement --
4998 your testimony was that you didn't have a recollection of
4999 that evening.

5000 A I don't.

5001 Q And so you don't have a recollection of that
5002 evening. Ms. Johnston seems to have a recollection of that
5003 evening, but you took the position that she's lying. Is
5004 that correct?

5005 A All I know is that it's just not true.

5006 Q Despite the fact you don't have any recollection
5007 of that evening?

5008 A Correct.

5009 Ms. Seymour. I object to that. I don't think that
5010 that fairly characterizes his testimony. He said he did
5011 not recall any evening like that, and now he says that it
5012 didn't happen. Those are completely reconcilable. He's
5013 not saying he doesn't know because he lacks any
5014 recollection. I think the transcript will show that. I
5015 think this is unfair.

5016 ████████████████████ I would ask counsel to refrain from

5017 characterizing the testimony in this case. The record will
5018 reflect what the record reflects.

5019

5020 By [REDACTED]

5021 Q Now, Mr. Snyder, it wasn't only Ms. Johnston's
5022 testimony that this incident occurred. There is also
5023 corroborating evidence from Mr. Friedman; correct?

5024 A I just know that the whole claim is not true.
5025 And after looking at my calendars over nearly two decades,
5026 I don't have a dinner on my calendar with Jason Friedman or
5027 even a meeting or a lunch.

5028 Q Mr. Snyder, why would these two people lie about
5029 that evening?

5030 A I don't know what people's motives are. And I'm
5031 not going to speculate on people's motives.

5032 Q Now, Mr. Snyder, there were a number of other
5033 women at that roundtable who offered testimony about the
5034 toxic workplace at the Washington Commanders. Do you
5035 believe their statements about the harassment and bullying
5036 that they experienced at the team were also lies?

5037 Ms. Seymour. Can we be specific about which witness
5038 and which allegation, please?

5039 By [REDACTED]

5040 Q Certainly. Well, there were a number of
5041 witnesses at the roundtable. Ms. Nunez testified at the

5042 roundtable.

5043 Is it your view, Mr. Snyder, that Ms. Nunez's statements
5044 were outright lies?

5045 Ms. Seymour. Do you want to be specific about which
5046 statement? Unless Mr. Snyder recalls all their testimony.

5047 [REDACTED] Well, does Mr. Snyder recall thinking
5048 that any of her statements were outright lies?

5049 Ms. Seymour. You should ask first if he has a
5050 recollection of any statements.

5051 [REDACTED] I trust that Mr. Snyder can answer the
5052 question.

5053 The Witness. I don't recollect which statements.

5054 By [REDACTED]

5055 Q Emily Applegate testified about the harassment
5056 that she suffered at the hands of Mitch Gershman. Do you
5057 believe those statements were true?

5058 A I don't recollect the statements.

5059 Q Melanie Coburn testified about the lingerie
5060 pictures of Tiffani Johnston. Were those allegations true?

5061 Ms. Seymour. Are you asking -- these statements,
5062 there's not even an allegation that Mr. Snyder has
5063 firsthand knowledge. I'm happy to have you ask about
5064 whether he knows whether something is true, but to ask him
5065 whether another witness's statement about which he may or
5066 may not have had firsthand knowledge is untruthful and

5067 seems inappropriate.

5068 [REDACTED] The allegation was that Mr. Snyder
5069 requested lingerie photos of Tiffani Johnston from
5070 Ms. Coburn.

5071 The Witness. No, I did not.

5072 By [REDACTED]

5073 Q Mr. Snyder, Rachel Engelson at that same
5074 roundtable testified about the harassment that she suffered
5075 at the hands of Larry Michael. Do you recall those
5076 allegations?

5077 A I've heard that one, yes.

5078 Q Do you have a view as to whether or not those
5079 allegations were true or untrue?

5080 A I don't have a view. Look, as I've said numerous
5081 times, and continue to state, we apologize for any
5082 workplace misconduct of the team. And I think -- we stand
5083 by the work we've done over the last two and a half years
5084 of tremendous change and reform.

5085 And I think that our words have spoken for themselves, and
5086 our actions have as well, in terms of our organization and
5087 our culture change and transformation.

5088 Q My question, Mr. Snyder, is that there were
5089 accusations leveled against one of your long-term senior
5090 executives, Larry Michael. And my question to you is
5091 whether you have an opinion as to whether or not those

5092 allegations were true or untrue, you as the owner and CEO
5093 of the team.

5094 A I was unaware of those accusations.

5095 Q When you say you were unaware of those
5096 allegations, meaning you were unaware of the allegations
5097 when they were made at the roundtable in February of this
5098 year?

5099 A Yes.

5100 Q Well, Mr. Snyder, I find that puzzling, because
5101 the Committee conducted a deposition of Mr. Lafemina, who
5102 testified in his deposition that he brought to your
5103 attention concerns -- or he brought to your attention
5104 Rachel Engelson's allegations against Larry Michael when he
5105 joined the team in 2018.
5106 Do you recall that?

5107 A No, I do not.

5108 Q Do you remember, Mr. Snyder, that when
5109 Mr. Lafemina joined the team, he insisted on the importance
5110 of hiring an entity, Sageview, to do an audit of the human
5111 resources function at the team?

5112 A I don't recall.

5113 Q You do not recall?

5114 A No.

5115 Q Well, if you could pull up document B0 which I
5116 will mark for purposes of this deposition as Exhibit 7. Do

5117 you have that? Do you have that, Mr. Snyder?

5118 (Exhibit 7, Sageview Consulting agreement, was marked
5119 for identification.)

5120 A Yes.

5121 Q Do you see in the first page in the Background
5122 section, do you see that paragraph? Do you see where it
5123 says, "The companies have approximately 150 to 200
5124 employees? The new president of business operations and
5125 CEO has identified the need to conduct an assessment of the
5126 company's human resources function to ensure compliance
5127 with federal and state law, as well as determine what is
5128 needed to strengthen the human resources function. In
5129 addition, there is an immediate need to conduct 'respect in
5130 the workplace' training for senior management, management
5131 and staff of the company."

5132 Do you see that, Mr. Snyder?

5133 A Yes, I do.

5134 Q Do you recollect Mr. Lafemina coming to you and
5135 telling you that it was important to hire Sageview to
5136 conduct immediate "respect in the workplace" training?

5137 A I don't recall this document.

5138 Q Do you recall a conversation with Mr. Lafemina
5139 about the urgent need for training for senior management at
5140 the company?

5141 A I don't recall that conversation.

5142 Q You have no recollection of that conversation?

5143 A I don't. He was only there, I think, seven or
5144 eight months.

5145 Q Well, in his deposition, Mr. Lafemina said that
5146 because of the Rachel Engelson allegations coming to light,
5147 he felt the need to make sure that this happened
5148 immediately, and that he brought those allegations to your
5149 attention. Do you have any recollection of that?

5150 A I don't have a recollection of the conversation,
5151 no.

5152 Q You don't have a recollection of Mr. Lafemina
5153 bringing to your attention the fact that Larry Michael, one
5154 of your longstanding executives, the voice of the Redskins,
5155 was sexually harassing Ms. Engelson?

5156 A Not that conversation, no.

5157 Q You don't remember that in response to that, you
5158 told him Larry is a sweetheart and Larry wouldn't hurt
5159 anybody?

5160 A No, I do not.

5161 Q Is that what you think of Mr. Larry Michael, that
5162 he is a sweetheart and wouldn't hurt anybody?

5163 A I think through the course of the investigation,
5164 we learned a lot about a lot of people.

5165 Q What does that mean, Mr. Snyder?

5166 A You learn things, and he's no longer with the

5167 organization, and we've moved forward.

5168 Q Are you saying you believe Ms. Engelson's
5169 allegations that she was harassed by Mr. Larry Michael?

5170 A Possibly.

5171 Q And, Mr. Snyder, this document says that there
5172 was a need to conduct an assessment of the company's human
5173 resources function to ensure compliance with federal and
5174 state laws as well as to determine what is needed to
5175 strengthen its human resources function. This is July 12,
5176 2018.

5177 Do you agree, Mr. Snyder, that this document was putting
5178 you on notice that the human resources function at the
5179 Commanders might not comply with federal and state law and
5180 needed strengthening?

5181 Ms. Seymour. I'm going to object. There's no
5182 evidence that he ever saw this document.

5183 By [REDACTED]

5184 Q Mr. Snyder, did you ever see this document?

5185 A I don't recall it, no.

5186 Q Did you ever discuss hiring Sageview Consulting
5187 with Mr. Lafemina?

5188 A I don't recall, no.

5189 Q If you don't recall -- is it fair to say that if
5190 Mr. Lafemina testified that he brought this to your
5191 attention and discussed it with you that you have no basis

5192 to disagree with that testimony?

5193 Ms. Seymour. Objection.

5194 [REDACTED] What's the nature of the objection?

5195 Ms. Seymour. The lack of foundation. Merely because

5196 one witness has said something doesn't mean if the witness

5197 says that he has no recollection of what another person

5198 said that therefore you have no basis. His lack --

5199 [REDACTED] Ms. Seymour, my question is a very

5200 simple one. My question was whether -- Mr. Snyder

5201 testified he has no recollection.

5202 My question was, therefore, whether he believes --

5203 whether he has a basis to say that he does not believe that

5204 Mr. Lafemina's testimony was truthful. He either has a

5205 basis or he doesn't have a basis. The witness can answer

5206 that question.

5207 The Witness. All I know is I don't recollect seeing

5208 this document and a conversation with him. That's all I

5209 know.

5210 By [REDACTED]

5211 Q Mr. Snyder, you talked at length about how

5212 important the people in your organization are, how

5213 important it is to have a respectful workplace. And yet,

5214 it's your testimony now that the president of the team

5215 brings to your attention harassment by one of your most

5216 senior executives and tells you about the urgent need for

5217 training and an assessment of the HR function, that you
5218 have no recollection of that?

5219 A I don't recollect this conversation you're
5220 referring to. I don't have any recollection.

5221 Q Isn't the president of your team raising a big
5222 red flag about sexual harassment in 2018 and the absence of
5223 a proper HR function, one that might not be in compliance
5224 with law, isn't that a big red flag that you would
5225 remember?

5226 A I'm just telling you what I-- I don't remember
5227 this document and I don't recall that conversation you're
5228 referring to.

5229 Q Is it the case that you just didn't care when
5230 Mr. Lafemina brought this up, and that's why you don't
5231 remember?

5232 A Is that a question? I don't understand.

5233 Q Usually people remember things that they care
5234 about. You don't seem to remember this conversation, so
5235 I'm asking you, is it possible you just didn't care when
5236 Mr. Lafemina raised these red flags?

5237 Ms. Seymour. I'm going to object again. You're
5238 assuming something that we don't even know whether it
5239 happened. It's a completely unfair question for this
5240 witness.

5241 [REDACTED] I'm asking whether Mr. Snyder, sitting

5242 here today, believes that it's possible that the president
5243 could have brought this to his attention and it would not
5244 have been an important factor.

5245 The Witness. I think not only did we demonstrate how
5246 much we care by our actions, but I'm just telling you I
5247 don't recall the conversation or this document. And...

5248 By [REDACTED]

5249 Q Okay. Mr. Snyder, I agree with you that facts
5250 matter. So let's go to a document that I believe you do
5251 remember. This is Minority Exhibit J, the August 2, 2021,
5252 Vestry Laight report.

5253 Do you have that Mr. Snyder?

5254 A I have the document, yes.

5255 Q I'd like you to turn to page 5. At the bottom of
5256 the page, do you see under heading 3 where it says, "In
5257 October 2020, McKinsey conducted an organizational health
5258 and inclusion survey of the WFT, "Washington Football Team?
5259 Do you see that?

5260 A Yes.

5261 Q This is October 2020. That's about two and a
5262 half years after this Sageview Consulting agreement that we
5263 looked at just a moment ago was sent. Do you agree?

5264 A From the date of that document and the date of
5265 this document, is that your question?

5266 Q Yes. That there's about two and a half years

5267 between July 12, 2018 when the Sageview Consulting
5268 agreement was, and October 2020 when McKenzie conducted an
5269 organizational health and inclusion survey. That's two and
5270 a half years?

5271 A Can you ask the question again, please?

5272 Q It's not a trick question. One document is
5273 July 12, 2018; the second document talks about an
5274 October 2020 survey. Two and a half years have elapsed
5275 between those two dates. Is that fair?

5276 A Yes.

5277 Q And let's see what Vestry Laight has to say about
5278 McKinsey's survey. On the next page, page 6, it says, "The
5279 results vary across departments, but notable were feelings
5280 of being undervalued, a perception of lack of fairness and
5281 accountability, siloed work units and inconsistent
5282 communication.

5283 "The analysis concluded that many of the problems, such as
5284 inconsistency across departments and feelings of lack of
5285 recognition and accountability stems from an underdeveloped
5286 human resources function."

5287 Do you see that, Mr. Snyder?

5288 A Yes.

5289 Q So in 2020, McKinsey found that the Commanders
5290 had an underdeveloped human resources function that led to
5291 feelings of lack of accountability. That's the conclusion

5292 of McKinsey; right?

5293 A Yes.

5294 Q So in 2018, Mr. Lafemina hires Sageview
5295 Consulting and raises a red flag about the HR function.
5296 And yet in October 2020, two and a half years later, you
5297 still have done nothing about it?

5298 Ms. Seymour. I'm going to object. We have an
5299 unsigned document. We don't know what it is. The witness
5300 doesn't recall anything about it, and I think it's unfair
5301 to ask him the assumption that that all happened. We have
5302 no idea, sitting here today.

5303 By [REDACTED]

5304 Q Okay. Well, August 2, 2021, the Vestry Laight
5305 report says that in October 2020, McKinsey concluded that
5306 there was an underdeveloped human resources function that
5307 led to feelings of lack of accountability. Can we agree on
5308 that, Mr. Snyder?

5309 A I think we've said time and time again that our
5310 HR staff was missing. I think we've been upfront about
5311 that. I think that we've talked a lot about our HR
5312 organization today and where we are. So we obviously have
5313 stated publicly that our HR was not functioning properly.
5314 And now I think, you know, it's obviously succeeding and is
5315 doing very well.

5316 Q Well, after the Wilkinson investigation and after

5317 your fine by the NFL and you were made to hire Vestry
5318 Laight, you know, you got these reports that things had
5319 changed. But what we see is that in 2018, there's a
5320 consulting agreement and in 2020, there's a McKinsey
5321 assessment that things had not, in fact, changed; that you
5322 did nothing to improve the HR function in that time period.

5323 Ms. Seymour. Is that a question?

5324 By [REDACTED]

5325 Q Mr. Snyder, are you aware that during that time
5326 period, Ms. Engelson quit her job because she continued to
5327 be harassed by Larry Michael and had no support from the
5328 team?

5329 A Can you repeat the question?

5330 Q Are you aware that during this time period, 2018
5331 to 2020, during which the HR functions did not improve,
5332 Ms. Engelson was forced to quit the team because she was
5333 being harassed by Larry Michael and no one on the team was
5334 doing anything about it? Are you aware?

5335 A No.

5336 Q Do you realize that your failure to address the
5337 HR function for all these years meant that you had
5338 employees who were being harassed and had no HR department
5339 to turn to for years?

5340 A Obviously from the presentation, you can see that
5341 we used McKinsey when Jason Wright took over from his

5342 predecessor, and I think we've made tremendous strides
5343 since then. And we've acknowledged and continue to
5344 apologize for not having proper procedures in place and
5345 proper HR in place, for which we did apologize.

5346 Q So since they gave you a failing grade, you went
5347 to McKinsey. McKinsey gave you a failing grade, you went
5348 to Vestry Laight. Is that what happened, Mr. Snyder?

5349 Ms. Seymour. I'm going to object to that question
5350 again. It completely lacks a foundation with respect to
5351 Sageview, but I think the question can be answered again
5352 about McKinsey and Vestry.

5353 The Witness. I don't know if Sageview was hired or
5354 not. And possibly Jason Wright's predecessor would know
5355 that. But I also know that that by hiring McKinsey and by
5356 looking within -- and McKinsey and -- Vestry is not
5357 replacing McKinsey. Vestry is very cultural organization
5358 focused --

5359 By [REDACTED]

5360 Q Let me --

5361 A Can I finish my --

5362 Q I'm sorry, Mr. Snyder. I thought you were done.

5363 A All I know is that I know that Jason Wright hired
5364 McKinsey to help give him more guidance. I know he did a
5365 heck of a job. And when we all retained Vestry, it was not
5366 saying -- or meant to replace McKinsey. It was meant to be

5367 an ongoing and -- relationship of looking within, and it
5368 maintains that today. Yesterday's report speaks for
5369 itself.

5370 Q Well, Mr. Snyder, Mr. Lafemina testified that
5371 Sageview did, in fact, conduct an audit and that the
5372 results of the audit were provided to the team. Do you
5373 have any reason to dispute that?

5374 A I'm unaware.

5375 Q Well, Mr. Snyder, we don't have a copy of the
5376 Sageview audit report. And so I would ask you here on the
5377 record to commit to providing that audit report to the
5378 Committee so that we can see exactly what Sageview said.

5379 Ms. Seymour. We'll take that back and -- we'll take
5380 all the requests back and see what we can say.

5381 I will state that we received this unsigned document
5382 just a number of hours -- less than, you know, seven hours
5383 or something before the hearing began. And we were simply
5384 trying to download the documents. We really didn't even
5385 have time to review them. Certainly not time to explore
5386 the situation.

5387 [REDACTED] Noted. And this is a document, for
5388 reference, that was provided to the Committee by the NFL.

5389 Ms. Seymour. Right. We did not receive copies of the
5390 NFL's production. So we do not know what was provided to
5391 the Committee in this matter.

5392 By [REDACTED]

5393 Q Mr. Snyder, would you also commit on the record
5394 to providing the 2020 McKinsey report?

5395 Ms. Seymour. Again, we'll take that back under
5396 advisement. We'll try to keep a list, a running list, and
5397 we're happy to talk to the staff.

5398 By [REDACTED]

5399 Q Mr. Snyder, ultimately whose fault is it that in
5400 2018 all the way until 2020 for McKinsey, your team still
5401 lacked a proper HR function?

5402 A But I think in 2020 when Jason Wright was hired
5403 and then Andre Chambers shortly thereafter, we made great
5404 strides, unbelievable strides on -- in fact, there's a
5405 university out in Maine who is doing a transformation --

5406 Q Mr. Snyder, I'm sorry to interrupt you, but my
5407 question is: Whose responsibility is it that until 2020,
5408 your team failed to have an adequate HR function?

5409 Ms. Seymour. I ask him to be allowed to finish his
5410 answer.

5411 [REDACTED] The answer has to be responsive.

5412 By [REDACTED]

5413 Q Unless you're saying it's Jason Wright's fault.
5414 My question is: Who is responsible for the fact there was
5415 no HR function until -- that as of 2020, your team lacked a
5416 suitable HR function?

5417 A I think we've said that probably numerous times
5418 and have apologized for having an inadequate HR department
5419 and we continue to do it again. I'd be happy to do it to
5420 you.

5421 But before you interrupted me, I was finishing a sentence.
5422 If you don't mind, I would finish the sentence. And that
5423 is simply that a university is using our two years of
5424 transformation to do a case study on how an organization
5425 can be drastically transformed.
5426 And they have not even seen the most recent Vestry reports.
5427 But I do believe that -- you know, I apologize. I'll do it
5428 again to you, if that would help.

5429 Q Mr. Snyder, you're apologizing, and that's fine,
5430 but are you saying that it was your fault?

5431 A Well, we own the team, so we're responsible for
5432 the team. And that is why I'm apologizing. But -- thank
5433 you.

5434 Q So the men and women of the Washington Commanders
5435 who were harassed, who were -- who suffered sexual
5436 harassment, bullying, other forms of misconduct during --
5437 you know, up until 2020 and had no proper HR function to
5438 report that to you, you take responsibility for their
5439 suffering at the hands of the Washington Commanders
5440 workplace, is that fair?

5441 A I think we've taken responsibility and apologized

5442 for the organization and, importantly, by making changes --
5443 and change is hard, difficult to do -- we've led by
5444 example.

5445 Q Now, Mr. Snyder, this August 2, 2021, Vestry
5446 Laight report, this is after the conclusion of the
5447 Wilkinson investigation. Is that fair?

5448 A Yes.

5449 Q And do you agree that it's important for
5450 Ms. Wilkinson to have been able to do her job, that it was
5451 important for her to be able to talk to employees, and
5452 employees to be able to talk to her, without fear of
5453 retaliation?

5454 A Can you repeat the question?

5455 Q Sure. Do you agree that if employees at the
5456 Washington Football Team, at the Commanders, were afraid of
5457 retaliation, that puts into doubt Ms. Wilkinson's ability
5458 to conduct a thorough investigation?

5459 A I don't understand the question.

5460 Q In order to do a thorough investigation,
5461 Ms. Wilkinson needed to be able to talk to all your
5462 employees. Is that fair?

5463 A I believe she spoke to anyone she wanted to speak
5464 to. We gave her complete access to our emails and
5465 databases and whatever she requested. And we gave access
5466 to anyone she asked for, including myself.

5467 Q And it's important for that to be productive, for
5468 the employees to feel like they can speak freely without
5469 fear of retaliation; is that correct?

5470 A Yes.

5471 Q If you go to page 14 of the report, Mr. Snyder,
5472 of this August 2, 2021, report on page 14, this is Vestry
5473 Laight's assessment, it says, "Given the fear of
5474 retaliation reported to exist on the team, coupled with the
5475 McKinsey concern that team members do not know where to go
5476 when a concern arises, some fear of retaliation or losing
5477 responsibility if they share concerns, it will be important
5478 for us to explore through follow-up surveys the extent to
5479 which employees currently understand the reporting avenues
5480 available and their comfort with or hesitation to use the
5481 hotline and/or report to a manager/HR."

5482 Do you see that, Mr. Snyder?

5483 Ms. Seymour. I would object since this is not
5484 referencing the Wilkinson investigation here. This is
5485 employee reporting.

5486 [REDACTED] This is the assessment of Vestry Laight
5487 about the status of the team on August 2, 2021 that we have
5488 discussed -- Mr. Snyder has discussed at length. I don't
5489 understand your objection to us seeing what their
5490 assessment of the status of the team was.

5491 Ms. Seymour. Nobody -- I'm not objecting to that.

5492 I'm merely saying I think the question had to do with
5493 whether there was a fear of retaliation and employees would
5494 be discouraged to go to Beth Wilkinson.

5495 [REDACTED] Let me ask the question differently,
5496 then.

5497 Ms. Seymour. I'm fine. I'm trying to state why I was
5498 objecting.

5499 [REDACTED] Fair enough. I'm going to ask the
5500 question differently.

5501 By [REDACTED]

5502 Q Mr. Snyder, do you agree that Vestry Laight found
5503 that there was a fear of retaliation purported to exist on
5504 the team on August 2, 2021?

5505 To help you answer that question, Mr. Snyder, here is the
5506 sentence from Vestry Laight: "Given the fear of
5507 retaliation reported to exist on the team."

5508 Mr. Snyder, I'm confused. It seems like an easy question
5509 from me.

5510 A Can you give me a second to read the whole
5511 document, please?

5512 Q Mr. Snyder, I think the report speaks for itself.
5513 So if you're not able -- if you're unable to answer the
5514 question, we can move on.

5515 A I just want to point out that the McKinsey report
5516 was October 2020, and Jason Wright had just started a few

5517 months before, and this Vestry report is dated August 2,
5518 2021. And by then, I believe Andre Chambers had staffed
5519 the HR department, et cetera, et cetera. So I think the
5520 important thing is not to insinuate but to state the facts.

5521 Q I agree, Mr. Snyder. And it seems like Vestry
5522 Laight did too, and that's why they stated the fact that a
5523 fear of retaliation was reported to exist on the team.
5524 With that, let's move on.

5525 You discussed with my colleague the 2009 sexual assault
5526 allegation that was leveled against you by an employee and
5527 that your team settled. Is that correct?

5528 A Yes. The insurance company.

5529 Q Now, in September 2021, Ms. Wilkinson reportedly
5530 became aware of that settlement. Are you familiar with
5531 that?

5532 A I'm not familiar with -- are you saying when did
5533 she become aware?

5534 Q Let me ask you differently. When did you become
5535 aware that Ms. Wilkinson had learned about the existence of
5536 the 2009 settlement?

5537 Ms. Seymour. Privilege, as it relates to privilege.
5538 The witness asked a question about attorney-client
5539 privilege. Could we step outside?

5540 [REDACTED] Briefly.

5541 (Discussion held off the record.)

5542 Ms. Seymour. Thank you.

5543 The Witness. Thank you. Can you repeat the question,
5544 please?

5545 By [REDACTED]

5546 Q When did you become aware that Ms. Wilkinson had
5547 learned about the existence of the 2009 sexual assault
5548 settlement?

5549 A In July 2020.

5550 Q And how did you learn about that?

5551 A We informed her.

5552 Q You informed Ms. Wilkinson about the 2009
5553 settlement?

5554 A The team, yes.

5555 Q Now, did Mr. Chirite inform Ms. Wilkinson of this
5556 settlement?

5557 A I don't recall exactly who. I know she was
5558 informed in July of 2020.

5559 Q After she was informed of this, Mr. Donovan sued
5560 Ms. Wilkinson in federal court in Virginia to prevent her
5561 from using this information in her report and to destroy
5562 any documents she received regarding the settlement. Are
5563 you aware of that?

5564 A Yes.

5565 Q Did Mr. Donovan consult with you regarding this
5566 lawsuit before he brought it against Ms. Wilkinson?

5567 A No.

5568 Q You had no conversations with him before he
5569 brought this lawsuit?

5570 A No.

5571 Q Now, did you intervene in this lawsuit? By
5572 "you," I mean, you or the team.

5573 A Yes.

5574 Q Why did you intervene in that lawsuit?

5575 A I'm not an attorney, so I think lawyers did that.

5576 Q Were you seeking to prevent Ms. Wilkinson from
5577 using the information about the 2009 settlement in her
5578 report?

5579 A Ms. Wilkinson interviewed the accuser and also
5580 interviewed me.

5581 Q Were you trying to prevent her from including
5582 that information in her report?

5583 A No.

5584 Q Was there any purpose, in your eyes, then, to
5585 spending money intervening in this lawsuit?

5586 A I'm not an attorney, so...

5587 Q You're the one who pays the attorney.

5588 A Yes, I do. We do, the team.

5589 Q In your eyes, is there any purpose to intervening
5590 in this lawsuit?

5591 A I'm not knowledgeable enough to give you an

5592 answer.

5593 Q Mr. Snyder, I'd like you to look at a document
5594 identified by the letters BF which we've identified as
5595 Exhibit 8 in this deposition.

5596 (Exhibit 8, Letter dated May 20, 2021, was marked for
5597 identification.)

5598 Ms. Seymour. Could you identify what the document --
5599 sorry.

5600 Q The May 20, 2021, letter to Counsel of Record for
5601 Intervenor of Washington Football Team from HWG, who
5602 represented Beth Wilkinson in Ms. Wilkinson's depo.

5603 Ms. Seymour. You got it, thank you.

5604 By [REDACTED]

5605 Q Do you see that, Mr. Snyder?

5606 A I do.

5607 Q If you go to page 2, the top paragraph. It says,
5608 "Subsequently, as you know, the team intervened in the
5609 Donovan litigation and launched a series of attacks against
5610 Ms. Wilkinson. In so doing, the team plainly staked out a
5611 position of adversity with Ms. Wilkinson and the Firm more
5612 generally."

5613 Do you see that?

5614 A Yes.

5615 Q What was the position of adversity that the team
5616 staked out against Ms. Wilkinson?

5617 A I'm unaware.

5618 Q Did the team launch a series of attacks against
5619 Ms. Wilkinson related to the Donovan litigation?

5620 A I'm unaware.

5621 Q You're unaware. In filings in that litigation,
5622 Ms. Wilkinson described efforts to force a witness into
5623 silence and noncooperation that were documented and was
5624 brought by Brendan Sullivan.

5625 Mr. Snyder, is Brendan Sullivan the attorney who represents
5626 your accuser from 2009?

5627 A Back then, yes.

5628 Q Mr. Snyder, did you or anyone acting on your
5629 behalf or on behalf of the team offer your 2009 accuser
5630 additional money in exchange for her continued silence?

5631 A No.

5632 Q No one offered her any money for her continued
5633 silence during the course of the Wilkinson investigation?
5634 Is that your testimony?

5635 A I think I've answered. No.

5636 Q As part of your settlement in 2009, was there a
5637 nondisclosure agreement that applied to that settlement?

5638 A Yes.

5639 Q And that 2009 -- who did that nondisclosure
5640 agreement cover?

5641 A Five different parties, I believe.

5642 Q Including your accuser?

5643 A Yes.

5644 Q Including Mr. Sullivan, her attorney?

5645 A I'm unsure.

5646 Q If this NDA was in effect, what possible reason
5647 could your attorneys have had to reach out to your
5648 accuser's attorney?

5649 A I'm unaware.

5650 Q You're unaware of any reason?

5651 A Yes. I'm unaware.

5652 Q Mr. Snyder, would you agree on the record to
5653 release from the NDA your accuser in 2009 so that she can
5654 speak freely to the Committee, if she so chooses, as well
5655 as her attorney?

5656 Ms. Seymour. Again, we'll take this under advisement.
5657 I think the record reflects this is a five-party agreement.
5658 So it really would not be within Mr. Snyder's power to
5659 release the other signatories, given the other signatories'
5660 agreement.

5661 By [REDACTED]

5662 Q Mr. Snyder, during the course of the Wilkinson
5663 investigation, did you or anyone acting on your behalf or
5664 on behalf of the team offer any former employee money in
5665 exchange for their silence?

5666 A No.

5667 Q Did you or anyone on your behalf or on behalf of
5668 the team offer -- reach out to any clients of the law firm
5669 Katz, Marshall, Banks, including Ms. Applegate or miss
5670 Imbert to offer them money in exchange for entering into a
5671 nondisclosure agreement in February 2021 or at any time
5672 during the Wilkinson investigation?

5673 Ms. Seymour. Counsel, just to be clear, are you
5674 talking about a settlement of their claims that could
5675 include a nondisclosure agreement? Are you talking about
5676 something after a settlement to induce hush money? So if
5677 you could clarify what you mean by the allegation. So
5678 perhaps we can take them one at a time.

5679 So let's start with the first one.

5680 Ms. Seymour. Is the question, are you aware of any
5681 settlement agreements with any Katz & Banks clients that
5682 contain nondisclosure agreements?

5683 During the Wilkinson investigation.

5684 The Witness. Yes.

5685 By

5686 Q And who did that cover?

5687 A Which parties? What's the question, please?

5688 Q Who was covered by that nondisclosure agreement
5689 as part of the settlement?

5690 A I'm unaware of the details.

5691 Q You don't have any details on who it covers?

5692 Ms. Seymour. Are you asking who was a party to this
5693 settlement? I'm sorry.

5694 [REDACTED] Exactly.

5695 Ms. Seymour. Okay. I think if they are nondisclosure
5696 agreements, you know, the question is the people who
5697 settled their claims, are you asking for the names of the
5698 people or what are you asking for?

5699 [REDACTED] Description of what --

5700 Ms. Seymour. Oh, a description of the people who
5701 settled their claims.

5702 The Witness. Description of the people?

5703 Ms. Seymour. Yes.

5704 By [REDACTED]

5705 Q Are they former employees?

5706 A Former cheerleaders.

5707 Q Is that in relation to the lewd videos?

5708 A It's in relation to multiple -- multiple topics,
5709 I believe.

5710 Q Outside of that settlement agreement, did you or
5711 anyone on your behalf or on behalf of the team approach any
5712 client of Katz, Marshall, Banks to offer them additional
5713 money in exchange for entering into a nondisclosure
5714 agreement?

5715 A I'm unaware of that.

5716 Q You're unaware. Does that mean it did not

5717 happen, or it may have happened, and you just don't know?

5718 A I'm unaware.

5719 Q Mr. Snyder, is it your testimony that you do not
5720 know if people acting on your behalf offered hush money to
5721 clients of the Katz, Marshall, Banks law firm?

5722 A I'm just unaware.

5723 Q So you're saying it's possible. You just don't
5724 know?

5725 A I don't know what you're talking about. I've
5726 never said -- I just told you that the cheerleaders were --
5727 I'm unaware, yes.

5728 Q You talked about the settlement that applied to
5729 the cheerleaders. So we set that aside. Now, outside of
5730 that settlement, did you or anyone acting on your behalf or
5731 on behalf of the team offer money to clients of Katz,
5732 Marshall, Banks, in order to induce them to enter into a
5733 nondisclosure agreement?

5734 A I'm unaware of that.

5735 Q And so if you're saying you're unaware, I'm
5736 asking, does that mean that it's possible that people
5737 acting on your behalf did so?

5738 A I don't believe so.

5739 Q But it's possible?

5740 A I'm unaware. I've answered the question.

5741 Q Do you agree, Mr. Snyder, that entering into a

5742 nondisclosure agreement during the Wilkinson investigation
5743 would violate your promise of full cooperation that you
5744 made with regard to that investigation?

5745 A No.

5746 Q No? You don't believe that buying someone's
5747 silence during the Wilkinson investigation would fall short
5748 of full cooperation?

5749 Ms. Seymour. I'm going to object to that. There was
5750 no buying silence. There were settlement agreements, as he
5751 testified, and I think he also testified that Wilkinson was
5752 able to talk to anyone, notwithstanding any nondisclosure
5753 agreement. So that's really an unacceptable question.

5754 By [REDACTED]

5755 Q Did you enter into any nondisclosure agreement --
5756 to the extent nondisclosure agreements prevented people
5757 from going to the press with their concerns, The Washington
5758 Post that had these exposés, would you agree that that
5759 would have been a problem, Mr. Snyder?

5760 A I just don't understand the question.

5761 Q Mr. Snyder, you said that you informed the -- the
5762 NFL was informed in 2009 of the allegations and the
5763 settlement. Is that correct?

5764 A Yes.

5765 Q So in 2009, was the NFL informed of the substance
5766 of those allegations?

5767 A I just know that our general counsel spoke with
5768 their general counsel, as well as outside counsel spoke to
5769 them as well.

5770 Q And did they disclose to the NFL that an employee
5771 had made an allegation of sexual misconduct against you,
5772 the owner of the team?

5773 A Yes.

5774 [REDACTED] If I could have just a moment's
5775 indulgence. With that, I think for a time, I will pass it
5776 to my Minority colleagues for any questions that they may
5777 have.

5778 [REDACTED] Do you want to take a five-minute break?
5779 Does the witness need a break?

5780 Ms. Seymour. Thank you.

5781 [REDACTED] So we'll be back at 5:00.

5782 (Recess)

5783 Ms. Seymour. Before we get started, I'm just noting
5784 for the record that it's after midnight here in Israel, and
5785 we've been going now for nine hours, and -- and, you know,
5786 we are -- we'll endeavor to be cooperative, but we will
5787 hope that we can stop without too much more time.

5788 We did offer to make ourselves available during the
5789 workday at 9:00 on the East Coast, after midnight here.
5790 So, again, we're trying to be cooperative. We recognize
5791 that folks have questions, but we are hoping we can wrap

5792 this up before too long. But thank you.

5793 [REDACTED] One point of clarification. Did you say
5794 you offered to make yourself available at 5 p.m. Eastern
5795 Time tomorrow?

5796 Ms. Seymour. No, I did not say that. I understood
5797 that the staff had asked us to be available during east
5798 coast business hours, and we have done that. We're now
5799 after 5 p.m. on the East Coast. It's after midnight here.
5800 And so I'm just, you know, hoping that folks can take that
5801 into account and hoping that we can end before too long.
5802 It's been going nine hours, so it's a long -- a long day
5803 for everybody.

5804 [REDACTED] I wanted to make sure that I understood
5805 what you were referring to. We certainly appreciate your
5806 patience here, but, of course, as you know, our preference
5807 would have been to do this on the same time zone so that
5808 you wouldn't have had to be inconvenienced.

5809 So we will endeavor to get as through as much of this
5810 as we can quickly, and we've made good time so far. But I
5811 will take that -- just wanted to make sure I understood
5812 exactly what your concerns were.

5813 Ms. Seymour. Just it's been a long day, but we will
5814 keep going.

5815 [REDACTED] And I will just note, too, that despite
5816 whatever time zone we are on, this has still been a long

5817 time, even if we were all on East Coast time. I think my
5818 Majority counterparts know we rarely start an interview
5819 before 9:00. We started at 8:00 a.m., and it's now past
5820 5 p.m. So even by our own standards, regardless of the
5821 witness being on a wholly different time zone, that it's
5822 been a pretty long day by all Congressional Committee
5823 investigation standards.

5824 EXAMINATION BY

5825 ██████████

5826 Q So with that, we'll go back on the record. I'll
5827 be jumping around a little bit, so I'll try to make sure I
5828 have the predicates, you understand kind of where the
5829 question is coming from. But if it's not clear, just let
5830 me know, just because I will be jumping around.
5831 And at the outset, I don't think we'll be taking the full
5832 hour on this round. But we have some -- just some handful
5833 of questions here and there on a few different topics.
5834 This is going back a couple hours into the day, a
5835 discussion about Beth Wilkinson's investigation and her
5836 firm taking over -- taking over or assuming that
5837 investigation and that work. And I just want to clarify to
5838 make sure this is your understanding.
5839 I'm going to read from NFL Commissioner Roger Goodell's
5840 opening statement that he gave at the June 22 hearing, so
5841 last month, a few weeks ago, relating to this and to

5842 clarify that as also your understanding.

5843 This is his statement: "The Commanders are one of 32 NFL

5844 clubs, each of which is managed by its ownership and

5845 executives and have their own workplaces and policies.

5846 "Two years ago, the Commanders asked me to recommend

5847 independent counsel to address workplace issues and

5848 recommend changes to improve the workplace culture. We

5849 identified several candidates, and the club selected Beth

5850 Wilkinson, a distinguished former federal prosecutor.

5851 "Approximately six weeks later, the club asked my office to

5852 assume oversight of the Wilkinson firm's work. The

5853 Wilkinson firm conducted a comprehensive review of the

5854 workplace at the club, interviewing more than 150

5855 witnesses."

5856 And that is from his statement on the record on June 22.

5857 Is that your understanding of what happened with regard to

5858 selecting Beth Wilkinson and her assuming that role and the

5859 NFL's relationship with her firm in this investigation?

5860 A Yes, that's what I believe I said earlier. Yes.

5861 Thank you.

5862 Q This is following up from last hour. Just to be

5863 clear, the complaining witness in the 2009 incident, as far

5864 as you understand, was interviewed by Beth Wilkinson?

5865 A Yes, as was I.

5866 Q As you probably are, no doubt, aware, the

5867 Committee had a deposition of a former employee, David
5868 Pauken, and have been relying on that testimony and have,
5869 in fact, released -- publicly released that transcript on
5870 the day of the hearing with Roger Goodell.

5871 Did anyone from the Majority on the Committee reach out to
5872 you or to your counsel, to the extent you're aware, about
5873 Mr. Pauken's tenure with the team -- with your team or with
5874 Snyder Communications?

5875 A No.

5876 Q So as I just mentioned, that transcript was
5877 released the day of the hearing. Did you or your attorneys
5878 have an opportunity to review or see that transcript before
5879 it was publicly released or to respond to the allegations
5880 in that transcript?

5881 A No.

5882 Q Do you believe that there were questions that
5883 could have been asked that were not asked of Mr. Pauken
5884 during that deposition?

5885 A Yes.

5886 Q So one of the allegations that Mr. Pauken had
5887 made was that you were, quote, abusive to him. He, as far
5888 as I know, left your employment well over 10 years ago, if
5889 not longer. Is that your understanding?

5890 A I think, 16 or -- 16 or almost 17, so some years
5891 ago.

5892 Q I think in his last position, he was the COO of
5893 the team. Is that accurate?

5894 A Yes.

5895 Q So he had a pretty significant position, was it
5896 not?

5897 A Yes.

5898 Q Did you in any way ever cause him harm or abuse
5899 Mr. Pauken?

5900 A No.

5901 Q And then do you know what his compensation
5902 package was during that period of time?

5903 A I don't remember much about him at this point
5904 since it was so long ago, but a couple things that I do
5905 remember, just a few, about him from a long time ago. I'd
5906 be happy to tell you whatever I know or whatever I
5907 remember.

5908 Q I mean, as far as you recollect, it was a
5909 generous compensation package?

5910 A Yes. He actually left after being very, very
5911 disgruntled. And he was compensated well, but somehow he
5912 believed he was entitled to some equity in the franchise at
5913 my previous company. We gave stock options, a public
5914 company. This being a private company, we did things
5915 through compensation, et cetera.

5916 He had asked for equity, I can't remember if he asked for 1

5917 or 2 percent, I don't remember which percent, but I
5918 remember him being extremely, extremely angry. That's what
5919 I recall.

5920 Q So based on your recollection, he was disgruntled
5921 because he was denied having equity in the team?

5922 A Yes.

5923 Q Do you recall his tenure as a team employee at
5924 all?

5925 A Not really. I mean, it was so long ago. I
5926 remember afterwards, I can't remember when, whether it was
5927 a COO or a CFO, someone end up coming in and showing me a
5928 lot of documents that during his tenure at the club, he was
5929 constructing his new home using team commercial contractors
5930 that we use for major renovation at our stadium.

5931 I remember the big companies was millions and millions of
5932 dollars, Carlson Construction, and I remember something
5933 about a gate and him taking employees from the stadium in
5934 Maryland to Virginia to help construct his gate and his big
5935 house and using our vendors.

5936 We were chatting, what should we do with all this, should
5937 we do something with it, a report? I said, look, let's
5938 just leave him alone. He's unhappy. Just leave it alone.
5939 I don't remember much about him at this point other than
5940 that.

5941 Q But from what you recall, he was using, like,

5942 team contractors and vendors to work on his personal
5943 residence?

5944 A To construct his home. It was not obviously
5945 discovered during his tenure. It was discovered
5946 afterwards, all the documents and corresponding -- I
5947 decided not to pursue it. I just thought, leave him alone.
5948 Let's let him go on his way.

5949 Q So you didn't learn about this until after he had
5950 departed from the organization?

5951 A That's correct, yes.

5952 Q If you had learned he was doing this while he was
5953 still employed with the organization, would you have taken
5954 any action?

5955 A I would have terminated him.

5956 Q Why would that have been your course of action?

5957 A Because these are -- Carlson Construction, for
5958 example, is a commercial, nonresidential-type contracting
5959 company, and he was using their employees to help with his
5960 home, as well as other vendors that we were paying
5961 substantial -- many millions of dollars for these vendors.
5962 I have not investigated or looked into this. I decided the
5963 best thing to do was to let him go on his way. And that
5964 was disappointing.

5965 Q Was there anything else you recollected from his
5966 tenure with you, either with Snyder Communications or with

5967 the team?

5968 A No. I thought he was a good accountant.

5969 Q That was his background, accounting?

5970 A Yes.

5971 Q So you didn't have an opportunity to provide some
5972 of that information with regard to his coming forward to
5973 the Committee to testify in the deposition; correct?

5974 A No. I'm sure we have that file somewhere. We
5975 can get it to you.

5976 Q I'm going to just go through a couple of other
5977 quick kind of allegations made. I think, as I understand
5978 it, that some of these came actually from David Pauken.
5979 One is that he alleged that you had, I think, ordered or
5980 requested or something sour milk being poured in a suite
5981 owned by the Lerner, the owners of the Washington
5982 Nationals.

5983 Do you recall having requested or ordered sour milk being
5984 poured in one of your stadium suites?

5985 A I have no recollection of that whatsoever. And
5986 Mark Lerner and his wife are friends of my wife, Tanya and
5987 I. We have them over to our home for dinner.

5988 Q Is that even something that you think you would
5989 ask one of your employees to do?

5990 A It's just silly.

5991 Q David Pauken had characterized, while he was

5992 there with the organization, that you were -- he
5993 characterized it as, like, you were not a hands-off owner.
5994 How would you characterize your ownership style over the
5995 course of, I guess, about two decades of owning the team?

5996 A Probably first couple of years, I was pretty
5997 hands-on, and then from there, we began to -- the last
5998 decade, probably -- we're obviously affiliated with people
5999 and we made a mistake prior to Jason and I wasn't in the
6000 office frequently, maybe 30 days a year at headquarters and
6001 then games, the 20 games that we would go to. So I was not
6002 hands-on and, obviously, should have been much more aware
6003 of things.

6004 And I've apologized for that numerous times over and over.
6005 And I continue to. But we're getting it right now and
6006 we're excited about our future.

6007 Q Around the time that Mr. Pauken departed the
6008 team, did your management style shift then or, like, before
6009 or after? Was there anything -- I guess the phases that
6010 you have gone through, what has affected the phases?
6011 I understand you said you were initially hands on, then you
6012 kind of changed. Was there something that precipitated
6013 that? And then obviously kind of in more recent years,
6014 there's been some evolution as well.

6015 A I think in the beginning, I was hands-on. And in
6016 2001, I was diagnosed with cancer. And I had the thyroid

6017 cancer, thyroidectomy. And I had papillary carcinoma. And
6018 at the time, I remember we said, it's all gone. It wasn't.
6019 It had spread to my lymph nodes and required radioactive
6020 chemo stuff at Hopkins, and I got some very bad side
6021 effects for quite some time. And then I ended up doing I
6022 think it was six more surgical procedures at Mayo Clinic up
6023 into '03. And it's a life changer.

6024 I want to spend time with my family. The biggest life
6025 changer happened in 2008 when my wife had breast cancer and
6026 serious surgeries, serious stuff affecting my life.

6027 And from there on down, we ended up in the years after that
6028 homeschooling our kids and spending a lot of time with
6029 family first.

6030 And we're empty nesters now. That's why Tanya's able to do
6031 the great things she's doing, the great work she's doing.
6032 And I'm proud of her and I'm proud of the whole leadership
6033 team of the organization.

6034 Q Have you stayed in remission since those, like,
6035 period of surgeries and so forth?

6036 A Yes, I have. Thank you for asking. And so has
6037 she. We've both got a lot of things done, but the toll it
6038 takes on you, a couple years for me and then a couple years
6039 for her, and it's life-changing. So it's difficult stuff,
6040 real stuff.

6041 And I think that it probably pushed us to do what we did

6042 with our kids and our family and be able to spend more time
6043 than ever to focus on them. We're proud. It turned out
6044 pretty well. We're proud.

6045 Q Looking to the future, obviously hoping that the
6046 health challenges stay in the background and don't ever
6047 resurface, what are the biggest challenges you see, like,
6048 facing -- for the team over the next handful of years kind
6049 of looking for?

6050 A Well, first thing we got to do is we got to win
6051 the Super Bowl. We got to win that championship. And we
6052 really have unbelievable faith in coach Ron Rivera, we're
6053 excited as can be about our new quarterback. Real excited
6054 about the season upcoming.
6055 And Tanya -- we've told Jason directly we're so excited
6056 about the -- watching him really grow and lead, and it's
6057 been really great to see a rising star.

6058 [REDACTED] I'm going to mute just one moment.

6059 (Discussion held off the record.)

6060 [REDACTED] We're about done with our questions. I
6061 just wanted to give you the opportunity to see if there's
6062 anything else you wanted to say or clarify that you feel
6063 like you didn't get the opportunity to. Otherwise, we'll
6064 be done with our round of questions here.

6065 The Witness. Thank you.

6066 [REDACTED] Do you have anything further? Or we'll

6067 just go off the record.

6068 The Witness. Thank you for your time.

6069 [REDACTED] I appreciate it. Going off the record.

6070 You can kind of take the ball. I don't know if you want to
6071 break or you just want to jump into it, leave that to you
6072 and Mr. Snyder.

6073 [REDACTED] I think we're fine. Probably hungry.

6074 (Discussion held off the record.)

6075 EXAMINATION BY

6076 [REDACTED]

6077 Q Mr. Snyder, during your tenure as CEO and co-CEO
6078 of the Commanders, have you ever used the services of a sex
6079 worker in connection with a work-related event?

6080 A No.

6081 Q Have you ever paid a woman for sex at or in
6082 connection with a work-related event?

6083 A No.

6084 Q Have you ever borrowed money from a current or
6085 former Commanders employee to secure the services of a sex
6086 worker?

6087 A No.

6088 Q Earlier you testified about a statement that was
6089 made on or around August 26 in response to The Washington
6090 Post second exposé which leveled accusations about
6091 misconduct.

6092 First of all, those were personal allegations against you.
6093 Are you aware that The Washington Post's August 26, 2020,
6094 exposé was based on interviews of more than 100 current and
6095 former Commanders employees?

6096 A No.

6097 Q Does it surprise you to hear that more than 100
6098 current and former employees contributed to that article?

6099 A Would it surprise me to know? I don't think I
6100 said that, so...

6101 Q Do you have any reason to believe that the more
6102 than 100 employees who contributed to the article were
6103 untruthful?

6104 A No.

6105 Q I want to ask you some questions about the July 1
6106 announcement of Beth Wilkinson's findings. I believe
6107 earlier you testified that you discussed with Ms. Wilkinson
6108 personally the 10 points of remedial actions that were
6109 recommended for you to take. Is that correct?

6110 A No.

6111 Q Did you have any discussions with Ms. Wilkinson
6112 directly about the 10 points that were listed in the July 1
6113 announcement?

6114 A No.

6115 Q Did you have any conversations with the NFL about
6116 those 10 points that were listed in the July 1, 2021,

6117 announcement?

6118 A I think -- and I have a hard time remembering
6119 July 1 and 2. My mom had a stroke on July 1. My mom
6120 passed on July 2. So I'm having a hard time remembering
6121 everything. The night before, the morning of the 1st, we
6122 learned all the details. But I have a hard time
6123 remembering those two dates. My mother had a stroke on the
6124 1st.

6125 Q Did you have a conversation with the NFL at any
6126 point before July 1 about the remedial actions that were
6127 detailed in the announcement?

6128 A Did I? No.

6129 Q Did anyone acting on your behalf, your attorneys
6130 have a conversation with the NFL prior to the release of
6131 the July 1 announcement?

6132 A I believe so. Maybe the night before or morning
6133 of, I think.

6134 Q Would it surprise you to learn that your
6135 attorneys or agents acting on your behalf had multiple
6136 conversations with the NFL in the weeks leading up to the
6137 July 1 announcement?

6138 A I can't remember when they had spoken. I just
6139 know about the July 1 date.

6140 Q Just so the record is clear, you're not saying
6141 that they did not have that conversation. You're saying

6142 that you don't recall if those conversations occurred. Is
6143 that correct?

6144 A That's correct. I don't recall.

6145 Q I'd like to direct your attention to the document
6146 referenced AN, as in Nancy. This is the July 1
6147 announcement. This document will be marked as Exhibit 9
6148 for identification purposes.

6149 (Exhibit 9, Announcement, was marked for
6150 identification.)

6151 By [REDACTED]

6152 Q Mr. Snyder, let me know when you've had a chance
6153 to review.

6154 A Okay.

6155 Q Do you recognize this document?

6156 A Yes.

6157 Q And what is it?

6158 A I believe it's a July 1 league announcement.

6159 Q Now, prior to the July 1 release of the league
6160 announcement, did you have an opportunity to discuss and
6161 review any aspect of the information contained in this
6162 release with anyone from the NFL?

6163 A I didn't. No.

6164 Q Did your agents or anyone acting on your behalf
6165 have an opportunity to discuss any aspect of the content of
6166 this July 1 release prior to its release?

6192 Mr. Snyder, did you view your role of concentrating on the
6193 new stadium plan as stepping back from your duties as the
6194 CEO?

6195 A I just know that Tanya Snyder attends the league
6196 meetings and is deeply involved in the day-to-day
6197 activities, and as it says here, I'm focused on the new
6198 venue. That's accurate.

6199 Q Are you deeply involved in the day-to-day
6200 operations of the Commanders currently?

6201 A I have not been to the stadium or the facility in
6202 a year now. I did -- except for games, excuse me.

6203 Q And so by you saying that you haven't been to the
6204 facility in over a year --

6205 A I want to correct. And also for a couple
6206 charitable events.

6207 Q You've been to the facility for charitable
6208 events, for games?

6209 A The stadium.

6210 Q The stadium; correct. But your testimony is that
6211 you have not been involved in the day-to-day team
6212 operations; is that correct?

6213 A I have not been to the stadium or the facility in
6214 a year other than for games and events. I was at USO
6215 events and stuff.

6216 Q Have you been involved in the day-to-day

6217 operations at the Commanders over the past year?

6218 A I'm -- it's-- if asked and needed, I answer and
6219 try to be helpful -- and that's what I've done. I think
6220 the results speak for themselves. The whole organization.

6221 Q So that's a "yes"?

6222 A I'm sorry?

6223 Q That's a "yes," you have been involved in the
6224 day-to-day operations; correct?

6225 A Not really. I mean, I've given advice and help,
6226 but the day-to-day operations, no. The answer is Tanya
6227 Snyder has been to that stadium and the team headquarters,
6228 and they can't count the amount of time and effort, and --
6229 and I don't want to diminish the great work she's done.
6230 And it's unbelievable. And I have not, and she has. But
6231 if I'm needed, I'll do that. And it may be necessary to
6232 help.

6233 Q So that the record is clear, you have not resumed
6234 the day-to-day operations of working for the Commanders, is
6235 that correct?

6236 A That would be more accurate. She's there and --
6237 a lot of meetings. I can't tell you how many. It's an
6238 enormous number. I've been with her at all the games.
6239 I've done some charitable activities, et cetera. And,
6240 obviously, I think we all have close relationships with our
6241 leaders of the team and meet them when called upon.

6242 Q I want to direct your attention back to a
6243 document we previously referenced, which is AE or
6244 Exhibit 6. This is your August 26 statement specifically.

6245 A Yes.

6246 Q Second paragraph you state, "I have admittedly
6247 been too hands-off as an owner and allowed others to have
6248 day-to-day control to the detriment of our organization.
6249 Going forward, I'm going to be more involved."

6250 Do you see that?

6251 A Yes.

6252 Q Mr. Snyder, how do you reconcile your August 26
6253 statement with your July -- the July 1 announcement that
6254 says you will be focusing on the stadium and that
6255 Ms. Snyder will be stepping into the day-to-day operations?
6256 How do you reconcile those two things?

6257 A I think this is August of 2020 and that was
6258 July 1, '21. And when I was involved back then, I was
6259 helping hire some great people and helping recruit and
6260 retain some great talent, and I'm proud of the work they've
6261 achieved.

6262 Q What do you think changed that made you believe
6263 that you no longer need to be more involved, and you need
6264 to be less involved and focused on other efforts?

6265 A I think that even before July 1 as Tanya geared
6266 up and got more and more involved in the day-to-day, I

6267 think it's been incredibly impressive and kind of fun to
6268 watch and hear about.

6269 But this document you're referring to is August of 2020
6270 when Jason Wright was in the midst of recruiting, and we
6271 hired a very solid leadership team. And Tanya is enjoying
6272 it every day.

6273 Q I believe you testified earlier that Tanya had an
6274 integral role in hiring Coach Rivera; correct?

6275 A Yes.

6276 Q How would you say that Coach Rivera has performed
6277 for the Washington Commanders?

6278 A I think he's done a marvelous job. The Vestry
6279 report that we glanced at today speaks highly of the
6280 football organization and I think quotes some of his
6281 employees, and I think -- it also, I believe, complements
6282 him in the style and his communication abilities and the
6283 abilities to work with people and to create a fabulous
6284 football team.

6285 Q Do you trust Coach Rivera?

6286 A Yes.

6287 Q How often do you speak to him?

6288 A Once or so a week.

6289 Q What do you speak to Coach Rivera about?

6290 A He calls, updates me. Went to his son's wedding
6291 this summer in Europe, my wife and I, with his family.

6292 And...

6293 Q Are you aware that Coach Rivera stated that he
6294 sat with you and Tanya for an end of-the-season meeting in
6295 January?

6296 A Yes.

6297 Q What was that end-of-the-season meeting about?

6298 A He came over, talked about the end of the season
6299 and just his positivity for the future.

6300 Q Future of the team?

6301 A Future, yes.

6302 Q Were you involved in acquiring quarterback Carson
6303 Wentz?

6304 A I'm sorry? I didn't understand the question.

6305 Q Were you involved in acquiring quarterback Carson
6306 Wentz?

6307 A It was actually Martin Mayhew's entire strategy.
6308 I called Martin after congratulating him. I was ecstatic
6309 about it, and they called me prior to the move and said
6310 we're doing this. I jumped for joy.

6311 Q Beyond congratulating him and jumping for joy,
6312 what, if anything, else was your involvement?

6313 A They called up -- we own the club, me and Tanya,
6314 and both Tanya and I called Carson Wentz and congratulated
6315 him. Went to dinner with Carson Wentz and his wife to
6316 welcome him to D.C., at our home.

6317 Q Is it your testimony that you were not heavily
6318 involved in acquiring Carson Wentz as quarterback?

6319 A No, I was not heavily involved in it, no.

6320 Q Were you moderately involved?

6321 A I was updated and kept informed, and supported
6322 the decision.

6323 Q Why did you give brief public remarks at the
6324 unveiling of the renaming of the Commanders in February?

6325 A I'm sorry?

6326 Q Why did you give public remarks at the unveiling
6327 of the Commanders' new name and new brand in February of
6328 this year?

6329 A It was a historic occasion. And mine were brief
6330 compared to some others.

6331 Q Were you involved in any way in unveiling the
6332 rebranding or the planning and the lead-up to?

6333 A Kept informed completely.

6334 Q How often?

6335 A Often. It was a big decision.

6336 Q What does "often" mean to you?

6337 A A few times a week.

6338 Q By whom?

6339 A Jason Wright, Tanya and whoever called.

6340 Q Can you give us an example of a day-to-day
6341 activity that you used to be involved in that you no longer

6342 are?

6343 A I can give you examples of what Tanya is doing
6344 day to day, if that's what you're asking for.

6345 Q Are those things things that you used to be
6346 involved in that you no longer are involved in?

6347 A As I said during all of this meeting, prior to
6348 Jason Wright, I was only there a certain amount of days,
6349 et cetera. And, in turn, after hiring Jason, we've
6350 obviously given our organization a great place. Can you
6351 repeat that question, though?

6352 Q The question is what day-to-day activities are
6353 you no longer involved in today that you were involved in a
6354 year ago when you were the sole CEO?

6355 A Oh. It's funny you say that, because I think if
6356 you asked Jason Wright, he would tell you that Tanya was
6357 sort of co-owner, co-CEO from the moment we met. And I
6358 think they always saw us together in the beginning and
6359 throughout the process of recruiting and hiring.
6360 And I can tell you what Tanya is doing today, things that I
6361 didn't do in the past, relying solely on the president of
6362 the club [Zoom audio interference] for a decade before
6363 Jason, and now we've got more of a leadership team, and
6364 Tanya is an important part of that, and we're doing some
6365 great, great things.

6366 Q Was Tanya made co-CEO on June 29, 2021?

6367 A That was the announcement, yes.

6368 Q That was just days before the July 1
6369 announcement, wasn't it?

6370 A Yes.

6371 Q Where it was announced officially; correct?

6372 A Yes.

6373 Q Did you have conversations with the NFL on or
6374 around June 29 or even in advance of that regarding your
6375 wife's change in responsibilities as co-CEO?

6376 A I don't recall.

6377 Q You testified earlier that you retained Vestry
6378 Laight -- is it Laight?

6379 A Laight.

6380 Q -- Vestry Laight prior to the conclusion of what
6381 was an investigation; is that correct?

6382 A Yes.

6383 Q According to public records, you retained Vestry
6384 Laight on June 3. Do you recall that?

6385 A That sounds right.

6386 Q Prior to the NFL approving Vestry Laight as the
6387 entity that would assist with fulfilling the remedial
6388 action in the July 1 announcement, did you have any
6389 conversations with the NFL about retaining a firm like
6390 Vestry Laight to perform any type of diversity equity
6391 inclusion work?

6392 A I can't recall.

6393 Q You testified Damon Jones was someone that you
6394 brought to join the leadership team in or around 2020,
6395 2021; correct?

6396 A Jason Wright. Yes.

6397 Q Did you have any role at all?

6398 A Yeah. He hired him.

6399 Q Did you approve that hire?

6400 A I recruited him.

6401 Q I'm sorry, can you repeat that?

6402 A I helped recruit him.

6403 Q He's no longer with the Commanders; correct?

6404 A He's at the Los Angeles Dodgers.

6405 Q You also announced that Julie Jensen would be
6406 joining the executive team. Does that sound right?

6407 A Yes.

6408 Q Is Ms. Jensen still employed with the team?

6409 A No.

6410 Q Why not?

6411 A I think the best person to ask would be Jason
6412 Wright.

6413 Q Do you need me to repeat my question?

6414 A I'm sorry, I didn't hear your question.

6415 Q My question for you is, why is Julie Jensen no
6416 longer with the team?

6417 A I would not be qualified to tell you based on
6418 my...

6419 Q Do you know why she's not employed with the team?

6420 A Not the particulars, no.

6421 Q Putting aside the particulars, what can you share
6422 with me about her departure?

6423 A I just know it didn't work out.

6424 Q What do you know about why it didn't work out,
6425 Mr. Snyder?

6426 A I don't have the details. I didn't work with
6427 her.

6428 Q Mr. Snyder, you committed to the Committee in
6429 advance of this deposition to provide full and complete
6430 testimony. So I'm going to ask you again, what can you
6431 tell me about the circumstances surrounding Ms. Jensen's
6432 departure?

6433 A I actually wasn't involved in her departure. So
6434 you need to ask Jason -- Jason Wright that question.

6435 Q You're refusing to tell me and refusing to answer
6436 the question?

6437 A I'm not refusing.

6438 Ms. Seymour. I think that's unfair. He doesn't know,
6439 and he's saying he doesn't know more.

6440 ██████████ I'm aware of what his response is. It's
6441 clear he has more to share. He wants me to go to a

6442 different source. I'm giving him an opportunity to provide
6443 full and complete testimony, as he represented that he
6444 would.

6445 By [REDACTED]

6446 Q This is directly relevant to the Committee's
6447 investigation. You have boasted about this leadership
6448 team. We're very interested in hearing about who you
6449 brought on and why they left. So if you have information
6450 about why Ms. Jensen left the Commanders, we would like to
6451 know. I'll give you that opportunity.

6452 A I just know it didn't work out. Not every single
6453 hire of Jason and the leadership team will work out. That
6454 one didn't work out.

6455 Q Is there anything else you can share, to the best
6456 of your knowledge, about what happened with Ms. Jensen?

6457 A I don't have any knowledge of day to day with
6458 Julie Jensen, if that's what you're asking. I don't
6459 understand the question.

6460 Q Is [REDACTED] still employed with the
6461 Commanders?

6462 A No. Jason let him go. I can't remember when.

6463 Q Why?

6464 A I think just performance. Something about
6465 numbers. I just know we're up in sponsorship 20-something
6466 percent and things are going really well.

6467 Q So he was let go because you're up in sponsorship
6468 and things were going well?

6469 A I believe so.

6470 Q What was [REDACTED] -- [REDACTED] title?

6471 A I think he was [REDACTED]. I don't
6472 remember the exact titles. He was the vice president.

6473 Q Just so the record is clear, is your testimony
6474 that since his departure, sponsorship has improved or
6475 increased?

6476 A Yes.

6477 Q Who is Gary Edwards?

6478 A Who?

6479 Q Gary Edwards.

6480 A I think he ran the Native American Foundation for
6481 a while. I believe.

6482 Q Does he still run the foundation?

6483 A No. We changed that I think in 2019, I believe.
6484 I don't remember exactly.

6485 Q Why is that?

6486 A We decided to go in a different direction. I
6487 think Jason Wright made a statement about that, I believe.

6488 Q Sitting here today, what was the different
6489 direction?

6490 A With all our charitable things we're doing, we
6491 decided to make a change.

6492 Q Are you aware that Mr. Edwards was accused of
6493 touching an employee in an offensive manner, giving her
6494 expensive gifts and asking her personal questions in 2014?

6495 A I heard about that later.

6496 Q How did you hear about it?

6497 A I think in the media.

6498 Q What did you hear?

6499 A I can't remember, but I believe it was in the
6500 media.

6501 Q When did you hear it?

6502 A I cannot recall.

6503 Q What, if anything, can you recall about either
6504 Mr. Edwards and the incident or the victim and the
6505 incident?

6506 A I have no recollection of that.

6507 Q Do you know if there was an investigation
6508 conducted?

6509 A No, I do not.

6510 Q Is there anything that would refresh your
6511 recollection?

6512 A I'm sorry?

6513 Q Is there anything that I can provide that would
6514 refresh your recollection?

6515 A I wasn't involved.

6516 Q Who is Karl Schreiber?

6517 A He is our CFO of our family office.

6518 Q Is he currently -- CEO or CFO?

6519 A CFO.

6520 Q Is he currently the CFO?

6521 A Yes.

6522 Q Has he ever been employed by the Commanders?

6523 A No.

6524 Q Why did Mr. Schreiber have an office at the
6525 headquarters in Ashburn, Redskins Park?

6526 A When I went to watch practice, he would come
6527 along, and he needed a place to work out of and then...

6528 Q Did you have Mr. Schreiber perform any job duties
6529 in connection with the Commanders and the operations of the
6530 team?

6531 A The only thing we had him do was when we hired
6532 coach Ron Rivera, we had to go through attorneys and keep
6533 it confidential because, as I said, we did interviews off
6534 campus. I wanted to keep that really confidential. And so
6535 had him involved in coordinating paperwork.

6536 Q That's the only thing that Mr. Schreiber has done
6537 in connection with performing job duties related to the
6538 Commanders organization?

6539 A He works on my taxes and financials and is
6540 involved in my -- we're an S Corporation, so it rolls into
6541 the family office. So he is involved in financial

6542 information.

6543 Q Who terminated Mr. Lafemina, Mr. Snyder?

6544 A I did.

6545 Q Why?

6546 A It was an obvious situation that he couldn't
6547 coexist with Bruce Allen, and I made the wrong decision.
6548 Terminated the wrong guy.

6549 Q I want to make sure I understand what you just
6550 said. You made the wrong decision about what exactly?

6551 A I said I made the wrong decision and terminated
6552 the wrong guy.

6553 Q Who terminated Mr. Allen?

6554 A I did.

6555 Q So is it your testimony that you terminated the
6556 right guy?

6557 A Later than I should have.

6558 Q Are you aware that Mr. Lafemina has testified
6559 that Karl Schreiber hand-delivered him his letter of
6560 termination?

6561 A No. That -- that's possible. We had Karl
6562 deliver something, I'm sure.

6563 Q A moment ago, you testified that the extent of
6564 his involvement was assisting with interviews, is that what
6565 you said, with Ron or Coach Rivera?

6566 A No, I didn't say interviews with Coach Ron

6567 Rivera. Paperwork.

6568 Q Paperwork. A moment ago, you said that was the
6569 extent of his involvement. And now you're testifying that
6570 he hand-delivers things to Commanders employees.

6571 Ms. Seymour. I'll object. I think he said there was
6572 additional involvement as well.

6573 By [REDACTED]

6574 Q Mr. Snyder, what were the duties that
6575 Mr. Schreiber had in relation to the Commanders' day-to-day
6576 operations?

6577 A Day-to-day operations? None.

6578 Q Public reports confirm that Mr. Schreiber
6579 participated in an investigation into allegations of sexual
6580 harassment against Gary Edwards. Are you aware of that?

6581 A No, I was not aware until I read that.

6582 Q So you are aware that there was an investigation
6583 that was conducted when you read it in the media. Is that
6584 your testimony?

6585 A I didn't recall. I can't remember the article.

6586 Q But now you do?

6587 A If you say -- if you say there was. I'm just
6588 repeating what you said.

6589 Q Did you or did you not read an article that
6590 detailed an investigation into allegations against
6591 Mr. Edwards?

6592 A I've heard about it. I did not read it, but I
6593 heard about it. I've heard it in the media.

6594 Q Would it surprise you to hear today that you had
6595 subjected the victim in that matter to a nondisclosure
6596 agreement?

6597 A I don't know.

6598 Q Well, we would request formally on the record
6599 that you release her and other victims from the Original
6600 Americans Foundation who are victims of Mr. Edwards from
6601 their NDAs so that they can communicate with the Committee
6602 regarding their allegations.

6603 Ms. Seymour. We'll take any of your requests under
6604 advisement.

6605 By [REDACTED]

6606 Q Now, a moment ago, Mr. Snyder, you said that you
6607 made the wrong decision by terminating Mr. Lafemina, but
6608 you made the right decision when you terminated Mr. Allen
6609 later.

6610 A I meant between the two, they couldn't coexist.
6611 I chose the wrong one.

6612 Q What do you mean by you chose the wrong one?

6613 A It was obvious that the two of them couldn't
6614 coexist, and I chose -- I terminated the wrong guy.

6615 Q Why do you believe that Mr. Allen, who was in his
6616 role after Mr. Lafemina was terminated, was the wrong guy

6617 to have retained, and why do you believe you made the right
6618 decision to let him go when Mr. Lafemina was no longer
6619 employed with your organization?

6620 A Because of the discovery -- discoveries, and our
6621 workplace culture. And as I mentioned, I think, earlier in
6622 this meeting, I talked about the statement of October of
6623 2019 when he said we have -- someone in the media asked him
6624 at a press conference if he fired Jay Gruden, and he said,
6625 "we have a damned good culture." I think I've said that my
6626 wife and I said, "no, we don't," that very night.

6627 Q What do you mean by "discoveries"?

6628 A I'm sorry?

6629 Q You said the reason why you think you made the
6630 wrong decision by firing Mr. Lafemina and holding on to
6631 Mr. Allen was because of the discoveries. What do you mean
6632 by "discoveries"?

6633 A The workplace environment culturally needed to be
6634 fixed, and that was fixed. And he was president of both
6635 sides, football and business, and ran the whole
6636 organization.

6637 Q You terminated Mr. Allen in December 2019. Is
6638 that correct?

6639 A Yes.

6640 Q And I believe you testified earlier that you were
6641 unaware of the allegations that were detailed in The

6642 Washington Post report, but was not published until
6643 July 16, 2020. Is that correct?

6644 A That's correct.

6645 Q So what culture are you referring to when you say
6646 that there was a workplace culture and you're suggesting
6647 that Mr. Allen was responsible for it in 2019?

6648 A I believe it's four or five days prior to
6649 termination of Jay Gruden, who was on TMZ smoking
6650 marijuana. And we knew we had a problem, obviously. He
6651 was the head coach.

6652 Q Mr. Allen was the head coach?

6653 A No. I'm referring to four or five days prior to
6654 the termination of Jay Gruden at a press conference where
6655 Bruce Allen said, we have a damned good culture, it was on
6656 TMZ, Coach Jay Gruden was smoking marijuana on a sidewalk
6657 somewhere. Crazy video. And we knew that it was an
6658 obvious signal there was a culture problem.

6659 Q The culture problem that you're referring to is
6660 Mr. Gruden smoking marijuana on TV?

6661 A No. I'm referring to, as I said, when Bruce
6662 Allen said -- answered the question, a damned good culture,
6663 we just didn't believe him.

6664 Q So what did you believe the culture to be when
6665 Mr. Allen defended the culture of your organization?

6666 A Not what he was saying.

6667 Q And why did you not think it was what he was
6668 saying?

6669 A Well, his head coach was on TMZ four or five days
6670 earlier. So we were doubting whatever he was saying.

6671 Q Other than the marijuana incident, what else can
6672 you point to that led you to believe there was a culture
6673 that Mr. Allen was responsible for, apart from him
6674 defending the Washington Commanders?

6675 A We just thought we had some work to do on the
6676 culture, and what we needed as a head coach was a mature
6677 culture-setting coach. We started there.
6678 As I mentioned, we hired Coach Rivera the beginning of
6679 2020. And as I also said earlier, we got to the business
6680 side -- and would have gotten there earlier too had it not
6681 been for COVID.

6682 Q I want to give you one last opportunity just in
6683 case maybe I'm unclear about the culture.
6684 The concern that you appear to have had about the culture
6685 at the Washington Commanders in or around 2019, is there
6686 anything that you can point to that led you to have
6687 concerns about the culture at the Washington Commanders
6688 under Mr. Allen's leadership apart from what we discussed?

6689 A I think what we discussed is substantial when the
6690 head coach is behaving that way. It's probably a
6691 substantial signal that you don't have a good culture in

6692 your organization.

6693 And, as I said, we started with the football organization.

6694 We hired a culture coach in Ron Rivera, and then we moved

6695 to the business side and hired Jason Wright.

6696 Q Who do you believe is responsible for the culture

6697 that existed prior to 2009 when Mr. Allen was hired?

6698 As you know, the Committee has heard directly from several

6699 former employees about incidents that occurred in 2004,

6700 2008 with the lewd videos, 2005 with the dinner and you

6701 placing your hand on Ms. Johnston's leg is her allegation.

6702 Who do you believe is responsible for that culture prior to

6703 Mr. Allen's arrival?

6704 A Is that the date from the -- you said 2005?

6705 Q I believe Ms. Johnston has said around 2005 or

6706 2006. The point being that it predates 2019 when Mr. Allen

6707 was fired.

6708 My question to you, Mr. Snyder, is who was responsible for

6709 the culture at that time?

6710 A Well, just to simplify, we own the franchise and

6711 we're responsible for all of those years, including Bruce

6712 Allen's years. And I've taken full responsibility.

6713 We apologized. And we've performed unbelievably, and we're

6714 trying to get better every day in our organization. I

6715 believe we are.

6716 Q Would you hire Mr. Allen back?

6717 A No.

6718 Q Why not?

6719 A I think for the obvious reasons. And the changes
6720 since he's been gone have been drastic, and we're proud.

6721 Q Respectfully, I don't know that the reasons are
6722 that obvious. So I'm asking you to indulge me by
6723 explaining what specifically you would point to as reasons
6724 not to hire Mr. Allen back to the Commanders.

6725 A It would be a long list. Substantial list. I
6726 think myself, Tanya Snyder, Jason Wright, Coach Rivera. It
6727 would be a big list. It's pretty obvious.

6728 Q Are you unable to give me any reasons as to why
6729 you would not hire Mr. Allen back for now?

6730 A Obviously we entrusted our franchise with him.
6731 We were, as I said earlier, not often around. And trusting
6732 him was a bad decision. And hiring the right people is
6733 critical, and we've done that.

6734 Q Do you believe Mr. Allen is responsible for the
6735 allegations that were detailed in the July 16, 2020 report
6736 regarding the toxic workplace culture?

6737 A We talked about -- I think you mentioned Alex
6738 Santos, Richard Mann, different scouts that were in that
6739 story. It was based on that story. So he hired them.

6740 Q So because he hired them, you blamed him; is that
6741 correct?

6742 A I'm not -- let me be clear. As I've said, we
6743 take responsibility in ownership of the franchise. We're
6744 not avoiding that. But he was -- he hired the coach with
6745 the TMZ thing. So obviously a lot of poor decisions.
6746 The only other thing I'd add in, obviously, is having
6747 learned well afterwards about all the homophobic,
6748 misogynistic emails that Bruce Allen participated in with
6749 Jon Gruden and others we did not know about and, obviously,
6750 those were rather shocking.

6751 Q Are you aware that Mr. Pauken has accused you of
6752 calling him gay because of his desire not to take over the
6753 cheerleading club when he was your COO?

6754 A I did not call him that.

6755 Q Are you refuting Mr. Pauken's testimony?

6756 A Yes.

6757 Q Have you ever used derogatory language about
6758 one's sexual orientation in the workplace toward a member
6759 of the Commanders organization?

6760 A I don't believe so. I don't recall.

6761 Q Have you ever used any derogatory language about
6762 one's sexual orientation directed at Mr. Pauken
6763 specifically?

6764 A No.

6765 Q Why did you or your agents search Mr. Allen's
6766 email account?

6767 A I'm sorry. I don't understand the question.

6768 Q Did you or someone working on your behalf collect
6769 emails from Mr. Allen's email accounts after he departed
6770 from the team?

6771 A I believe we did after the 1782 discovered that
6772 he was in communication with John Moag. And we delivered
6773 those to the National Football League.

6774 Q The emails that were collected, were they turned
6775 over to the NFL?

6776 A Yes.

6777 Q Why is that?

6778 A It was the right thing to do.

6779 Q I note that you keep looking around the room.
6780 I'm just curious, again, is it something about my
6781 questions? I want to make sure that I'm asking you --

6782 A I apologize. It's 1:30 or 2:00 in the morning
6783 here. I'm a little tired.

6784 Q So turning the emails over to the NFL were the
6785 right thing to do. Have you done that for any other
6786 employees of the Commanders, turn over their emails to the
6787 NFL?

6788 A I don't believe so. I'm not sure. I don't
6789 believe so.

6790 Q What made you think that turning those emails to
6791 the NFL was the right thing to do specifically? What was

6792 it about the emails? Did you find anything in the email
6793 that led you to believe that the NFL needed to know?

6794 A The behavior, it was obvious that I needed to do
6795 that.

6796 Q What do you mean by "the behavior"?

6797 A As I've said, the misogynistic, homophobic
6798 emails, discovered that and turned them over to the
6799 National Football League.

6800 Q Did you or anybody acting on your behalf leak the
6801 emails that you collected to the media?

6802 A No.

6803 Q Do you know if the NFL did?

6804 A I don't know who did.

6805 Q Was Mr. Allen part of the negative agenda that
6806 you had referenced in your August 26 statement?

6807 A I can't recall. I don't believe so. At the
6808 time, it was regarding the **Form** XXXXXXXXXX information.

6809 Q Did you make presentations to the NFL -- did you
6810 or anyone acting on your behalf make presentations to the
6811 NFL regarding Bruce Allen and his role in the toxic work
6812 environment, as you've described it?

6813 A I believe we did.

6814 Q Do you recall how many presentations you made to
6815 the NFL?

6816 A No. I do not.

6817 Q Did you participate in those presentations?

6818 A I don't recall if I did. I think I participated
6819 in one -- I know I -- I met Attorney General Lynch once or
6820 twice.

6821 Q I'll note for the record that we have not been
6822 produced the materials regarding the presentation that you
6823 made to the NFL regarding Bruce Allen. And to the extent
6824 you're maintaining that he was involved in the creation of
6825 the toxic work environment, we would want that information.

6826 Ms. Seymour. Just for the record, we haven't had any
6827 requests for any documents before today. So, again, we're
6828 in a cooperative posture.

6829 We're happy to take whatever requests back and see what we
6830 can produce. But this is the first time we're being asked.
6831 All the productions today, to my knowledge, have come from
6832 the NFL and not from the team and not from Mr. Snyder
6833 personally, nor have we been asked to provide anything.

6834 By [REDACTED]

6835 Q Mr. Snyder, as you are well aware, the Commanders
6836 have withheld over 40,000 documents from the Committee,
6837 relevant documents, documents collected by Ms. Wilkinson
6838 during the course of her litigation to your investigation
6839 that are directly relevant to our investigation.

6840 And if you are acting in good faith and attempting to
6841 cooperate with the Committee, as you say, we would like you

6842 to produce those documents to the Committee as soon as
6843 possible.

6844 It's been over eight months since we requested the
6845 documents, and we still do not have them. And there's no
6846 reason why the Committee should not have already received
6847 those documents. So we will renew our request on the
6848 record.

6849 Ms. Seymour. We have never been requested to produce
6850 any documents, and so we're happy to talk after this and
6851 see what it is that you believe that you're owed and to
6852 whom.

6853 And we're happy to address it, but I do want to say
6854 Mr. Snyder, I think, has answered the question, but I think
6855 that is a question. But he wouldn't be aware of anything
6856 because we're not aware of your request.

6857 As I understand it, the Holland & Knight
6858 attorneys are on the line; correct? Mr. Brownlee and
6859 Mr. Nash.

6860 Mr. Nash. Yes, I'm here. I'm falling asleep, but I'm
6861 here.

6862 Well, I'm glad you're not asleep because
6863 I think it's important that you hear that we're still
6864 waiting on the documents that were withheld from the
6865 Committee, over 40,000 documents from Ms. Wilkinson.

6866 Mr. Nash. Ms. Seymour is absolutely correct, there

6867 has never been a request for a single document from the
6868 team or Mr. Snyder.

6869 So we're happy to take any requests that you want to make
6870 of us, but to suggest that we have withheld any documents
6871 is absolutely untrue.

6872 [REDACTED] As you are aware, you have been reviewing
6873 documents for privilege that the NFL has produced to the
6874 Committee, and they have represented that 40,000 documents
6875 that would otherwise have been produced to the Committee
6876 have been withheld.

6877 I appreciate you taking it under advisement and I
6878 trust that you will work to get the documents as quickly as
6879 you can.

6880 By [REDACTED]

6881 Q I have one last question. Mr. Snyder, in March
6882 2021, a local sports radio station, 106.7, The Fan,
6883 received news that there was a draft report from the
6884 Wilkinson investigation that recommended several potential
6885 recommendations.

6886 The first one was to force the owner, you, to divest
6887 ownership in the team. Were you made aware of a draft
6888 report?

6889 A No.

6890 Q Is this the first time you're hearing that there
6891 was a draft report that was leaked to a radio station?

6892 A I've heard about what the radio station said.

6893 That's all I've heard.

6894 Q Did you hear that the radio station said that the
6895 recommendations from Ms. Wilkinson were to force you to
6896 divest your ownership of the team?

6897 A I've heard what the radio station said, yes. But
6898 that's all I've ever heard.

6899 Q Did you or anyone working on your behalf contact
6900 the radio station after the information was aired regarding
6901 the information that they shared publicly?

6902 A I don't believe so. I am not aware.

6903 Q Ahead of that July 1 announcement by the NFL, did
6904 you ever have occasion to discuss what sanctions the NFL
6905 was considering imposing as a result of the Wilkinson
6906 investigation?

6907 Ms. Seymour. Could you re-read that question. I
6908 missed that, I'm sorry.

6909 (Record read)

6910 Q To be clear, I mean did you discuss with
6911 Commissioner Goodell or the NFL the sanctions that they
6912 were considering?

6913 Ms. Seymour. As opposed to being informed shortly
6914 before the announcement went out?

6915 ██████████ I would like to hear both. If he was
6916 informed shortly before what the sanctions were, I would

6917 like to hear that. If he had discussions before that time,
6918 I would also like to hear that.

6919 Ms. Seymour. Do you understand the question?

6920 The Witness. No. Sorry. I'm fading a lot. So I
6921 don't understand the question.

6922 By [REDACTED]

6923 Q Did you have any discussions about these
6924 sanctions that were being considered against you before the
6925 July 1 announcement with the NFL?

6926 A I still don't understand the question.

6927 Ms. Seymour. I think she was trying to break down two
6928 time frames about the punishment associated with the NFL
6929 announcement, one at the time of the announcement or just
6930 shortly before, and another is before that, whether you had
6931 conversations about that. If I have that right.

6932 [REDACTED] That is correct.

6933 Ms. Seymour. Okay. That's what I think she's trying
6934 to get at.

6935 The Witness. As I said, I think our attorney spoke
6936 with them [Zoom audio interference] before we heard about
6937 the announcement and I heard about a list of 10
6938 recommendations. I have no knowledge of anything else.

6939 By [REDACTED]

6940 Q Could you repeat the last part of what you said.
6941 I missed that.

6942 A I said I have no knowledge of anything else

6943 [REDACTED] No further questions on our end.

6944 [REDACTED] So what's the status of how many more

6945 questions that you all have, [REDACTED]

6946 (Discussion held off the record.)

6947 [REDACTED] We are also done. We don't have any

6948 further questions.

6949 (Proceedings adjourned at 6:39 PM)

ERRATA SHEET p. 1

INSTRUCTIONS: After reading the interview transcript, please note any change, addition, or deletion on this sheet. DO NOT make any marks or notations on the actual transcript. Use additional paper if needed.

Investigation Name	The National Football League Investigation
Witness Name	Daniel Snyder
Date of Interview	July 28, 2022

PAGE	LINE	CORRECTION	APPROVED*
6	119	Sullivan ¹ / ₄ Cromwell	
15	351	"Not--more. <u>Not</u> anticipate."	
23	563	"Jason <u>and</u> the team."	
25	614	"everything to her, <u>to</u> solve that."	
28	685	" <u>un</u> fair"	
48	1190	change "tour" to " <u>Torah</u> "	
54	1332	change "████" to "████"	
54	1339	change "quorum" to " <u>Torah</u> "	
55	1358	change "assumed" to " <u>Zoomed with</u> "	
56	1380	change "a" to " <u>and</u> "	
58	1439	change "we're damned good" to " <u>we have a damned good culture</u> "	
58	1441	change "a" (before "football") to " <u>on the</u> "	
62	1527	change "him" to " <u>them</u> "	

161 1508 change "in Greg" to "is Greg"

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ERRATA SHEET

PAGE	LINE	CORRECTION	APPROVED*
63	1544	"it would be coaches for us from "	
64	1570	change "Zaidan" to " <u>Zeta</u> "	
67	1657	change "him" to " <u>them</u> "	
68	1667	change "Tanya's mother" to " <u>Tanya and his</u> <u>mother</u> "	
70	1717	[unknown - "Bonnie Jackson" is a transcript error. strike.]	
70	1720	"lawyer <u>s</u> "	
81	2001	insert "questions <u>reflect that</u> ."	
82	2022	change "of" to "on"	
82	2024	strike "that fact ^g "	
93	2298	insert " <u>This</u> is Karen Seymour."	
102	2535	"referring to <u>are</u> Ms. Scourby's"	
103	2560	change "reflected" to " <u>directed</u> "	
108	2688	change to "we thought <u>they</u> were"	

see
 Errata
 sheet
 # 4
 8/25/
 2022

DATE: 8/18/22

SIGNATURE: [REDACTED]

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ERRATA SHEET p. 2

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Investigation Name	The National Football League Investigation
Witness Name	Daniel Snyder
Date of Interview	July 28, 2022

PAGE	LINE	CORRECTION	APPROVED*
113	2810	change to " <u>she</u> was blown away"	
119	2943	change "foundation" to " <u>validation</u> "	
122	3026	"really funny. <u>And</u> all this stuff"	
126	3120	"That week of June —"	
139	3455	"if there was <u>an attorney</u> "	
143	3544	"to your staff's email"	
169	4202	strike "from"	
177	4415	change "Molly" to " <u>Mali</u> "	
178	4436 4437	insert "making <u>it</u> the best" add "bench be beefed <u>up</u> ."	
179	4457	change "he" to " <u>we</u> "	
158	3927	change "so" to " <u>which said</u> "	
184	4583	change "all the" to " <u>other</u> "	
189	4711	insert " <u>a meeting</u> "	

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ERRATA SHEET

PAGE	LINE	CORRECTION	APPROVED*
194	4818	should be "Wilmer Hale"	
214	5340	change to "McKinsey when"	
215	5344	insert " <u>for</u> which we did"	
215	5356	strike "a"	
215	5357	change to " <u>focused</u> "	
218	5418	change to "happy to do it <u>for</u>"	
239	5961	change "invested" to " <u>investigated</u> "	
238	5930-31	"companies <u>with</u> millions... dollars <u>of work</u> ,"	
241	5998	insert "Jason, and <u>I</u> wasn't in"	
243	6042	insert "to focus on <u>them</u> ."	
248	6178	change to "attorneys"	
250	6231	strike "you"	
253	6314	change "wet a" to " <u>went to</u> "	

DATE: 8/18/22

SIGNATURE: 

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ERRATA SHEET p. 3

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Investigation Name	The National Football League Investigation
Witness Name	Daniel Snyder
Date of Interview	July 28, 2022

PAGE	LINE	CORRECTION	APPROVED*
262	6526	insert "place to work out <u>of</u> "	
265	6601	change to " <u>Taking</u> your requests"	
262	6539	insert "involved <u>in</u> my"	
263	6559	change "He" to "We"	
266	6631-32	insert "needed <u>to be</u> "	
274	6826	strike "the"	
275	6858	Change to "Mr. <u>Nash</u> "	
275	6864	Change to "Mr. <u>Nash</u> "	

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ERRATA SHEET

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Investigation Name	The National Football League Investigation
Witness Name	Daniel Snyder
Date of Interview	July 28, 2022

PAGE	LINE	CORRECTION	APPROVED*
61	1508	change "in Greg" to "is Greg"	
69	1707	change "attorney" to "attorneys"	
70	1717	change "Bonnie Jackson" to "our lawyers"	
70	1717	change "Bonnie Jackson" to "finding the facts and then"	
79	1950	insert quotation marks before "you"	
79	1951	insert quotation mark after "things,"	
82	2023	change "league's" to " <u>League's</u> "	
93	2306	change "admit" to "take"	
104	2581	insert "a" after "time"	
136	3371- 3372	replace "[zoom audio interference]" with "I can't remember exactly"	
140	3485	change "Indian" to "India"	
141	3503+ 3504	same change as above: "Indian" to "India"	
146	3686	insert "the" before "Jeffrey"	

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ERRATA SHEET

PAGE	LINE	CORRECTION	APPROVED*
149	3692	insert "that" before "I was"	
181	4514	add "it" after "embraced"	
190	4734	change "Told" to "He told"	
190	4735	insert "not" before "the type"	
193	4808	change "Great" to "'Great'" (add quotation marks) ^ ^	
194	4822	should be "Witmer Hale"	
195	4866	change "It's" to "It has"	
204	5076	insert "of" after "heard"	
204	5086	change "culture, change transformation" to "cultural change and transformation"	
208	5189	change "Lafemina testified" to "Lafemina testified" [add a space]	
209	5197	change "no" to "a"	
213	5300	insert "it" change "that that" to "that it"	
214 218	5310 5422	change "the university" to "a university"	

DATE: 8/25/2022

SIGNATURE: 

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ERRATA SHEET

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Investigation Name	The National Football League
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PAGE	LINE	CORRECTION	APPROVED*
246	6121	change "we've" to "we"	
250	6217	change "it's [zoom audio interference]" to "if asked and is needed, I answer and try to be helpful."	
250	6224-6225	replace [zoom audio interference] with "advice and"	
265	6601	change "Take" to "We'll take"	
266	6623	Add quotation marks around "we have a damned good culture"	
266	6624	Add quotation marks around "no, no we don't"	
268	6678	change "[zoom audio interference]" to "and would have gotten there earlier if too had it not been for COVID."	
278	6934	replace "[zoom audio interference]" with "a night or two"	
278	6935	replace "[zoom audio interference]" with "And I heard about a list of 10 recommendations. I have no knowledge of anything else."	
278	6939	change "emails" to "anything else"	

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