



**Excerpts from the Deposition of
Bruce Allen**

September 6, 2022

Committee on Oversight and Reform

U.S. House of Representatives

December 2022

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On September 6, 2022, the Committee conducted a deposition of Bruce Allen, former President and General Manager of the Washington Commanders, from 2009 to 2019. Below are key excerpts from the deposition.

Mr. Snyder “Was Very Involved in the Entire Operation, in the Organization” and Warned: “I Want to Know Everything. Don’t Let Me Find Out About It.” (pp. 73-76)

- Q: Mr. Allen, what is your reaction to Mr. Snyder’s statement that he was a hands-off owner?
- A: I would disagree with that characterization.
- Q: So why does that not ring true based off your experience of Commanders?
- A: He was very involved in the entire operation, in the organization.
- Q: And would that hold true for football operations?
- A: That would hold true to the football operations as well, yes.
- Q: And for business operations?
- A: Yes, sir.
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- Q: Was there ever a time where you made a decision that Mr. Snyder felt you should’ve consulted him on that you did not?
- A: Yes, but not in that -- not in the assistant coach category.
- Q: Sure. What was that decision?
- A: It might’ve been a -- I forget, but from time to time he would remind me, ‘I want to know everything. Don’t let me find out about it.’ Maybe we put a claim in on trying to pick up a player on a waiver wire; or we’re talking about a trade that made the media, and he read it. He had to know about it.
- Q: And when you said that he wants to know everything, did this also hold true for the other people reporting to Mr. Snyder -- for example, the CFO, the head of business operations, ticket sales, the other heads of departments --
- A: Yes.
- Q: -- to your knowledge? Yes?
- A: Yeah.
- Q: And when you said you would consult with him on these matters, what does that mean?
- A: Discuss it with him, give him my thoughts on it. But he had final say on the outcome.

Mr. Snyder Was Responsible for “Morale Issues” at the Commanders in “Various Ways” (pp. 224-225)

- Q: Would you say that there was an issue with morale with the front office staff of the Washington Commanders during your employment?
- A: Oh, yes. At different times for different reasons, but yeah. And I assume that the employees liked Brian, because what they were looking for was some direction and Brian had a game plan of what to do with that. I sat in his first meeting -- he asked me to come to it -- when he addressed the entire staff, and he was received very well.

- Q: But the morale issues, was any of that, in your experience, tied to the way that Mr. Snyder ran his organization?
- A: Yes, in various ways. Yes.
- Q: And can you describe what those ways were?
- A: There was -- the compensation element seemed like it was an annual battle for the business side of it. And Brian was trying to address that as well.
- Q: By "compensation," do you mean that employees were underpaid?
- A: Well, I don't think -- I had never heard an employee complain about being overpaid.
But I think it was more than that, of maybe some of the commissions changed or something -- the formulas. They didn't appreciate the formulas that were being used or something like that. I can't really -- I shouldn't even try and guess. But it was compensation issues.
- Q: And who approved of those formulas that were used?
- A: Pardon me?
- Q: Who approved of the formulas that were used that affected compensation?
- A: Dan.

Mr. Allen Did Not Participate in the Wilkinson Investigation Because "No One Ever Said I Was Cleared from My Confidentiality Clauses in My Contract," and Had Mr. Snyder Wanted Him to Participate "He Would Have Asked Me to" (p. 128)

- Q: So do -- Beth Wilkinson was hired to investigate a number of allegations brought up -- it started with The Washington Post article, an expose on the cheerleaders. And then Beth Wilkinson was hired. Do you remember that occurring or hearing about it?
- A: Yes.
- Q: Did you speak with Ms. Wilkinson or anyone on her team in furtherance of that investigation?
- A: No.
- Q: Were you asked to speak to her?
- A: No, I was not asked. I think they reached out to some of the other lawyers that I've had to retain.
- Q: Did you want to participate in Ms. Wilkinson's investigation?
- A: I didn't -- when the Redskins were doing the investigation, it didn't make sense for me to participate. And no one ever said I was cleared from my confidentiality clauses in my contract.
Around that same time, ironically, the NFL asked me to testify on their behalf on a grievance with [redacted], a former player who put in a grievance. Covington asked me to testify for them. I did then have to retain a lawyer. Never does he tell me that the league has a common interest agreement with Snyder. Never tells me that during this whole thing. But I helped the league and testified.
So, if Snyder wanted me to talk to Beth Wilkinson, he would have asked me to.

The Washington Commanders Hired Private Investigators to Follow Mr. Allen (pp. 18-20)

Q: When you say that your coworkers and friends were spied on and harassed, what are you referring to?

A: In these documents that were provided me is some testimony. And it's just -- it's hard to read on what for some of these people -- and I don't know some of these people whose depositions I've read.

And it's -- I feel bad for my wife and my kids when I'm followed, but I just can't believe the other people were followed. And the team's been doing that the last 2 years.

Q: Are you referring to the private investigators?

A: Yes.

Q: And who do you understand was responsible for sending private investigators to follow, as you said, your coworkers and your friends and yourself?

A: Well, the one who followed me told me the Washington Football Team hired him.

Q: When were you followed by a private investigator, Mr. Allen?

A: Last year.

Q: Do you recall when, approximately?

A: Yes. It was in around -- well, I don't know when it started. I met him I think in -- right around beginning of March. But I don't know when it started and I don't know if it stopped.

Q: And how did you know the person who was following you was a private investigator?

A: My wife was concerned. We live in a -- we had just moved into a home. And the street's a real narrow street. It's hard two cars even to go by. And she saw a car out there the night before, and then in the morning it was there and it's running, the engine's running.

And I had made some coffee. And I went out. And the gentleman stepped out of the car and he said, "Hi, Mr. Allen."

I said, "Well, that's interesting. You need a cup of coffee? Are you here to serve me with a subpoena or something?"

He said, "No, we're just here to follow you," and something like "document your actions."

Q: Why did you ask if he was there to serve you with a subpoena?

A: I had no -- well, in the newspaper there were stories that Dan was trying to sue me for something at the time.

Q: Did this individual provide you any credentials?

A: Yes, ma'am.

Q: Did those credentials demonstrate that he was, in fact, a private investigator?

A: Yes. And he was a former FBI agent for a number of years, he told me, and his associate. There was another car parked down the block on the left side, because I guess there's two ways to get out of my neighborhood. And so they had another car in case I drove out the other way.

Mr. Allen Informed NFL In-House Lawyer Lisa Friel, Who Helped Oversee the Wilkinson Investigation, That Mr. Snyder Sent Private Investigators to His Home and She Was “Not Shocked” (p. 180)

- Q: So at some point did you relay to Ms. Friel that private investigators had approached you?
- A: Yes.
- Q: What was her reaction to that?
- A: I felt it was compassionate, but it was more of a, “I’m not shocked.” I think they’ve heard of with the other people. And I said, “I don’t know what you guys are doing with any of this, but this, it’s really getting out of control.”
- Q: What did she relate in response to you saying this was getting out of control?
- A: I believe she was sympathetic toward it.

Mr. Allen Reported Mr. Snyder’s Abuse of Federal Courts to the NFL’s Counsel, and She Agreed With Mr. Allen That Mr. Snyder’s Actions Were “Bad” and “Conduct Detrimental” to the NFL (pp. 177-179)

- Q: Who did you have a conversation with?
- A: Lisa Friel.
- Q: When did you have this conversation?
- A: I believe date wise it would be after they filed -- included some of my emails in their filing that we had just talked about a little while ago. And I called her and said something to the extent of, “Do you guys permit this. We have memos coming down from the league office about having people’s medical records and HIPAA violations and all of that, and you’re allowing people to use emails that have nothing to do with anything that he’s accusing me of.” And so I notified her.
- Q: And just because we weren’t on that call with Ms. Friel, what did you explain to her you thought Mr. Snyder was doing?
- A: Oh, I think it’s the same thing that I hate to tell you is going to happen within a week or two probably from now. It’s to intimidate me to shut up or -- I don’t know -- or to hand over my phone. At that time, once again, I don’t know about the common interest agreement between the league office and the Redskins. So I don’t know if she told Dan my conversation or Dan’s lawyer my conversation. I don’t know that.
- Q: So just so your testimony is clear, you said, “Does the league permit this?” What was “this” that you relayed to Mrs. Friel? What did you say to Ms. Friel that Dan Snyder was doing at that time?
- A: He was putting my private emails with conversations with friends or other people in his pleadings against me in this frivolous lawsuit about India.
- Q: And what did Ms. Friel say in response?
- A: She thought it was bad. She thought it was bad form, bad for the league. You know, he included things that, once again, have nothing to do with India, zero to do with India, in that article that ran about it.
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- Q: Did Ms. Friel relate to you that the league was going to take some action to stop this, considering that she agreed that it was not good behavior?
- A: Yes.
- Q: What did she say the league was going to do?
- A: She said that she'll get on it. She agreed it's bad. She thought it was conduct detrimental. It's bad.

The NFL's Counsel Informed Mr. Allen That Mr. Snyder Privately Blamed Him for "Everything" But That Mr. Allen Had Not "Been Accused of Anything" in the Wilkinson Investigation (pp. 180-181)

- Q: Did she ever share with you other information on your emails?
- A: Other than she told me, "We're aware of the emails." They weren't a part of the Wilkinson investigation. That the team gave them the emails and that there was a presentation at a -- I don't know if it was a league hearing or something between the league office and Dan where "he blamed you for everything."
- I said, "Well, how can I be blamed for things when I'm working in Tampa? How do I get blamed for things that happened before I got there?"
- And she goes, "We know your resume," noting that I wasn't there when the early serious allegations were made.
- Q: So she related to you that there was a presentation made by Mr. Snyder?
- A: Yeah, by either him or his lawyer. I forget.
- Q: Did she relate to you what was in that presentation?
- A: She said it was a PowerPoint, a PowerPoint or a slide show, one of the -- a phrase like that.
- Q: And what was the purpose of that presentation, to your knowledge?
- A: I guess to blame me for what happened.
- Q: And who was that presentation made to?
- A: I don't know if it was -- I don't know who was at it. She was. And either Dan presented it or his lawyer or his PR firm presented it. It was one of the three.
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- Q: Apology. And in your conversation with Mrs. Friel, did she convey to you that -- it seems like she conveyed to you that she understood that you were not responsible for the culture? Is that a correct understanding?
- A: Yes. The accusations of, that have all been well documented and well reported, happened before I was there. I was there for Alex Santos, that's true, but that wasn't why he got fined that amount of money.
- Q: Specifically in terms of Mrs. Friel's view of your involvement, did she have a view as to your involvement in the Washington culture that she conveyed to you?
- A: No. She didn't say anything to me that was negative. In fact, she said, "You haven't been accused of anything."

After Mr. Allen's Emails Were Leaked to the Wall Street Journal, Ms. Friel Informed Mr. Allen: "We Didn't Do It at The League Office. It Came Out of Their Side" (pp. 184-185)

- A: I called Lisa Friel after I got it, and I said -- she couldn't take my call initially. Because I thought I was giving them a heads-up about it, but I was adamant, "What the heck is going on here?"
- And you could tell that it was busy, because once again, it was 7 p.m. our time, so 10 o'clock your all's time, so -- or maybe it's 9. Maybe it's the time change thing. Maybe it's only 9 o'clock.
- But she says, "Yes, we're aware. It's bad."
- I said, "Well, who in the hell is giving my emails to The Wall Street Journal? Why don't I -- I'm the only person that doesn't have my own emails. Why?"
- And she went on to say, "We didn't do it at the league office. It came out of their side." And she said, "Well, you know, you don't look good with this."
- And I said, "Can someone tell me what it is? I don't even know what it is. There's something that he says is racist and homophobic in an email to me, but I have no idea what you guys are talking about."
- She read Coach Gruden's line, and I didn't understand what she read, because I didn't put together De Smith. I didn't understand who it was about, and I think it was because I'm angry.
- And she goes, "Yeah, this is a problem." And I've never talked to her since then.
- Q: When she said it came out of their side, what did you understand her to mean by that?
- A: She was saying her crew, all the crew that -- whoever the crew is on their side who have all my emails, including my mom's friends, didn't do it. So she's pointing a finger at the team -- unless there's another group who has my emails who I don't know.
- Q: So Lisa Friel was saying that the NFL hadn't leaked it and it had come from the team, to your understanding?
- A: Yes. Because there's only -- as far as I know, but I don't -- it's hard to believe. You would think there's two entities, and it's the entities that signed the common interest agreement.
- So whoever did it or whoever didn't do it knows exactly who did it, because they have to -- they both have to agree to do it or they both did it together.

Mr. Snyder Wanted Roger Goodell Removed from His Role as Commissioner (p. 161)

- Q: Understood. And was it your understanding that Mr. Snyder was upset over the national anthem controversy and that's why he wanted Commissioner Goodell removed?
- A: Yeah, but it seems like there's more to it than that. But yes.
- Q: What else was there to it?
- A: I don't, just there's a feeling that there was more angst than just the national anthem controversy, if that's what you want to call it.
- Q: And was the controversy between Mr. Snyder and Mr. Goodell or was the controversy in the public?

A: No, I'm saying it feels like there's some other things that Dan was upset about on top of the national anthem, if I'm saying that properly.

Mr. Snyder Sent Emails to Other Owners Lobbying Them to Remove Commissioner Goodell (p. 100)

Q: Did Mr. Snyder ever take any steps to convince other owners to replace Commissioner Goodell?
A: Well, he expressed his opinions in those emails we previously discussed.
Q: How did he express his opinion?
A: He would send an email that would just go to the owners in the league.

Mr. Snyder Once Remarked That He Was Going to Have Commissioner Goodell "Followed" to "Find Something Out About Him" (pp. 101-102)

Q: Did Mr. Snyder ever take any other steps to remove Commissioner Goodell, to your knowledge?
A: I'm sitting here once again talking to you all on this committee. You know, he says a lot of things, which I never would have put one and one together except that I'm sitting here. You know, he said at that time I'm going to follow – I'm going to have him followed, follow the Commissioner. You know, I'm going to find something out about him.
But, one, I didn't believe him, so it was like just one of those comments. Two, I never would have approved it, because if it came through finance and someone said, we're following the -- they never would have approved that, like they're doing now.
Now, after I read about everyone who's getting followed around the country, I don't know if it was true or not. I have no idea.

Q: Does this relate to the national anthem protests?
A: It could be, because that was one of the controversial times in the league.
Q: Is it around this time that he was sending those emails?
A: Yes.
Q: And it was around that time he suggested that he was going to have Commissioner Goodell followed?
A: He said it. I don't know if it's true or not. I know what happened to me and I know what happened to some of these other people in these depositions, but I don't know. But he said it.
Q: Where were you when he said this?
A: In his office.

Mr. Snyder Flew Mr. Allen to the League Office to Review Commissioner Goodell's Contract Because He Was "Unhappy at the Time" and Wanted Mr. Allen to See if "Roger Was Doing His Duties Properly" (pp. 98-99)

- Q: Mr. Allen, the question was, did Mr. Snyder ever share his views about Mr. Goodell's performance as commissioner with you?
- A: I believe so, yes.
- Q: And what were Mr. Snyder's views?
- A: They probably changed from time to time over the years.
- Q: Did he ever feel that Mr. Goodell was not performing adequately as commissioner?
- A: There was one time that he had Stephen Choi, our CFO, and me go with him to the league office to read Commissioner Goodell's contract.
- Q: And why did he have you do that?
- A: He was unhappy at the time, and I guess which I'd never known that owners have a right to do that. But you have to read it. You don't take a copy of it, a photocopy of it or anything. And he flew Stephen and I up there, and we read the contract.
- Q: And was the purpose of you reading Commissioner Goodell's contract?
- A: Really, for me to read it, it didn't mean anything to me. But at that time, I think he really wanted to see his compensation and what his duties, if Roger was doing his duties properly.
- Q: Did Mr. Snyder ever convey to you why he wanted you to read the contract?
- A: I don't know why he brought me to it. I am not a lawyer. I'm not a lawyer. So I have no idea why it would be me versus our general counsel.
- Q: Did he ever convey, to your knowledge, to Mr. Choi why he wanted him to read the contract?
- A: Well, he was the CFO, and I think Dan was looking for a better picture of the compensation he was receiving.

Mr. Allen Believed That Lawyers for Mr. Snyder Sent the Committee a Batch of Mr. Allen's Emails Containing Inappropriate Content the Night Before His Deposition to Send Him a Message to "Be Careful" (p. 17)

- Q: In the lead-up to this deposition, is there anything that Mr. Snyder or anyone acting on his behalf did, in your opinion, to discourage, threaten, or otherwise intimidate you in connection with your testimony?
- A: Well, leaking my emails randomly that involve family and friends and personal issues to different media outlets I think is – it's despicable, but I think it's also trying to send a message.
- Q: And what message do you think it's trying to send?
- A: "Be careful."
- Q: Be careful about what?
- A: There's – in these exhibits, I see there's things I don't remember from 10, 12 years ago that occurred. It's just saying he owns me with these emails, which

affect my coworkers, the alumni, my family and friends. So it hurts every time it goes out.

After Mr. Snyder Terminated Mr. Allen in December 2019, Mr. Snyder Accused Mr. Allen of Failing to “Congratulate Him” for Hiring Coach Ron Rivera (pp. 236-237)

Q: My question to you was, what happened between you and Mr. Snyder related to a text message regarding Coach Ron Rivera after your termination?

A: Dan said that he -- which I did. I text Ron's agent when they were -- before he was going to do the press conference, he was being announced as head coach, congratulations, hope you guys did well or hope you guys are happy or something like that and good luck to his agent, who's been a friend of mine for 40 years. Dan says I didn't congratulate him I think because he was standing next to the agent when he received the text and he thought for sure I would also text him and congratulate him.

I did not know that Frank -- that's the agent -- was standing next to Dan when I text him. I was in Arizona and the press conference was in Virginia. And I did not watch the press conference, so I had no idea, but it was before that went on.

Q: Did Mr. Snyder ask, as a term of some type of a settlement or resolution of the matter, that you send him a congratulatory text?

A: No. I pointed out to him that I congratulated him on getting Ron when he fired me. He told me that's where he was going with his decision. I don't -- I haven't looked for a while. The end of that was his email and my counsel exchanging emails saying it's over, the arrangement. And I'd have to go back and look at that email to see what's in there. But I didn't sign anything. It was just the two attorneys confirming that the money would be restored.

BDO, the Accounting Firm that Conducts the Commanders' Financial Audits, Was Also a Corporate Sponsor of the Team (p. 213)

Q: Does BDO sound familiar?

A: Yeah. They were also -- yeah, they were a sponsor of ours, so that would make sense.

Q: And when you say they're a sponsor of yours, what do you mean by that?

A: I think they had a -- I think they -- if I remember correctly, there was a sign with their logo on it.

Q: And is that to say that BDO, the company that conducts the independent audits of the team's financial statements, had purchased a suite with the Commanders or rents a suite?

A: They could have. I wouldn't know that. I've heard that name; that's all I'm telling you.

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4 COMMITTEE ON OVERSIGHT AND REFORM,

5 U.S. HOUSE OF REPRESENTATIVES,

6 WASHINGTON, D.C.

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11 DEPOSITION OF: BRUCE ALLEN

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Tuesday, September 6, 2022

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Washington, D.C.

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The deposition in the above matter was held via Zoom, commencing at 11:31 a.m.

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Present: Representative Biggs.

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2 Appearances:

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5 For the COMMITTEE ON OVERSIGHT AND REFORM:

6

7 [REDACTED] GENERAL COUNSEL

8 [REDACTED] COUNSEL

9 [REDACTED] COUNSEL

10 [REDACTED] COUNSEL

11 [REDACTED] CHIEF COUNSEL

12 [REDACTED] DETAILEE

13 [REDACTED] MINORITY COUNSEL

14 [REDACTED] MINORITY COUNSEL

15 [REDACTED] MINORITY COUNSEL

16 [REDACTED] MINORITY STAFF DIRECTOR

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19 For BRUCE ALLEN:

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21 STEPHANIE QUINCY,

22 GREENBERG TRAURIG LLP

1 [REDACTED] On the record. It's 11:31.

2 This is the deposition of Bruce Allen conducted by the House Committee on
3 Oversight and Reform. The deposition is occurring as part of the committee's
4 investigation into the Washington Commanders' toxic work environment and the NFL's
5 handling of that matter.

6 This investigation was launched to inform the committee's legislative efforts to
7 strengthen protections for employees across all workplaces, including legislative efforts
8 to prevent and address toxic work environments and workplace investigation processes,
9 strengthen protections for workers experiencing misconduct in the workplace, and
10 address the use of nondisclosure agreements to prevent the disclosure of unlawful
11 employment practices, including sexual harassment.

12 The person transcribing this deposition is a House stenographer and notary public
13 authorized to administer oaths. The stenographer will now place you under oath.

14 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
15 that the testimony you are about to give will be the truth, the whole truth, and nothing
16 but the truth?

17 The Witness. I do.

18 [Exhibit No. 1

19 Was marked for identification.]

20 [REDACTED] Before we begin, I will mark the subpoena as exhibit 1 and enter it
21 into the record.

22 Would the witness please state his full name and spell his last name for the
23 record?

24 The Witness. Gerald Bruce Allen, A-I-I-e-n.

25 [REDACTED] Mr. Allen, my name is [REDACTED], and I have been

1 designated majority counsel for this deposition. I am accompanied by [REDACTED], and he
2 is also majority counsel for the committee.

3 At this time, I will ask the additional individuals in the room and then on the Zoom
4 to introduce themselves for the record, starting with the majority staff. Please turn on
5 your video when introducing yourself.

6 [REDACTED] [REDACTED], majority counsel.

7 [REDACTED] [REDACTED], majority counsel.

8 [REDACTED] [REDACTED], majority staff.

9 [REDACTED] [REDACTED], majority staff.

10 [REDACTED] [REDACTED], minority staff.

11 [REDACTED] [REDACTED], minority staff.

12 [REDACTED] [REDACTED], minority staff.

13 [REDACTED] [REDACTED], minority staff.

14 [REDACTED] We are operating pursuant to committee rules, specifically rules --

15 Mr. Biggs. For your awareness, Congressman Andy Biggs, Arizona's Fifth

16 Congressional District.

17 [REDACTED]. Thank you, Mr. Biggs.

18 We are operating pursuant to committee rules, specifically rules 15 and 16, which
19 cover the guidelines for today's deposition. We previously provided Mr. Allen's personal
20 counsel with a copy of these rules.

21 I will now briefly review the ground rules for today's deposition.

22 The way questioning will proceed is as follows. The deposition will begin with
23 the majority asking questions of you for up to 1 hour. Thereafter, the minority will have
24 the opportunity to question you for an equal period of time. We will rotate back and
25 forth, 1 hour per side, until we are out of questions.

1 If you need to take a break at any time, please let us know. We are happy to
2 accommodate you. Ordinarily, we take a 5-minute break at the end of each hour of
3 questioning, but if you need a break before that, please do let us know.

4 To the extent there is a pending question, I would just ask that you finish
5 answering the question before you take a break.

6 Do you understand, Mr. Allen?

7 The Witness. Yes.

8 ██████████. Under the committee's rules, you are allowed to have an attorney
9 present to advise you. Do you have an attorney present with you today?

10 The Witness. Yes.

11 ██████████. Would counsel for Mr. Allen please identify themselves for the
12 record?

13 Ms. Quincy. Stephanie Quincy of Greenberg Traurig, representing Mr. Allen.

14 ██████████. As you can see, Mr. Allen, the stenographer is taking down
15 everything I say and everything you say to make a written record of this deposition. For
16 the record to be clear, please wait until I finish each question before you begin your
17 answer, and I will wait until you finish your response before asking you the next question.

18 The stenographer cannot record nonverbal answers, such as shaking your head, so
19 it is important that you answer each question with an audible, verbal answer.

20 Do you understand?

21 The Witness. Yes.

22 ██████████ You are required to answer all questions unless you are asserting a
23 privilege. To the extent you or your counsel object to a question to assert a privilege,
24 you must clearly state the specific privilege being asserted and the reason for the
25 assertion on or before the scheduled date of testimony.

1 Objections must be made in a nonsuggestive, nonargumentative manner.

2 Members of committee staff are not permitted to raise objections.

3 Mr. Allen, you may only refuse to answer a question to preserve a privilege
4 recognized by the committee and not for any other reason. For example, it is improper
5 to object to questions on the basis of confidentiality and/or concurrent litigation
6 interests.

7 Do you understand?

8 The Witness. I understand what you said, yes.

9 ██████████ The House of Representatives and the committee do not recognize
10 any common law nondisclosure privileges, including but not limited to deliberative
11 process privilege, attorney-client privilege, attorney work product protection, and any
12 purported contractual privileges, such as nondisclosure agreements.

13 Mr. Allen, do you understand?

14 The Witness. I understand what you said.

15 ██████████. The only assertions of executive privilege that the chair of the
16 committee will consider are those made in writing by an executive branch official
17 authorized to assert the privilege.

18 Do you understand?

19 The Witness. Yes, I understood what you said.

20 ██████████. If you refuse to answer a question on the basis of privilege, the
21 majority staff may either proceed with the deposition or seek a ruling from the chair on
22 the objection, by telephone or otherwise, during the deposition at a time of the majority
23 staff's choosing. If the chair overrules any such objections during the deposition, you
24 are required to answer.

25 Do you understand?

1 The Witness. I understand what you said.

2 ██████████. If you refuse to answer a question after being directed by the chair
3 in writing or orally during the deposition, as reflected in the record, you may be subject to
4 sanctions.

5 Mr. Allen, do you understand?

6 The Witness. Yes.

7 ██████████. We want to make sure that you answer our questions in the most
8 complete and truthful manner possible, so we are going to take our time. If you have
9 any questions or do not understand any of the questions, please do let us know. We will
10 be happy to clarify or rephrase our questions.

11 Do you understand?

12 The Witness. Yes.

13 ██████████. If I ask you about conversations or events in the past and you are
14 unable to recall the exact words or details, you should testify to the substance of those
15 conversations or events to the best of your recollection.

16 If you only recall a part of the conversation or event, you should give us the best
17 of your recollection of those events or parts of the conversations that you do recall.

18 Do you understand?

19 The Witness. Yes.

20 ██████████. Mr. Allen, because you have been placed under oath, your
21 testimony here today has the same force and effect as if you were testifying before the
22 committee.

23 If you knowingly provide false testimony, you could be subject to criminal
24 prosecution for perjury, making false statements, or other related offenses.

25 Mr. Allen, do you understand?

1 The Witness. Yes.

2 ██████████. Have you consumed anything, including medications, alcoholic
3 beverages, or other substances, that would impair your ability to testify truthfully today?

4 The Witness. No.

5 ██████████. Is there any reason that you are unable to testify truthfully today?

6 The Witness. No.

7 ██████████. Do you have any questions before we begin?

8 The Witness. I have a lot of questions. I have a lot of questions.

9 ██████████. Do you have any questions about the committee's ground rules
10 before we begin?

11 The Witness. Pardon me?

12 ██████████. Do you have any questions about the committee's ground rules?

13 Ms. Quincy. No. No, ma'am, not on the ground rules, but I have other
14 questions.

15 ██████████. ██████████, I do want to note something on the record from the
16 minority staff.

17 ██████████. Before you do that, Jessica, if you would allow me to finish.

18 ██████████. Oh, I thought you were done. Okay.

19 ██████████. Last evening at approximately 5:10 p.m., lawyers for Dan Snyder
20 from the Holland and Knight Law Firm produced to the committee documents collected
21 from the email account of Bruce Allen.

22 According to the law firm, which also offered to send the documents to Mr. Allen's
23 counsel, the emails were sent to the committee to, quote, "facilitate a full examination of
24 Mr. Allen," end quote.

25 The committee's majority staff did not request these documents from Mr. Snyder

1 or his counsel. Prior to this production, Mr. Snyder produced only a single document
2 requested by the committee to majority staff.

3 Mr. Snyder has not provided the committee's majority staff access to any other
4 documents, including those specifically requested by the committee's majority staff.

5 [REDACTED].

6 [REDACTED] Yes. I'd just like to note for the minority staff that we learned last
7 night at approximately 11 p.m. that this deposition was being recorded.

8 This is the first deposition or transcribed interview in this investigation that is
9 being recorded in such a manner, and it is, in fact, I believe the first one this Congress
10 before this committee. And, in fact, I don't think this committee has ever recorded,
11 outside of doing a transcript, a deposition or a transcribed interview before in the history
12 of this committee.

13 So we are in novel territory recording this Zoom deposition. There was no prior
14 discussion with minority staff about this decision. So we're noting that for the record,
15 that we're in this unprecedented nature of recording a deposition in this manner.

16 [REDACTED]. It's 11:43 a.m. The majority staff will now begin its questioning.

17 EXAMINATION

18 BY [REDACTED]:

19 Q Mr. Allen, do you know why you're here today?

20 A Yes. I'm here because of the common interest agreement that was signed
21 by the league office and the Redskins.

22 Q What are you referring to when you say the common interest agreement?

23 A I read that the NFL and -- well, the league office and the Redskins made a
24 common interest agreement surrounding the Beth Wilkinson investigation. And from
25 there, it grew into something that I don't know how to explain.

1 Q Why do you believe that the committee sought your testimony today?

2 A Pardon me?

3 Ms. Quincy. We're having a little bit of difficulty hearing you. The other people
4 are coming through at a pretty good volume. So I don't know if it's -- candidly, I don't
5 know if it's the mask, I don't know if it's your sound system. But if you could speak up,
6 that would be great. We have our system turned up as high as it can go.

7 [REDACTED]. Sure.

8 BY [REDACTED]:

9 Q Mr. Allen, why do you believe the committee sought your testimony today?

10 A I would suspect just to have another opinion of everything you're
11 investigating.

12 Q Are you aware that the committee launched this investigation after emails
13 from your Commanders email account containing offensive language and content
14 between you and former Raiders coach Jon Gruden, as well as others, and between you
15 and NFL's general counsel Jeff Pash were leaked to the media?

16 A Yes, I am aware.

17 Q The emails were referenced in an October 2021 Wall Street Journal article as
18 well as New York Times article.

19 Mr. Allen, are you aware of the email that I'm referring to?

20 A I didn't hear the last part of what you said.

21 Q Are you aware of the emails that I am referring to?

22 A Yes, ma'am.

23 Q Mr. Allen, why did you send those emails?

24 Ms. Quincy. Objection, compound question.

25 The Witness. Do I answer?

1 Ms. Quincy. You can answer if you can.

2 The Witness. You know, the report that Congress published where it said that
3 the league office and the Redskins utilized my emails to create a scapegoat to cover up
4 for their actions is accurate. And, unfortunately, it smeared a lot of people.

5 [REDACTED] And so the emails that you recognize from the October 2021 Wall
6 Street Journal and New York Times articles, I was asking about those emails and what
7 your explanation is for sending those emails in the context of your employment with the
8 Commanders.

9 Ms. Quincy. Let me just inject.

10 First of all, I'm still having trouble hearing you. It's very difficult to hear you.

11 I also want to say you are talking about a bunch of different emails. And we are
12 going to be very, very careful in giving testimony under oath and to speaking accurately.

13 There are several emails that were released. The one involving Mr. Gruden, for
14 example, there is nothing inappropriate that Mr. Allen wrote in that email.

15 Asking a question of why he sent a number of different emails is a compound
16 question.

17 So I understand this may be background, but Mr. Allen very much wants to testify
18 precisely. So if you can ask a more precise question, you will get a more precise answer.

19 [REDACTED]. And, Stephanie, I would ask that you keep your speaking
20 objections to a minimum. And as we went over during the ground rules, there are
21 specific bases for objections, and objecting on the basis of a compound question is not a
22 legitimate objection for purposes of this deposition.

23 Ms. Quincy. Okay. Well, then I will object to the form of the question, that it is
24 unintelligible and that it calls for speculation, because you are asking him a specific
25 question about many, many different emails, and you're asking for one answer addressing

1 many different emails.

2 I just want to be very clear about this. If this is going to be an exposition into
3 those particular emails and why they were sent, many of them nearly a decade ago, we
4 are going to have a very short day.

5 Go ahead and re-ask your question, and if the witness can answer it, he will.

6 [REDACTED] Our expectation is that Mr. Allen will cooperate with the
7 committee, as he has agreed to do, and provide full and complete testimony.

8 BY [REDACTED]

9 Q So I'm going to re-ask my question, Mr. Allen, which is, the emails that you
10 acknowledge that you recall from the Wall Street Journal and the New York Times
11 articles, my question is, why did you send the emails that were referenced in those
12 articles?

13 A According to the Wall Street Journal and the NFL league office, there are
14 650,000 emails in the bunch. I received an email from The Wall Street Journal hours
15 before they published it saying that they had their hands on some of my emails and
16 wanted to know if I could comment on them. I didn't even know what emails they were
17 talking about because I don't have my emails.

18 Q So is your testimony today that you don't recall the emails that were
19 referenced in those articles?

20 A They -- the emails from The Wall Street Journal had three different subjects,
21 and they wanted me to call them that night, and I did not call them.

22 Q I will move on.

23 Mr. Allen, did you have anything to do with the emails that were leaked to The
24 Wall Street Journal or The New York Times?

25 A No, ma'am.

1 Q Do you know who did?

2 A That was one of my questions I had earlier. No, I don't.

3 Q You left the team in December -- and by team, I mean the Washington
4 Commanders -- in December of 2019. Is that correct?

5 A Yes.

6 Q Was your departure tied in any way to the mistreatment of employees,
7 including allegations of sexual harassment or bullying of the Commanders' employees?

8 A You need to start at the beginning again with that. It's my -- it's the sound
9 that I'm missing.

10 Ms. Quincy. We really are having a hard time hearing you. It is tremendously
11 muffled.

12 [REDACTED] Can we go off the record 11:51?

13 [Discussion off the record.]

1 ██████████ We're back on the record. It's 11:54.

2 BY ██████████:

3 Q Mr. Allen, before we went off the record, I had asked you about your
4 departure in December of 2019.

5 Was your departure tied in any way to the mistreatment of employees, including
6 sexual harassment or bullying of Commanders employees?

7 A No, ma'am.

8 Q After your separation from the team, did The Washington Post or any other
9 media outlet name you as a former team executive responsible for harassing or bullying
10 employees, to your knowledge?

11 A No, ma'am.

12 Q Did you conduct yourself or do you believe that you conducted yourself
13 appropriately in the Commanders' workplace at all times?

14 A Yes.

15 Q And what do you mean when you say "yes"?

16 A I was proud of the relationships I had with my coworkers and appreciate
17 them, and I still appreciate them today.

18 Q Sitting here today, what if any regrets do you have about sending emails,
19 including those that were leaked by The New York Times and The Wall Street Journal, as
20 the former president of a professional football team?

21 A Well, there's 650,000, allegedly, emails. And some of them probably have
22 things I wish I would have thought before sending. But since only about 30 or 40 of
23 them have appeared, I would imagine the rest are good, I guess.

24 Q Mr. Allen, does Mr. Snyder or his attorneys know that you're here today
25 testifying before the committee?

1 A Excuse me? Say it again, please.

2 Q Does Mr. Snyder or do his attorneys know that you are here today testifying
3 before the committee?

4 A Yes, ma'am.

5 Q And how do you know that?

6 A My counsel informed his counsel of the subpoena, and it's in the media.

7 Q Did you have an obligation to notify Mr. Snyder about testifying before the
8 committee?

9 A You'd have to ask my counsel.

10 Ms. Quincy. I know that you have been working with Mr. Snyder. And because
11 we got information that Mr. Snyder's counsel had provided both the minority and the
12 majority committee with information that they wanted used to examine Mr. Allen, has
13 anyone approached Mr. Snyder or his counsel about being willing to waive any
14 nondisclosure or confidentiality agreements Mr. Allen may be under in this deposition?

15 [REDACTED]. Ms. Quincy, you are not the witness here. So my questions are
16 directed at Mr. Allen. I would appreciate if you have a question to direct that to your
17 client off the record. But if you would like clarification on something that I have asked
18 Mr. Allen, feel free to ask that clarification if it's helpful to assist him in his testimony.

19 With respect --

20 Ms. Quincy. It would be helpful if you or [REDACTED] could answer the question.
21 You interviewed Mr. Snyder. You both have been in direct communication with his
22 counsel. You both are well aware and this full committee is supposedly investigating
23 Mr. Snyder's use of nondisclosure and confidentiality agreements.

24 Was anything done to make sure that Mr. Allen could give full, complete, and
25 truthful testimony today without fear of retribution by Mr. Snyder pursuant to any

1 agreement?

2 That's an important question that both you and [REDACTED] can answer, and if you
3 want full, complete, and truthful testimony from Mr. Allen, something that we would like
4 some reassurance on.

5 [REDACTED]: Mr. Allen, I'm going to re-ask my question to you.

6 Are you under a nondisclosure agreement?

7 Ms. Quincy. You may answer that question yes or no.

8 The Witness. Nondisclosure agreement. There's a confidentiality clause in
9 contracts, yes.

10 BY [REDACTED]:

11 Q So before testifying here today, were you required to provide notice to the
12 Commanders or Mr. Snyder before giving your testimony here today?

13 A Yes, we did.

14 Q My question is a little bit different. Were you required to, pursuant to the
15 agreement between you and the Commanders?

16 A Yes, and we did.

17 Q Mr. Allen, did Mr. Snyder or anyone acting on his behalf attempt to
18 discourage, threaten, or otherwise intimidate you in connection with your testimony
19 today?

20 A Today? No.

21 Q In connection with your testimony that you're providing today, at any time
22 before today's deposition.

23 A Well, I think everything I've gone through for the last 2 years is sending a
24 message, yes, to me.

25 Q And what do you mean by that?

1 A Well, this is the fourth time I've had to engage counsel to deal with different
2 issues that have come up since I've left the Redskins.

3 Q And we will, during the course of this deposition, get to the issue that you
4 just referenced.

5 A Is that a question?

6 Q No.

7 In the lead-up to this deposition, is there anything that Mr. Snyder or anyone
8 acting on his behalf did, in your opinion, to discourage, threaten, or otherwise intimidate
9 you in connection with your testimony?

10 A Well, leaking my emails randomly that involve family and friends and
11 personal issues to different media outlets I think is -- it's despicable, but I think it's also
12 trying to send a message.

13 Q And what message do you think it's trying to send?

14 A "Be careful."

15 Q Be careful about what?

16 A There's -- in these exhibits, I see there's things I don't remember from 10, 12
17 years ago that occurred. It's just saying he owns me with these emails, which affect my
18 coworkers, the alumni, my family and friends. So it hurts every time it goes out.

19 Q And when you were referring to "these exhibits," are you referring to the
20 documents that Mr. Snyder's counsel provided the committee yesterday evening?

21 A Yeah, that's some of them. Yes, ma'am.

22 Q Mr. Allen, are you concerned about what Mr. Snyder or others acting on his
23 behalf may do to you as a result of your testimony here today?

24 A Yes.

25 Q Why is that?

1 A Once again, this is the fourth time, and it's -- I go back to your -- the
2 Congress report. You know, it's for somehow -- trying to scapegoat other people for
3 their actions doesn't make sense.

4 Q And when you are referring to scapegoating for other people's actions, what
5 specifically are you referring to, Mr. Allen?

6 A Well, a number of the issues that have been brought to light by your
7 committee or that you can read in the press, some of the most egregious actions of
8 whatever occurred on that airplane and propositioning people and propositioning a
9 cheerleader and having prostitutes and the ticket issues and all of that all occurred before
10 I was even with the Redskins.

11 And then afterwards, all my coworkers and myself being followed and spied on
12 and harassed have occurred after I left the Redskins. So I don't -- I would imagine it'll
13 continue.

14 Q When you say that your coworkers and friends were spied on and harassed,
15 what are you referring to?

16 A In these documents that were provided me is some testimony. And it's
17 just -- it's hard to read on what for some of these people -- and I don't know some of
18 these people whose depositions I've read.

19 And it's -- I feel bad for my wife and my kids when I'm followed, but I just can't
20 believe the other people were followed. And the team's been doing that the last 2
21 years.

22 Q Are you referring to the private investigators?

23 A Yes.

24 Q And who do you understand was responsible for sending private
25 investigators to follow, as you said, your coworkers and your friends and yourself?

1 A Well, the one who followed me told me the Washington Football Team hired
2 him.

3 Q When were you followed by a private investigator, Mr. Allen?

4 A Last year.

5 Q Do you recall when, approximately?

6 A Yes. It was in around -- well, I don't know when it started. I met him I
7 think in -- right around beginning of March. But I don't know when it started and I don't
8 know if it stopped.

9 Q And how did you know the person who was following you was a private
10 investigator?

11 A My wife was concerned. We live in a -- we had just moved into a home.
12 And the street's a real narrow street. It's hard two cars even to go by. And she saw a
13 car out there the night before, and then in the morning it was there and it's running, the
14 engine's running.

15 And I had made some coffee. And I went out. And the gentleman stepped out
16 of the car and he said, "Hi, Mr. Allen."

17 I said, "Well, that's interesting. You need a cup of coffee? Are you here to
18 serve me with a subpoena or something?"

19 He said, "No, we're just here to follow you," and something like "document your
20 actions."

21 Q Why did you ask if he was there to serve you with a subpoena?

22 A I had no -- well, in the newspaper there were stories that Dan was trying to
23 sue me for something at the time.

24 Q When the individual said that, "We are here to follow you," what, if
25 anything, did you say in response?

1 A Please restate that.

2 Q Can you read back the record, please?

3 [The reporter read back the record as requested.]

4 A I said, "Why didn't you help me?" I was moving boxes from our rental
5 home into our new home. And I asked, "Why didn't you help me move those boxes if
6 you've been following me?"

7 Q Did the individual respond to that?

8 A He said, "That's not my job."

9 Q Other than following you around, did he explain what his job was?

10 A No. That was it, to document my travels and I guess who I meet with.

11 Q Did this individual provide you any credentials?

12 A Yes, ma'am.

13 Q Did those credentials demonstrate that he was, in fact, a private
14 investigator?

15 A Yes. And he was a former FBI agent for a number of years, he told me, and
16 his associate. There was another car parked down the block on the left side, because I
17 guess there's two ways to get out of my neighborhood. And so they had another car in
18 case I drove out the other way.

19 Q And remind me, did this former FBI agent turned private investigator inform
20 you that he was sent on behalf of Mr. Snyder or the Washington Commanders?

21 A He said the Washington Football Team, which they weren't the Commanders
22 yet and they weren't the Redskins. They were the Washington Football Team.

23 Q Other than that incident, did you have any other interactions with those
24 individuals or others?

25 A Well, I was going back to the rental house that morning. And I told him, I

1 said, "Just to make it easy, I don't want you to think I'm running away from you. I'm
2 going to that rental house to get some more boxes."

3 And he followed me there. And when I got to the house, there was another one
4 of his associates also there. And they just observed me moving boxes into the car.

5 Q What was your reaction to having two individuals with whom you had not
6 interacted prior to that date, as I understand it, that you understood were sent by the
7 Washington Football Team, what was your reaction to that?

8 A I thought it was despicable. And it's worse for others. I don't know if they
9 followed my wife. I don't know. I do not know that. But when I've read some of
10 these other testimonies, I felt for people who went through similar situations.

11 Q Other than what you shared with us, during that encounter was there any
12 other exchange of communication or engagement with those individuals who visited your
13 home that day?

14 A No, ma'am. I have his business card if you need it.

15 Q Do you recall the individual's name?

16 A Yeah. [REDACTED]. I looked it up after -- he gave me his card. And he
17 was cordial. And they have an impressive company here in Arizona.

18 Q And when [REDACTED] said that the Washington Football Team had sent
19 him, did you understand that to mean that he was sent on behalf of Mr. Snyder?

20 A I can't answer that. They're paying the bills for it, so whoever pays the bills
21 is responsible for it.

22 Q Do you have any reason to believe that there would be anyone other than
23 Mr. Snyder who would send private investigators to follow you?

24 A I don't know.

25 Q Do you know how long the private investigators followed you?

1 A No, ma'am.

2 Q Other than the encounter you just mentioned, were there any other
3 incidents where you identified private investigators following you?

4 A Well, in this new home -- and our neighbor pointed it out to us -- that there
5 were drones outside of our back of our house. And they were sitting there, which look
6 into -- we didn't have any window coverings or curtains or shades yet -- could look into
7 the house.

8 And so they were monitoring that, because they showed one of the workers at our
9 home a photo of me in the house, and they asked this worker, "Tell us about Bruce Allen."

10 Q Did the neighbor, in fact, tell them about you?

11 A No, it wasn't the neighbor. It was the construction worker they
12 confronted. And he was nervous. I mean, he was scared, thinking he did something
13 wrong. And I assured him -- actually, my wife assured him that don't worry about it.

14 Q Do you know if the construction worker provided the private investigator
15 any information about you?

16 A No, I don't.

17 Q Did that happen on the same day or a different day as the incident you
18 previously testified about?

19 A I don't know what date that happened. We heard the story subsequent to
20 when I went out to meet the gentleman.

21 Q When you say "went out to meet the gentleman," you're referring to the
22 private investigator?

23 A Yes. Yes, ma'am.

24 Q I believe you testified that that happened in March. Was that March of
25 2021?

1 A You know, during the next break, I'll find the dates of it.

2 Q So other than the incident where the private investigators came to your
3 home and the incident where the private investigators approached your -- or a
4 construction worker near your home, were there any other run-ins with private
5 investigators that you're aware of that were sent by the Washington Commanders?

6 A Not that I know of. But, once again, if they're good, I don't know where
7 they're following me.

8 Q We'll come back to the incidents that happened with your coworkers and
9 your friends and the private investigators, but I'd like to move on for this moment.

10 I want to talk a little bit about your employment history with the Commanders. I
11 understand prior to joining the Commanders, you were with the Tampa Buccaneers. Is
12 that correct?

13 A Yes, ma'am.

14 Q Do you recall when you began your employment with the Commanders?

15 A When I began with the Commanders?

16 Q Right.

17 Ms. Quincy. Do you mean the Buccaneers?

18 [REDACTED] No, the Washington Commanders.

19 The Witness. Correct. I joined the Redskins, it wasn't the Commanders, in
20 2000 -- December 17th, 2009.

21 BY [REDACTED]

22 Q And for purposes of this deposition, I will refer to the team as the
23 Commanders, but that certainly is in reference to the Washington Redskins, the
24 Washington Football Team, and now the Washington Commanders.

25 A Right.

1 Q How did you learn of the opportunity that was made available to you with
2 the Commanders?

3 A Dan Snyder reached out to me, and we just had a general conversation at
4 some point in the season.

5 Q So is that to say that Mr. Snyder reached out to you while you were
6 employed with the Buccaneers?

7 A Oh, no, ma'am. No, ma'am. When I was -- I was let go of the Buccaneers
8 in January of 2009. And in football terms, that makes you a free agent, where you can
9 talk to any team about anything at any time. There was no whatever you call the
10 contractual restriction.

11 Q Do you recall how soon after you were let go by the Buccaneers that Mr.
12 Snyder reached out to you to have a conversation?

13 A Not off the top of my head.

14 Q Did you know who Dan Snyder was before you had a conversation?

15 A Yes, ma'am.

16 Q Had you had interactions with Mr. Snyder before he reached out to you
17 about employment with the team?

18 A Yes, ma'am.

19 Q How would you describe your interactions with Mr. Snyder prior to joining
20 the team officially?

21 A Similar to various league meetings during the year when I was with the
22 Raiders, which is before Tampa. He acquired the football team. And at different
23 league meetings you meet all the owners and at different times you're talking to all the
24 various owners. And I had met him at several of those meetings.

25 Q And how would you describe your interactions with him at those league

1 meetings?

2 A It was cordial. You know, I congratulated him the day he got the
3 franchise -- I was with the Raiders at the time -- because, to me, the Redskins were a
4 prestigious team in the league.

5 Q After Mr. Snyder reached out to you about employment with the team, did
6 you have conversations with anyone else in the league or outside the league about
7 whether you should take the role that was being offered?

8 A Well, during that time -- you know, like, I wasn't ready to retire. And I
9 spoke to a lot of people in the league and discussed. But most of the time, you don't
10 know where the opportunity is going to be until the season ended.

11 So in January is when most teams, if they're going to release a GM or a coach, is
12 when the job market usually opens up. And so it was a unique time to get hired in
13 December. You know, I believe they had three games left in the season when he had
14 released his previous general manager.

15 Q After that first conversation with Mr. Snyder -- and I know you can't recall
16 the timing at this moment -- did you have any other conversations with Mr. Snyder about
17 coming to the Washington Commanders? In other words, how many conversations did
18 you have with Mr. Snyder before officially joining the team?

19 A Oh, probably ten.

20 Q Were those conversations -- how did those conversations take place?

21 A Over the phone a few times, and then we met a couple times.

22 Q Do you recall what Mr. Snyder told you about joining the team and what he
23 was willing to offer?

24 A Do I recall -- say it again, please.

25 Q Do you recall what Mr. Snyder told you about why he wanted you to join the

1 team and what he was willing to offer?

2 A He never really offered until the end. But he talked about how he wanted
3 to win and respect the history of the franchise, which, obviously, I grew up being a ball
4 boy for the team, so I appreciated that. That's generally what he talked about.

5 Q When you say you grew up being a ball boy, what do you mean by that?

6 A I was a ball boy. You pick up dirty laundry, dirty jock straps, and get the
7 balls and fetch them and do whatever somebody tells you to do.

8 Q Did you have a connection with the Washington Commanders prior to being
9 hired by Mr. Snyder?

10 A My dad was the coach of the Redskins in the '70s.

11 Q Did that in any way inform your desire to join the Commanders when you
12 ultimately joined in December of 2009?

13 A Absolutely.

14 Q Did anyone ever caution you against joining the Commanders franchise
15 before you agreed to the opportunity?

16 A I don't know if I gave anyone the opportunity to do that.

17 Q What do you mean by that?

18 A Is that a question?

19 Ms. Quincy. That's a question.

20 The Witness. What was it?

21 Ms. Quincy. What do you mean by that?

22 The Witness. Oh, I think it came together at the end so quickly on whether I
23 should go or not go, I don't know who I would have had that conversation with.

24 BY [REDACTED]:

25 Q Did you have any concerns about working for the Washington Commanders

1 before joining?

2 A No.

3 Q What role were you hired into when you ultimately joined the Washington
4 Commanders?

5 A General manager.

6 Q Who made the decision to hire you?

7 A Dan Snyder.

8 Q Anyone else?

9 A No. He's the principal owner.

10 Q What, if anything, did you understand your job entailed as a general
11 manager with the Washington Commanders?

12 A Generally, to supervise and manage the scouting department, the training
13 staff, assist the coaches in anything they needed, player acquisitions. And that was
14 about it when I first got there. But my contracts, all of them say that I work at the
15 direction of the principal owner and might be given different tasks from time to time.

16 Q Mr. Allen, I'm going to direct you to a document which has been pre- marked
17 AV, A as in Adam, V as in violet, as well as AW, A as in Adam, W as in Walter.

18 A AB?

19 Ms. Quincy. AV as in vowel and --

20 The Witness. Vowel.

21 [Exhibits Nos. 2 and 3

22 Were marked for identification.]

23 [REDACTED]. AV as in vowel will be marked exhibit 1. AW as in Walter will be
24 marked exhibit 2. Excuse me, exhibit 2 and 3.

25 Ms. Quincy. Hang on one second. I think they may be -- I think they may be in

1 another room. Could we take a short break right now and I'll run and grab those two?

2 Oh, wait a minute, here they are. V and W, W and V.

3 The Witness. I got them.

4 Ms. Quincy. Okay, these are 1 and 2?

5 [REDACTED]. Exhibit 2 and 3. AV as in vowel will be 2, and AW will be 3.

6 So starting with exhibit 2, this document was produced by the Washington -- the
7 counsel for Mr. Snyder to the committee yesterday evening.

8 I will give you a moment to review exhibit 2. Please let me know when you're
9 done.

10 The Witness. This one's 2?

11 Ms. Quincy. This is 2. No, this is 2, this is 3. Here, let me just mark it since
12 they're going to refer to them that way.

13 The Witness. Okay.

14 BY [REDACTED]:

15 Q Mr. Allen, do you recognize exhibit 2?

16 A Yes, ma'am.

17 Q How do you recognize it?

18 A It's my employment contract with the Redskins.

19 Q Is it a fair and accurate depiction of your employment contract with the
20 Washington Commanders, as you last remember it?

21 A Yes, ma'am.

22 Q I want to direct your attention to the first page, the very first paragraph. It
23 states, "Employment agreement dated as of the 30th day of December, 2013, by and
24 between Pro-Football, Inc. (The 'Club') and Bruce Allen ('employee')."

25 Mr. Allen, what is Pro-Football, Inc.?

1 A That's the corporation that owns the Redskins.

2 Q And as you recall it, this is the employment agreement that you entered into
3 upon your hire at the Commanders, is that correct, or was this a supplemental contract?

4 A Oh, this next one you're saying?

5 Ms. Quincy. This one.

6 The Witness. What do you mean, it's a supplemental?

7 Ms. Quincy. The date on the first page.

8 The Witness. Oh, the 30th day of December 2013.

9 BY [REDACTED]:

10 Q You were hired in 2009. So was this an agreement that you entered into
11 after you were hired?

12 A Yes, ma'am. This was my second contract.

13 Q And is there a reason why you entered into a second contract with the
14 Commanders?

15 A He put it in front of me and said, "I want you to stay here longer." So we
16 had -- this is at the end of the '13 season, 2013 season. We had let Coach Shanahan go
17 as head coach. And I don't think he wanted me to leave. And so he extended my
18 contract.

1

2 [12:33 p.m.]

3 BY [REDACTED]:

4 Q I want to direct your attention to page 3. Oh, I apologize. Bottom of page
5 2, paragraph 6, do you see that?

6 A Yes, ma'am.

7 Q I want to ask you some questions about your duties, but before I do that,
8 you mentioned that he wanted to extend your employment contract. Who is the "he"
9 that you're referring to?

10 A Dan Snyder.

11 Q And did he tell you why he wanted to extend your contract?

12 A I don't remember why. I would think it's positive.

13 Q Turning back to the bottom of page 2, paragraph 6, where it says "duties,"
14 second line, "the employee"; that's you, correct?

15 A Yes.

16 Q The employee shall have the following duties and responsibilities, in addition
17 to any others commensurate with his position which may hereafter be assigned to him by
18 the principal owner, to which he shall be devote his full time and efforts managing all
19 financial operations, which shall include but not -- but not limited to the following.

20 Principal owner is Mr. Snyder. Is that correct?

21 A Yes, ma'am.

22 Q It goes on to list: (A) Manage and supervise the head coach and all
23 coaching staff.

24 Briefly, can you tell me what your responsibilities included as it related to
25 managing and supervising head coach and all coaching staff?

1 A Well, that is to give the head coach the support he needed to do his job.
2 The head coach had the responsibility of selecting his assistant coaches but to manage
3 and supervise.

4 Q Did you have the ability to hire head coaches and coaching staff?

5 A No. Dan had the ability to hire or fire head coaches.

6 Q Is that to say you did not have the ability to fire head coaches or coaching
7 staff?

8 A No. I did not, but Dan had -- Dan had the say on that.

9 Q And just so the record is clear, when you say you did not, are you saying you
10 did not have the authority to?

11 A That's what I'm saying. The authority rests with the principal owner, which
12 is Dan Snyder.

13 Q Moving on to (B), it states: Manage and supervise the club's scouting
14 department.

15 Do you see that?

16 A Yes, ma'am.

17 Q Briefly, what was your responsibilities as it related to managing and
18 supervising the club's scouting department?

19 A Was selecting scouts. We have a pro personnel professional scouting
20 department and a college scouting department. So we have two different scouting
21 departments with various scouts who are spread out throughout the country.

22 Q Are those scouts employees of the Washington Commanders?

23 A Yes.

24 Q Did have you the ability to hire or fire scouting employees?

25 A Yes. Yes. But for any of the director positions, Dan wanted to approve it.

1 Q And when you say "director," is that the most senior role in the --

2 A Or we hired a general manager once, and we hired an executive vice
3 president of football operations, and Dan had to approve of those selections.

4 Q Would you have had the ability to hire or fire the general manager?

5 A Not without his approval, no.

6 Q Would you have had the ability to hire or fire the executive vice president of
7 football operations?

8 A Not without his approval.

9 Q And by "his," you're referring to Mr. Snyder, correct?

10 A Yes.

11 Q Going onto the next paragraph, (C), it states: Negotiate player contracts
12 and coordinate free agent activities for the club.

13 Do you see that?

14 A Yes.

15 Q Briefly, what did your responsibilities include?

16 A Well, our department also negotiated all the player contracts, whether it's a
17 rookie contract or a veteran contract. And that was under my supervision.

18 And free agent activity is, really, we evaluated all of the players whose contracts
19 were expiring in the NFL. And you rank them and evaluate them based on your needs
20 and the current budget.

21 Q Mr. Allen, did you have the ability to negotiate player contracts without
22 Mr. Snyder's approval?

23 A At times, yes.

24 Q What do you mean by that?

25 A There -- if the dollar -- if it wasn't a significant signing, meaning somebody in

1 excess of \$2 million, he didn't care. He cared about the budget. So it's how you're
2 fitting all of the pieces in; that's what he cared about.

3 Q Did you have the ability to coordinate free agent activity without
4 Mr. Snyder's approval?

5 A Well, we were -- we were capable, and we did do all of the evaluations and
6 all of that. It's -- it -- trying to put it in the proper words.

7 If there's a free agent named Larry Smith and he's going to cost \$20 million, we're
8 not going to sign Larry Smith without talking to Dan.

9 But that's -- that's not unusual to, you know, just the Redskins. That flows
10 generally with every team.

11 Q Just so the record is clear, what would you consider, or what did you
12 consider at the time, a significant contract amount for which Mr. Snyder would
13 had -- would need to be notified or involved?

14 A Well, he wanted to be notified about any signing or any -- any acquisition.
15 He wanted to be notified about it. But it -- and, once again, I'm not saying that's bad.
16 That's his right to run his business how he wants to. But it's -- I would say anything over
17 \$2.5 million, but the cap has increased so much. I don't know what the number is these
18 days.

19 Q When you say \$2.5 million, is that from 2019? Would that be significant,
20 anything over \$2.5 million, is that considered significant back in 2019?

21 A Oh, yeah, yes.

22 Q And just so the record is clear, when you say that Mr. Snyder wanted to be
23 notified about signing and any acquisition, in your opinion, is that different than requiring
24 approval?

25 A He wanted to know about all of them. But if it was a significant number or

1 salary payment, he would -- he would -- could approve or disapprove.

2 Q Now moving to paragraph (D), bottom of page 2, it states: Personnel
3 selection decisions relating to free agency and the draft.

4 And I believe that was subsumed in the conversation we just had where you just
5 testified about. Did you have the ability to engage in personnel selection decisions
6 relating to the free agency and the draft without Mr. Snyder's approval?

7 A The first -- first two rounds, he wanted to make sure he -- he approved of
8 them. Rounds five through seven, you know, I don't -- I don't think he paid attention. I
9 don't want to say -- that's improper. He wasn't familiar with those players that you're
10 selecting later in the draft.

11 Q Turning to the top of page 3, it reads: Manage and supervise all
12 football-related areas, including training, medical and rehabilitation, equipment, grounds,
13 football public relations, et cetera.

14 Do you see that?

15 A Yes, ma'am.

16 Q Did Mr. Snyder require -- did you require approval from Mr. Snyder in
17 performing your job duties under paragraph (E)?

18 A Well, he approved the trainer that we hired. The doctors, it was the same
19 doctors that were there when I came. So he approved them. The football PR person
20 came the same year I did. And so, yes, he approved them. And the equipment man,
21 we had one change in equipment man or manager, I should say. And he approved the
22 new hire, yes.

23 Q Finally, paragraph (F) says: Prepare and submit budget for approval by
24 principal owner.

25 Do you recall preparing and submitting an annual budget to Mr. Snyder's

1 approval?

2 A I would -- I would not have done that. That would have been done by our
3 director of football administration, who would do a projection of what the players'
4 salaries would be for the upcoming season.

5 Q And Mr. Snyder would have to approve that, correct?

6 A Yes.

7 Q At the time that this employment contract was signed, did you have any
8 responsibilities for business operations of the club and its affiliated entities?

9 A No, ma'am.

10 Q Directing your attention to page 9, the very last page of the same document,
11 I note that there is a signature by Roger Goodell, Commissioner of the National Football
12 League. Was Mr. Goodell required to sign off on all employment agreements entered
13 into between team owners?

14 A Yes, he is.

15 Q Now I'd like to go to exhibit 3, which is the amended employment
16 agreement.

17 [Exhibit No. 3

18 Was marked for identification.]

19 [REDACTED]. Do you see it?

20 The Witness. Yes.

21 BY [REDACTED]:

22 Q I want to direct your attention to the top of the page, first paragraph. It
23 says that it's dated as of April 14th, 2017.

24 Do you see that?

25 A Yes.

1 Q Do you recall why you entered into this amended employment agreement
2 with the Commanders?

3 A Dan extended our head coach's contract another 2 years and -- and -- and
4 then came to me and said: You have to sign, too. So you're getting extended, as well,
5 2 years.

6 Q I want to direct your attention to page 2, first paragraph. It's a series of
7 duties that were required under this contract. I want to direct your attention to
8 paragraph F. Do you see that --

9 A Yes.

10 Q -- where it says "manage the following business-related departments"? It
11 says: finance, legal, marketing suites, stadium operations, IT, ticket operations, and
12 premium ticket sales.

13 Under this amended contract, were you required to oversee the business-related
14 departments as part of your job duties?

15 A No.

16 Q Do you know why the contract would state that you are, in fact, required to
17 oversee those business-related departments if you -- if your testimony is that they were
18 not?

19 A No.

20 Q Mr. Allen, when you entered into this agreement, had you been promoted
21 by the Washington Commanders from general manager to something else?

22 A Yeah, I was general manager and president.

23 Q Do you recall when that promotion took place?

24 A Excuse me?

25 Q Do you recall when that promotion took place?

1 A No. Well, yes, this -- the exhibit we just looked at, the title changed in this
2 one to -- the previous one was general manager, and this one is President and general
3 manager. So on the 30th day of December 2013.

4 Q And just so the record is clear, your testimony is that you were not
5 responsible for managing business-related departments, finance, legal, marketing suites,
6 stadium operations, IT, ticket operations, and premium ticket sales, correct?

7 A Correct.

8 Q Who was responsible for managing those business-related departments, if
9 not you?

10 A Well, at various times there was different people for each one of those
11 departments.

12 Q Were you responsible for setting salaries in your role as president or general
13 manager?

14 A No.

15 Q Were you involved in any way in the compensation structure of employees
16 on the business side?

17 A Involved, no. The -- from time to time different department heads would
18 say: Will you speak Dan on our behalf?

19 Q And, with that, would you go back and relay concerns of your subordinates
20 to Mr. Snyder?

21 A Well, I -- you know, one of my jobs for 10 years there was trying to explain,
22 being the spokesman, really, of decisions that were made, you know, to players, coaches,
23 staff, fans. And so people would come to me with different issues from time to time,
24 and I would bring it up if I was going to be around Dan.

25 Q Were you at all involved in workplace investigations, Mr. Allen?

1 A Was I involved?

2 Q Did have you any role or responsibilities with respect to workplace
3 investigations?

4 A Those were really handled by our legal department. I got involved after
5 they came to a conclusion and addressed it with some of the people.

6 Q By "some of the people," do you mean -- who do you mean?

7 A Some of the employees.

8 Q I think we're out of time. So we'll go off the record at 12:50.

9 [Recess.]

10 [REDACTED]: Hi, Mr. Allen.

11 My name is [REDACTED]. I'm counsel for the minority. I'm just going to do a
12 quick check to make sure everyone's in the room, and then we can get started.

13 [REDACTED], are you all ready to go?

14 [REDACTED]: We're ready to go.

15 [REDACTED]: And is the court reporter ready?

16 Wonderful. We can go ahead and go on the record, then?

17 Mr. Allen, as I said, my name is [REDACTED]. I'm counsel for the minority, and
18 I'll be handling questions for this hour.

19 But before we get to our questions, I want to reiterate Ranking Member Comer's
20 concerns with this so-called investigation.

21 This is an investigation of a single private organization for workplace conduct that
22 took place years ago. This -- the House Oversight Committee is not the proper forum for
23 this investigation.

24 While Mr. Comer and the committee's minority members agree that the alleged
25 behavior is troubling, there is no relief for any of the aggrieved parties before this

1 committee.

2 The primary mission of the House Oversight and Reform Committee is to root out
3 waste, fraud, abuse, and mismanagement of the Federal Government. But this entire
4 Congress, Democrats have been completely derelict in this core responsibility. This
5 committee has not conducted any oversight of the Biden administration. Instead, it has
6 focused on the American private sector.

7 While Mr. Comer agrees bad actors must be held accountable, the workplace
8 misconduct that is the topic of today's transcribed interview has already been subject to
9 investigations, fines, settlements, and intense media scrutiny. New leadership has been
10 installed and improved workplace policies implemented, all without congressional
11 involvement.

12 No new punishments have been levied against the Commanders due to this
13 investigation because they already faced consequences for its previously hostile
14 workplace. No new relief has been granted to any of the aggrieved parties because
15 Congress has no authority to provide relief in any of these instances.

16 This committee is using valuable resources pursuing a private company to
17 investigate alleged wrongs for which we can offer no remedy or redress.

18 Further, as Mr. Comer pointed out in his letter to the chairwoman, this
19 investigation has lacked basic investigatory standards. And some members have even
20 used this investigation as a fundraising tool.

21 Today the committee minority is even taking unprecedented action in this matter,
22 including video recording this deposition, something we've not done before in this
23 committee.

24 Meanwhile, the American people are suffering. Inflation continues to spiral.
25 The U.S. economy shrunk for the second straight quarter. On top of that, desperate

1 parents still cannot find baby formula on store shelves; fentanyl is killing our teenagers;
2 and our southern border is beyond broken; drug and sex traffickers are making money
3 hand over fist to the detriment of vulnerable women and children.

4 This committee has jurisdiction to examine all of these pressing crises, but we are
5 not. Instead, we are here today, interviewing a prior NFL football president over
6 matters that have no connection to the Federal Government or to the current crises
7 facing our Nation.

8 With that, I'll move into our questions for this hour.

9 Thank you for your patients, Mr. Allen.

10 EXAMINATION

11 BY [REDACTED]:

12 Q I want to talk a bit about your career. As I understand it and in your
13 conversation with the Democrats, you worked for the Raiders, Bucs, and, at the time,
14 Redskins. Is that correct?

15 A Yes.

16 Q What was your title at the Raiders?

17 A Senior assistant.

18 Q Senior assistant?

19 A Yes, ma'am.

20 Q And what were your duties there?

21 A Whatever Al Davis, who was the owner, asked me to do but mostly football
22 operations. But we did some other things, too.

23 Q Okay. So you reported directly to Al Davis at the time then?

24 A Yes.

25 Q Who was the CEO at the time -- or President? Sorry.

- 1 A I don't know if we had a President.
- 2 Q What was your role with the Buccaneers?
- 3 A Pardon me?
- 4 Q What was your role with the Buccaneers?
- 5 A I was general manager.
- 6 Q And what were your duties there?
- 7 A Football operations.
- 8 Q Football operations? And that included sort of what you walked through
9 with [REDACTED] last hour, similar?
- 10 A Yes, ma'am.
- 11 Q Was there anything different about your role with the Bucs versus the
12 Redskins?
- 13 A Different markets but, no, not really.
- 14 Q Okay. You mentioned when you were speaking with my colleague that you
15 weren't in charge of the business side, just the football operations side.
16 Is that a fair characterization?
- 17 A Yes.
- 18 Q But then you mentioned there at the end that you were involved in
19 investigations of employees or workplace misconduct or things of that nature. Is that
20 right?
- 21 Ms. Quincy. I think that misstates his testimony?
- 22 BY [REDACTED]:
- 23 Q Okay. Mr. Allen, could you please correct my recollection?
- 24 A Please restate -- try and be a little bit more specific.
- 25 Q Yeah. So [REDACTED] asked you if you were involved in investigations of

1 workplace conduct or things of that nature internally within the Redskins organization, if
2 you were involved in any of those kinds of investigations that occurred during your
3 tenure. So I'm just wondering if that was what you said.

4 A Yeah, but the investigation was done. And then they would -- the legal
5 department would tell me some of their findings in order to talk to a couple of
6 employees.

7 Q In order to talk to employees that were directly reported to you?

8 A No. No. About the behavior. They reported to -- they reported to
9 other people.

10 Q Okay. So the legal department came to discuss the findings of these
11 investigations with you at the conclusion of the investigation. Is that right?

12 A Yes.

13 Q And for what purpose did the legal department discuss the findings with
14 you?

15 A Well, in one case, it was somebody in the scouting department. And I
16 informed him that -- that any more behavior, he would be terminated, and that his
17 supervisor had said he's not going to allow him to go on certain scouting trips as a
18 discipline and that everyone was aware of what he had done.

19 Q Okay. And so the legal department reported to you because you oversaw
20 the scouting.

21 A No -- yeah, because I oversaw the scouting, yes.

22 Q Right. Do you remember any other investigations that occurred during
23 your tenure there?

24 A No --

25 Ms. Quincy. He's there for 10 years. Do you want investigations of someone

1 stealing a bag of peanuts from a suite? I mean, what are we talking about here?

2 BY [REDACTED]:

3 Q Yeah, any investigation you -- you can recall or can share with us today.

4 A Yeah, there's one other. And I informed the employee that who we were
5 asking him to resign.

6 Q And where did that employee work? What department?

7 A He was in charge of suite sales.

8 Q In charge. Okay.

9 Would you say that the suite sales is the business side or the football operations
10 side?

11 A Well, his title was President of business operations, so business.

12 Q Business side.

13 And the legal department discussed this investigation with you at the time.

14 A At the conclusion of their investigation.

15 Q So the legal department felt that you should be made aware of something
16 that occurred on the business side, not the football side. Is that fair.

17 Ms. Quincy. Let me just make sure I understand.

18 You're asking him what the legal department felt?

19 [REDACTED]. What his understanding was of why the legal department would
20 discuss with him business, a termination on the business side of operations if he, in fact,
21 just did the football operations side.

22 A Because -- because the -- Dan, the owner, wasn't going meet with the
23 employee to have the conversation. So they had me do the conversation.

24 BY [REDACTED]:

25 Q Okay. So then is it fair to say that perhaps on occasion you did do some of

1 the business side of the franchise?

2 A That's a general way. I might try and help you a little bit.

3 Q Please. Please do.

4 A I would do 50 to 90 events a year where the suite sales or the club seat sales
5 or the sponsorship people were having events, where they're trying to make sales. And
6 I would go and speak about the football team to our fans and explain what the -- we were
7 doing this off-season, for example, and things of that nature.

8 But the person I'm talking about, he was president of business operations -- who
9 we let go.

10 Q Okay. And you were brought into that decision because Mr. Snyder didn't
11 want to handle it is what you said, the termination of that particular employee.

12 Ms. Quincy. That question's a little jumbled that you asked him about the
13 decision and then announcing the termination. Do you want to break it out or maybe
14 clarify your question?

15 [REDACTED]: Sure.

16 BY [REDACTED]

17 Q You said that you handled the termination of this particular employee, who
18 was on the business side of the franchise's operation. Is that right?

19 A Yes.

20 Q And you said that you handled that termination because Mr. Snyder either
21 asked you to or made clear he did not want to be involved in that. Is that fair?

22 A That's fair, yes, ma'am.

23 Q And so that was an instance that you engaged in the business side of
24 operations of the franchise. Is that right?

25 A I don't know if that's the business operations, but it affected a person on the

1 business side, yes.

2 Q Okay. You said that you worked for the then-Redskins, now-Commanders
3 for about a decade. As I understand it, there's two office locations. Is that correct?

4 A Yes.

5 Q And which one did you spend the most time?

6 A I was at Redskin Park in Virginia.

7 Q Why did you spend most of your time there?

8 A Because that's where we practiced. That's where the coaches and the
9 players were.

10 Q And the other location, where's that one?

11 A That's the -- at the stadium in Maryland, in Landover, Maryland.

12 Q How often did you go to the stadium in Landover?

13 A Besides games, maybe five or six times a year, and, once again, it would be
14 for a promotional event or fan events, things like that.

15 Q About how many days per week did you work during your tenure with the
16 Redskins?

17 A Every day.

18 Q Every day.

19 A Every day.

20 Q About how many hours per day?

21 A 6 to 8 p.m., I mean, 6 a.m. to 8 p.m. but it -- you don't worry about that.

22 I'm not any different than everyone in the league. There's one holiday. It's Memorial
23 Day. That's when there's not something going on in the NFL.

24 Q So it'd be fair to say it wasn't your typical 9 to 5.

25 A No, ma'am. It's great. It's great.

1 Q So you enjoyed being on call all the time, constantly working.

2 A I absolutely love football, the players, and the coaches, the game. It's
3 fantastic.

4 Q And as you mentioned with my colleague, your family's been around this
5 franchise for maybe a couple of years.

6 A Yes, ma'am.

7 Q Is it fair to say that you had a personal connection to the team?

8 A Especially to the alumni, but I feel that also with the Chicago Bears and the
9 Rams and the Raiders, you know, teams I've been with. And, yes, I love all the history of
10 the game.

11 Q While you were the GM, who in the organization reported directly to you?

12 Ms. Quincy. Over the course of 10 years, do you want a list of names?

13 [REDACTED]. Yeah, that'd be great.

14 The Witness. It would have been the football administration, Eric Shaffer, and
15 various directors of scouting. We had a few, whether it's Pro department or the college
16 department, the equipment manager. The trainer reported to the head coach on
17 certain issues and to me on other issues. The director of football player programs
18 reported to the head coach and me. The football PR person reported to the head coach,
19 Dan, and me. That's generally it, I think.

1 BY [REDACTED]:

2 Q Did anyone in marketing or ticketing report to you?

3 A No.

4 Q [REDACTED] touched on this briefly, but you were terminated from the Redskins
5 in 2019. Is that correct?

6 A Yes.

7 Q Why do you believe you were terminated from your role as GM?

8 A In 2018, we were in first place. We were six and three, and we had a tragic
9 injury. Alex Smith had a terrible injury, and we lost him for those 2 years, the rest of '18
10 and '19. Finished in last place. We never really came up with a good answer on the
11 quarterback, and we failed at doing that. And was happy to see, after I left, Alex came
12 back and went five and one.

13 But I think going and finishing in last place and not having a quarterback, that's
14 probably got a lot of guys fired in the NFL.

15 Q Did anyone discuss with you the reasons for your termination, or was that
16 just kind of a generally understood guess because of the record?

17 A Dan, when he let me go, was cordial. It was after our last game, and he
18 said he wants to pick his own coach and make a change and sorry it didn't work out.

19 Q Did you receive a termination letter?

20 A No.

21 Q Were you upset after your termination?

22 A Well, it's a -- it is a form of rejection, but it -- I understood. We came in last
23 place, and we never -- we never could answer the injury to Alex.

24 Q Had there been other years in your duration where you had losing seasons?

25 A When I had a what?

1 Q A losing season or a season comparable to the one that ended in your
2 termination.

3 A Yeah, yeah, and I didn't get terminated.

4 Q So what do you think the difference was then?

5 A I think Dan wanted a new head coach, which he told me. And he wanted to
6 give him all the power over personnel, which was really my job. So he had to replace
7 me.

8 Q Okay. Understood. Thank you.

9 A Which is understandable. I'm not -- there's no criticism with that.

10 Q I want to jump back to your time with the Raiders just a little bit. Do you
11 recall the years that you worked for the Raiders?

12 A 1995 through 2003.

13 Q And you were, you said, an executive assistant?

14 A Senior assistant.

15 Q Senior -- sorry. I apologize. A senior assistant.

16 And reported directly to the owner. Is that right?

17 A Yes.

18 Q Of the Raiders. Okay.

19 A Yes.

20 Q Did you work with Jon Gruden at all during your time there?

21 A Yes.

22 Q Can you tell me a little bit about those interactions?

23 A We hired him, I believe, in 1998, and he had a very successful run with the
24 team. I think the first 2 years we went eight and eight, and then we won the division
25 the next 2 years.

1 Q Did you know him prior to your overlap with the Raiders?

2 A Well, we had interviewed him for the offensive coordinator position in 1996,
3 I think. And he turned us down, and then we also interviewed him for a head coaching
4 job in 1997. So I knew him from those previous interviews.

5 Q Did you and Mr. Gruden ever see each other outside of the context of the
6 Raiders or the NFL, or was it just kind of a work relationship?

7 A He worked -- his hours are -- were not human, but he got to work at 3 in the
8 morning and went to 9. There wasn't much socializing time with John.

9 Q And this was touched on briefly in the Democrats' questioning, but you're
10 aware that Mr. Gruden stepped down as the head coach of the Raiders in 2021. Right?

11 A Yes.

12 Q And are you generally aware that the reason he stepped down was due to
13 racist, sexist, homophobic, or other generally offensive emails?

14 A I believe that -- I believe the emails were the cause.

15 Q And you were on a number of those emails. Isn't that right?

16 A Yes.

17 Q If you had still been working for an NFL franchise at the time those emails
18 were released, do you think you would have similarly been asked to step down?

19 A I don't know how to answer that question. I don't know. I don't
20 understand the question. I mean, it's a hypothetical.

21 Q It is a hypothetical, yes. I'm asking you to just answer. Hypothetically, do
22 you think that the nature of these emails you were included on could have led to a similar
23 request that you step down from your role, as Mr. Gruden faced?

24 A I don't know how to answer that precisely. If I -- if I did something
25 inappropriate, it's different than if someone else did something inappropriate.

1 Q So you don't believe that the emails that were made public in Mr. Gruden's
2 situation reflected anything inappropriate by you. Is that fair?

3 A I didn't -- I didn't say that. What I'm saying is I don't know another instance
4 where 12 years ago emails have ever come up. So I don't know how to answer a
5 hypothetical question.

6 Q Okay. We can move on.

7 [REDACTED]. I'm going to introduce what's previously been marked as Minority
8 Exhibit X, and I'm just going leave all the exhibits the same.

9 [Minority Exhibit X
10 Was marked for identification.]

11 Ms. Quincy. I don't know if we've got that one. Can you tell us what it is?

12 [REDACTED]: Yeah. It is the article from ProFootballTalk, dated October 18th,
13 2021.

14 It should have been in the zip file that we sent to you last night.

15 The Witness. What's the letter on it?

16 [REDACTED]: X, as in Xavier.

17 The Witness. Oh.

18 Ms. Quincy. Hang on one second.

19 [REDACTED] Yeah, take your time.

20 Ms. Quincy. Different pile.

21 The Witness. Here's Z.

22 Ms. Quincy. Yeah. That's a different pile.

23 The Witness. Here. That's a different X.

24 Ms. Quincy. That's a different X. Okay.

25 Wait a minute. What's the headline on it?

1 ██████████: "Amy Trask Repeatedly Reported Bruce Allen to Al Davis." It's
2 from ProFootballTalk.

3 Ms. Quincy. We've got it.

4 ██████████: Okay. I'll give you just a minute to familiarize yourself with the
5 article.

6 Ms. Quincy. Hang on one second.

7 ██████████: Uh-huh.

8 The Witness. Okay. Do you have a question?

9 ██████████: I do. I wanted to wait for your counsel to get back.
10 Are you ready to go, Ms. Quincy?

11 Ms. Quincy. Yes. Thank you very much for waiting for me.

12 ██████████: Yes, of course. No problem.

13 BY ██████████:

14 Q So, if you look on what's page 2 of the exhibit, down near the bottom, it
15 says -- it's the paragraph that starts with "on Sunday." I'm going to the second
16 sentence. It says: Former Raiders President Amy Trask, whose long tenure with the
17 team overlapped with Allen -- speaking about you, Bruce Allen -- during 8 years in
18 Oakland from 1995 to 2003, made it clear that she complained about Allen's behavior
19 more than once.

20 Do you remember working with Amy Trask?

21 A Yes.

22 Q In this article a little bit further down -- actually, I'm sorry. It's on the next
23 page. She's speaking about -- this is Ms. Trask said: I did hear comments of that
24 nature from the individual to whom John sent those emails -- referring to you, Mr. Allen,
25 and the emails that led to Mr. Gruden's termination.

1 And she says, quote: And I did speak up. I spoke up repeatedly. I spoke up
2 forcefully. I talked to the owner about it.

3 Do you have any idea what Ms. Trask is referring to in this article?

4 A No idea.

5 Q So, within the context of the emails being released and your name being on
6 the emails that Mr. Gruden was fired over, essentially, she's saying she heard comments
7 of that nature from the individual to whom John, Mr. Gruden, sent those emails. That's
8 you, Mr. Allen. And she spoke up repeatedly about them.

9 So, in your tenure, in the overlap that you had with her, did you ever use offensive
10 language around her, to the best of your recollection?

11 A No. Now maybe -- I had used profanity throughout my life, by the way.
12 But I don't believe this to be true.

13 Q Okay. Is --

14 A Al -- let me finish. Al Davis, if someone made a complaint to Al Davis such
15 as what she's suggesting --

16 Q Uh-huh.

17 A -- Al Davis would have called me in 45 seconds and brought me into his office
18 and addressed it. He loved confrontation. He wanted -- Al would not ever put up with
19 it if someone said I did something wrong. He would not have.

20 Q You worked with Ms. Trask for about 6 years. Is that right?

21 A I think she was with the team the entire time I was.

22 Q The entire time. Okay.

23 And your testimony here today is that you never made these comments because,
24 if you did, you would have heard about it from Mr. Davis.

25 Ms. Quincy. What are "these comments"? You refer to "these comments."

1 What are "these comments"?

2 The Witness. I was referring to her comment that I find it impossible to believe
3 that Al Davis heard a complaint that I made some inappropriate statement and would not
4 have called me within 30 seconds of getting it. That's Al. Al was great that way.

5 BY [REDACTED]:

6 Q And so Al never called you with any allegations of you saying inappropriate
7 things around Ms. Trask.

8 A Correct. And Al did like employees to baby and having it -- he would have
9 loved it, whether it was Bruce said we should fly the flag on the right side of the field
10 versus me wanting to be do left field, Al would have loved to have that argument. I
11 mean, he was -- he was great that way in engaging people. But he wouldn't permit that,
12 no.

13 Q So you're saying that the allegations by Ms. Trask in this article are false.

14 A I don't know what she means by that. I know what -- I read this with the
15 writers interpreting her words to me. But, yeah, that would not have happened with Al.

16 Q So you never faced any disciplinary measures or any corrective measures
17 from Al, as you call him?

18 A No.

19 Q And is there any discipline on your record from your time at the Raiders at all
20 for any issues?

21 A No. And I don't think with Tampa or the Redskins or, those two teams in
22 the USFL, or the team I was with the Canadian Football League.

23 Ms. Quincy. Just so we're clear, did you ever make racist statements in front of
24 Amy Trask?

25 The Witness. No.

1 Ms. Quincy. Okay. I want to make sure the record is very clear on that.

2 The Witness. No.

3 Ms. Quincy. How about sexist statements?

4 The Witness. No.

5 [REDACTED]: So that means Amy Trask lied to the media.

6 The Witness. I don't know what she means by that. I know what the writer
7 seems to interpret it to me.

8 [REDACTED]: I'm going to switch gears a little bit, and we're going to be looking
9 at Minority Exhibit U.

10 [Minority Exhibit U
11 Was marked for identification.]

12 [REDACTED]: I'll give you a minute to grab that one. It's a court filing from
13 Arizona in 2021.

14 Ms. Quincy. My pile. Hang on one second.

15 [REDACTED]: Yep, no rush.

16 Ms. Quincy. Always the last one you look in. Right? There we go.

17 [REDACTED]: All right. I will give you just a minute to look over it, Mr. Allen.

18 Ms. Quincy. These are not being marked, correct?

19 [REDACTED]: Marked as labeled as previously. So it's the same --

20 Ms. Quincy. Yes.

21 [REDACTED]: -- same letters. It's just because I didn't want to confuse.

22 Ms. Quincy. Okay.

23 BY [REDACTED]:

24 Q All right. So this is from the United States District Court for the District of
25 Arizona. It was filed on May 14th, 2021. And it is a declaration by you, Mr. Allen. Is

1 that the document in front of you?

2 A Yes.

3 Q Do you remember filing this declaration in court in Arizona?

4 A Yes.

5 Q I'm going to have you turn to page 2 of the declaration. So I think page 3 of
6 the physical exhibit, and it will be paragraph No. 9.

7 A Yes.

8 Q Okay. And in this paragraph of your declaration, you state: I have never
9 served as an anonymous source for any news or media reports.

10 Do you stand by this declaration?

11 A Yes.

12 Q You have never served as an anonymous source for any news or media
13 reports?

14 A Not knowingly, no.

15 Q Not knowingly. Okay.

16 [REDACTED]. We're going to go ahead and grab exhibits what have been
17 previously marked as exhibits V and W from the minority.

18 [Minority Exhibits V and W

19 Were marked for identification.]

20 Ms. Quincy. Tell me again what it is? B and W?

21 [REDACTED]. V, as in Victor; W, as in walrus.

22 Ms. Quincy. What are they?

23 [REDACTED]. They're emails.

24 Ms. Quincy. Okay.

25 Ms. Quincy. V and W. Got them?

1 Ah, interesting. Okay.

2 BY [REDACTED]:

3 Q Give you just a minute to look at -- we're going to go through V, as in Victor,
4 first, so if could you look at that one.

5 A Okay.

6 Q All right. So this email is dated January 9th, 2014.

7 A Oh, I have the wrong --

8 Ms. Quincy. Wait a minute.

9 The Witness. I have the wrong one. I have 2015.

10 Ms. Quincy. I do, too.

11 Why don't you tell me specifically what you're looking at so I can make sure we've
12 got the wrong one -- have the right one? I've got V and W, but I've got emails dated
13 2015 and 2015.

14 The Witness. What's the headline on it?

15 [REDACTED]: The email is between you and Mike Jones from The Washington
16 Post.

17 The Witness. Okay.

18 Ms. Quincy. It should be -- wait a minute.

19 [REDACTED]: Make sure you're looking at Minority Exhibit V.

20 Ms. Quincy. Yeah, I've got the wrong one. Hang on one second.

21 [REDACTED]: Okay.

22 Ms. Quincy. Got the wrong pile. Now I'm getting the right pile. Okay. So
23 we've got [REDACTED] first.

24 [REDACTED]: Yep. And then Adam Schefter is second.

25 Ms. Quincy. Got it. Okay. Here you go.

1 The Witness. Okay. And the first one is the Mike Jones?

2 BY ██████████:

3 Q Correct. So let's -- I'll give you a minute to look over that, and then we'll
4 look at it.

5 So the original email is, as I said, Mike Jones at Washington Post to Bruce Allen on
6 January 9th, 2014. The subject is "Gruden," and the text of the email reads: Hey,
7 Bruce, we've been told that you all are close on an agreement with J. Gruden. Can you
8 help me on this? Is this true? We won't quote you, obviously. Thanks, Mike Jones,
9 The Washington Post.

10 The next message, sent about an hour and 20 minutes later on the same day, is
11 from you to Mike Jones, saying: Good morning. We will call you later to update you.

12 The final email is from Mike Jones to you saying: Thanks. But can you tell me if
13 I'm wrong? The latest I have heard from two sources was, quote, damn near 100
14 percent it's done, end quote, and another said, quote, he has accepted, end quote.

15 Did you ever call Mike Jones to update him?

16 A No. No. My answer to him was being -- I am courteous to media -- is we
17 had a press conference later that day, and so I probably saw him at the press conference.

1

2 [1:35 p.m.]

3 BY [REDACTED]:

4 Q Why do you think he reached out to you for a confidential tip?

5 A Oh, I think they probably reached out to hundreds of people.

6 Q Had he ever reached out to you before?

7 A Not that I remember. But this was announcing a head coaching position, so
8 that's a big news in Washington, D.C.

9 Q Okay.

10 [Minority Exhibit W
11 Was marked for identification.]

12 BY [REDACTED]:

13 Q We can move on to Minority Exhibit W, which is the Adam Schefter email
14 chain. This is an email -- the original email is dated October 12, 2017. It's from
15 someone named Drew Rosenhaus.

16 Do you remember who Drew Rosenhaus was?

17 A Yes.

18 Q Can you tell me who he was?

19 A He's a very successful sports agent.

20 Q And he sent you a list of names, which you then forwarded that same day
21 and received a response from Adam Schefter that says: "Love this. That's unlike you,
22 sharing something good. I will use Sunday morning. I'm grateful and appreciative.
23 Thank you."

24 Can you tell me who Adam Schefter is?

25 A He's a sports broadcaster for ESPN.

1 Q Is it fair to say he's a member of the media?

2 A Yeah.

3 Q You respond to that email, "Every couple of years." What did you mean by
4 that?

5 A Sarcasm.

6 Q Sarcasm in reference to what?

7 A That -- I once told him we signed a punter, and he yelled at me.

8 Q He yelled at you?

9 A He yelled at me.

10 Q Okay.

11 At the bottom of the original email, so page 2 of the exhibit, it says: "This list is
12 confidential and intended for the sole purposes of the recipient. It cannot be shared,
13 distributed, or disseminated, in the media or otherwise."

14 Yet you forwarded this email to Adam Schefter. Do you feel like -- or, I guess,
15 why did you email this to Adam Schefter?

16 A Drew Rosenhaus would send this email to a thousand people, to everybody
17 in the league, and all of that. There might've been a player that I was asking about. I
18 don't remember one.

19 Q Your email to Schefter just said "FYI." Does that sound like it was
20 something you were asking about, or just sharing the information?

21 A I don't know. I don't know what I meant by that.

22 Q Okay.

23 Did you see the disclaimer at the bottom of the email that said this list is
24 confidential and should not be shared, distributed, or disseminated, in the media or
25 otherwise?

1 A No, because not only does Drew -- you receive this email, you also receive a
2 text that has it, and I've never seen that.

3 Q Okay.

4 Is it fair to say that you did share confidential information with someone in the
5 media after looking at this email?

6 A No.

7 Q And why not?

8 A This is -- there's nothing confidential in this email. We all --

9 Q But the bottom says that it's confidential --

10 Ms. Quincy. Wait a minute. Wait a minute. Wait a minute. He's going to
11 finish his answer.

12 Go ahead.

13 The Witness. We all know every one of those players is a free agent. We know
14 that. Everybody knows that. This is just Drew telling people he represents these
15 players.

16 BY ██████████:

17 Q It seems interesting that Adam Schefter would respond "love this, thank you,
18 I am grateful and appreciative" if he already knew this information. Is that fair?

19 A No. That could be sarcasm also with Adam Schefter, who has a great
20 relationship with Drew Rosenhaus.

21 Q Regardless of whether or not you believed this was confidential information
22 at the time, do you agree that it does say that it is confidential and should not be shared
23 at the bottom of the email?

24 A Well, I can read that, yes.

25 Q And so you did send something that was labeled as confidential and not for

1 distribution to someone in the media?

2 A Yes, but that doesn't answer your other question, but go ahead.

3 Q In sharing this confidential information with Adam Scheffer, do you believe
4 that that is a contradiction to your declaration in paragraph 9 which states, "I've never
5 served as an anonymous source for any news or media reports"?

6 Ms. Quincy. That's not confidential. That's what he just told you. This
7 information isn't confidential. I'm not sure what point you're trying to make out of this,
8 but he just told you the information wasn't confidential.

9 [REDACTED]. Ms. Quincy --

10 Ms. Quincy. So if we're going to sit here and have testimony --

11 [REDACTED]. Ms. Quincy, it is labeled as confidential at the bottom of the
12 document. Therefore, I have to conclude that the information was intended to be
13 interpreted as confidential information.

14 Ms. Quincy. Actually, I will give you way more intellectual credit than that, that
15 you are able to get past what is probably a common footer that many of us have on a
16 footnote and doesn't import some type of high, top-secret, state-secret kind of
17 information shared. Mr. Allen actually clarified for you that this information wasn't
18 confidential.

19 So if you've got the next question --

20 [REDACTED]. He did --

21 Ms. Quincy. -- ask it.

22 I will note for the record that apparently these are the documents that
23 Mr. Snyder's counsel provided you that he also attempted to use to prove that point.

24 If you have 650,000 emails of Mr. Allen, I'm sure you can come up with something
25 better than he disclosed that was confidential rather than a list of who was a free agent,

1 which I could've even figured out, and I don't know diddly about football.

2 [REDACTED]: Thank you for your interlude, Ms. Quincy. We'll go ahead and
3 move to additional emails. As you said, the NFL produced a number of emails, the vast
4 majority of which had to do with your client, Mr. Allen. I know I only have about
5 15 minutes left, so I don't think we're going to get through this entire section of
6 questioning, but we'll go ahead and move on.

7 [Minority Exhibit Y
8 Was marked for identification.]

9 BY [REDACTED]:

10 Q We spoke a little bit about Mr. Gruden's emails which led to his resignation.
11 We're going to go ahead and look at what's been previously marked as exhibit Y from the
12 minority. So if you could take that one out, and just let me know when you have it in
13 front of you.

14 Ms. Quincy. I will. Give me one second.

15 There you go.

16 BY [REDACTED]:

17 Q Okay. This email has been widely disseminated. I think Washington Post
18 and others have published it. It's the email chain that was part of Jon Gruden's
19 resignation.

20 We're going to start toward the end of the first page. It's an email from you,
21 Bruce Allen, on Thursday, July 21, 2011. And it's sent to a list of emails, so I'm going to
22 have you help me identify some of these email names.

23 So the first one is [REDACTED]@gmail.com. Do you remember who that is?

24 A I don't know why you're doing this.

25 Q It's --

1 A These people have nothing to do with the Redskins, and all you're doing is
2 harming more people.

3 Q Well, of course, it's not my intent to harm people, Mr. Allen. And as I
4 mentioned at the beginning of this, we have no business, as Congress, in being in this
5 investigation, and we agree that we would rather not be here doing this. This is not
6 something that is within our jurisdiction. However, the Democrats have launched and
7 pushed for this investigation for the last year. And it is our duty as congressional
8 investigators to look at all the evidence as it is presented to us.

9 So if you could please help me out with the person who is [REDACTED] ?

10 A Well, I think I will help you out with what I said in the email, because that's
11 the only thing that matters.

12 Q I disagree that it's the only thing that matters, but we can go ahead and talk
13 about that.

14 And I will go ahead and list what we know is public information, who these people
15 are: Jon Gruden, [REDACTED]. I'm not sure who [REDACTED] is. But then we have, I
16 believe, [REDACTED], [REDACTED] and then [REDACTED], who are listed on this email from you
17 from your official Redskins account to these members.

18 It says: "Your old owner Lurie hates me." Can you tell me what that was
19 about?

20 A Yeah. The Eagles owner must've been pissed off at me.

21 Q Did that happen a lot?

22 A Maybe. Maybe. There were a couple owners that I had disagreements
23 with. But the super-majority of them I continue to have a great relationship with.

24 Q Okay.

25 In response, Jon Gruden takes everybody else off the email and just responds to

1 you. He says: "What did you do?" and then makes a racist comment that I'm not
2 going to repeat here. You may read it off the exhibit. I'm sure you're already aware of
3 it.

4 What did you think he was asking you when he said, "What did you do?"

5 A I said I told him to quit acting like a punk.

6 Q Yeah. So, in the next email, you said: "He is really pissed. Told him to
7 quit acting like a punk."

8 Who were you referring to when you said "he" is really pissed? Who was this?

9 A Jeff Lurie, the owner of the Eagles.

10 Q And so the comment about Mr. Smith below, you just kind of breezed by
11 that, decided not to engage on it?

12 A You know, until I saw it in The Wall Street Journal, I don't even remember
13 seeing that.

14 Q You don't remember seeing that comment?

15 A No.

16 Q Is that because Gruden frequently sent racist emails and so it's kind of hard
17 to differentiate, or it just didn't stick out to you as something that was relevant?

18 A I'm not going to comment for Jon. Jon's commented quite a bit about his
19 emails --

20 Q Oh, yes, I --

21 A -- at length.

22 Q I understand that Mr. Gruden has commented on these emails at length.
23 But I'm just saying, as someone who received it and saw it, it didn't stick out to you; is
24 that right?

25 A I --

1 Ms. Quincy. That isn't what he said.

2 The Witness. I don't remember -- I don't remember ever seeing it.

3 BY [REDACTED]:

4 Q But you did answer his question, the "what did you do?" You said: "He is
5 really pissed."

6 A Right.

7 Q That was in response to his question?

8 A Yes. On Jeff Lurie.

9 Q So you saw the first sentence, but you don't remember seeing the second
10 sentence?

11 A I don't.

12 Q Okay.

13 A And I think I would've remembered it. I didn't even understand it when I
14 first saw it in The Wall Street Journal.

15 Q Okay.

16 The next email, in response to your comment that he is really pissed, Gruden says:
17 "Good. Tell Amy, Al, and all the Glazers I feel the same."

18 Who are those people?

19 A I'm guessing Amy is Amy Trask, who you referred to earlier. I'm guessing Al
20 is Al Davis. And the Glazers is the Glazers.

21 Q You responded: "Amy made a fool of herself today." And you said that
22 was probably referring to Amy Trask?

23 A I would guess. I don't know.

24 Q Do you remember what you meant by she made a fool of herself?

25 A No.

1 Q Okay.

2 A From 11 years ago? No.

3 [Minority Exhibit F
4 Was marked for identification.]

5 BY [REDACTED]:

6 Q We can go ahead and move into what's been previously marked as Minority
7 Exhibit F, as in "fence."

8 Ms. Quincy. Before we get into this exhibit, I just want to echo Mr. Allen's
9 concerns that the stated purpose for this inquiry is to look into whether or not the culture
10 of a business was oppressive or harassing or domineering or inappropriate in some way.
11 And what has happened is, a lot of people who have no relationship to that organization
12 whatsoever have been caught in the crossfire and have had things happen to them
13 that -- they're probably collateral damage. And I know that this committee has
14 redacted, for certain things we have been sent, people's names. You are well aware
15 that the person who you are investigating has full access to the names and probably a lot
16 of other information about some of the people involved.

17 That being said, go ahead and ask your questions.

18 BY [REDACTED]:

19 Q All right. So this email was originally produced to us from the NFL. It's
20 Bates stamped NFL00002376. And this email is from June 2, 2013, from [REDACTED]
21 [REDACTED], to Bruce Allen at your Redskins email.

22 The email is quite offensive, and we will just introduce it into the record, but if you
23 could please read it to yourself so you have an awareness. It makes comments about
24 immigrants; it appears to be people of the Muslim faith -- things along those lines. The
25 subject says, "The English language spells," and then goes into all of these very offensive

1 terms.

2 And, Mr. Allen, you respond: "Great one."

3 Do you remember getting this email?

4 A No.

5 Q Who is [REDACTED]?

6 A This is an example of what I was talking about earlier, that common interest
7 agreement of distraction by the league office and the football team. [REDACTED]
8 has never been to a Redskin game.

9 Q Who are --

10 A She lives in [REDACTED]. She's 80-some years old. Wouldn't recognize
11 Roger Goodell if he was standing by her mailbox.

12 Q So you know this person in a personal capacity?

13 A Yes. She's a friend of [REDACTED]

14 Q And she emailed your official Redskins email?

15 A Yes. I guess, by this, it says it did.

16 Ms. Quincy. By the way, I just want to note for the record, you're working for
17 the Republican minority, correct?

18 [REDACTED]: Correct.

19 Ms. Quincy. And you find making disparaging comments about immigrants and
20 Muslims inappropriate. Did I hear that right?

21 [REDACTED]: I am just a counsel. I am not a Member of Congress. And so my
22 political affiliation, thoughts, and feelings are not the subject of this investigation.

23 Ms. Quincy. Ma'am, I just asked you to confirm what you just said. That's all.
24 That is what you said on the record to my client.

25 [REDACTED]: I --

1 Ms. Quincy. No, no, no. Before we go there and use another email from some
2 ██████████ woman who has nothing to do with the team to try to drag my client through
3 the mud, I want to confirm what you said, that disparaging comments about immigrants
4 and Muslims would be inappropriate to you.

5 ██████████: I'm not going to respond to your comment right now. We can
6 discuss that off the record after I'm done with my questioning.

7 This email was produced in furtherance of this investigation, and, as congressional
8 investigators, it is our job to go through the evidence as it is given to us. This was given
9 to us as a piece of evidence, and I am allowed to use it in a deposition.

10 I am not trying to harm your client. I am not trying to hurt him. I am trying to
11 use the evidence that I was given as a congressional investigator in furtherance of this
12 investigation that the Democrats have launched for the last year, that we really don't
13 have any skin in the game. We're doing our jobs, ma'am, just as you are.

14 Ms. Quincy. I under- --

15 ██████████: So, Mr. Allen, I'll ask you again --

16 Ms. Quincy. I understand that. I give you far more credit than that, than just to
17 take what someone's lawyers have handed you --

18 ██████████: We're going off the record.

19 Ms. Quincy. -- and using it to attack and challenge someone's credibility.

20 ██████████: Okay. As █████ just said, we're going to go off the record really
21 quick, and we can have a discussion.

22 So, Ms. Quincy, please --

23 Ms. Quincy. I'm going to the restroom. Thank you. I'm taking my 5-minute
24 restroom break. You can start questioning when we get back.

25 [Recess.]

1 ██████████ We can go back on the record.

2 BY ██████████:

3 Q I have about 3 minutes left, so I'm just going to go ahead and ask my
4 question again, Mr. Allen, on this exhibit F.

5 This person sends a very aggressive, racist slew of words, and you respond:
6 "Great one." Do you agree with the sentiment presented in this email?

7 A Ma'am, my email has a quote from someone. It starts out, "Spells," then
8 semicolon, and then it goes into a quote. I don't know who the quote came from.

9 Q Right. And I don't --

10 A Is it on your -- mine -- no, it's not on mine. Is it on yours?

11 Q No. I have the same exact piece of paper in front of me as you have there.
12 It's just this sentence rife with racist terms, and it was sent to you, and I don't know -- I
13 mean, it was originated from an email belonging to ██████████. I don't know if she
14 wrote it or copied it from somewhere else.

15 But all I'm asking is if you, Mr. Allen, in your response with "great one" to that
16 sentence, was agreeing with the sentiment presented in that sentence or in that quote.

17 Ms. Quincy. Let me state an objection for the record, that many of the emails
18 that you sent to us do not appear to be complete emails.

19 ██████████. I'm sorry. Can you say that one more time? I didn't hear it.

20 Ms. Quincy. Yeah. Many of the emails that apparently Dan Snyder supplied to
21 the committee through his attorneys --

22 ██████████. Oh, that was from the NFL, actually, so --

23 Ms. Quincy. I don't know if it was from the NFL or if it was Dan Snyder. They
24 have a cooperation --

25 ██████████. This one is from the NFL. See the Bates stamp at the bottom, it

1 says, "NFL00002376"? That means it originated from the NFL and was given to us by the
2 NFL.

3 Ms. Quincy. Okay. [REDACTED], I will do you the courtesy of not interrupting
4 you if you will pay me the same courtesy.

5 [REDACTED]: Please.

6 Ms. Quincy. Many of the emails that have been provided to us, which either
7 came from the team, Dan Snyder, or the NFL, who were all together in a cooperation
8 agreement -- I will note that legal counsel for the NFL began sending us emails to review.

9 We objected to emails that were privileged in some way -- for example, Mr. Allen
10 and his wife, which you are using one of the emails or at least sent to us an email like
11 that -- emails that were clearly personal in nature or otherwise privileged or having
12 confidential information to do nothing with the team be not publicly released, be not
13 provided to Congress -- which is one and the same, frankly, these days.

14 Despite this, not only were they, but things like this email -- I do litigation 24/7.
15 This is not what a normal printoff of an email looks like. I don't know that it is an
16 authentic copy of an email that was sent and received when it purports to be, by whom it
17 purports to be. I have now noted that for the record. But the assumption that this
18 email is -- it looks very odd, and even the verbiage doesn't seem to follow.

19 That being said, if you want to ask Mr. Allen if he shares those sentiments, that's
20 what I would suggest that you do.

21 [REDACTED]: That is what I just asked, ma'am. And I --

22 Ms. Quincy. No, you didn't. You asked --

23 [REDACTED]: Okay. Are you instructing your client to answer or not answer the
24 question?

25 Ms. Quincy. Oh, you will certainly know if I instruct my client not to answer a

1 question, as will he.

2 [REDACTED]: Okay.

3 BY [REDACTED]:

4 Q Mr. Allen, could you please answer the question? Do you agree with the
5 sentiment in the sentence sent to you from [REDACTED]?

6 A The sentence that's in quotations --

7 Q Yes.

8 A -- is awful, but I have no idea who they're talking about. I have no idea who
9 it's insulting. I don't. But it's -- it's bad.

10 Q It's bad, but you responded, "Great one." So why did you respond, "Great
11 one"?

12 A Once again, I can't believe that, this, I responded, "Great one." Now,
13 what --

14 Q So you're saying that the NFL provided us a fake document?

15 A I don't -- it seems like there's a lot missing from here. I mean, who's the
16 quotation from? I have no --

17 Ms. Quincy. So we are clear, anything you received from the NFL was sent to the
18 NFL by the team. It's not like the NFL had access independently to all of the 32 teams'
19 full emails going back 12 years. We don't know whether this is authentic or not. What
20 we have been given does not allow us to evaluate that.

21 Mr. Allen has now answered your questions. Please ask the next one.

22 The Witness. And let me add, [REDACTED] does not speak like this. This
23 is not her quote. There's no way. She doesn't speak like that.

24 Ms. Quincy. And, again, I would really appreciate it if the committee would keep
25 her name out of this. This is an elderly woman who lives [REDACTED] and has nothing to

1 do with the team whatsoever. We don't want private investigators showing up and
2 talking to her. We don't want media showing up and talking to her. I hope that the
3 committee and anyone with whom the committee is in contact will be implored to keep
4 her out of this.

5 [REDACTED]: I understand. The Democrats actually control this recording, the
6 transcript, and the release of the documents. We actually don't have control over the
7 minority. So please discuss with them the confidentiality you would like to maintain.

8 With that, my time has expired, so we'll go off the record. We can take another
9 5-minute break, [REDACTED] if you would like to, or we can go straight into your questions.
10 I'll leave that up to you.

11 The Witness. I'm ready.

12 [REDACTED]: Okay. Give us 1 minute.

13 Ms. Quincy. Are we still on the record?

14 [REDACTED]: We are still on the record. We can go off the record.

15 Ms. Quincy. No, no, no. I just want to say in followup to what [REDACTED] said,
16 our concern is not with this committee, frankly. We are all well aware that these emails
17 have been leaked by some source. They were leaked prior to this committee ever
18 acting. That's our concern.

19 What the committee chooses to do with it we anticipate will be respectful.
20 However, it's obvious that others who are more intent on damaging other people have
21 access to these documents. That's what I'm talking about.

22 And, as someone very clearly is in touch at least with Mr. Snyder's attorney, we
23 would hope that that message would be conveyed -- and the NFL's attorneys.

24 [Discussion off the record.]

25 [REDACTED] Good afternoon, Mr. Allen.

1 owner?

2 A I would disagree with that characterization.

3 Q So why does that not ring true based off your experience of Commanders?

4 A He was very involved in the entire operation, in the organization.

5 Q And would that hold true for football operations?

6 A That would hold true to the football operations as well, yes.

7 Q And for business operations?

8 A Yes, sir.

9 Q And what kind of decisions would you, as GM and president of the franchise,
10 consult with him on?

11 A Mostly money and player salaries is the big thing. Coaching salaries and
12 extensions, he would determine if we were going to give extensions to the assistant
13 coaches, as well as the head coach obviously.

14 Q And when you say "assistant coaches," what do you mean by "assistant
15 coaches"?

16 A Well, there's a head coach and there's 20 assistant coaches who work under
17 the direction of the head coach. And if the quarterback coach, you know, whose
18 contract's coming up, I always wanted to extend, but he would determine if we were
19 going to extend any of the assistant coaches.

20 Q So, on these types of contracts, how often would you consult with
21 Mr. Snyder? Did you consult with him often?

22 A Yeah. Yes. Those come up in a timeframe; that's usually an off-season
23 type of a discussion. You don't talk about it during the season, on the assistant coaches.

24 Q And would there be coaches where you wouldn't consult with Mr. Snyder on
25 a contract extension or --

1 A No, all -- excuse me, but no. All of them. He was adamant that he know
2 and approve of any coaching assistant contracts.

3 Q So is it fair to say that you were required to consult with him on these
4 extensions?

5 A Yes.

6 Q And what would happen if you did not?

7 A Good question. I don't know. I always did, so I don't know.

8 Q Was there ever a time where you made a decision that Mr. Snyder felt you
9 should've consulted him on that you did not?

10 A Yes, but not in that -- not in the assistant coach category.

11 Q Sure. What was that decision?

12 A It might've been a -- I forget, but from time to time he would remind me, "I
13 want to know everything. Don't let me find out about it." Maybe we put a claim in on
14 trying to pick up a player on a waiver wire; or we're talking about a trade that made the
15 media, and he read it. He had to know about it.

16 Q And when you said that he wants to know everything, did this also hold true
17 for the other people reporting to Mr. Snyder -- for example, the CFO, the head of business
18 operations, ticket sales, the other heads of departments --

19 A Yes.

20 Q -- to your knowledge? Yes?

21 A Yeah.

22 Q And when you said you would consult with him on these matters, what does
23 that mean?

24 A Discuss it with him, give him my thoughts on it. But he had final say on the
25 outcome.

1 Q Would you ever bring him a decision and he would come to a different
2 decision?

3 A Please restate that.

4 Q Would you ever come to him with a, you know, preferred decision and he
5 would decide to go a different way?

6 A Yeah.

7 Q If you were to estimate, when you were with the team, how often would
8 Mr. Snyder visit Redskins Park?

9 A Maybe -- well, it varies. During the season, he was generally at two, maybe
10 sometimes three. If he traveled, obviously, I mean, overseas or something, he wasn't in,
11 but --

12 Q When you say two, sometimes three, are you saying two, sometimes three
13 times a week?

14 A Yes.

15 Q Okay.

16 A During the season. Because he would come to practices and he would
17 meet, you know, with different people. And --

18 Q And what about --

19 A -- there's nothing wrong with that. That's probably a common practice
20 around the league.

21 Q Understood.

22 And what about in the off season? How often would he visit the Redskins Park in
23 the off season?

24 A Around draft time, he'd be there quite a bit leading up to the draft process.
25 And free agency, he would come in quite a bit. It varied.

1 Q What is "quite a bit"?

2 A Well, during the draft week, he probably came every day of draft week.
3 Free agency, probably came 3 days leading into free agency, that week.

4 Q And understanding that you weren't at FedEx Field as much, how often was
5 it your understanding, or to your knowledge, that Mr. Snyder would visit FedEx Field?

6 A I don't know.

7 Q During your employment, how often would you and Mr. Snyder speak by
8 telephone?

9 A Frequently.

10 Q What is "frequently"?

11 A Sometimes seven times a day.

12 Q And did that hold true both during the season and during the off season?

13 A Yeah. I mean, there were some days, you know, once or twice, but if he
14 wasn't there, it would be -- some days, there's more.

15 Q You also would exchange text messages?

16 A Pardon me?

17 Ms. Quincy. I'm sorry. You're breaking up a little bit. Again, I don't know if
18 it's the mask, but we're having a hard time hearing you.

19 [REDACTED]. Sure. I'll speak up a little bit, and let me know if it continues.

20 BY [REDACTED]:

21 Q Would you also exchange text messages?

22 A Yes.

23 Q How often would you exchange text messages?

24 A Frequently.

25 Q And what is "frequently"?

1 A It would vary. I don't even know how to put a number on it. There could
2 be 10 or 15 in a day. I don't know how to put a number on it. A lot.

3 Q So is it fair to say that you were in frequent or almost constant contact with
4 Mr. Snyder?

5 A Yes. He was accessible. Yes.

6 Q And what sort of things were you talking about with Mr. Snyder, either by
7 phone or text messages?

8 A Whatever subject he wanted to bring up. I mean, it could be anything.

9 Q And was that frequently related to the football operations side or other
10 matters?

11 A It could be football. It could be NFL. It could've been the stadium. It
12 could've been a number of things.

13 Q Sure. And would you also exchange emails with Mr. Snyder?

14 A No. I would get emails from the executive office.

15 Q And --

16 A So he might --

17 Q Sorry. Go ahead.

18 A He might tell his assistant, send Bruce XYZ, and they would send it to me via
19 email.

20 Q And when you say he would tell his assistant to send Bruce XYZ, what does
21 that mean? Would he actually tell his assistant what to send?

22 A Yes. Dan wants you to do XYZ.

23 Q Is it your understanding that he would dictate those emails to his assistant?

24 A I don't want to -- I'm not trying to evade anything. I don't know what
25 "dictate" -- he would say it to his assistant, tell Bruce I want XYZ, or meet me at so-and-so,

1 or something like that.

2 Q And so you stated that this is the executive communications email; is that
3 correct?

4 A Executive office.

5 Q Executive office email.

6 A Yeah, [REDACTED]

7 Q Did Mr. Snyder have access to this email?

8 A Probably.

9 Q Did you ever witness Mr. Snyder using this email account?

10 A Witness him doing what?

11 Q Using or otherwise accessing this email account.

12 A I would not know. I've seen him work on a laptop or -- he had an Apple
13 laptop.

14 Q Have you ever witnessed Mr. Snyder, you know, explaining to an executive
15 assistant, as you said earlier, you know, what to put into an email to other individuals?

16 A Yes.

17 Q When was that?

18 A Specifically, I can't tell you. But, you know, tell -- send a message to Jay
19 Gruden to come down and join us at the office. Something like that. Or to
20 Doug Williams, let him know to come over, I want to see him. Something like that.

21 Q So why didn't Mr. Snyder have a personal email account?

22 A I do not know.

23 Q And so you stated that he would use this to communicate with other
24 Commanders executives, you know, inside the building. Would he also use this to
25 communicate with the league or other NFL owners?

1 A With owners, there was -- they had access to send this message to all the
2 owners from Dan or something like that.

3 Q Did you ever witness Mr. Snyder using this email account to send a message
4 to other NFL owners?

5 A I don't understand that question.

6 Q Did Mr. Snyder ever send a message from the executive
7 communications -- or executive office email account to other NFL owners?

8 A Yes.

9 Q And when did he do that?

10 A I don't know the particular year off the top of my head, but there was
11 discussions going on where it was just the owners having discussions about the league,
12 and I think it was when Roger was up for an extension -- Roger Goodell.

13 Q So we were speaking about Mr. Snyder's day-to-day role with the
14 Commanders. Mrs. Snyder, do you know -- do you have a relationship with her,
15 Tanya Snyder?

16 A Yes.

17 Q And how would you describe that relationship?

18 A I thought it was good.

19 Q And how would you describe her role in the Commanders organization
20 during your tenure?

21 A I don't know what they're doing today.

22 Q Well, during your tenure, how would you describe her role?

23 A Oh. With the Redskins, she was actively involved in the Breast Cancer
24 Awareness Week. We had a lot of festivities and community events around that, and
25 Tanya really did a good job of contributing to the efforts. And she helped out at several,

1 actually, charitable event functions of different types.

2 Q Did Mrs. Snyder have any role on the business operations side of the team
3 while you were there, to your knowledge?

4 A Not to my knowledge.

5 Q What about football operations?

6 A Not to my knowledge.

7 Q And Mr. Snyder, while you were there, was the principal owner of the team.
8 Is that correct?

9 A Yes, sir.

10 Q And was he also the CEO of the team?

11 A Yes, sir.

12 Q Would you have described Tanya Snyder as the co-CEO of the team while
13 you were there?

14 A No, I would not.

15 Q Why is that?

16 A When I was there, no.

17 Q And why is that?

18 A She wasn't.

19 I think I understood your question correctly.

20 Q So, when you called Mr. Snyder to talk to him -- you testified that you would
21 call him or he would call you and you'd sometimes speak somewhat frequently -- would
22 you call to speak to Mr. Snyder, or Mr. Snyder and Mrs. Snyder?

23 And I can rephrase that if that's not clear.

24 A I would talk to Dan Snyder.

25 Q All right. How often would you speak to Mrs. Snyder on the phone?

1 A To Mrs. Snyder, you asked?

2 Q Correct.

3 A I don't know. I imagine I've talked to her on the phone, but I don't -- I don't
4 remember. Now, there would be meetings at the house, and we're having dinner, and
5 Tanya would be in the room sometimes. But I don't remember ever calling her for -- for
6 anything.

7 Q Can you recall any conversations that you ever had with Mr. Snyder where
8 he asked for Mrs. Snyder to join the meeting to talk about football or business
9 operations?

10 A Never about football. There was times, once again, going back to Breast
11 Awareness Week, which is a whole -- you know, a daily events schedule where we're
12 bringing in patients and families, and Tanya embraced that. So we always wanted to
13 know how she wanted it to run and things like that nature, and what players we needed.

14 Q Okay.

15 So I'd like to talk a little bit more about you and Mr. Snyder's, sort of, interactions
16 on the various parts of the Commanders', sort of, operations. And I'd like to start with
17 the football operations side.

18 So I think you've testified that you would discuss personnel decisions and that you
19 would discuss, sort of, broadly speaking, draft decisions with Mr. Snyder, but, you know, I
20 wanted to get into a little bit more on specifics.

21 Did he discuss whether or not to draft specific players with you or other members
22 of the football operations staff?

23 A You know, the answer is yes, but that's not uncommon in the NFL. You
24 know, I met -- I'm sure over half the owners have conversations with their football
25 people.

1 Q Understood.

2 So can you think of some specific examples, you know, about Mr. Snyder being
3 involved in the drafting process? For example, RG3. Was he involved in the decision
4 to move up in the draft to acquire RG3?

5 A Yes.

6 Q How involved would you say he was in that process?

7 A He was involved in -- he wanted to know how the trade talks were going
8 and -- quite a bit.

9 Q All right.

10 A But so was our head coach, Mike Shanahan. He was wanting to know how
11 it was going.

12 Q And, you know, extending to other parts of football operations, did he weigh
13 in on whether to cut or let go specific players who had been with the team for an
14 extended period of time towards the end of training camp?

15 A Yeah, he would voice an opinion.

16 Q And, you know, would you take that opinion into account when you were
17 making that final decision?

18 A Yeah. We listened to everybody's opinion.

19 Q And, for example, a notable player like Chris Cooley, if he was to be released,
20 would Mr. Snyder sign off on that decision, or would he weigh in or give a determination
21 in any way?

22 A I don't remember specifically on Chris, but Chris was more of a medical issue,
23 because coaches -- everybody wanted Chris to play, because he's a great guy. But I
24 remember Chris being more of a medical issue, where he couldn't go. So you really
25 didn't have -- he couldn't play up to his capabilities, so it wasn't really a decision as much

1 as a medical reality.

2 Q Okay. Were there specific examples that you did remember where you
3 consulted with Dan Snyder and he had strong feelings one way or another or gave you a
4 directive on who should be cut from the team?

5 A I don't remember cut as much as you could tell who he wanted to sign. It's
6 not as into cutting. But I'd have to give it some thought. I'm not sure how to answer
7 that.

8 Q Sure. On players he wanted to sign, was there a specific player that you
9 can remember that he really wanted to sign?

10 A Yeah, and -- yes. I don't want to hurt any of these players. They have
11 nothing to do with this stuff. If I say a name and it gets out, it's going to reflect poorly
12 on him. So I'll just say I don't remember a specific name.

13 But, yes, there'd be players he'd want to sign, and he'd be active in the
14 negotiations, and he would talk to Eric Schaffer, who was our vice president of football
15 administration who negotiated the contracts, and encourage him to keep bidding or
16 increasing or improving the offers.

17 Q And, Mr. Allen, I would like to remind you that you committed to giving full
18 and complete testimony here. You know, we would, you know, of course, like to get a
19 full name of some of these players that, you know, Mr. Snyder has weighed in and, you
20 know, really wanted you to sign. And, you know, we are mindful of the confidentiality
21 concerns here.

22 So, if you could give us a specific example of someone who Mr. Snyder asked you
23 to sign, that would be wonderful.

24 A I have a name, and I just -- but I don't -- I appreciate the confidentiality. I'm
25 not accusing anybody on the screen. And I don't even know you all. But it -- so his last

1 name is [REDACTED], and he wanted him signed, and he pushed Eric Schaffer to get him signed.

2 Q Did you or any other members of the staff have concerns about that?

3 A Yes.

4 Q Why is that?

5 A It was a lot of money. And you have a salary cap in the NFL, so, depending
6 how many apples you put in one basket, you don't have room for the pears and the
7 grapefruits.

8 Q Did you express those concerns to Mr. Snyder?

9 A Yes.

10 Q Did Mr. Schaffer express those concerns to Mr. Snyder?

11 A I can't speak for -- he -- he was taking orders from Dan.

12 Q And was this player, [REDACTED], eventually signed?

13 A Yes.

14 Q Was this player [REDACTED]?

15 A Yes.

16 Q In regard to decisions about coaches, I believe you said earlier that
17 Mr. Snyder came to you with a coaching contract for a coach for another 2 years and
18 wanted you to sign it. Who is that coach?

19 A Jay Gruden.

20 Q And had you been consulted before that time on Mr. Gruden's extension?

21 A Yes. Yes.

22 Q Was that Mr. Snyder's decision, to extend Jay Gruden?

23 A Yes.

24 Q When he said, "You need to sign it," had he made that final decision at that
25 time?

1 A Yeah. He said, "You're going to have to sign it." Mine probably was
2 signed a few days after that, because we were at the scouting combine at Indianapolis,
3 and I remember Jay signing there, and I don't think I signed until we came back.

4 Q Are there any other examples of a head coach, offensive coordinator,
5 defensive coordinator, or any of the assistant coaches where Mr. Snyder wanted that
6 coach to be hired by the Redskins, now Commanders, and you hired that coach at
7 Mr. Snyder's behest?

8 A Oh, yeah. Several. He liked several of the assistant coaches.

9 Q Can you give an example?

10 A Well, I'll give you -- [REDACTED] is still on their staff, so he must've liked
11 him.

12 Q Who's [REDACTED]?

13 A He's their [REDACTED].

14 Q When was he hired?

15 A I'm gonna guesstimate '16 or '17, somewhere -- 2016 or '17.

16 Q And that was a decision that Mr. Snyder made, to hire [REDACTED]?

17 A No. Oh, no, no, no. I thought that -- I misunderstood your question.

18 Was he in favor of hiring some other assistant coaches or extending their contracts? I
19 thought that was the question.

20 So he was hired by Jay Gruden, and he's still on their staff, so I'm assuming he
21 approved that.

22 Q Appreciate it.

23 And I can sort of add to my original question, which is: Were there any particular
24 coaches where Mr. Snyder, you know, might've had a different perception of the coach
25 than you or other members of the executive staff and made the final decision to hire that

1 coach?

2 A Are you asking me, did he hire a coach that the head coach didn't want?

3 Q Potentially. Or someone that, you know, it was uncertain whether, you
4 know, everyone on the staff -- if it was Mr. Snyder's favorite or, you know, someone that
5 he particularly wanted on the staff, so, you know, that coach in particular was hired.

6 A I'm not trying to be evasive, but I don't understand. The head coach, when
7 I was there -- I don't know about before or after -- really approved of all the assistant
8 coaches that were hired. We never hired someone that the head coach didn't want to
9 hire. Did Dan like some of them more than others? I'm sure he did. But I don't know
10 how to give you names of who his favorites were.

1

2 [2:38 p.m.]

3 BY [REDACTED]:

4 Q So moving on to the business side, when you spoke with Mr. Snyder on the
5 phone, what type of issues would you discuss regarding the business side?

6 A Oh, he would talk about how the business was doing, how the sales were,
7 things like that, or NFL business and TV ratings and sponsorship. He would talk about all
8 of them.

9 Q And would you discuss hiring decisions on the business side with Mr. Snyder
10 as well?

11 A More I would listen to the hirings that were going on, who he was going to
12 hire.

13 Q And would Mr. Snyder share his assessment of different candidates on the
14 business side with you?

15 A I think he would share some of it. I don't know if he shared all of it. I
16 don't know who he considered, for example, besides Brian Lafemina. And I think that
17 was a great hire. But I don't know if he interviewed other people or not.

18 Q For example, did he discuss the hiring of Jake Bye with you?

19 Ms. Quincy. What's the name?

20 [REDACTED]. Jake Bye.

21 Ms. Quincy. [REDACTED]

22 [REDACTED]. [REDACTED].

23 Ms. Quincy. [REDACTED], got it. Thank you.

24 The Witness. I don't remember Dan mentioning Jake Bye. I remember Brian
25 mentioning that name.

1 BY [REDACTED]:

2 Q So would this -- would your discussions on the business side touch on who
3 should be promoted within the Commanders organization?

4 A Please repeat that.

5 Q Did it touch on who should be promoted within the Commanders
6 organization, as in internal promotions on the business side of the team?

7 A Not off the top of my head, no.

8 Q How involved was Mr. Snyder in the decision to terminate or fire
9 employees?

10 A He was involved.

11 Q How involved?

12 A He had final -- final say on it.

13 Q Would he often make the final decision to terminate Commanders
14 employees, to your knowledge?

15 A Yes, but I'm not talking about -- there's 65 people who work at the stadium,
16 but Dan would make the decision of who's going to be the stadium manager, who's going
17 to be the ticket manager, the directors. I don't think he knows that someone got fired
18 below that level other than he would know there's an opening.

19 Q Fair. So at the higher level and at the level you're sort of discussing, to your
20 recollection, did Dan Snyder ever make the final decision to terminate employees during
21 your tenure?

22 A Yes.

23 Q Can you remember specific employees?

24 A Yes, I can think of several names. Dave Donovan, Mitch Gershman, Lon
25 Rosenberg, Dennis Greene, Brian Lafemina. That's what I can think of right now.

1 Q And how do you know that Mr. Snyder was involved in the decisions to fire
2 those employees?

3 A Well, several, he asked me to let them know. So that's how.

4 Q Did he also consult with you before firing those employees? And I realize
5 there are several, so if there's different answers for each of them, feel free to specify.

6 A No, he would tell me who to let go. I don't know what you mean by the
7 word "consult."

8 Q And then would he consult with you as to whether that employee should be
9 fired?

10 A Yeah, in general things, but it would be more, "It's time to move on from
11 Dave Donovan, will you let him know that he's leaving?"

12 Q Did he give you any additional information on why he was terminating Dave
13 Donovan?

14 A I don't remember any.

15 Q So he just asked you to fire Dave Donovan and he didn't tell you why?

16 A No, not that I can remember. I think each one of them had had
17 conversations in some way with Dan prior to him saying, "Let him go." I mean, they
18 were all a little bit different, but all very similar.

19 Q And I think you said Mitch Gershman as well had --

20 A Yes.

21 Q Had Mr. Snyder given you any information about why he was firing Mitch
22 Gershman?

23 A I believe he had a replacement for Mitch. He always had a replacement in
24 mind when doing this. So I don't remember the specific date of that, but it's maybe he
25 was making room for one of the other people to be brought in.

1 Q Sure. In line with this, did you ever discuss disciplining employees with Mr.
2 Snyder as in when an employee wasn't to be terminated but was to be censured in some
3 way by the team?

4 A Please say that again.

5 Q Did you ever discuss disciplining employees with Mr. Snyder? So if he were
6 to be -- an employee were to be censured in some way by the team or at the end of an
7 investigation or some other instance you were to take an action against an employee,
8 would you discuss that with Mr. Snyder?

9 A Yes.

10 Q Can you remember specific instances in which you did so?

11 A The Dennis Greene situation. I think that's what I understand you to be
12 saying, did someone ever lose their job for disciplinary reasons.

13 Q Well, and we can talk about the Dennis Greene situation. I'm asking if
14 someone who was being retained by the team, did you also sort of talk with Mr. Snyder
15 about the decision to do that as well?

16 So I think earlier -- and you talked about someone in the scouting department that
17 was retained by the team.

18 A Oh, Alex Santos.

19 Q Alex Santos. So did you discuss that situation with Mr. Snyder?

20 A Yes, he probably -- yeah, he was aware, because of the legal department,
21 legal department being involved in that. They would have informed him, yes.

22 Q Did you discuss that with Mr. Snyder or was it the legal department that
23 discussed that?

24 A I probably did, yes.

25 Q And what was Mr. Santos accused of?

1 A Say it again?

2 Q What was Mr. Santos accused of?

3 A He made a female reporter uncomfortable.

4 Q And what did the Commanders' internal investigation find with regard to Mr.
5 Santos?

6 A I know that Eric Schaffer talked not only to the reporter but to the supervisor
7 of the reporter. And they set up a meeting. And I don't want to speculate too much,
8 but it became that we were going to put him on more than probation, I forget the legal
9 phrase for it, but just short of termination. And we gave him notice that any -- anything
10 else, he would be terminated.

11 Q And was that because some of the claims had been substantiated against
12 Mr. Santos?

13 A Yeah, I would suspect so, yes.

14 Ms. Quincy. Just so we're clear, I think Mr. Allen testified as to one claim, not
15 multiple claims.

16 The Witness. Right.

17 BY [REDACTED]:

18 Q Did you ever become aware of complaints against Larry Michael while you
19 were at the team?

20 A No.

21 Q Did you ever discuss any allegations against Mr. Michael in any way with Mr.
22 Snyder?

23 A No. But let me phrase it. I think when Brian Lafemina came to the team,
24 he said he was looking into things that involved the TV department. But I didn't get any
25 more into that, because they were doing an investigation.

1 Q And the TV department was the department that Larry Michael was in --

2 A Yes.

3 Q -- at the time?

4 A Yes.

5 Q And did Mr. Lafemina ever tell you anything more about those complaints or
6 how they were resolved?

7 A No.

8 Q You've described Mr. Snyder as hands-on in the day-to-day operations of the
9 team. You said that you typically consulted with Mr. Snyder on the major decisions.
10 What would happen if someone did not consult with Mr. Snyder on a major
11 decision or a decision that they felt they should have consulted with Mr. Snyder on -- or
12 he felt that someone should have consulted with him on?

13 A I do not know. I do not know. What would happen if X didn't happen? I
14 don't know, because I don't know if X ever didn't happen.

15 Q During your time with the team, did you become aware of someone not
16 consulting with Mr. Snyder and him becoming upset that a decision was made without his
17 knowledge?

18 A He would get upset from time to time, but I don't know if that was the
19 reason. I can't recall anything right now.

20 Q I'd like to move on to the Commanders' relationship with the NFL during
21 your tenure as GM and president.

22 How would you describe that relationship, understanding that it took -- it was
23 over the course of a number of years?

24 A The relationship between who?

25 Q The team and the NFL during the course of your tenure.

1 A I think it -- the league office technically works for the teams, and I would
2 imagine they treated us like they did the other 32. They probably had some people they
3 liked better than us, probably others the same. I can't describe how they treat other
4 teams, but they treated us fine.

5 Q And why would there have been some teams that they liked better than
6 you?

7 A Well, I'm just thinking they're human beings.

8 Q So during your employment, who were the primary points of contact
9 between the NFL and the team?

10 A From the team side?

11 Q From the team side, yes.

12 A From the team side?

13 Q From the team side.

14 A Well, it really -- it's a branch. The CFO would talk to the NFL CFO
15 department. The marketing would talk to the marketing department. The suites and
16 sponsorships would talk to those departments. Primarily, I would talk to the labor
17 department, and it's called the Management Council, that dealt with the player contracts.

18 There was a medical -- there's a medical division within the league, so the trainers
19 and the doctors could consult with them.

20 So they all branch out that way.

21 Q And you said you would talk with labor counsel. Is that correct?

22 A Yeah. It's called the NFL Management Council.

23 Q And who was that during your tenure?

24 A There's members of the NFL Management Council, because, once again, five
25 teams could be calling in at the same time, asking a question for an interpretation on a

1 contract or rule. And so when you dial the number, whoever picked up is who you
2 would talk to.

3 Q Who else in the league office and specifically the league's sort of executive
4 office would you speak with during your tenure?

5 A That I would speak with?

6 Q Correct.

7 A In 10 years, I probably spoke to everybody.

8 Q Did you speak with, for example, Jeff Pash during your time there?

9 A Yes, I did.

10 Q And who is Jeff Pash?

11 A He's the general counsel for the NFL, and he was the head of the NFL
12 Management Council.

13 Q And how often would you communicate with Jeff Pash?

14 A Ten times a year, other than league meetings where you'd see him at the
15 coffee shop and stuff like that.

16 Q And how would you describe your relationship with him?

17 A Fine. I thought good.

18 Q Would you describe yourself as friends?

19 A I don't know about friends. But I got along with a lot of people, still get
20 along with a lot of people.

21 Q Was there anyone else in the NFL general counsel's office that you would
22 speak to as part of your job duties?

23 A I would talk to other lawyers from time to time, yes.

24 Q Who else?

25 A There's ten lawyers in there, so I would talk to all of them.

1 Q Would you talk to Lisa Friel?

2 A Yes.

3 Q What would you talk to Lisa Friel about?

4 A When I was with the team, we had a player that was accused of something,
5 and she came down to investigate it. And the player -- the player was -- I don't know
6 the official word, but not guilty or there was no charges. But she did the investigation
7 for the league.

8 Q And what year was this?

9 A 2018, I believe.

10 Q And how would you describe your relationship with Mrs. Friel?

11 A At that time?

12 Q At that time.

13 A At that time, she was a league official who was part of the discipline
14 committee of the league.

15 Q Were you responsible for reporting information to the league?

16 A Our general counsel would, but everybody was responsible. We knew as a
17 team if something happened, if the personal conduct policy or something like that with a
18 player, that we had to turn it in.

19 Q Was that through you or the general counsel?

20 A The general counsel.

21 Q And how often would you attend league meetings?

22 A Attend league meetings?

23 Q Yes.

24 A Generally, all of them.

25 Q And how often were those?

1 A There's four a year.

2 Q Would you attend with Mr. Snyder?

3 A Sometimes.

4 Q And what were your responsibilities at league meetings?

5 A The league meetings is a great resource to learn. They give a lot of reports
6 on best practices. And there's different parts of league meeting. Obviously, the thing I
7 cared about the most was the competition committee, which applied to the rules of the
8 game and things of that nature, practice schedules, limitations, and things of that nature.

9 Q How would you describe Dan Snyder's relationship with Commissioner
10 Goodell?

11 A I always thought they got along.

12 Q Would they speak, either on the phone or at league meetings?

13 A Yeah, they would speak. I don't know about the telephone, but they would
14 speak.

15 Q And would they speak sort of frequently or infrequently, to your knowledge?

16 A If the commissioner is walking by, everybody says hi to the commissioner at
17 a league meeting. So I don't think it was out of line.

18 Q Did Mr. Snyder ever share his views with you of Mr. Goodell's performance
19 as commissioner?

20 A Yes.

21 Q And what did he share with you?

22 A Do I have to --

23 Ms. Quincy. This is a particularly concerning area of testimony for us, because
24 we believe that it would be upsetting to one if not both of them.

25 And so I'm not exactly sure how the committee wants to handle this, but we are

1 extremely concerned with Mr. Allen truthfully testifying as to this issue.

2 [REDACTED] Stephanie, we understand the concerns, but he is under subpoena
3 and this is relevant to the committee's investigation. So we're going to have to ask him
4 to answer the question.

5 Ms. Quincy. How much of this is going to be shared with Dan Snyder's
6 counsel?

7 [REDACTED] Again --

8 Ms. Quincy. I'm asking not only you. I'm asking [REDACTED] and [REDACTED] as
9 well as well as -- is [REDACTED] still on the call?

10 How much of this is going to be shared with Dan Snyder? And I'm not talking
11 about handing him the transcript. I'm talking about somebody calling and dropping a
12 dime.

13 Is the committee's official position that none of this is going to be shared with Dan
14 Snyder's counsel?

15 [REDACTED]. We're going to go off the record.

16 Ms. Quincy. Actually, we really want this on the record.

17 [REDACTED]. We're off the record.

18 [Discussion off the record.]

19 [REDACTED] Back on the record, 3:05.

20 BY [REDACTED]:

21 Q Mr. Allen, the question was, did Mr. Snyder ever share his views about
22 Mr. Goodell's performance as commissioner with you?

23 A I believe so, yes.

24 Q And what were Mr. Snyder's views?

25 A They probably changed from time to time over the years.

1 Q Did he ever feel that Mr. Goodell was not performing adequately as
2 commissioner?

3 A There was one time that he had Stephen Choi, our CFO, and me go with him
4 to the league office to read Commissioner Goodell's contract.

5 Q And why did he have you do that?

6 A He was unhappy at the time, and I guess -- which I'd never known -- that
7 owners have a right to do that. But you have to read it. You don't take a copy of it, a
8 photocopy of it or anything. And he flew Stephen and I up there, and we read the
9 contract.

10 Q And was the purpose of you reading Commissioner Goodell's contract?

11 A Really, for me to read it, it didn't mean anything to me. But at that time, I
12 think he really wanted to see his compensation and what his duties -- if Roger was doing
13 his duties properly.

14 Q Did Mr. Snyder ever convey to you why he wanted you to read the contract?

15 A I don't know why he brought me to it. I am not a lawyer. I'm not a
16 lawyer. So I have no idea why it would be me versus our general counsel.

17 Q Did he ever convey, to your knowledge, to Mr. Choi why he wanted him to
18 read the contract?

19 A Well, he was the CFO, and I think Dan was looking for a better picture of the
20 compensation he was receiving.

21 Q Did Mr. Snyder think Mr. Goodell was receiving excessive compensation?

22 A I'm not the right person to answer. I don't know what they think is
23 excessive or not.

24 Q Mr. Allen, what issue did you reference that Mr. Snyder believed Mr. Goodell
25 was not handling appropriately?

1 A You know, I'm not sure specifically. I got mad at the commissioner. In the
2 new collective bargaining agreement, this would be in 2011, they took \$36 million of our
3 cap room. And I put up a pretty big stink about that, because I thought it was unfair. It
4 hurt the competitive balance of the league. And I expressed that to them directly. But
5 I don't know if it was then or something else happened. I don't know if it was then.

6 Q So the question was, what issue did Mr. Snyder feel that Commissioner
7 Goodell was not handling appropriately? Did he ever convey to you what he felt
8 Commissioner Goodell was handling poorly?

9 A I don't want to guess. I don't know off the top of my head the specific issue
10 and I don't want to guess. I don't want to guess.

11 Q Did Mr. Snyder ever take any steps to convince other owners to replace
12 Commissioner Goodell?

13 A Well, he expressed his opinions in those emails we previously discussed.

14 Q How did he express his opinion?

15 A He would send an email that would just go to the owners in the league.

16 Q And what would he say to the other owners?

17 A Whatever's in that email.

18 Q Do you know what was in that email?

19 A You guys -- know, they probably wouldn't give you that exhibit,
20 because -- but if it was sent to me, it would be in my 650,000, but it was only sent to
21 owners. So we don't know, do we?

22 Q And the question was, do you know what was in that email? Do you know
23 what Dan Snyder expressed to the other owners?

24 A No. No.

25 Q But you do know that he was attempting to get the other owners to replace

1 Commissioner Goodell?

2 A I know he was giving his opinions on the commissioner.

3 Q Did Mr. Snyder ever take any other steps to remove Commissioner Goodell,
4 to your knowledge?

5 A I'm sitting here once again talking to you all on this committee. You know,
6 he says a lot of things, which I never would have put one and one together except that
7 I'm sitting here. You know, he said at that time I'm going to follow -- I'm going to have
8 him followed, follow the commissioner. You know, I'm going to find something out
9 about him.

10 But, one, I didn't believe him, so it was like just one of those comments. Two, I
11 never would have approved it, because if it came through finance and someone said,
12 we're following the -- they never would have approved that, like they're doing now.

13 Now, after I read about everyone who's getting followed around the country, I
14 don't know if it was true or not. I have no idea.

15 Q To the best of your recollection, what year was this?

16 A I don't -- it's during that time, though. It's during that time.

17 Ms. Quincy. For clarity's sake, what is "that time"?

18 The Witness. I know it's when he was sending the emails to the other owners.

19 BY [REDACTED]:

20 Q Does this relate to the national anthem protests?

21 A It could be, because that was one of the controversial times in the league.

22 Q Is it around this time that he was sending those emails?

23 A Yes.

24 Q And it was around that time he suggested that he was going to have

25 Commissioner Goodell followed?

1 A He said it. I don't know if it's true or not. I know what happened to me
2 and I know what happened to some of these other people in these depositions, but I
3 don't know. But he said it.

4 Q Where were you when he said this?

5 A In his office.

6 Q Was anyone else there?

7 A Eric Schaffer might have been there, or Karl Schreiber, but I'm not -- I
8 don't -- I can't be specific.

9 Q To your knowledge, did Mr. Snyder ever hire a private investigator to follow
10 Commissioner Goodell?

11 A No. To my knowledge, I don't know, no. I would never approve anyone
12 following people.

13 Q To your knowledge, has he ever hired a private investigator to follow an NFL
14 front office employee or other NFL owner?

15 A You're not talking about the guy who was following me, obviously. You're
16 saying other, other stories.

17 Q Other NFL employees, as in NFL front office.

18 A Oh, some other -- some -- I don't know. I don't know.

19 Q Has he ever suggested or made a comment about private investigators to
20 you in any other way besides this instance?

21 A That was -- that's the only one I remember.

22 Q So when he made this comment to you, what did he suggest this private
23 investigator or these individuals would do when they followed Commissioner Goodell?

24 A I don't know. I really don't know what the guys who were following me
25 were doing. They didn't give me their notebook. They didn't give me the video that's

1 in their cam. So I don't know what they're doing.

2 Q You say that at the time you weren't sure whether he was serious or not.
3 Did there come a time when you later reevaluated Mr. Snyder's statements regarding
4 these private investigators following Commissioner Goodell?

5 A One, when he said it, I didn't think he was serious, because it's just -- it's a
6 crazy thought. That I'm going to burn down the building next door. I don't believe
7 anyone is actually going to do that.

8 I had the thoughts when I heard about others being followed, former employees,
9 those cheerleaders, other people I know. And then obviously when it occurred to me, it
10 was like wow.

11 Q I think we're out of time. Off the record.

12 [Recess.]

1

2 [3:49 p.m.]

3 [REDACTED]: We can go ahead and go back on the record.

4 Mr. Allen, I'm going to ask about a few more emails that were produced to us by
5 the NFL in response to Chairwoman Maloney's investigation launched last October
6 examining the toxic workplace at the Commanders during the time you were the GM.7 So the first exhibit I'm going to introduce has been previously marked as exhibit C
8 for the minority.

9 [Minority Exhibit C

10 Was marked for identification.]

11 Ms. Quincy. Does it start -- hang on, I'm trying to blow this sucker up so I can see
12 it.

13 [REDACTED]: It's an email from May 1st, 2011.

14 Ms. Quincy. Got it.

15 [REDACTED] Okay. Do you have it in front of you, Mr. Allen?

16 Ms. Quincy. He doesn't yet. I'm trying to grab it. Hang on. Oh, it says,
17 "Does this Meme," that's how it starts?

18 [REDACTED]: Yes, correct, that's the one.

19 Ms. Quincy. Okay.20 The Witness. Okay.

21 BY [REDACTED]:

22 Q So the original email was sent from [REDACTED].

23 Who is [REDACTED]?

24 A Dan's -- Dan Snyder's executive assistant at the time.

25 Q Okay. So an employee of the Redskins at the time?

1 A Yes.

2 Q Okay. She writes, "Mr. Allen, good morning. There will be two Escalades
3 reporting at 8 a.m. this morning to the Inn." She gives more details about the drivers
4 and who will be in the cars.

5 You respond a few minutes later and say, "Does this mean...I have to get the
6 cheerleaders out of my house today?"

7 What did you mean when you wrote that email?

8 A First of all, the email's to my wife, not to me. And then, second, that is
9 humor, since my wife is on this email.

10 Q Okay. So what was the humorous part? Can you explain it to me?

11 A Do I have to get the cheerleaders out of my house?

12 Q And why is that humorous?

13 A I think it's funny. So she -- [REDACTED] would have thought it's funny.

14 Q Okay. Can you just help me understand what's funny about -- were there
15 cheerleaders in your house at any time?

16 A Well, my wife was a high school cheerleader, but no.

17 Q Okay. So with the exception of your wife, who was previously a
18 cheerleader, did you ever have Redskins or any other NFL cheerleaders in your home at
19 any point?

20 A Not that I can -- no, no.

21 Q No. Okay.

22 A Unless somebody was a high school cheerleader and I didn't know it when
23 we had functions at our home.

24 Q Okay. So when you sent, "Does this mean I have to get the cheerleaders
25 out of my house today," you said it was supposed to be funny.

1 The Witness. Excuse me, excuse me.

2 ██████████: Yes, Mr. Allen?

3 The Witness. What didn't I answer? I thought it was humor. My wife took it
4 as humor. You didn't take it as humor, but I don't understand I didn't answer your
5 question.

6 ██████████: Okay. That's noted. Thank you, Mr. Allen. We can go ahead
7 and move on to what's been previously marked as Minority Exhibit I, if you could get that
8 in front of you.

9 This is an email dated July 15th, 2016.

10 Ms. Quincy. Yeah. I pointed out the copies that you sent us are minuscule,
11 so --

12 ██████████: Yeah. That's how they were produced to us from the NFL. And I
13 didn't want to tamper with them at all, so I just produced them the same way they were
14 produced to us. So I apologize that they're small.

15 Ms. Quincy. Yeah. Again, this is all easy to take care of, but we're not,
16 obviously, debating that fact today. It starts "That's my partner"?

17 ██████████: Correct. That's the email, yes.

18 Ms. Quincy. By the way, this also is another example of an incomplete email.
19 It's page 1 of God knows how many. But I understand apparently that's the way you do
20 it, so have at it.

21 ██████████: So this email, as I said, was sent on July 15th, 2016. We're going
22 to start in the middle of the page with an email from ██████████. Do you see that one at
23 1:20 p.m.?

24 The Witness. Oh, okay.

25 Ms. Quincy. I don't see one at 1:20 p.m.

1 The Witness. It's stuck right in the middle.

2 ██████████: Right in the middle. It's right above the original message from ██████████

3 ██████████

4 Ms. Quincy. Okay, got it.

1 BY [REDACTED]:

2 Q The original message was from -- involved [REDACTED], [REDACTED], Bruce
3 Allen, Jon Gruden, [REDACTED]. The subject is "Re: Brantley (ph) Party."

4 And the email I was going to start with was the one from [REDACTED] at 1:20 p.m.,
5 and he says, presumably to [REDACTED], "That was your deal, abusing and exploiting young
6 women for professional gain. How do you sleep at night?"

7 Then [REDACTED] responds, "[REDACTED] was there to help pick up the pieces of a
8 shattered girl as a great American."

9 [REDACTED] responds, "Exactly, just happy to help."

10 [REDACTED] responds, "And protect America," in all caps, "from seeing her vagina. Many
11 bold directors would have ducked that responsibility."

12 And you say, quote, "That's my partner!" with an exclamation point.

13 Can you help me understand -- as I understand it, [REDACTED] is involved with
14 Hooters. Is that right?

15 A Yes.

16 Q So is that -- presumably the, "That was your deal, abusing and exploiting
17 young women for personal gain," did you understand that to be in connection to his
18 Hooters connection?

19 A I have no idea what this conversation is about.

20 Q But you are on the email, right?

21 A I'm on the email.

22 Q And you did respond to the email?

23 A Correct. I have no idea what the conversation's about.

24 Q You said: "That's my partner!" Can you recall who you were referring to?

25 A [REDACTED] my golf partner.

1 Q [REDACTED] is your golf partner?

2 A Yes.

3 Q And it said, [REDACTED] was there to help pick up the pieces of a shattered girl as a
4 great American." And just within this email chain, you say, "That's my partner!"

5 So you're continuing this conversation and saying that that's my partner. Was
6 that an, "I'm proud of him"? Was it an, "I'm being sarcastic, I hate him"? What was
7 the feeling behind that email?

8 A I like everybody on this email that were all personal friends who have
9 nothing to do with the Washington Redskins.

10 Q But it was from your work account and not your personal account that this
11 conversation occurred?

12 A Yes. I'm obviously not where they are at, so I have no idea what the
13 conversation's about.

14 Q What do you mean, you're not where they're at?

15 A July 15th, I'm not in Tampa, Florida.

16 Q So you're not physically in their presence while this email chain was
17 occurring?

18 A Whatever happened the day before, the second day before, I don't know.

19 Q So then the, "That's my partner!" wasn't a negative thing, it was kind of a
20 positive thing. You said you like all the people on this chain.

21 A I like these people. They're my friends.

22 Q So that was more of an affirmation than anything else?

23 A I'm not talking about the subject. I'm talking about the people.

24 Q I understand. And you said, "That's my partner!" You said you were
25 probably referring to Jim, so that seems like an affirmation of Jim in this conversation.

1 A As a person, yes.

2 Q Okay.

3 Ms. Quincy. Are we going to be wasting a lot more time on questions like this?
4 For someone who just professed that this whole proceeding is a waste of time, I think you
5 just managed to waste about 10 minutes of everyone's.

6 [REDACTED]. I understand that you might feel that way, ma'am, and I am sorry.

7 Ms. Quincy. No, it's not a feeling. It's a fact.

8 [REDACTED]. So, as we said before, we did not call this investigation. We have
9 said --

10 Ms. Quincy. If you have another question --

11 [REDACTED]. Ma'am, could you please let me speak?

12 Ms. Quincy. No. If you have another question, ask it. I don't want to be
13 lectured to anymore. I don't want to hear about you would be doing all these wonderful
14 things and --

15 [REDACTED] Okay. I will just go to another exhibit, as you requested, ma'am,
16 because you're obstructing my line of questioning by continuing to interject. So, yes, I
17 am going to continue my line of questioning, and I would appreciate that you keep your
18 objections to a minimum, as [REDACTED] said at the beginning of this interview.

19 Ms. Quincy. They aren't my objections. If I object, it's while a question is
20 pending before my witness --

21 [REDACTED]. I'm sorry, then your injections into my line of questioning, ma'am.

22 Ms. Quincy. No, I'm interjecting that you are wasting everyone's time. And at
23 5 p.m. today we will be done. So keep going.

24 [REDACTED]. All right.

25 Ms. Quincy. Especially if the line of questioning is along the lines of --

1 [REDACTED]: So I want to go ahead and introduce Minority Exhibit L, if you could
2 get that in front of you. This is an email from 6/3/2017.

3 [Minority Exhibit L
4 Was marked for identification.]

5 Ms. Quincy. All right. Hang on. 6/3?

6 [REDACTED]: Uh-huh, June 3rd.

7 Ms. Quincy. Yes, I'm familiar with what 6/3 is.

8 Impossible to read this tiny little print. Here we go. This is the one that is,
9 "Nice of you to give her that sturdy ladder."

10 Do you have the attachments to this, by any chance?

11 [REDACTED]: I don't. So some of these are produced in camera by the NFL, and
12 so I don't have the physical copies of photos. Those are all kept at the law firm, and we
13 reviewed them eightish months ago.

14 Ms. Quincy. So we don't have any idea what the pictures are that the very
15 minimal commentary is about.

16 [REDACTED]: Right. I just want to ask about one of the sentences on this.

17 Ms. Quincy. Right, but it's obviously about the photograph that's attached that
18 we don't have.

19 Go ahead. I'm just noting my objection for the record. The questioning a
20 witness --

21 [REDACTED]: Thank you. Your objection is noted. Thank you.

22 Ms. Quincy. No, it's not until I'm done talking, and I will finish my question -- or
23 my statement. So go ahead.

24 [REDACTED]: On June 3rd, 2017, Ed Droste wrote to you, Jon Gruden, [REDACTED]
25 [REDACTED] and -- 7

1 Ms. Quincy. [REDACTED].

2 BY [REDACTED]:

3 Q -- someone whose email I'm not sure what it is. And he writes, "A true
4 dickette will do whatever it takes to get the game back on."

5 Who were the dickettes or dickette?

1

2 [4:04 p.m.]

3 A I don't know.

4 Q This is not the only time they are referred to as dickettes throughout the
5 production, and I won't waste any more time adding additional dickette emails.

6 But it seems like it's a reference to the wives of what is in the emails as the
7 dickheads. Are you familiar with who the dickheads are?

8 A We actually refer to ourselves more frequently as devoted husbands, but
9 yes.

10 Q Okay. And who are the dickheads/devoted husbands?

11 A Friends. This is -- my recollection would say that he took a picture of his
12 wife fixing the TV antenna in his house and my comment: Nice of you to get a sturdy
13 ladder for your wife.

14 I didn't say "wife," but for your wife.

15 Q So my question is: Why did you refer to yourselves as your wives as the
16 dickheads and the dicketts?

17 A Are you serious?

18 Q I am serious, sir. Please do take this seriously.

19 A That's good.

20 And, by the way, I'll correct you later on something else.

21 But these friends, most of them were married. One wasn't, and we just
22 socialized.

23 And she said: Why don't you guys, you DHs, tell your buddy to propose to me so
24 I can be a married woman like everyone else?

25 And she came up with the name, and they ended up getting married, and they live

1 happy ever after.

2 So that's not the reason I'm here. This has nothing to do with the Washington
3 Redskins, the common interest -- this common interest agreement of the NFL.

4 Q So the investigation that Chairwoman Maloney launched was looking into
5 the toxic workplace of the Washington Commanders prior -- the Washington football
6 team, previously the Redskins. The time period which Chairwoman Maloney's
7 investigation is looking into is the time period at which you were the general manager.

8 A That's -- excuse me. I need to correct. You said that earlier. You're
9 looking into the time period also way before I was with the Redskins.

10 Q Yeah.

11 A And you're looking at the time period after I'm with the Redskins.

12 Q Yes, we are. But you're the person who's being deposed today. So that's
13 why I'm focusing on the time that you were there because would you have knowledge of
14 when you were there.

15 A Right. But the investigation is wider, yes.

16 Q Yes. I agree.

17 [REDACTED]. So let's move into what's been previously marked as Minority
18 Exhibit O, as in octopus.

19 [Minority Exhibit O

20 Was marked for identification.]

21 Ms. Quincy. This one doesn't have a Bates label on it. Where did it come
22 from?

23 [REDACTED]. It should. It should be NFL.00093977 and then 93978.

24 Ms. Quincy. Okay.

25 [REDACTED]. Bottom right corner.

1 Ms. Quincy. The one printed off doesn't have them.

2 [REDACTED]: I apologize. Is it on your -- it should be on your computer copy in
3 the bottom right corner.

4 Ms. Quincy. It sure is. You're exactly right.

5 [REDACTED]: Okay. Great.

6 BY [REDACTED]:

7 Q So this, the second page, which is 93978, is a letter from Senator Harry Reid
8 to you, Mr. Allen. And he essentially says: During my time in the United States Senate,
9 I have worked to right many of the injustices endured by Americans throughout the
10 country. Among the most egregious in our history have been those injustices inflicted
11 upon American Indians, Alaska Natives, and Native Hawaiians. This is personal for me.
12 I will not stand idly by while a professional sports team promotes a racial slur as a team
13 name. It disparages the American people. Nor will I consider your invitation to attend
14 a home game until your organization chooses to do the right thing and change its
15 offensive name.

16 So it sounds like there is an invitation for Senator Reid to come to a game, and he
17 very assertively said "no thank you."

18 And then you send this letter to Paul Hicks at the NFL, Jeff Pash at the NFL, and
19 then Adolpho Birch, who also appears to be at the NFL. And you just said: FYI, I think I
20 should have sent a cheerleader calendar in my last letter.

21 Can you tell me why you would have sent a cheerleader calendar to a Senator?

22 A Well, our Redskins calendars are available throughout the Washington, D.C.,
23 area. In any store, you can buy the calendar. You can buy them at the stadium.

24 I was trying to say maybe I should have tried something sweeter than -- you -- you
25 don't have the copy of the letter I sent him, but I corrected his previous public statements

1 about the Redskins team name.

2 And so he had a different opinion. He wrote me the letter. But if I'm going
3 communicate with a Member of Congress, I wanted -- I wanted the league to know that
4 he responded.

5 Q Okay. And you said you wanted to maybe -- I think you used the word
6 make it a sweeter offer. How would the cheerleader calendar make it a sweeter offer to
7 Senator Reid?

8 A Makes it a different type of gesture than me arguing with him. And I
9 don't -- I don't have my letter to him, but if you read that letter, it has a completely
10 different opinion than Senator Reid.

11 Q In regards to the name of the team?

12 A Yes.

13 Q Okay. And so can you explain why the cheerleader calendar could have
14 maybe changed his response?

15 A Put a bottle of wine. Put whatever you want, a six-pack of Coca-Cola. It
16 doesn't matter.

17 Q I think it does matter, though, because I think the cheerleader calendar, as
18 you said, is publicly available. It's very sexual in nature, which I understand is common
19 across the NFL. And I'm not saying anything right or wrong about that. But I do think it
20 is interesting that it was a cheerleader calendar that you chose to use instead of a bottle
21 of wine or a six-pack of Coke.

22 And I'm just wondering why the cheerleader calendar would have sweetened it.

23 A No, I really can't tell you.

24 Q Okay.

25 A It's -- what year was this? 2014. Obviously, the league had no issue with

1 it, correct?

2 Q The league had what? Sorry?

3 A No issue with it.

4 Q I'm not sure. I don't have any of the league's responses to your email on
5 that one.

6 [REDACTED] So -- all right. We can move on into what's been previously
7 marked as Minority Exhibit K.

8 [Minority Exhibit K

9 Was marked for identification.]

10 Ms. Quincy. This is the one that starts: What kind of cunts live there?

11 [REDACTED]. Yes, that one.

12 The Witness. I have it.

13 BY [REDACTED]:

14 Q So it seems you sent an email on September 1st, 2016, which is an article
15 from The Washington Times, which started this email chain. And Jon Gruden responds
16 to you: Tell Dan Steinberg to fuck himself.

17 Can you tell me who Dan Steinberg is?

18 A I believe he was a writer for The Washington Post, I believe.

19 Q Okay. And in response to that, you said: I already do that every time I
20 see him.

21 Did you see Dan Steinberg often?

22 A No.

23 Q So what made you say that you tell him to fuck himself?

24 A I don't know -- I don't know if I'm responding to that comment.

25 Q Okay. So the email was sent from Jon Gruden to [REDACTED], you, and [REDACTED]

1 [REDACTED], at 6:16 p.m., on September 1st. And your response comes through at 6:26
2 p.m. on September 1st. So it does appear that you're responding to that, but that's okay
3 if you don't remember.

4 A Yeah, maybe I am. But I don't -- I don't see -- I could speculate. I probably
5 see him at the most once every 3 months or maybe even 4 months, Dan Steinberg.

6 Q Okay. And then, at the very top of this email, which your lawyer already
7 read, "what kind of cunts live there," was sent from Jon Gruden to you and the others I
8 listed. Did Gruden frequently use that kind of language in emails with you?

9 A No. I don't remember that. I'm sure, if he did, you would have it.

10 Q Did -- to me, the word "cunts" is pretty offensive and pretty aggressive. So
11 it would have jumped out at me as a person when I see it on an email. However, you
12 know, if it is a pattern of someone's behavior, maybe it wouldn't stick out as much.

13 A It is --

14 Q Oh, that's just that guy. You know him, you know?

15 A It is an offensive word. And it's not a word that I use or I hear very often in
16 the last 30, 40 years. I don't know -- I don't know.

17 Q All right. So but it didn't strike you at the time that you received it. Or
18 you don't remember receiving it. So it wasn't too --

19 A No.

20 Q -- striking in the moment. Okay.

21 Ms. Quincy. Oh, my God.

22 [REDACTED]. All right. So we can move ton what's been previously marked as
23 Minority Exhibit N.

24 [Minority Exhibit N

25 Was marked for identification.]

1 Ms. Quincy. This is the "let the games begin"?

2 [REDACTED] Yes.

3 The Witness. Okay.

4 BY [REDACTED]:

5 Q Okay. So this is a series of emails that you started on June 5th, 2019. It's
6 an excerpt from an article about Trent Williams not being at minicamp, and the article
7 states that Williams is upset with how the team's medical staff handled a recent health
8 scare. And there's a little bit of conversation about it.

9 And then you say: Let the games begin. As I said, let's enjoy the
10 entertainment.

11 So, in the context of Trent Williams and his medical condition and his displeasure
12 with his treatment by the medical staff, do you remember why you said "let the games
13 begin"?

14 A The Trent Williams situation you're simplifying a little bit too much. Trent
15 did have a problem with the medical staff. He was upset at the doc for not discovering
16 he had a medical issue, I'll say. And he couldn't put a helmet on to be at the minicamp,
17 but he was holding out because he wanted a new contract from the team.

18 And Trent and I had a great relationship until all of this and still did during this
19 time, especially during this time. And we could have resigned him. He's an elite
20 player. He's a great football player, great football player. And Dan said no. He said:
21 Not one dime. Fine him the max.

22 And that's what we did.

23 Q And you were -- I think you talked with my Democrat counterparts about this
24 a bit, but you were in charge of the football side of things. Right? So you would have
25 been pretty involved in this Trent Williams situation as it was unfolding?

1 A Yes.

2 Q Okay.

3 A Very.

4 Q I'm sorry? Go ahead.

5 A Very.

6 Q Very involved.

7 And I think it later came out that, yes, he actually had, like, a skin cancer scare or
8 something along those lines that he didn't feel the medical staff handled properly.

9 But in your reference to this email about this topic, so "let the games begin, as I
10 said, let's enjoy the entertainment," what was the entertainment part of Trent Williams'
11 contract renegotiation and scuffle with the medical team?

12 A Holdouts in professional sports is something the media likes. And so you
13 just let them -- the media is the entertainment. I didn't like it for the football team
14 because he was a great player.

15 I went to -- what's the date of this? June 5th. After this, I went down to
16 Houston and talked to Trent for a long time and found out everything that he was looking
17 for. But Dan said no.

18 Q So, when you referred to "let the games begin" and "let's enjoy the
19 entertainment," the contract renegotiation isn't part of the first email excerpt you sent.
20 It's just the medical staff handling of his health scare.

21 A No. I think you're misreading it. It's about Trent Williams missing the
22 minicamp. That's all.

23 Q Yes, it is. Here I can just read it: Washington left tackle Trent Williams is
24 unhappy enough with the team to skip mandatory minicamp. But even one of his
25 closest friends on the team doesn't know exactly what the issue is. Asked about the

1 report that Williams was upset with how the team's medical staff handled a recent
2 medical scare, ██████ said he and Williams are close, and that's the first he's heard of it.
3 I don't know where it came from. I talk to Trent all the time. I don't know.

4 And then it talks about ██████ and Williams' relationship.

5 But there's no mention of his contract negotiation in this excerpt, is there?

6 A No, but except for what Trent told me.

7 Q Right.

8 A And then, obviously, if you find articles later, you'll find out it was a contract.

9 Q Yeah, and an article later details what his medical issue was and all of those
10 things. But at the time it didn't -- the contract renegotiation wasn't really part of this
11 chain. And it seems that you were responding to his medical issue with the medical
12 training staff as "let the games begin, let's enjoy the entertainment."

13 A Because the writer didn't put in what was truly happening is not something I
14 can deal with.

15 Ms. Quincy. Did you understand that? Because your final questions indicate to
16 me you didn't understand what Mr. Allen was saying.

17 ██████. I understood just fine. Thank you.

18 Ms. Quincy. Okay. The question certainly didn't indicate it. So, if you didn't, I
19 wanted to make sure we clarified it so you could understand.

20 ██████. I appreciate your concern. Thank you.

21 So the next document I want to talk about was something that I did review in
22 camera as counsel for the team. I know the Democrats also reviewed these documents
23 in camera, and I sent it as, like, a list item to both sides. And like as we've discussed, we
24 don't want to disclose anyone's photos or involve any people unnecessarily in this.

25 And so I'm not going to introduce the actual exhibit of the photo, which you do

1 have in your possession and we have in our possession, because it was sent by the team.
2 But I don't want to do that.

3 But, just for your reference, so you know what -- so we're all on the same page
4 about what we're talking about, it is -- in the list that I sent you, it's the first item. It's
5 NFL Bates No. 32203.

6 Ms. Quincy. What is it?

7 [REDACTED]. It is an email from Bruce Allen on January 19th, 2012, entitled "For
8 dickhead eyes only."

9 Ms. Quincy. You sent the actual email?

10 [REDACTED]. No. I sent -- this is a list item, because I had reviewed this in
11 camera. And so, when I sent you all of this, I didn't -- on Sunday night, I didn't have the
12 document in my possession.

13 Ms. Quincy. But it was sent thereafter?

14 [REDACTED]. But then, yes, photos were sent by -- as you're well aware, the
15 team sent you documents. They sent us documents. They sent the Democrats
16 documents.

17 Ms. Quincy. No, no, no, so we're clear. The team has sent me nothing. Zero.
18 Zip.

19 [REDACTED]. Okay. I was under the impression that you had the documents
20 that the team sent to both minority and majority staffer last night or two nights ago.

21 Ms. Quincy. The majority staff sent to me what was sent to them by the team.
22 The team has not communicated with me or with Mr. Allen in any way, shape, or form. I
23 just want to make sure the record is very, very clear. And I am pulling up that
24 document, which is a 10-year old email, so Mr. Allen can see it.

25 [REDACTED]. And the email that was produced last night has been previously

1 marked as Minority Exhibit Z.

2 [Minority Exhibit Z

3 Was marked for identification.]

4 Ms. Quincy. Okay.

5 [REDACTED]: But I had originally sent it to you as something we reviewed in
6 camera because I didn't have it.

7 Ms. Quincy. The re line is "soccer game"? That's minority -- oh, no, that isn't
8 minority. That's majority. Hang on. Minority Exhibit Z.

9 [REDACTED]: Z, yes, as in zebra.

10 Ms. Quincy. Okay. Here we go. Okay.

11 [REDACTED]: So, when I reviewed this document in camera, as you can see, the
12 subject is "for the dickheads' eyes only."

13 It was sent from [REDACTED], who has a Hooters email. And this
14 photo is a photo of a nude woman standing in what looks like in a home next to a
15 fireplace. And it was disseminated, I suppose, to you, [REDACTED], Jon
16 Gruden, [REDACTED]

17 And you responded to the photo: This is a much better picture than the five of
18 us.

19 Do you remember receiving a photo of a woman from [REDACTED]?

20 A No, I don't remember it. I see what you or the NFL or the Redskins have
21 produced, but I don't remember it.

22 Q So do you know the woman?

23 A I do not know the woman. It's obviously a friend of [REDACTED], I'm guessing.

24 Q Why do you guess it's a friend of [REDACTED]?

25 A He's the one who sent it.

1 Q Did he --

2 Ms. Quincy. [REDACTED] let me make sure I understand this. You were -- no
3 one was allowed to see these. They were produced only in camera. And yet last night
4 Mr. Snyder's attorney sent them?

5 [REDACTED]: I don't -- it was from the team, I believe. The Commanders?

6 Ms. Quincy. Was it the same -- was it Holland & Knight, the firm that
7 represented Mr. Snyder at his whatever it was?

8 [REDACTED]: Yes.

9 Ms. Quincy. Okay. That would be Mr. Snyder's personal attorneys.

10 [REDACTED]: Okay.

11 It was my understanding it was the representative of the Commanders, but we
12 can figure that out offline.

13 Ms. Quincy. How is -- okay. Okay. Go ahead.

14 BY [REDACTED]:

15 Q Were nude photos of women often shared between you and the rest of the
16 DHs, as you called them?

17 A No.

18 Q They were not?

19 A No.

20 Q So this email is pretty out of the ordinary then?

21 A I don't know if I ever emailed with [REDACTED] in my lifetime.

22 Q But this email that you're holding is from him, and you responded to it.

23 A No. Someone forwarded it, the email of [REDACTED] to them, to me. So I --

24 Q So it went from [REDACTED] to [REDACTED] and [REDACTED] to you. So perhaps the
25 better question is, did [REDACTED] frequently send you seminude photos?

1 A No.

2 Q Okay. So was this out of the ordinary for your discourse?

3 A I would think so.

4 Q Okay. Did it strike you as odd that he would forward something like that to
5 you?

6 A Odd. Yeah, it doesn't mean anything to me.

7 Q It doesn't mean anything to you? Okay.

8 At the beginning of this deposition, you mentioned that you feel like you are the
9 scapegoat for Dan Snyder and that you had been appropriate at all times in your
10 interactions at the Redskins in your email correspondence and your correspondence
11 otherwise. Is that right?

12 A I did not say that.

13 Q It was probably -- it was, gosh, maybe 4 hours ago at this point.

14 [REDACTED]. Yeah, that isn't what he said. That's why we have the transcript.
15 So if you want to --

16 [REDACTED]. If I could easily pull it up and find it, I would read it back to you.

17 BY [REDACTED]:

18 Q But from my notes of what you were saying is that, the Democrats asked,
19 "Have you conducted yourself appropriately at all times," and you said yes.

20 A I did say yes to that question. But what I said was Congress released a
21 report, a written report, which you should have that.

22 Q Yeah, our Democrats counterparts wrote that, yes.

23 A Which -- well, I'm sorry. Congress. You're all Congress to me. That said
24 that there was a campaign to scapegoat others for others' actions, and I said I agreed with
25 that report.

1 Q Okay. So you agree with the report that some people are scapegoats for
2 others' actions.

3 But you do not agree that you're one of those scapegoats.

4 A No. They've intentionally, ever since they signed that common interest
5 agreement, it feels like, the league office and the Redskins, that they have directed the
6 attention to smear my coworkers, myself, my friends, based on the actions that they did,
7 not any of my coworkers, alumni, or friends.

8 Q And so all of the emails that we've spent the last 40-ish minutes talking
9 through, those were all things that you said and/or sent and/or responded to and/or
10 were a party to, identical emails that didn't have your name on them.

11 Do you think that that is appropriate conduct for the workplace from your work
12 email?

13 A There's obvious things -- obviously things in there that are inappropriate.

14 My conduct was never the question that came up in anything, as far as I know,
15 and that the league told me I wasn't accused of anything in it. And as you brought up,
16 there was an email to the management of the NFL, including the general counsel. And
17 they didn't say any of my actions were inappropriate until this campaign to find someone
18 else to take the blame for their actions.

19 Q So the emails that we talked through, you just said you agree that perhaps
20 some were inappropriate. Is that fair?

21 A I said it on the record when you brought up to respond with a word I don't
22 use. I don't think -- I don't even know if I've ever used the word. And I think it is
23 inappropriate, yes. That's a bad word. I agree.

24 You gave me an email that is a quotation from something that's been cut and
25 pasted that, yeah, the words in there are bad. I have no idea who said it or anything. I

1 have no clue who said it or who it's supposed to have been about.

2 Q So do -- Beth Wilkinson was hired to investigate a number of allegations
3 brought up -- it started with The Washington Post article, an expose on the cheerleaders.
4 And then Beth Wilkinson was hired. Do you remember that occurring or hearing about
5 it?

6 A Yes.

7 Q Did you speak with Ms. Wilkinson or anyone on her team in furtherance of
8 that investigation?

9 A No.

10 Q Were you asked to speak to her?

11 A No, I was not asked. I think they reached out to some of the other lawyers
12 that I've had to retain.

13 Q Did you want to participate in Ms. Wilkinson's investigation?

14 A I didn't -- when the Redskins were doing the investigation, it didn't make
15 sense for me to participate. And no one ever said I was cleared from my confidentiality
16 clauses in my contract.

17 Around that same time, ironically, the NFL asked me to testify on their behalf on a
18 grievance with [REDACTED], a former player who put in a grievance. Covington asked
19 me to testify for them. I did then have to retain a lawyer. Never does he tell me that
20 the league has a common interest agreement with Snyder. Never tells me that during
21 this whole thing. But I helped the league and testified.

22 So, if Snyder wanted me to talk to Beth Wilkinson, he would have asked me to.

23 Q Okay. There's another investigation led by Ms. Mary Jo White into the
24 team, also run by the NFL. Are you aware of that investigation?

25 A I've read about it, yes.

1 Q You've read about it? Okay. Have you been in contact with anyone to
2 provide testimony or answer questions?

3 Ms. Quincy. Out of curiosity, out of my own curiosity, what is the basis for these
4 questions? Because I can tell you Mr. Snyder's lawyers asked me those questions
5 repeatedly during the 1782 proceeding. And, as much as the NFL has guaranteed no
6 retaliation, I'm curious as to why those questions are being asked here today.

7 [REDACTED]. I actually don't have to answer that because he's -- your witness is
8 here testifying under a deposition, and in furtherance of our investigation, we're allowed
9 to ask things connected to the toxic workplace environment that Chairwoman Maloney
10 launched an investigation into a year ago.

11 Ms. Quincy. Okay. I just wanted to note for the record that I thought it was
12 very curious that Dan Snyder's attorneys, when I was in touch with them, had the exact
13 same questions.

14 [REDACTED]. I have asked these questions of every single person we've deposed
15 and interviewed over this entire course of this investigation because it is important to
16 understand.

17 So I would like to move into the reports that have come out since your departure
18 from the Commanders. And there's a firm called Vestry Laight, and they have been
19 conducting oversight over the workplace at the Commanders.

20 Have you heard anything about these reports that have come out in the news or
21 otherwise?

22 The Witness. No.

23 [REDACTED]. Okay. That wraps up our hour. So we can have a 5-minute
24 break, and then the majority will take their next hour.

25 Thank you, Mr. Allen. We can go off the record.

1 [Recess.]

2 [REDACTED]. Back on the record. It's 4:45.

3 BY [REDACTED]:

4 Q Now, Mr. Allen, previously you testified that violations of the NFL's personal
5 conduct policy were required to be reported to the league office. Is that correct?

6 A Yes.

7 Q I believe you also testified that the individual responsible for reporting those
8 violations would have been the general counsel of the Washington Commanders.

9 Correct?

10 A Yes.

11 Q I'd like to direct your attention to what majority staff has premarked exhibit

12 G --

13 Ms. Quincy. That's in this file.

14 [REDACTED]. -- G, as in Gary. This will be marked as exhibit 5 for identification
15 purposes.

16 [Exhibit No. 5

17 Was marked for identification.]

18 Ms. Quincy. Yes. Here we go. Got it?

19 The Witness. Got it.

20 BY [REDACTED]:

21 Q I'll give you a moment to review. Please let me know when you're done.

22 A Okay. I'm generally good.

23 Q Do you recognize what I just handed you?

24 A Yes, ma'am.

25 Q How is it that you recognize it?

1 A I've seen it over the years, and it's the seal. It's, you know, it's an NFL
2 document.

3 Q This document is titled "Personal Conduct Policy."

4 Is this the personal conduct policy that you testified earlier that required teams to
5 notify the league of violations under this policy?

6 A Yes.

7 Q This policy, I'll direct your attention to the bottom left-hand corner, where it
8 says December 2014.

9 Do you see that?

10 A I see it.

11 Q Were you employed with the Commanders in December of 2014?

12 A Was I a member of the Redskins then?

13 Q Were you employed by the team?

14 A Yes.

15 Q Do you have any reason to believe that this document was not in place, this
16 was not the personal conduct policy that governed at the time when you were employed
17 by the team in December 2014?

18 A I would believe this is the document, yes.

19 Q I want to direct your attention to the first paragraph, second sentence,
20 beginning with the word "everyone."

21 Do you see that?

22 A First paragraph, second sentence. Yes.

23 Q It states: Everyone who is part of the league must refrain from conduct
24 detrimental to the integrity and public confidence in the NFL.

25 What is your understanding of what is meant by "conduct detrimental to the

1 integrity and public confidence in the NFL"?

2 A It is -- it is somewhat of a subjective term but used when a behavior or an
3 event created negative publicity or a very negative outcome that would embarrass or put
4 the league in a bad light. That's the best I can do.

5 Q Would you agree that the revelations in July 2020 regarding the Washington
6 Commanders' toxic work environment, as well as the allegations made in the August 2020
7 Washington Post article, not only about the Washington toxic work environment but
8 about Mr. Snyder's involvement and allegations made against him directly, would you
9 agree that those are examples of conduct that would be detrimental to the integrity of
10 public confidence in the NFL?

11 A Yes. I -- and I don't -- they hate -- she'll hate me for talk -- the NFL to me,
12 once again, is the players, the coaches. The -- it's the game on the field. The
13 commissioner's office or the league office is the one who judges the behavior of everyone
14 in the NFL.

15 But, yes, that -- those articles were very, very bad and reflected poorly on them.
16 It doesn't reflect on the players and coaches, though. That's my point. It reflected on
17 the corporation of the league.

18 Q And when you say the "corporation of the league," do you mean the
19 owners?

20 A Yes, yeah, to the shield itself because the players and coaches are artists
21 really, in my view. And the fans love them, and that's what makes the sport so great.

22 Q I'd like to direct your attention to page 6 of the same document. That
23 paragraph near the bottom, beginning with ownership and club or league, do you see
24 that?

25 A Yes.

1 Q It reads: Ownership and club, or league management, have traditionally
2 been held to a higher standard and will be subject to more significant discipline when
3 violations of the personal conduct policy occur.

4 Do you agree with the statement that ownership has traditionally been held to a
5 higher standard when violations of the personal conduct policy occur?

6 A Ma'am, I don't know if I can -- I can answer that, because I might not know of
7 every accusation. I think I've been more of a defender of the players when they go
8 through the process and know it. But I don't know what all the accusations are and how
9 they would compare to the ones I do know about.

10 Q Do you believe that Dan Snyder had been held to a higher standard as it
11 relates to the violations that may have occurred in connection with the allegations in The
12 Washington Post back in 2020?

13 A The allegations that I've read about in the paper and some of this testimony
14 that was given to me are atrocious. I mean, it's awful. I don't know if the
15 commissioner, what went into his decision. He didn't call me and ask me for my
16 opinion, but I don't know what went into it. The allegations are some of the worst that
17 I've seen in the NFL.

18 Q Do you believe that the discipline that has been imposed on Mr. Snyder is
19 fitting of what you have coined some of the most disturbing allegations that you've seen
20 in your time in the NFL?

21 A I don't know if it's fair for me to make a judgment. I can tell you I thought it
22 was inappropriate, that the league over-suspended Tom Brady. I thought they
23 over-suspended Ben Roethlisberger. I thought they over-suspended Sean Payton as
24 head coach of the Saints. I thought that was atrocious, but those were cases I knew a
25 lot about. I don't know what that common interest agreement allows the commissioner

1 to do. So I don't know.

2 Q Putting aside the common interest agreement, because I want to make sure
3 I understand your testimony, were you surprised -- well, I'm going to back up.

4 Are you familiar with the punishment that was imposed on Dan Snyder in
5 connection with the Beth Wilkinson investigation?

6 A No, I don't know. I don't know what happened. I read where he got fined
7 \$10 million, but I don't know what else there was.

8 Q I want to direct your attention to what the committee has premarked exhibit
9 AB, as in Ashley, B as in Bobby.

10 Ms. Quincy. You should have a nice copy. You don't have a nice copy. Hang
11 on one second. I've got an abbreviated copy.

12 I may need to reprint a better one. Give me one minute.

13 The Witness. Oh, this is the commissioner's press release?

14 Ms. Quincy. This is the commissioner's press release?

15 [REDACTED] Correct.

16 Ms. Quincy. Yeah, I may need to print a better copy. Hang on one second.

17 [REDACTED] We'll go off the record at 4:57.

18 [Recess.]

19 [REDACTED] Okay. We're back on the record. It's 4:57.

20 The Witness. Yes.

21 [REDACTED] Now, Mr. Allen, do you recognize this document?

22 Ms. Quincy. And before I do that, this will be marked exhibit 6.

23 [Exhibit No. 6

24 Was marked for identification.]

25 The Witness. I never got this document. But I saw it on, you know, in press

1 briefs and press articles at the time.

2

BY [REDACTED]

3

Q I want to direct your attention to what is page 2 of my copy. There's a

4

paragraph that's the last paragraph, beginning near the end of the 2019 season.

5

Do you see that?

6

A Beginning near?

7

Q Correct. In the middle of that paragraph, there's a sentence that begins

8

with "none of the managers or executives."

9

A I see it.

10

Q Do you see that? That sentence reads: None of the managers or

11

executives identified as having engaged in misconduct is still employed at the club.

12

Do you see that?

13

A Yes.

14

Q Do you agree with that statement, sitting here today?

15

A Well, number one, I never seen Beth Wilkinson's report. So I don't know.

16

I was told there was no accusations against me. That's two.

17

And so I don't know -- I don't know the other misconduct, even though -- I don't

18

know if Dan is being considered an executive or not.

19

Q If Mr. Snyder were, in fact, considered an executive, would you agree with

20

this statement?

21

A Well, based on all the accusations, they're accusing him personally of the

22

behavior.

23

Q Does Mr. Snyder still own the team?

24

A Yes. So I don't know -- see, I don't -- I think he's an owner, not an

25

executive.

1 Q Does he own a larger share of the team than he did when you were
2 employed with the Commanders?

3 A Yes. He was the principal owner and the majority shareholder.

4 Q I want to direct your attention to the next page. You'll see that there are a
5 series of paragraphs numbered, beginning with "protocol for reported harassment."

6 Do you see that?

7 A Yes.

8 Q Have you ever had an opportunity review the recommendations that were
9 made in connection with the Beth Wilkinson investigation for the Washington
10 Commanders?

11 A Did I ever review them? No, no, I haven't.

12 Q What --

13 A I -- you're talking about Beth Wilkinson's report? Did I review it?

14 Q No. I'm asking, in this press release that's before you, the
15 recommendations that are delineated on the next two pages, have you had occasion to
16 review what was recommended by Ms. Wilkinson as stated in this press release?

17 A No. I -- I probably never read this.

18 Q Okay. I'd like to quickly review what the recommendations are with you,
19 beginning with paragraph 1. One of the specific recommendations flowing from her
20 investigation is to develop a formal protocol for reporting allegations of harassment and
21 misconduct that allow victims to report anonymously and without fear of retaliation.

22 Going to the second paragraph, beginning with "Disciplinary Action Plan," it reads:
23 Develop a formal disciplinary action plan with clear protocols and processes for
24 documenting, evaluating, and adjudicating misconduct.

25 Do you see that?

1 A Yes.

2 Q Going to the next one, "Regular Culture Surveys," it reads: Conduct regular
3 anonymized workplace culture and sexual harassment climate surveys to track the club's
4 progress in addressing these issues.

5 Going to paragraph four, "Regular Training": Engage an independent and
6 professional third party to provide regular training for all employees on bullying, sexual,
7 and other forms of harassment, diversity, and inclusion and other issues of workplace
8 conduct.

9 Turn the page, paragraph 5, recommendation five, "More Diverse Workforce," it
10 reads: Increase the number of women and minorities throughout the organization,
11 particularly in leadership and supervisory positions that have decisionmaking authority.

12 Paragraph 6, "Establish Clear Lines of Authority," it reads: Implement clear
13 organizational structure and clear lines of authority for club executives to eliminate,
14 influence informal or unaffiliated advisors on the club business operations.

15 Going to the next recommendation, number seven, it reads: Expand and
16 empower the in-house HR and legal departments, particularly with respect to their ability
17 to investigate and address allegations of misconduct at all levels, without interference
18 from club executives.

19 Going to recommendation eight, "Develop Formal Onboarding, Performance
20 Management, and Compensation System and Exit Interview Process," it reads:
21 Implement a formal onboarding process for new hires, a program of regular performance
22 and compensation reviews, and an exit interview or debriefing process for departures.

23 Recommendation nine, "Protecting Cheerleading Teams": Ensure that
24 cheerleaders, if a program is retained either in its earlier form or in a new co-ed dance
25 team, have access to HR and other organizational resources, including by assigning an HR

1 employee to the cheerleading squad.

2 Recommendation 10, it reads: Regular Assessment of Policies. Require the
3 club to retain an independent professional consultant selected by the team and approved
4 by the league office to conduct an annual assessment of all employment policies to
5 ensure they are both consistent with best practices and being implemented in practice.

6 So, Mr. Allen, these are the 10 recommendations that flowed from the Wilkinson
7 investigation, the contents of which were unknown what her findings were as a result.

8 Off the record.

9 [Recess.]

10 [REDACTED]. We apologize. We're having some technical issues here. Give
11 me one moment.

12 Okay, Mr. Allen, my apologies. I'm ready when you are.

13 The Witness. Okay.

1

2 [5:06 p.m.]

3 [REDACTED] Back on the record. It's 5:06.

4

BY [REDACTED]

5

Q So, Mr. Allen, I was asking you about the recommendations that flowed from Ms. Wilkinson's investigation. I believe you testified that you had not seen these prior to today. Is that correct?

8

A Yeah, I don't remember if I've ever seen them.

9

Q And I believe my counterparts on the minority staff referenced a report called Vestry Laight that -- they are quarterly reports or semiannual reports that a team is supposed to submit reflecting the progress as it relates to these recommendations.

12

Now, moving on, same document, that last paragraph, you reference you were familiar with the fact that Mr. Snyder had to pay a \$10 million fine.

14

You will see that last paragraph, beginning with "Having considered." Do you see that?

16

A Having the -- I see the 10 million, yes.

17

Q It reads: "In addition to paying all fees and expenses associated with the Wilkinson investigation, the club will pay \$10 million, which will be used to support organizations committed to character education, anti-bullying, healthy relationships, and related topics."

21

And then, turning to the next page, which is the final page, third paragraph, or fourth, excuse me, beginning with, "As co-CEO," do you see that?

23

A Yes.

24

Q It says: "As co-CEO, Tanya Snyder will assume responsibilities for all day-to-day team operations and represent the club at all league meetings and other

25

1 league activities for at least the next several months. Dan Snyder will concentrate on a
2 new stadium plan and other matters. All senior executives of the club, including Dan
3 and Tanya Snyder, will undertake comprehensive training and workplace conduct and
4 related issues," and it goes on to list, "including bullying, diversity and inclusion,
5 harassment, LGBTQ issues, microaggression, and unconscious bias, among other topics."

6 So, Mr. Allen, now that we have reviewed the outcome of the Wilkinson
7 investigation and the punishment that was imposed on Mr. Snyder -- and by
8 "punishment," I mean \$10 million fine, incorporating the recommendations that were
9 made by Ms. Wilkinson, and, as it had been subsequently characterized, stepping away
10 from the day-to-day operations of the team -- do you feel, going back to the personal
11 conduct policy, that the discipline that was imposed on Mr. Snyder is proportional to the
12 allegations that were raised in the July 2020 Washington Post article as well as the
13 August 2020 Washington Post article and that has come out of the committee's
14 investigation?

15 A I don't know if I'm a fair judge of the discipline that the league did.

16 I think these programs, they sound -- they're good. There's nothing bad about
17 the suggestions that I just read from Beth Wilkinson or the league's suggestions on
18 different things going forward.

19 When I hear about what's happened to my coworkers and our alumni -- when I
20 say "alumni," it's anyone who had worked for the team before and know what I'm going
21 through -- I'm not the right one to judge it, because it's too personal. When people are
22 asking me about emails from friends of mine, my mom's friends, when Covington tells my
23 lawyer that any conversation he had with his mom is fair game -- well, my mom has
24 passed away, and it's not fair game to make fun of my mom, to me.

25 And so, no, I'm not the right one to judge.

1 Q And you're not the right one to judge, because this has been made very
2 personal for you. Is that your testimony?

3 A Yeah. And I'm not saying just about me. I don't like what it's done to
4 other people. And I'm too much in it. I wouldn't be a fair jurist. There's the phrase I
5 was looking for.

6 Q Mr. Allen, what has it done to other people?

7 A First of all, the allegations -- and I don't know if this is the governing body
8 that finds out if it's true or not, or who does. I really don't. The allegations are so
9 atrocious that they speak just by the allegations. And that's one thing.

10 But when you go through these documents that were provided of following
11 people, women who have three young children, I mean, it rips your damn heart out. I
12 mean, there is no justification for that. There's none, zero. If you have a question, pick
13 up the phone and call the person. There's no justification for that.

14 Q I want to direct you back to exhibit 5, which is the NFL's personal conduct
15 policy.

16 A Yes.

17 Q Page 3, the paragraph beginning with "Investigations," do you see that?

18 A The investigations part?

19 Q Correct.

20 A Yes.

21 Q It reads: "Whenever the league office becomes aware of a possible
22 violation of the personal conduct policy, it will undertake an investigation, the timing and
23 scope of which will be based upon the particular circumstances of the matter."

24 In your experience while employed with the team, did the league office ever
25 become aware of a possible violation of this policy for which they undertook an

1 investigation into the Washington Commanders?

2 A There was an investigation -- we had a couple investigations into some
3 player incidents, and that the league brought their staff down to interview some people.
4 But, you know, the accusations that happened in all of these stories and stuff, they
5 didn't -- excuse me. The cheerleading, the NFL got involved, making sure we're doing
6 the right investigation on the cheerleaders' -- what country? -- Costa Rica photo shoot.

7 So I don't know if that's the question you're asking, but you got an answer.

8 Q With respect to that particular incident -- and we'll get to that later -- can
9 you briefly describe how the NFL was involved in that, in the Costa Rica cheerleading
10 incident?

11 A I think if memory serves me right, Eric Schaffer informed them of the steps
12 he was taking in bringing his own investigation into the allegations.

13 Q So that's to say that the NFL itself did not undertake an investigation but that
14 the team was in communication with the NFL regarding its own internal investigation?

15 A I think the NFL -- I believe the NFL was satisfied with what Eric laid out as a
16 game plan. And then I believe they asked, you know, for updates from time to time on
17 the steps he was taking, him or his assistant.

18 Q Outside of the Costa Rica incident and the player incidents that you
19 mentioned, is there anything else that comes to mind with respect to the NFL engaging in
20 a workplace investigation during your tenure with the Commanders?

21 A Not that I remember, or you can remind me. Not that I can think of.

22 Q I'd like to direct your attention to the last page of the personal conduct
23 policy, first paragraph, beginning with "Conduct Committee." Do you see that?

24 A Yes, I see that.

25 Q It reads: "To ensure that this policy remains current and consistent with

1 the best practices and evolving legal and social standards, the commissioner has made a
2 conduct committee. The committee will be made up of NFL owners, who will review
3 this policy at least annually and recommend any appropriate changes in the policy,
4 including investigatory practices, disciplinary levels or procedures, or service compliance."

5 Mr. Allen, are you familiar with the conduct committee?

6 A No.

7 Q Is this the first time you're hearing about the conduct committee?

8 A Oh, I probably had heard about it, but there's dozens and dozens, maybe
9 four dozen, NFL committees, so I don't know which owners were selected for them.

10 Q Do you know if Mr. Snyder ever sat on a conduct committee?

11 A Not when I was there, no.

12 Q Okay.

13 And, briefly, what is the role of a committee, such as a conduct committee, as it
14 relates to promulgating new policies for the NFL?

15 A Well, the committee works that I am more familiar with, what they do is
16 they review practices or, you know, the competition committee reviews all the films and
17 the penalties that were called the year before. It's a group of 8 to 12 members on the
18 committee. They suggest rule changes, ways to improve the game, make it safer. And
19 then they present their findings or recommendations to the entire league so they can
20 vote on particular rule changes and stuff like that.

21 So there's other committees that do finance and stadiums and all of that, so I
22 would imagine that's what that committee would do.

23 Q So the decisions coming out of the committee would then be recommended
24 to the full ownership, after which time there'd be a vote on whether or not the
25 recommendations would be adopted. Is that correct?

1 A Yes.

2 Q And, in your experience, what was the role of the league office in holding
3 teams accountable for violations of workplace incidents?

4 Or -- I'm going to rephrase that. What was your experience with the league
5 office holding teams accountable for violations of workplace policies?

6 A You know, I don't know under what guise they suspended the coach of the
7 Saints. I don't know if that was workplace or if that was competitive. I don't know. I
8 can't think of -- I can't think of something for that. But an incident, I mean, a team, an
9 incident anywhere on something.

10 Now, there's probably minor things with a bunch of teams. We got yelled at
11 during a preseason game for half the players not traveling on a preseason game during a
12 hurricane in Tampa. But they reviewed it, looked into it, and they understood we did
13 the right thing. But no other team would know about that, because we were the only
14 one affected. And I'm sure they have that with a number of teams.

15 Q Are you aware of the allegations that were made against former Carolina
16 Panthers owner Jerry Richardson?

17 A I read the newspapers at the time, yes.

18 Q What do you recall about those allegations?

19 A Creepy, but there's got to be a better word than that. But they were,
20 besides bad and all of that, it was insane, maybe shocking.

21 Q Mr. Richardson was accused of race- and gender-based harassment by
22 current and former employees at the time. Of course, Mr. Richardson no longer owns
23 the Carolina Panthers.

24 Do you know if Mr. Snyder was aware of those allegations?

25 A Oh, he would be aware -- and I did hear what you said he was accused of,

1 because I didn't -- I didn't hear what he said. But he would've been aware because of
2 the same newspaper accounts, and I'm sure he read them.

3 Q And what I had said is that he was accused of race and sexual -- race
4 harassment as well as gender-based harassment.

5 A Yeah. Okay. Yeah.

6 Q And when you say he would've been aware because of the publications, are
7 you talking about email alerts that the team would receive, or is there some other mode
8 in which he would receive news for consumption?

9 A Every team gets a general -- looks like one of these things right here -- of
10 every newspaper article in the NFL, every day, from every city. And Jerry being such a
11 high-profile person, it goes on ESPN, it was on everything. It wasn't just in the Charlotte
12 Observer, those stories.

13 Q Do you recall what Mr. Snyder's reaction was to Mr. Richardson's allegations,
14 including the fact that the NFL assumed responsibility for the Carolina Panthers
15 investigation just days after Mr. Richardson had announced that he was launching an
16 investigation?

17 A I didn't -- what's my question?

18 Q Do you recall what Mr. Snyder's reaction was?

19 A Oh. Oh, no, not off the top of my head, no.

20 Q I'd like to direct your attention to what was previously marked as exhibit H,
21 "H" as in "Harry."

22 A Got it.

23 Q This will be marked as exhibit 7.

24 [Exhibit No. 7

25 Was marked for identification.]

1 BY [REDACTED]:

2 Q Mr. Allen, do you recognize what you're currently looking at, the document I
3 just referred you to?

4 A Yeah. It looks like a standard league memo.

5 Q And what do you mean by "standard league memo"?

6 A We would get emails like this from the league office from time to time.
7 Well, not this -- this format. I don't want to say this happened all the time with Jerry
8 Richardson.

9 Q This document was provided to the committee by the NFL. It's titled
10 "Memorandum." It is addressed to chief executives.

11 Mr. Allen, who are the chief executives, if you know?

12 A The owners.

13 Q All 32?

14 A Oh, 31, and then Mark Murphy in Green Bay. They don't have an owner.
15 Well, excuse me, the city owns them.

16 Q This memorandum is from Commissioner Goodell. It's dated June 28, 2018,
17 and it's regarding Carolina Panthers.

18 I want to direct your attention to the third paragraph, beginning with, "I have
19 imposed a fine." Do you see that?

20 A Yes.

21 Q It says: "I have imposed a fine of \$2.75 million on Jerry Richardson."

22 Do you recall there being a fine imposed on Jerry Richardson in connection with
23 the allegations of race- and gender-based harassment?

24 A I didn't remember the fine, and I don't want to be insignificant about the
25 dollar number or the allegations, but, as this memo says, he was already -- he sold the

1 team. He was leaving the league. And I think that is the greater effect of this
2 investigation, so to speak.

3 Q Do you have any reason to believe that Mr. Richardson sold the team as a
4 result of the allegations?

5 A It sure seemed quick after the allegation. But I did not talk to him, so I
6 don't know.

7 Q Do you know if Commissioner Goodell would've had the authority to impose
8 that fine without the approval of the chief executives?

9 A The commissioner has the authority on his own to fine people that
10 amount -- not players. But he doesn't need approval to do 2.75.

11 Q Would Commissioner Goodell have needed approval to fine a team owner
12 \$10 million?

13 A I shouldn't say. I'm not sure. I thought there was an extent to his
14 unilateral decisions on stuff like that, but I'm not sure.

15 Q I want to direct your attention to the last sentence of the same paragraph.
16 It says: "Finally, we will review with the conduct committee a series of
17 recommendations that Mary Jo made regarding our own policies." And Mary Jo is the
18 former U.S. attorney and SEC Chairman whom the NFL appointed to investigate the
19 matter.

20 Do you recall there being a series of recommendations flowing from the Carolina
21 Panthers investigation that were considered by the conduct committee?

22 A I do not remember that, you know, sitting here today, no.

23 Q Mr. Goodell goes on to write: "We will issue the attached release shortly.
24 Any owner with questions or who would like to discuss this matter should feel free to call
25 either Jeff Pash or me."

1 Do you recall if Mr. Goodell issued a press release or would have issued a press
2 release in connection with the Carolina Panthers forwarded to you before it was
3 published?

4 A I don't know.

5 Q Would it surprise you to learn that that was a practice by the league office,
6 to circulate a press release for an internal workplace investigation prior to publishing?

7 A Would it surprise me? No. Probably -- I didn't know it, but it's not
8 shocking.

9 Q Would the league office release a press release regarding the punishment or
10 discipline of an owner without allowing other owners to provide feedback, to your
11 knowledge?

12 A Oh, no. I would think that he would have the discussion with the owner
13 first.

14 Now, in Jerry's case, I don't know if he told them never to call me again. I don't
15 know. You know, because he was already out; he was selling his team. I don't know.

16 Q One more question on the memo. Do you believe that the NFL would've
17 circulated a similar memorandum to the chief executives following the conclusion of the
18 Beth Wilkinson investigation?

19 A I would think so, but I'm out of the league and I don't know.

20 Q I want to direct your attention to what was previously marked Reference
21 Document I, as in "Isabel."

22 Ms. Quincy. I'm sorry. What was it?

23 The Witness. I.

24 [REDACTED] I as in "Isabel."

25 Ms. Quincy. Oh, got it.

1 Ms. [REDACTED]. This will be marked exhibit 8.

2 [Exhibit No. 8

3 Was marked for identification.]

4 BY [REDACTED]

5 Q Please take a moment to review, and let me know when you're done.

6 A Okay.

7 Q Do you recognize this document?

8 A I recognize it. If you didn't have it in front of me, I wouldn't have
9 remembered it. But, yes.

10 Q And how is it that you recognize it?

11 A It is an NFL standard press release.

12 Q Do you recall reading a press release regarding the NFL's findings in the
13 Carolina Panthers workplace investigation back in 2018?

14 A No, I don't remember it, but I'm -- I'm reading it.

15 Q I want to direct your attention to the second page, bottom. There's a
16 bullet. But before the bullet, it says that White, who is Mary Jo White, made a number
17 of recommendations of broader applicability for the league which would be presented to
18 the conduct committee for consideration in advance of the 2018 season.

19 One of those recommendations was a specific prohibition of using nondisclosure
20 agreements to limit reporting of potential violations or cooperation in league
21 investigations under the personal conduct policy.

22 Now, Mr. Allen, do you recall if there was ever a specific prohibition of using NDAs
23 to limit reporting of certain violations or cooperation in league investigations following
24 the Carolina Panthers investigation?

25 A No, I don't remember.

1 Q I believe I asked you earlier in this deposition about whether or not you were
2 subject to an NDA. Do you recall that?

3 A Whether I was?

4 Q Right.

5 A Yes.

6 Q You are?

7 A I remember you asking, yes.

8 Q Okay. And can you remind me what your answer is?

9 A I have a confidentiality clause in my contract, which means I would not be
10 here today unless I had to because of the subpoena.

11 Q I believe you also testified that no one ever told you, whether from the NFL
12 or from the Commanders, that the confidentiality clause in the agreement that you
13 executed with Mr. Snyder was lifted for purposes of speaking to Ms. Wilkinson. Is that
14 correct?

15 A Oh, no, it was never -- no, I received nothing from the team or the league
16 office.

17 Q And so, as you understood it, during the pendency of Ms. Wilkinson's
18 investigation, your confidentiality clause still governed and would prevent you from
19 speaking out about matters that were covered by the agreement. Is that correct?

20 A Yes, ma'am.

21 Q Okay.

22 I want to turn to the next page, first bullet. This is the second recommendation
23 that was made by Ms. White to the NFL. It was a specific requirement that claims of
24 workplace misconduct issues be reported to the league office under the personal conduct
25 policy.

1 Do you ever recall there being a requirement that claims of workplace misconduct
2 issues be reported to the league office?

3 A Yes. I spoke about that.

4 Q Well, I believe, Mr. Allen, you testified that violations of the personal
5 conduct policy were supposed to be reported to the league office. This is asking about
6 workplace misconduct issues more specifically.

7 A Okay.

8 Q And so my question is, do you recall whether or not there was a specific
9 requirement that workplace misconduct be reported to the league office?

10 A Yeah, I would think so. Yeah.

11 Q And when you say you would think so, that was your understanding of what
12 was required, or you recall there being a requirement in place as a result of the Carolina
13 Panthers?

14 A Well, I -- once again, I don't remember this particular statement, but I would
15 say that, yes, workplace misconduct, personal conduct, if there's a violation, should be
16 notified to the league, and Eric Schaffer would.

17 I mean, I think we notified him -- one of our players had an aggravated -- or
18 there's an elevated -- "elevated" I think it is -- speeding ticket, and we let them know
19 about that, too, to try and figure out how much they want to catch in their basket.

20 Q Moving on to the third bullet, do you recall if there was ever a hotline
21 established or another system that allowed league or club employees to report issues of
22 workplace conduct on a confidential basis following the Carolina Panthers investigation?

23 A With our club, you're asking?

24 Q Do you recall if there was ever a requirement imposed with the
25 Commanders and/or other teams by the league office?

1 A I think it's this where we put up these signs and we had a hotline number
2 too. Yes. Yes. The [REDACTED] guy set it up.

3 Q Who is [REDACTED]?

4 A He worked with a PR firm that Dan hired to help us with various issues.
5 And one of the things he cared personally deeply about was domestic violence, and I
6 remember him talking to me about the hotline. So, yeah, we did that.

7 Q Do you recall if there were any efforts within the Commanders organization
8 during your tenure to improve the operations of the human resources department?

9 A Yes.

10 Q And what is it that you recall?

11 A A number of people -- well, I can think of two off the top: Eric Schaffer
12 independently and then Brian Lafemina -- wanted to add people to our HR department,
13 staffing.

14 Q What do you recall that Mr. Schaffer wanted to do with respect to the
15 human resources department?

16 A He wanted to do a job search and interview -- it might have been more than
17 one; it could've been two additional staffers to it. I remember Brian just saying he's
18 gonna try to improve our -- something to the likeness of "upgrade our HR and staffing."

19 Q Was Mr. Snyder aware of Mr. Lafemina's efforts?

20 A Oh, that's who he would recommend it to.

21 Q Is that a "yes"?

22 A Yes.

23 Q Was Mr. Snyder aware of Mr. Schaffer's efforts?

24 A That's who he said it to. Yes.

25 Q Do you recall if Mr. Snyder had a reaction to the efforts of either

1 Mr. Lafemina or Mr. Schaffer's efforts?

2 A Yeah. He explained to Eric what he had at Snyder Communication, which
3 was his company he had before he bought the team.

4 Q And what was that?

5 A That the CFO and his sister, who was an executive with Snyder
6 Communication, were able to handle -- I think he had over 2,000 employees in several
7 countries -- just fine, so we ought to be able to handle our group.

8 Q Is that to say that Mr. Snyder rejected the efforts of Mr. Schaffer and
9 Mr. Lafemina?

10 A Yeah. That's -- I was saying what Eric had. That was the answer Eric got.
11 I don't know what answer Brian got. But I don't think we added anybody.

12 Q Did you have any understanding of how Mr. Snyder felt about the human
13 resources department as a cost center or a profit center for the team?

14 A Well, it's a business. I mean, the team is a business. For every team in
15 the league, it is.

16 Q And so what does that mean with respect to the human resources
17 department?

18 A Well, I might have misunderstood your question. Please ask me again.

19 Q I'll rephrase my question. Did you believe that Mr. Snyder valued the
20 human resources department as it relates to, for example, departments like the ticketing
21 department, marketing department, et cetera?

22 A It'd be unfair to try and put words in his mouth or think like that, but it -- the
23 team is a business. Dan, like probably many owners, really looked at the bottom line as
24 the, you know -- as a business.

25 Q And what does that mean?

1 A Well, it -- I don't know how he looked at the HR department. I know what
2 he had told Eric to his response about adding someone.

3 Q Do you recall if Mr. Lafemina ever contracted with a third party to conduct a
4 risk assessment or review of the Commanders' human resources department, its policies,
5 legal risks, et cetera?

6 A I remember him saying he was gonna do something like that, yes.

7 Q Do you recall or did you ever participate in a training that was conducted by
8 a third party with respect to workplace civility?

9 A I think from the football perspective, meaning the players, the coaches, and
10 the scouts, ours was going to be in the off season, versus the staff, who was doing it in
11 season.

12 We did, for our players and coaches, every year do different seminars through our
13 player program director twice a year -- the rookies I think got it four times a year -- and
14 shining a bright light on the subject and the type of conduct that we expected.

15 Q Is that to say that you don't recall if you sat in on a workplace civility training
16 on the business side, not the football side?

17 A I sat in on -- and there's a document in here. When Lon Rosenberg got let
18 go -- he was our stadium manager -- we brought in some experts from a company out in
19 New York to give it on behavior not only in the workplace but with customers. And I
20 went out to the stadium -- it was the off season -- and sat in on that one.

21 And I sat in several of our team ones where we had the guest speakers or
22 presenters talking about every issue imaginable, including how to sleep better at night.

23 Q You mentioned that you recall Mr. Lafemina discussing something about
24 trying to improve the HR department and potentially bringing in someone to conduct
25 some type of assessment. Is that correct?

1 A Correct.

2 Q Do you recall if there was ever a report that was produced that revealed its
3 findings with respect to the state of the Washington Commanders' human resources
4 department and any legal risks associated with it?

5 A No, ma'am, not off the top of my head, unless it's in one of these things.

6 [REDACTED] I have 1 more minute, and then we can take a 5-minute break.

7 Ms. Quincy. Sounds good. Are we taking a short break?

8 The Witness. No, in 1 more minute.

9 Ms. Quincy. Oh, 1 more minute. Okay.

10 [REDACTED] One more minute.

11 BY [REDACTED]

12 Q Mr. Allen, I wanted to go back to something you testified about earlier
13 regarding Alex Santos and your involvement.

14 I believe you testified that your involvement was to communicate with Mr. Santos
15 that he should not engage in the behavior that he was accused of again or he would be let
16 go. Was that accurate?

17 A That is accurate. And it was -- Doug Williams was his boss. Doug had
18 given him the message, and Doug wanted me to reinforce the message.

19 Q Do you know if Mr. Snyder was aware of the allegations that were made
20 against Mr. Santos back in 2019?

21 A Yeah, I would think so. I think that would be something that Eric would tell
22 Dan -- Eric Schaffer, our general counsel.

23 Q Do you know if the Commanders interviewed not only the woman who
24 made the accusations against Mr. Santos, but I believe there was another -- Rhiannon
25 Walker. There was another reporter who came forward and said that she, too, had

1 been harassed by Mr. Santos prior to Ms. Walker coming forward. Do you recall if either
2 one of those individuals were interviewed by the Commanders as part of its internal
3 investigation?

4 A I believe I knew about the Ms. Walker one. I'm not sure who the other one
5 is. I don't think I heard about two. I think that would stick in my mind if I had heard
6 about two.

7 Q Do you know --

8 A I think -- excuse me. I knew about the woman with The Athletic, which is a
9 newspaper.

10 Q Do you know if that incident with Ms. Walker was reported to the league
11 office?

12 A I do not know. I do not know.

13 ██████████: Okay. That's it for me. Off the record.

14 [Recess.]

15 ██████████: We're back on the record.

16 BY ██████████:

17 Q Mr. Allen, just a few questions. We're going to go quickly on just a couple
18 different topics.

19 The first is, you have testified today that you really handled the football
20 operations side of the organization when you were with the Washington football team.
21 Is that correct?

22 A Yes, ma'am.

23 Q So, with regard to, like, the financials, like, kind of, handling of the books,
24 that didn't come within your purview?

25 A No, ma'am. That would be the CFO.

1 Q And so the CFO never directly reported to you?

2 A No. He reported to the owner.

3 Q Okay.

4 A I would meet with him from time to time regarding how we're spending on
5 players and different issues, or Dan told me to talk to him, but he reported to Dan.

6 Q Understood.

7 Moving on from that topic, so there are -- just to kind of set up these last few
8 questions, there's been some conflation about two separate matters that overlapped a
9 little bit in time, one being -- and we've seen this conflation kind of play out over the past
10 few months -- one being, there's been the Beth Wilkinson investigation that had
11 happened with regard to the toxic workplace environment.

12 Separately, there was an investigation through the NFL that was conducted by
13 former Attorney General Loretta Lynch. It was an investigation into prohibited conduct
14 related to at least one of the then-minority shareholders of the Washington football
15 team.

16 And I think there's been some -- you know, we saw this kind of play out in the
17 hearing with Roger Goodell in June -- some conflation of, like, those two matters since
18 they did overlap a little bit in time.

19 So, after you were released from the Washington football team, did you have any
20 communications -- so this would've been -- you were released at the end of 2019, so in
21 2020 -- have any communications with any of the then-minority shareholders for the
22 football team, those being Robert Rothman, Dwight Schar, and Fred Smith?

23 A Yes.

24 Q What were the nature of those conversations with those minority
25 shareholders?

1 A How am I doing. I mean, they were just reaching out, making sure I was
2 okay. Talked to them as well, just, how are you doing, things of that nature.

3 I did ask Bob Rothman about stocks, you know, Chevron versus J.P. Morgan, that
4 type of stuff.

5 Q Because that was his expertise?

6 A He was -- he was -- he was good.

7 Q You know, part of that investigation by, you know, former Attorney
8 General Lynch was a finding that one of those shareholders engaged in improper leaking
9 and public disparagement of the team owners.

10 Was any of the conversations that you had with any of the minority shareholders
11 involved at all with, you know, any sort of public disparagement of the team owners?

12 A No, ma'am, because that's really the first time I've ever even heard that.
13 So Attorney General Lynch found that somebody did what?

14 Q So the finding was specifically that there was improper leaking of
15 information and public disparagement of the team owners, specifically by Dwight Schar.
16 That was her finding in late 2020.

17 A No, I didn't know that. I did see a comment that Dwight Schar isn't allowed
18 to own part of a team or something like that, but that was in a media report.

19 Q Correct. That's related to that -- stemmed from that Loretta Lynch
20 investigation.

21 A Yeah. And I actually thought it was just a phony media report, because I
22 don't -- I'd find it hard to believe that any one of those three did anything inappropriate.
23 And I don't know how the league can say someone can't own part of a team. I don't get
24 that, I don't understand that. So I never believed it when I saw that little clip.

25 Q So, just to clarify, then, my questions, then, today are a revelation to you

1 about any of their involvement in anything connected with this investigation from 2020?

2 A No. No. And I didn't even know she did it, Loretta Lynch.

3 [REDACTED] Just one moment, Mr. Allen.

4 [Discussion off the record.]

5 [REDACTED] Okay, Mr. Allen, that concludes our questions this round. We'll go
6 off the record.

7 The Witness. Thank you.

8 [Recess.]

1

2 [6:11 p.m.]

3 [REDACTED]. On the record.

4 BY [REDACTED]:

5 Q So, Mr. Allen, I want to spend most of this hour discussing some of the
6 substance that my co-counsel here began this deposition with, and that's the private
7 investigators and your leaked emails, which occurred in October of 2021.

8 But before we get to that, I want to briefly return to what we discussed last time
9 during my hour of questioning, and that's Mr. Snyder's relationship with Mr. Goodell.

10 Now, I understand that you have some concerns about sharing this, and I want to,
11 of course, give you an opportunity to voice that on the record. But I also want to ask a
12 couple factual questions about what you understood to be happening during this time.

13 So during this time in 2017, there was recently news reports that John Schnatter,
14 who is the CEO of Papa Johns, reported that Mr. Snyder and Mr. Jones had been
15 recruiting different NFL owners to try and get Mr. Goodell removed as NFL Commissioner.

16 Are you familiar with those news reports?

17 A Yes.

18 Q And was that around the same time that you were sent to the league offices
19 to review Mr. Goodell's contract?

20 A It feels like it, but I'm not sure. I don't -- when I got fired, my whole
21 calendar was on the computer, along with these gazillion emails. And so I -- I'm -- it
22 feels like it's right.

23 Q Understood. And was that also around the same time that you related to
24 us that Mr. Snyder would send those emails to other NFL owners regarding Commissioner
25 Goodell?

1 A I believe so.

2 Q And these news reports related that Mr. Jones and Mr. Snyder were upset
3 with Mr. Goodell over his handling of the national anthem controversy in the NFL.

4 Is that also your understanding of why Mr. Snyder was taking these actions
5 regarding the email and sending you to review Mr. Goodell's contract?

6 A I'm going to answer your question. Let me clarify. I'm not speaking about
7 anything about Mr. Jones.

8 Q Understood.

9 A Because I don't -- I do not know -- I love him, I think the world of him, but I
10 don't know where his mind is in those conversations. But it does seem like that period
11 of time, and Dan did have a relationship with John -- or Papa John.

12 Q Understood. And was it your understanding that Mr. Snyder was upset
13 over the national anthem controversy and that's why he wanted Commissioner Goodell
14 removed?

15 A Yeah, but it seems like there's more to it than that. But yes.

16 Q What else was there to it?

17 A I don't -- just there's a feeling that there was more angst than just the
18 national anthem controversy, if that's what you want to call it.

19 Q And was the controversy between Mr. Snyder and Mr. Goodell or was the
20 controversy in the public?

21 A No, I'm saying it feels like there's some other things that Dan was upset
22 about on top of the national anthem, if I'm saying that properly.

23 Q Did he ever relate those things to you, or did you come to understand what
24 those things were?

25 A He might have, and I don't recollect them. I would tell you.

1 Q And just a few more questions on this subject.

2 When he sent you to the league offices with Mr. Choi to review this contract, what
3 parts of the contract did he specifically ask you to review?

4 A Just read the contract.

5 Q Were there particular parts that he was interested in?

6 A No, nothing that I can remember him saying. Just read it.

7 And after we did it, we got on a plane and we were headed to I think a league
8 meeting. And I didn't -- I don't remember even talking about what I read that much in
9 the contract.

10 Q Did you have a conversation with Mr. Snyder about what you read?

11 A I'm sure we talked about it on the airplane, and Stephen probably did the
12 economics of the contract. But I don't -- I didn't see anything in there that would tell me
13 something that I'm looking for. I don't even know what I'm looking for.

14 So I think I was just on the plane because we were going to the league meeting,
15 but we stopped in New York and he said, "Let's go read the contract."

16 Q Were there any duties in particular that Mr. Snyder was concerned about in
17 Mr. Goodell's contract?

18 A Not that I could recall.

19 Q I would like to turn our attention to the concerns that you expressed earlier
20 about relating this.

21 Do you have concerns about sharing this information with the committee?

22 A Yes, sir.

23 Q And why is that?

24 A Fourth time I've had to hire a lawyer in this situation. I understand that we
25 finished in last place, and I understand that we had no answer at quarterback once Alex

1 got hurt, but I do not understand why this is going on.

2 And the common interest agreement, which I had never heard of before in our
3 league, it says that the two of them get to decide what happens to all my emails. And
4 my emails can, as you can see, can embarrass some other people who I care about.

5 But it also has all my tax information. It has all the medical information from
6 every player in the league, because we get that medical information from the combine.
7 I'm a trustee for two estates. It's got all that tax information in it.

8 And no one will tell me how many people have read every one of these emails.
9 And they are reading every email, because you don't pick out these things based on some
10 buzzword. They're reading everything to hurt my friends and family through me.

11 And I wasn't accused of bad behavior. That's not in my -- it's not in my life.
12 That's not who -- I would do. And if I knew about these things, I would have addressed
13 them before I ever came to the Redskins, to say, "What about this? What about that?
14 What about this?" But I didn't.

15 Q You stated there's been four times you've had to hire a lawyer in relation to
16 this. What are the four times? And if I can offer another question on top of that, what
17 is "this"?

18 A This is us today is the fourth time.

19 Q Okay. What are the other three?

20 A The first, he reduced my salary, saying it was a force majeure clause in the
21 contract, even though I was terminated from my agreement. So I had to hire a lawyer to
22 file a grievance, and the money got reinstated.

23 The second time was I hired a lawyer to help the league in the [REDACTED] case,
24 which had nothing, no benefit for me, it only benefited the NFL and the Redskins. And
25 Covington during that asked me for my phone, never telling me, never telling me about

1 the common interest agreement, while they're representing me, some of my interests in
2 this.

3 And number three was the wild goose chase about some story in India that he
4 somehow -- there's a number to it. The 1782 claim in India, that I spread a bad rumor in
5 India about.

6 So those are the four.

7 Q And those have been in the approximately year and a -- or 2 years since
8 you've left the team, or two and a half years?

9 A Yes. New Year's Eve '19 -- or 2019.

10 Q So I'd like to talk about that, that India lawsuit. So that lawsuit started out
11 of articles that were posted on an Indian blog called MEAWW, which is shorthand for
12 Media Entertainment Arts WorldWide, and that article linked Jeffrey Epstein to Daniel
13 Snyder.

14 How did you first become aware of this article?

15 A I think someone sent it to me, like an email or a text.

16 Q And what was your impression of the allegations in that article?

17 A Well, I could tell you I don't recall, but he got it through some discovery of
18 the other person. And I said it looks like The Onion, that humorous web -- newspaper,
19 which I still -- I don't even know if The Onion still exists. But when I was younger, there
20 was something called The Onion that was humor with fake headlines.

21 Q So, in your opinion, it didn't seem credible?

22 A No, I thought it was a bad joke, I think I put in it.

23 Q Did you ever become aware of litigation relating to this article?

24 A Only after he served me. I saw reports either that he or his lawyer said
25 they're going to sue the site and said that -- said it was false.

1 Q And you said you became aware of litigation concerning you. When did he
2 serve you with a lawsuit or with process concerning this litigation in India?

3 A Can I ask my counsel? I have no idea. It seems like it's May of 2021.

4 Q So The Washington Post reported that in April 2020 Mr. Snyder filed what's
5 known as a 1782 petition against you in Arizona District Court.

6 Is that correct, to your knowledge?

7 A So April -- yeah. I think the way I became aware of it, there was a
8 newspaper account that someone sent me that he was filing it in California. And it was
9 in the media before it was ever filed. And then they said they're going to withdraw that,
10 because they figured out I live in Arizona, and serve it here. So I saw it in the media first.

11 Q Understood. What was Mr. Snyder's claim in this petition? What was he
12 alleging that you did or what you had?

13 A It's a good question, because what he wanted were documents that I have
14 no idea how they would ever be related to India. And they were very similar requests
15 that -- I forgot about that one.

16 He served me a request for production -- is that what it's called -- in what your
17 previous counsel was just asking me about, in his partner's lawsuit. They had served me
18 with a request for production to know everything I've talked to and everyone I've talked
19 to regarding the partners. And it had a bunch of names that weren't partners as well,
20 which made no sense to me.

21 Q So you're saying that he had asked for your communications or who you had
22 talked to?

23 A Yes.

24 Q And why do you think he was asking for your communications with the
25 partners or your communications with these other people in relation to the India article?

1 A I have zero clue why.

2 Q Can you venture a guess as to why he would want these communications?

3 A I go back to the congressional report that going after me and accusing
4 former people of things they didn't do is a good distraction, I guess. But it sounds -- it
5 clearly had a PR spin to it.

6 [REDACTED] I would like to now direct your attention to document AF, Albert Fred,
7 which will be marked as Majority Exhibit 9 for identification purposes.

8 [Majority Exhibit No. 9

9 Was marked for identification.]

10 Ms. Quincy. Did you say AF as in Albert Frank?

11 [REDACTED] Yes.

12 BY [REDACTED]

13 Q And I would like to direct your attention to pages 6 and 7 of this, but I would
14 also like to give you a second to review this document.

15 A Okay.

16 Q Do you recognize this document?

17 A Yes.

18 Q What is this document?

19 A This is one of their lawyers sending Stephanie here an email proposing
20 search on my phones and computers for all of these different people, companies,
21 whatevers, because I don't -- I'd never heard of most of these names.

22 Q And when you say "their lawyers," who are you referring to?

23 A Snyder's Reed Smith. Reed Smith, who is one of Snyder's attorneys.

24 Q So I would like to direct your attention to a few of these search terms in
25 particular.

1 Mr. Snyder's lawyers asked you to produce documents and communications
2 related to Jeffrey Pash. As a reminder, who is Jeffrey Pash?

3 A He's the general counsel of the NFL.

4 Q To your knowledge, did Jeffrey Pash have any relation to the India article?

5 A To the India article?

6 Q The India article linking Daniel Snyder to Jeffrey Epstein.

7 A No, no.

8 Q So why was Dan Snyder asking for your communications with Jeffrey Pash?

9 A No idea.

10 Q Mr. Snyder's lawyers also asked you to produce all communications relating
11 to Melanie Coburn.

12 Who is Melanie Coburn?

13 A I'm familiar with her name, and I believe she testified or there's some
14 newspaper articles about her. She's a former cheerleader with the Redskins, and I
15 haven't met her.

16 Q Did you know who she is when this petition was filed?

17 A Please repeat.

18 Q Did you know who she was when this petition was filed in Arizona District
19 Court?

20 A No, no.

21 Q To your knowledge, was she in any way connected to the India article or any
22 of the -- any of the claims therein?

23 A No. No. No.

24 Q To your knowledge, had she been quoted in Washington Post reports
25 concerning the toxic workplace at the Washington Commanders?

1 A Repeat that again.

2 Q To your knowledge, at this time had she been quoted in Washington Post
3 reports about the toxic workplace at the Washington Commanders?

4 A I'm having a problem understanding the actual question. I heard you -- is it
5 more likely this is -- he's looking for information about the Washington Post stories?

6 Q I can repeat my question. At this time, did you know whether she had
7 been quoted in Washington Post stories about the Washington Commanders?

8 A Oh. I don't know if it's that time, but I had read her quotes in The Post. I
9 don't know if that's before or after this happened. I saw her quotes in the USA Today.
10 I remember that.

11 Q Why would he ask you about Melanie Coburn?

12 A I don't know. I have no idea.

13 Q He also asked for all communications relating to The Washington Post.

14 A Correct.

15 Q The petition also filed in support of these search terms say that your name
16 rarely, if ever, was mentioned in those articles, referencing the July and August 2020
17 articles about the Commanders' toxic workplace culture.

18 Mr. Allen, why do you believe that your name was, in their words, rarely, if ever,
19 mentioned in those Washington Post articles?

20 A Because I wasn't accused of wrongdoing by my coworkers or the previous
21 workers of the team. I would suggest that there's millions of people who weren't
22 named in it. I saw that, and I was -- I'm a nonlawyer, so I was flabbergasted you could
23 actually write that sentence.

24 Q Mr. Allen, to your knowledge, was The Washington Post involved in any way
25 in the India articles or --

1 A I would not know. I don't know. I doubt it. Why would a media outlet
2 send it to another media outlet?

3 Q So, Mr. Allen, you stated that these search terms were unrelated to the India
4 article. Why do you think Mr. Snyder was requesting these communications from you?

5 A I believe it created, for the PR firms that they hired, a good way to distract
6 from the actual claims. And, obviously, the league office, in their common interest
7 agreement, agreed to this strategy.

8 Q So when you say the PR firms that they had hired in relation to the league,
9 are you saying that these were linked to the NFL's investigation?

10 A Well, the common interest agreement that I read made an agreement that
11 anything that we found, that they found together, would stay in their possession unless
12 they approved it being released. So someone gave it to their PR firm or to their staff to
13 release.

14 Q Had Mr. Snyder previously tried to request your communications in any
15 other proceeding?

16 A One more time, please?

17 Q Had Mr. Snyder ever previously tried to request your communications in a
18 different proceeding?

19 A Yes, in his lawsuit that they were talking about with his minority partners.

20 Q And when -- around when would he have requested your communications?

21 A That would have been a few months before this one.

22 Q Could that have been around in the fall?

23 A No. No, it was -- it's my recollection that his request for production of
24 those documents in the partners dispute was prior to this one.

25 Q Do you remember the date?

1 A No, sir. I could find it for you.

2 Q Does September 30th ring a bell?

3 A Okay. Yeah, that seems like it fits.

4 Q So Mr. Snyder was trying to obtain your communications in two different
5 proceedings. Did you view these efforts to be linked in any way?

6 A Yeah, because much of it is the same names, although these -- whatever
7 Eleven is and MEAWW is, I think those were the additional names put in there.

8 Q During the Arizona action, did Mr. Snyder ever collect and file any of your
9 personal or work email?

10 A Yes.

11 Q What did he use them and try and show?

12 A Well, I think he was trying to show me that he has them, that he has
13 possession of them.

14 Q And why would he want to do that?

15 A To make me give him his phone -- give me -- give him my phone, you know,
16 to show leverage, I guess.

17 Q And at the time when these were introduced in the Arizona action, did his
18 use of your work emails concern you?

19 A Please ask me that again.

20 Q Did his use of your work emails in that proceeding, did that concern you at
21 the time?

22 A Oh, absolutely.

23 Q Why is that?

24 A What's in my -- you know, I've seen five or six now that I, even after reading
25 them, I don't remember them at all.

1 But I know, I know general topics that are in my emails, and it's not good for the
2 NFL. It's not good for him. Why would you be doing this if you have people's wills and
3 estates in this stuff, and you're just -- I'm shocked lawyers would actually do it, but
4 they're involved, obviously.

5 Q Were you concerned that he might do so again in another context?

6 A Oh, it was showing a hand, without a doubt.

7 Q So in this Arizona proceeding, did you ever turn over your communications
8 that Mr. Snyder requested in this exhibit?

9 A No, sir.

10 Q Why is that?

11 A We did it. The case got -- he dismissed it with -- or withdrew it, whatever
12 the phrase is, dropped it.

13 Q Why did Mr. Snyder drop it?

14 A You're asking for me to -- I don't understand a lot of things. I don't know
15 why he filed it, so I don't know if I know why he dropped it either.

16 Q Did your attorney call him to testify in that action?

17 Ms. Quincy. Could you say that question again?

18 BY [REDACTED]

19 Q Did your attorney call for Mr. Snyder to testify in that action?

20 A Oh, yes. Yes.

21 Q After your attorney called for Mr. Snyder to testify, did he drop that action?

22 A Yes, he did.

23 Q Do you believe him dropping that filing was related to your attorney calling
24 for Mr. Snyder to testify?

25 A Well, I think the judge ordered him to testify. Yes. I don't think he

1 wanted to do that.

2 Q How soon after the judge ordering Mr. Snyder to testify did the case settle?

3 A I think about a week before. There was a date set for the testimony, and I
4 want to say it's like a year, August 31st a year ago.

5 Q Why do you think Mr. Snyder didn't want to testify?

6 A What is -- you've got to get -- there's some penalties for frivolous lawsuit
7 and harassment. There's got to be something. I don't -- and he didn't want to have to
8 go under oath and have to explain this.

9 Q So, in your opinion --

10 A Is my guess, is my guess.

11 Q So, in your opinion, it's your testimony that this was a frivolous lawsuit?

12 A Yes, I believe so.

13 Q You testified earlier that Mr. Snyder had spoken to you before about
14 potentially using private investigators to follow Roger Goodell and that that conversation
15 happened around 2016 or 2017. Is that correct?

16 A Yes.

17 Q And could you just recount for us again very briefly that conversation?

18 A It was a bit of an off-the-cuff thing. He goes, "I know. I'll get someone to
19 follow him and find out what he's been doing."

20 Q And you testified that you were in Mr. Snyder's office when that occurred.
21 Is that correct?

22 A Yes, yes.

23 Q And what was your reaction at that time?

24 A I just thought it was a comment. Like, I didn't think anything of it. You
25 know, that's I'm going to go punch him in the face. All right. He's not going to punch

1 anybody in the face. It's just a comment.

2 Q Did there come a time when you began to think of that as more than a
3 comment?

4 A A few days after I met the guys following me around.

5 Q And you testified earlier that was around March 2021. Is that correct?

6 A Yeah, yeah.

7 Ms. Quincy. If we could just make a statement for the record to correct this.

8 We did go back and look at records, and it actually was late April.

9 The Witness. Late April. Okay.

10 [REDACTED] Understood. Thank you.

11 BY [REDACTED]

12 Q Around this time, in the spring of 2021, did you learn of other Commanders
13 employees, either current or former, who were being approached by private
14 investigators?

15 A Yes.

16 Q How did you learn about that?

17 A I read it in the newspaper.

18 Q Did you have conversations with former Commanders employees about
19 those reports?

20 A No. No, I didn't. And I don't know some of these people. They were
21 there before me. Some overlapped by a year or two, but I didn't know them.

22 Q Did you have conversations with former Commanders employees who were
23 approached by private investigators themselves?

24 A No. Have I talked to them? No, I have not talked to the employees.

25 Q Have you talked to anyone who has been approached by a private

1 investigator, by Daniel Snyder or by the law firm Reed Smith or anyone acting on behalf of
2 the Washington Football Team?

3 A Yes. John Moag told me that he had people that he had to confront who
4 were in his neighborhood, and he told me he was going to report it to Roger Goodell.

5 Q And who is John Moag again?

6 A John Moag, he has a business where he helps in sales of interests of all
7 sports teams. He's an investment banker, sort of.

8 Q And around when, if you can recall, was John Moag approached by these
9 private investigators?

10 A Yes, he was.

11 Q Around what time?

12 A Oh, oh, he was before, before I met my people, the ones assigned to me.

13 Q Do you know if John Moag ever did report the fact that private investigators
14 came to his house to the league?

15 A I do not know.

16 Q But he told you that he would?

17 A Yes.

18 Q And he said he would tell Roger Goodell specifically?

19 A I don't know, call or email or what, I don't know. But he said he was going
20 to let him know.

21 [REDACTED] I would like to now direct your attention to document AD, Albert
22 David, which we marked as exhibit 10 for identification purposes.

23 [Exhibit No. 10

24 Was marked for identification.]

25 Ms. Quincy. Did you say Albert David?

1 ■■■■. Correct.

2 Ms. Quincy. Hang on. I've got it printed off, a better copy for you.

3 Tell me what this one is.

4 ■■■■ This is a transcribed interview of Abigail Welch from May 17th, 2022.

5 The Witness. Okay. Yes, I have it.

6 ■■■■ Mr. Allen, according to Mrs. Welch's testimony, in late April/early May
7 2021, private investigators acting on behalf of the Washington Commanders and Reed
8 Smith came to Mrs. Welch's house to ask questions about the Washington Football Team,
9 you, yourself, and a sexual misconduct investigation.

10 Reed Smith is the same law firm that represented Mr. Snyder in the Arizona
11 action. Is that correct?

12 The Witness. Yes, sir.

13 ■■■■ I'd like to direct your attention to the bottom of page 20.

14 Ms. Quincy. Got it?

15 The Witness. I got it.

16 BY ■■■■

17 Q So here on page 20, you can see that at line 474 Ms. Welch says that she had
18 been talking to five other former Commanders cheerleaders and that they had been
19 approached by private investigators, quote, "asking questions about Bruce Allen and the
20 sexual misconduct investigation."

21 Mr. Allen, what is your reaction to hearing that private investigators were asking
22 former Redskin cheerleaders about a sexual misconduct investigation relating to you?

23 A When I read this, I was insulted and upset. But in her testimony there's
24 something that I hated more, was how they approached this woman, who I don't believe
25 I've ever met, and scared her and her three little kids. That affected me more than

1 more slanderous talk and false accusations.

2 Q Did you hear any similar reports of private investigators asking about you
3 during this time, either through other people, through other sources? You know, it says
4 here there are five former cheerleaders that were asked about this. Did you hear
5 anything about this?

6 A No. You know, it's been well-reported, I guess you would call it, or
7 well-documented. And I followed it. And I've seen Melanie Coburn, who we've talked
8 about her comment, and this.

9 It's -- it is a -- I think your report called it a shadow campaign. I think it's an
10 absolute. I don't know who comes up with game plans like this to try to hide their
11 actions. Just admit to what you did, deal with it, and go forward. I don't know. I
12 don't know who does this.

13 Q Mrs. Welch said she had never met you or had any interaction with you, and
14 I think you might have already addressed this, but is that the truth? To your knowledge,
15 have you ever met Ms. Welch?

16 A I don't believe I've ever met her.

17 Q Mr. Allen, why do you believe this private investigator was asking former
18 Redskins cheerleaders if they knew you and approaching so many of them?

19 A My brain doesn't work that way. I have no idea why they are doing this. I
20 don't. And my private investigator did not ask me, did you have -- do you know any of
21 these cheerleaders? He didn't ask me about any of them or who I knew or what I knew
22 or any of it. He just said he's documenting where I'm going and who I'm, I guess,
23 meeting with or having dinner with.

24 Ms. Quincy. I just want to clarify the record, that when he said "my private
25 investigator," he meant the private investigator hired by Dan to follow him.

1 The Witness. Yes. The one following me, yes.

2 Ms. Quincy. Not his personal private investigator, of which, to my knowledge, he
3 has none.

4 ██████████ Thank you.

5 So at this point, we've discussed a couple different topics. We've discussed the
6 Arizona petition. We've discussed the minority owner discovery. We've discussed the
7 private investigators, talking about the sexual misconduct investigation with the private
8 investigators coming to your house.

9 Did you view all these as linked?

10 The Witness. As?

11 ██████████ Linked.

12 Ms. Quincy. Linked together.

13 The Witness. Well, yeah, because I'm the brunt of all of them. So yes.

14 BY ██████████

15 Q Did you report the fact that you viewed these as linked to the league or did
16 you report these individually to the league in any way?

17 A I had a conversation with a woman in the league office in the legal
18 department.

19 Q Who did you have a conversation with?

20 A Lisa Friel.

21 Q When did you have this conversation?

22 A I believe date-wise it would be after they filed -- included some of my emails
23 in their filing that we had just talked about a little while ago.

24 And I called her and said something to the extent of, "Do you guys permit this.

25 We have memos coming down from the league office about having people's medical

1 records and HIPAA violations and all of that, and you're allowing people to use emails that
2 have nothing to do with anything that he's accusing me of."

3 And so I notified her.

4 Q And just because we weren't on that call with Ms. Friel, what did you explain
5 to her you thought Mr. Snyder was doing?

6 A Oh, I think it's the same thing that I hate to tell you is going to happen within
7 a week or two probably from now. It's to intimidate me to shut up or -- I don't
8 know -- or to hand over my phone.

9 At that time, once again, I don't know about the common interest agreement
10 between the league office and the Redskins. So I don't know if she told Dan my
11 conversation or Dan's lawyer my conversation. I don't know that.

12 Q So just so your testimony is clear, you said, "Does the league permit this?"
13 What was "this" that you relayed to Mrs. Friel? What did you say to Ms. Friel that Dan
14 Snyder was doing at that time?

15 A He was putting my private emails with conversations with friends or other
16 people in his pleadings against me in this frivolous lawsuit about India.

17 Q And what did Ms. Friel say in response?

18 A She thought it was bad. She thought it was bad form, bad for the league.
19 You know, he included things that, once again, have nothing to do with India, zero to do
20 with India, in that article that ran about it.

21 Q Is that what you were referring to earlier when you said there are things in
22 your emails that aren't good for the NFL? Was Ms. Friel also of the opinion that there
23 were things in your email that were not good for the NFL?

24 A What I think I'm trying to say is taking people's emails from servers -- there's
25 millions of emails every month in the NFL. Taking emails and putting them in pleadings

1 against former employees where there's nothing criminal, it might be bad humor, but
2 nothing criminal involved, it seems like the league shouldn't encourage that, or all the
3 employees in the league are going to start feeling different.

4 Q Did Ms. Friel relate to you that the league was going to take some action to
5 stop this, considering that she agreed that it was not good behavior?

6 A Yes.

7 Q What did she say the league was going to do?

8 A She said that she'll get on it. She agreed it's bad. She thought it was
9 conduct detrimental. It's bad.

10 Ms. Quincy. Finish the sentence. She agreed it was conduct?

11 The Witness. Detrimental to the league, and that it was bad. And she says, "I'll
12 get on it."

13 BY [REDACTED]

14 Q Did she say anything else during that initial conversation?

15 A Probably not too much else. I might have sent her the pleadings that he
16 had filed with the court, just so she could see them.

17 Q Did you relate to Mrs. Friel that private investigators had approached you?

18 A Well, that's the timing thing. If they had, I did. And if I didn't on the initial
19 one, I did the subsequent. I talked to her I believe three times.

20 Q So just so we have the timing correctly, what were the three times you
21 talked to Mrs. Friel. And if you can't remember exact dates [inaudible].

22 A The first time is when I first see -- and I think I'm using the right
23 terminology -- their pleading that includes emails in them.

24 The next time is a reporter from The Athletic has a copy-and-pasted email to me
25 that says he also has emails that he's gotten from someone. He didn't say who.

1 And I sent her -- I called her on that and I said, "I don't know what the heck's going
2 on here."

3 Q Do you remember around what time that second conversation was?

4 A It's all within probably 3 weeks of each other, but I can't tell you the dates.
5 We can look them up and get back to you if you want.

6 Q That would be helpful.

7 So at some point did you relay to Ms. Friel that private investigators had
8 approached you?

9 A Yes.

10 Q What was her reaction to that?

11 A I felt it was compassionate, but it was more of a, "I'm not shocked." I think
12 they've heard of with the other people. And I said, "I don't know what you guys are
13 doing with any of this, but this, it's really getting out of control."

14 Q What did she relate in response to you saying this was getting out of
15 control?

16 A I believe she was sympathetic toward it.

17 Q Did Ms. Friel ever convey to you what was happening within the NFL or
18 other actions Mr. Snyder was taking?

19 A No, not with -- no.

20 Q Did she ever share with you other information on your emails?

21 A Other than she told me, "We're aware of the emails." They weren't a part
22 of the Wilkinson investigation. That the team gave them the emails and that there was
23 a presentation at a -- I don't know if it was a league hearing or something between the
24 league office and Dan where "he blamed you for everything."

25 I said, "Well, how can I be blamed for things when I'm working in Tampa? How

1 do I get blamed for things that happened before I got there?"

2 And she goes, "We know your resume," noting that I wasn't there when the early
3 serious allegations were made.

4 Q So she related to you that there was a presentation made by Mr. Snyder?

5 A Yeah, by either him or his lawyer. I forget.

6 Q Did she relate to you what was in that presentation?

7 A She said it was a PowerPoint, a PowerPoint or a slide show, one of the -- a
8 phrase like that.

9 Q And what was the purpose of that presentation, to your knowledge?

10 A I guess to blame me for what happened.

11 Q And who was that presentation made to?

12 A I don't know if it was -- I don't know who was at it. She was. And either
13 Dan presented it or his lawyer or his PR firm presented it. It was one of the three.

14 Q And just to make sure I have the timing right of this, around what time was
15 this presentation made?

16 A Oh, I don't know. It was before my conversations.

17 Q And in --

18 A Before.

19 Q Apology. And in your conversation with Mrs. Friel, did she convey to you
20 that -- it seems like she conveyed to you that she understood that you were not
21 responsible for the culture? Is that a correct understanding?

22 A Yes. The accusations of, that have all been well-documented and
23 well-reported, happened before I was there. I was there for Alex Santos, that's true, but
24 that wasn't why he got fined that amount of money.

25 Q Specifically in terms of Mrs. Friel's view of your involvement, did she have a

1 view as to whether -- your involvement in the Washington culture that she conveyed to
2 you?

3 A No. She didn't say anything to me that was negative. In fact, she said,
4 "You haven't been accused of anything."

5 Q And earlier, I think, you said that you have been told there were no
6 accusations against you by the league. Were you referring to Mrs. Friel when you said
7 that?

8 A Yes.

9 Q And did Ms. Friel have a view that she conveyed to you about Mr. Snyder's
10 actions during the Wilkinson investigation?

11 A No. She said that they're blaming me, "me" being Bruce Allen.

12 Q And in terms of this presentation, I think you spoke to there being emails in
13 this presentation. Was there any other content that you're aware of in this
14 presentation?

15 A I don't -- I do not know. I'd love to have it if you guys have it.

16 Q Did the presentation, to your knowledge, have anything to do with MEAWW
17 or the -- and the defamation articles?

18 A No. And it probably didn't have anything to do with following people or
19 any of that other stuff.

20 Q So you stated that Mr. Snyder was trying to blame you for the problems at
21 the Commanders. Do you believe he intended to use your communications as part of
22 that effort?

23 A Yes. It's part of the PR plan, it feels like.

24 Q So on July 1st, 2021, Ms. Wilkinson released her investigation findings, and
25 my colleague has gone over those with you in length. To your memory, did those

1 findings mention you in any way?

2 A You're going to have to repeat that again.

3 Q Did those findings mention you in any way?

4 Ms. Quincy. Just for the record, we do not have Beth Wilkinson's written report.

5 The Witness. No. I was going to say I don't think anyone has the findings. I
6 think you started this because you don't have the findings.

7 BY [REDACTED]

8 Q I'm referring to the four-page press release that the NFL released and my
9 colleague Chioma went over with you briefly this afternoon. Did that mention you in
10 any way?

11 A Which one is it?

12 Q I believe it's exhibit 6.

13 A Okay. I have it.

14 Q Do you see your name anywhere?

15 A No.

16 Q Despite not being named, were you concerned at all that Mr. Snyder would
17 continue to try and blame you for the Washington Football Team's culture around this
18 time?

19 A Oh, yeah.

20 Q Why is that?

21 A It's still going on.

22 Q In light of that, on October 8th, one of your emails with Jon Gruden was
23 published in The Wall Street Journal, and we've already gone over that a little bit. Did
24 you have advance warning that this was going to be published?

25 A I got an email. I don't know what time it came in, but I didn't see it till

1 about 7 p.m. Arizona time. And I hadn't seen it. I got a phone call from Jon Gruden
2 that, "Something's going on. Why is The Wall Street Journal calling us about emails?"
3 And I had no clue.

4 I hung up. I opened my computer, iPad or whatever, and looked. I saw an
5 email from the writer. And it said, "We're going to publish this. You can call us for
6 comment."

7 It didn't have -- I don't believe it had the whole email, but it said Coach Gruden
8 had said something racist or homophobic, I believe. You know, that caught my eye.
9 But I don't think it had the actual email in the email he sent me.

10 I called Lisa Friel after I got it, and I said -- she couldn't take my call initially.
11 Because I thought I was giving them a heads-up about it, but I was adamant, "What the
12 heck is going on here?"

13 And you could tell that it was busy, because once again, it was 7 p.m. our time, so
14 10 o'clock your all's time, so -- or maybe it's 9. Maybe it's the time change thing.
15 Maybe it's only 9 o'clock.

16 But she says, "Yes, we're aware. It's bad."

17 I said, "Well, who in the hell is giving my emails to The Wall Street Journal? Why
18 don't I -- I'm the only person that doesn't have my own emails. Why?"

19 And she went on to say, "We didn't do it at the league office. It came out of
20 their side." And she said, "Well, you know, you don't look good with this."

21 And I said, "Can someone tell me what it is? I don't even know what it is.
22 There's something that he says is racist and homophobic in an email to me, but I have no
23 idea what you guys are talking about."

24 She read Coach Gruden's line, and I didn't understand what she read, because I
25 didn't put together De Smith. I didn't understand who it was about, and I think it was

1 because I'm angry.

2 And she goes, "Yeah, this is a problem." And I've never talked to her since then.

3 Q When she said it came out of their side, what did you understand her to
4 mean by that?

5 A She was saying her crew, all the crew that -- whoever the crew is on their
6 side who have all my emails, including my mom's friends, didn't do it. So she's pointing
7 a finger at the team -- unless there's another group who has my emails who I don't know.

8 Q So Lisa Friel was saying that the NFL hadn't leaked it and it had come from
9 the team, to your understanding?

10 A Yes. Because there's only -- as far as I know, but I don't -- it's hard to
11 believe. You would think there's two entities, and it's the entities that signed the
12 common interest agreement.

13 So whoever did it or whoever didn't do it knows exactly who did it, because they
14 have to -- they both have to agree to do it or they both did it together.

1

2 [7:11 P.M.]

3

BY [REDACTED]

4

Q Did Lisa Friel say anything else about Mr. Gruden or about your involvement in the emails?

5

A No. She says that it reflects poorly. She's got work to do. And that was it. And we've never talked -- I was obviously disturbed by everything, and it was just flying around. I mean, the -- it didn't make any sense to me.

6

Q We only have a minute or two left, but I want to ask if you've talked to anyone else at the league office about the leak of these emails.

7

A No. I have a lot of friends in the NFL. When I say "the NFL," once again, it's the teams, and that's friends in the league office. And I've intentionally not had conversations about any of this with them. We talk about football, and it allows us, and I think it protects them from ever being involved in this nightmare.

8

Q So, when Lisa Friel said it came out of their side and referring to the team, do you believe that it came, the email leak to The Wall Street Journal, the later leaks, also the newspapers, came from the team, "the team" being the Washington Commanders?

9

A I don't want to make a false accusation as people have done. But it -- that common interest agreement means that they're both guilty.

10

[REDACTED] Off the record.

11

[Recess.]

12

[REDACTED] We can go ahead and go back on the record.

13

BY [REDACTED]

14

Q You mentioned in the last hour of questioning somebody by the name of

15

John Moag. Can you remind me who he is?

1 A He's an investment banker based either in Baltimore or right outside of
2 Baltimore.

3 Q Okay. And how did you know him?

4 A I've known him since I was with the Raiders, and he was an expert witness in
5 a Raider trial.

6 Q Okay. How often did you speak with Mr. Moag while you were at the
7 Redskins?

8 A Probably two to three times a year. Maybe a little more some years.

9 Q Okay. And then, after you left the Redskins Commanders, how often did
10 you speak with him?

11 A Frequently. I don't know how many times. Snyder figured out how many
12 times, whatever that number is.

13 Q I don't know. But frequently, like once a week, every day? Do you have,
14 like, a guesstimate for what "frequently" means?

15 A No. I don't know if it's -- it wouldn't be every day. It's several times.

16 Q Okay. Are you aware that Mr. Moag was scheduled to be deposed by this
17 committee on April 13th?

18 A I did -- I did hear that.

19 Q How did you come to know that information?

20 A I don't know if it was a media report or I heard it or John told me he was
21 going in. I don't know what it was. It was either John told me or it was in the media.

22 Q Okay. And are you aware that it was postponed the morning of April 13th
23 and has not been rescheduled?

24 A Yes. I am aware.

25 Q Okay. And, in any of your conversations with Mr. Moag, did he say

1 negative things about the Redskins or about Mr. Snyder?

2 A You have to rephrase that.

3 Q Did you not understand the question or --

4 A It's too broad of a question. Yes, after -- he told me about the private
5 detectives or investigators, whatever we want to call them, that were following him.
6 And, yes, he was extremely upset about it. But, before then, there was
7 nothing -- nothing that he was negative about the team or the action. In fact, he would
8 rather have the team be more valuable than less valuable.

9 Q What do you do mean when you say that?

10 A He represented the three partners that were selling the team. So the more
11 valuable the team is, the more money they would get.

12 Q And did he ever talk to you about how the team would be more valuable
13 versus less valuable?

14 A He wouldn't have to explain that to me.

15 Q Okay. Could you explain it to me?

16 A It's based on the club revenue. It's multiples of the club revenue and the
17 market and the TV size.

18 Q And so the minority shareholders wouldn't have had a controlling stake in
19 the team, right?

20 A No, they have a percentage of the team. And if the team is worth more,
21 your percentage is worth more.

22 Q Would the team also be worth more if he was able to sell it in its entirety
23 versus just the minority percentages?

24 A Yeah, as a general practice, not just in the NFL but all sports team, the
25 controlling interest, it has a premium on it versus a minority interest.

1 Q Okay. So you said that Mr. Moag represented the minority shareholders,
2 which, as we've discussed, included Dwight Schar. Is that right?

3 A Yeah, there's three minority owners. He had represented Fred Smith for
4 several years.

5 Q Okay. And Dwight Schar is one of the people that we talked about in
6 connection with the Loretta Lynch investigation. Do you remember that from, like, 2
7 hours ago?

8 A Yes.

9 Q Okay. So, as we discussed earlier, Dwight Schar was one of the ones
10 investigated by former Attorney General Loretta Lynch and, consequently, was banned
11 from owning an NFL team. You said you had seen that consequence in the media at
12 some point.

13 A I saw that. I don't -- I don't -- I don't know if that's true.

14 Q Okay. And you spoke at length with my Democrat colleagues about the
15 India story in the India newspaper and the lawsuits that sort of stems from the claims in
16 that paper.

17 So isn't it possible that the -- this India story that we talked about -- I think you
18 talked about a few hypotheticals with my Democrat counterparts.

19 But isn't it possible that that story that was published in the India newspaper was
20 part of a broader attempt by people who perhaps want to see Mr. Snyder no longer own
21 the majority or the whole team I guess he owns now in an attempt to kind of disparage
22 his representation to make him sell the team? I'm not asking what you know. Just is it
23 possible?

24 A I -- no, that's not possible.

25 Q And why is it not possible?

1 A That's too improbable to believe.

2 Q And what makes it improbable?

3 A Repeat it and it just -- it's -- it's illogical. So someone -- you're suggesting
4 someone plants a story there to make Dan sell his interest in the team?

5 Q I'm asking if that's possible.

6 A I -- I doubt that's possible.

7 Q You said you didn't think it was probable. But in the world --

8 A Well, I said it's solely improbable, and I don't -- I don't even want to give it a
9 1 percent. I don't believe it. I don't believe anything with this story.

10 And I remember us asking in our pleadings back, what have you done to find out
11 who did this? And I don't know -- maybe you could ask the team: What have you
12 done to find out who wrote this story?

13 And they gave the story: Well, we're giving them 30 more days.

14 Well, that was 5 months ago. So hopefully they found out who did it.

15 [REDACTED] All right. That's all the questions we have.

16 Chairman or team, feel free to take back or we can go off the record.

17 The Witness. Thank you.

18 [REDACTED] We're ready when you are, Mr. Allen. If you need 5 minutes, we're
19 good. We'll be on the record in a minute.

20 [Recess.]

21 [REDACTED] Okay. Back on the record 7:35.

22 BY [REDACTED]

23 Q Okay. Mr. Allen, how would you describe Mr. Snyder's relationship with
24 the media?

25 A Individually, I don't think he has a relationship with the media.

1 Q How did he view, in your experience, negative press coverage?

2 A Well, once again, in my world, it's just a lot of years in sports that, when a
3 team gets some bad press coverage, it's -- you know why it is. If you fumbled five times
4 in the game, it's not going to be a positive story in the morning.

5 He, the media reports on him, he took very, very personally.

6 Q What do you mean by that?

7 A Well, it hurt him. But it might be, after my first year there, he
8 sued -- there's a D.C. street paper or something similar to that name. They wrote a bad
9 article about him, and he sued them.

10 Q Are you referring to the Washington City Paper?

11 A Yeah, that's it. That's it, yes.

12 Q Do you recall what Mr. Snyder accused the Washington City Paper of?

13 A He sued them for defamation.

14 Q Do you recall the outcome of that litigation?

15 A Yes. He -- after 4 or 5 months of wasting money on attorneys, no offense
16 to anyone here, we -- I set up a -- he asked me to have, see if they'll drop their charges if
17 he drops his charges.

18 Q And just so I make sure I'm clear, did you say he asked you to see if the
19 Washington City Paper would drop their charges if he dropped his?

20 A Yes. And I, through a conduit, I arranged for that to happen.

21 Q Do you know why Mr. Snyder wanted to arrange for each party to drop the
22 charges?

23 A Well, they -- after he sued, I believe they countersued. And -- and it was
24 just -- it was silly. When he sued, I found out when I came back into town. There was
25 a scouting season. So you're away from the building. And it made the newspaper.

1 It was, like, why -- who do we sue in this league? No one had read the article
2 outside of some people in Washington, D.C. Now the world knows this whole article
3 that you sued about.

4 But, after some time, I think I would imagine his lawyer said: You know, if you
5 can get out of it, get out of it.

6 Q When you say "his lawyer," are you referring to Dave Donovan or someone
7 else?

8 A Dave was with the team. But, no, he had an outside counsel who filed the
9 lawyer. I don't -- I don't recollect what the name is. I think she's -- I believe it was a
10 woman, and she was an entertainment lawyer.

11 Q Do you recall if Mr. Snyder believed he was, in fact, being accused -- accused
12 of things that were untrue by the Washington City Paper?

13 A You know, I can't say that I read the story. They have, like, a long list. It
14 was some type of a list of bad things, and I -- I think he thought it was anti-Semitic. I
15 remember that, that it was something -- he didn't like a caricature in it, and he just
16 thought it was defamation.

17 Q Did Mr. Snyder ever -- well, strike that.

18 How would Mr. Snyder handle negative media coverage, especially when it
19 implicated him personally, in your experience?

20 A Yeah, I -- I think it bothered him. It bothered him.

21 Q And so you're describing the effect it would have on him. I'm asking you
22 what he would do when he would read these stories in the media about Mr. Snyder.
23 How would he react to those negative stories outside of it bothering him? Would he do
24 anything?

25 A You know, a morning paper, he would probably read at his home. So I

1 wouldn't see his reaction. I don't really know how to answer it. Could he be mad?
2 Could he say, "Who in the heck would say this about me?" Yeah, he probably would say
3 that, but that -- I don't think that's unusual, that unusual for someone not to like that.

4 Q Did he ever suspect that employees were leaking negative information to
5 the media about him?

6 A Because I haven't read them, but there's plenty of stories that would say a
7 former staffer or a current staffer, you know, the writer would identify the source in
8 some characteristic, and so, yeah, that would make him suspicious of people that he
9 would think fit those categories.

10 Q What, if anything, would he do when he suspected specific employees of
11 being the sources of -- the source of negative media stories?

12 A I didn't -- I didn't really understand that.

13 Q Can you read it back, please?

14 [The reporter read back the record as requested.]

15 The Witness. I don't -- I don't know. He -- when a negative story would come
16 out, he would usually talk to the director of public relations about it and have
17 conversations with him, whether it's Tony Wyllie or one of his PR -- PR firms that worked
18 for him.

19 BY [REDACTED]

20 Q Tony Wyllie was the director of public relations for the Commanders,
21 correct?

22 A Yes, ma'am.

23 Q Mr. Wyllie still with the team?

24 A No, ma'am.

25 Q In your experience, would there ever be a negative story about which

1 Mr. Wyllie was aware involving Mr. Snyder that Mr. Wyllie did not make Mr. Snyder
2 aware of?

3 A No. He -- he would -- Tony -- Tony was very good about keeping Dan
4 informed on -- on -- on everything really.

5 Q If Mr. Wyllie were aware, for example, of the July 2020 allegations or the
6 August 2020 allegations about the Washington Commanders, including Mr. Snyder
7 himself, do you believe Mr. Wyllie would have notified Mr. Snyder about throws
8 allegations before they were published?

9 A Yes. Yeah, I think he'd -- I think he definitely would or ---and/or the PR firm
10 would then let Dan know.

11 Q And, just so the record is clear, the PR firm, is that the one in which Maury
12 Lane is employed or runs?

13 A [REDACTED] was, yes, was one. And then the firm later was Endeavor,
14 where [REDACTED] is involved.

15 Q Did Mr. Snyder ever take any actions to determine which employees were
16 speaking to the press, in your experience?

17 A Did he take actions? Only -- only -- only thing I would know about is he
18 would -- Dan would have a -- he would talk to the PR people. And I don't -- if they
19 directed him to do something, I'm sure he did it.

20 Q Are you aware of Mr. Snyder ever requesting or directing that emails of
21 employees, Commanders employees, be searched to discover if they're the source of a
22 negative media story?

23 A No. And I don't know -- you said Commanders. I don't know if that's
24 going back to -- if I knew he was searching people's emails back then, I would have
25 addressed that issue and stopped it. I never -- never heard that happening anywhere in

1 the NFL, someone doing that.

2 Q During your employment with the team, did Mr. Snyder ever accuse anyone
3 of trying to extort him or take him down or try to force him to sell the team?

4 A No.

5 Q And you joined the Commanders in December 2009, correct?

6 A Yes, ma'am.

7 Q Was that after the -- the unnamed employee raised concerns or a complaint
8 about Mr. Snyder sexually assaulting her on a plane, to your knowledge?

9 A Oh, yes, it's 10 years after.

10 Q As I understand it, Mr. Allen, the allegation was made in 2009. Or at least a
11 settlement was entered into in or around 2009. So that that would have happened
12 actually the same year you began your employment.

13 A Oh, no, I started 2009. I thought that happened -- which one is 2005? I
14 was thinking that's 2005.

15 Q Is there something that happened in 2005?

16 A Yeah, I'm just trying to remember all -- I know that -- there's an airplane
17 incident. There's something -- a proposition incident and then the video incident. But,
18 no, I was unaware of the airplane issue until I read about it.

19 Q Okay. And I want to talk to you about the proposition incident, which I
20 believe you're referring to the Tiffani Johnston allegations that were brought to light by
21 the committee's investigation, and the video incident, I believe you're referring to the
22 lewd videos that Mr. Snyder was accused of directing Larry Michael to direct others to
23 create for his personal consumption. Is that correct?

24 A Correct.

25 Q Now, starting with the 2009 confidential settlement, I'm referring to the \$1.6

1 million settlement into which Mr. Snyder entered with an unnamed former employee and
2 former team executive, I believe. She accused Mr. Snyder of sexually assaulting her on
3 his private plane on a ride back from I believe a trip to Las Vegas.

4 The details of the assault were revealed publicly in a Washington Post story on
5 June 21st, 2022, so a few months ago. And, in that article, it was revealed that
6 Mr. Snyder had, in fact, not only denied the allegations by this particular individual but
7 had actually accused her of trying to extort him.

8 Do you recall reading the article that I'm referring to that revealed the details?

9 A I read the article, yes.

10 Q Do you recall reading that this particular -- that Mr. Snyder -- and I believe
11 Dave Donovan, general counsel at the time, had accused that woman of trying to extort
12 Mr. Snyder?

13 A I don't remember that -- those words. I remember a rough denial by the
14 club.

15 Q What do you mean by "rough"?

16 A You know, tough or firm, a firm denial, saying it's bullshit or whatever. I'm
17 sorry.

18 Q Are you aware that the team, through Mr. Donovan on behalf of Mr. Snyder,
19 terminated the accuser because of what they called her lying or being dishonest about
20 the nature of her allegations against Mr. Snyder?

21 A I don't -- you know, I don't remember that. I -- maybe I'm not familiar with
22 the article. I'm familiar with the accusation and the incident from, what, reading it and
23 whenever that first appeared.

24 The Donovan, I thought, which was confusing to me, which I still don't have any
25 understanding of why, is he was involved with Beth Wilkinson, trying to stop something.

1 And he filed a suit against Beth Wilkinson. And I don't -- I really don't understand all the
2 strategy involved with any of them.

3 Q Why don't you tell me what you do know about the 2009 confidential
4 settlement and the allegations that led to it?

5 A Just what I read in the newspaper, I think, that there's an accusation of being
6 sexually assaulted on an airplane. And there's -- I don't know if anyone's confirmed.
7 There's a dollar amount, saying what -- there's a settlement agreement. I don't know if
8 anyone's ever confirmed that amount. But that's it. No one's ever talked to me about
9 it, if that's what you're asking, when I was with the team.

10 Q And against whom was that allegation made?

11 A Oh, against Dan Snyder.

12 Q And you said no one ever talked to you about it, meaning the allegation.
13 Did anyone talk to you about the settlement, the confidential settlement, or make
14 reference to the confidential settlement after the announcement?

15 A No, ma'am.

16 Q Did Mr. Snyder ever bring up that he had been accused of anything, even if
17 he didn't refer to the specific incident, after you began your employment?

18 A Not to me, no.

19 Q And he never made mention that he had entered into a confidential
20 settlement for any reason regarding an accusation made against him. Is that correct?

21 A Say that again. I want to make sure I'm answering your question.

22 Q Did Mr. Snyder ever make mention to you that he had engaged in some type
23 of confidential settlement for some type of complaint against him, whether or not he
24 disclosed the nature of the allegations?

25 A No.

1 Q You also mentioned you're familiar with the propositioning incident, and I
2 believe I mentioned that it may be the Tiffani Johnston allegation.

3 Prior to Ms. Johnston revealing her encounter with Mr. Snyder in or around the
4 2005 timeframe, were you ever aware of any allegations against Mr. Snyder about him
5 propositioning a team employee?

6 A No, ma'am.

7 Q Had you ever observed Mr. Snyder proposition a team employee or make
8 unwanted advances?

9 A No, ma'am.

10 Q You also mentioned the video incident. And I believe, as we discussed, that
11 is there were two allegations against Mr. Snyder in the August 2020 Washington Post
12 report. The first says there was a video made or in or around 2008, taking the outtakes
13 of a cheerleader photo shoot and compiling it, pairing it with music, Mr. Snyder's favorite
14 music or music he was fond of, for his personal consumption and, again, that there was
15 another video in or around 2010 that was made for Mr. Snyder's personal consumption.

16 And I believe the allegation was that the video itself was labeled "For Executive
17 Meeting."

18 Are you familiar with these allegations, Mr. Allen?

19 A I'm aware, because I've read about them. I -- no one's ever talked to them
20 about me when I was working there.

21 Q Did you ever have any experience, with Mr. Snyder or any other executive,
22 requesting video outtakes from cheerleader photo shoots to compile into a private video
23 for personal consumption?

24 A No, ma'am.

25 Q Were you ever shown a video of that nature while you were employed with

1 the Commanders?

2 A No, ma'am.

3 Q I want to talk to you about another incident that I referenced earlier in your
4 deposition regarding the NFL's involvement in the Costa Rica cheerleader scandal, which,
5 as I understand it, happened in or around 2013.

6 Can you remind me what your involvement was in the investigation into that
7 matter once it was made public by The New York Times in 2018?

8 A My part of the investigation was really supporting Eric Schaffer, our general
9 counsel, and Will Rawson, his deputy, his deputy, in their work. They did a pretty
10 extensive outreach to the cheerleaders. I believe they hired an outside counsel to assist
11 them, to find out what occurred and really to come up with a best practice for the future.

12 Q Do you recall what law firm was retained?

13 A I -- I -- no I don't remember. It could have been McGuireWoods. It could
14 be McGuireWoods, but I -- I don't.

15 Q You mention your role was supporting Eric Schaffer and Will Rawson. Can
16 you tell me what you mean by supporting?

17 A Making -- encouraging them, encouraging them to get to the bottom of it.

18 Q How would you encourage them?

19 A Don't let anything get in your way. Just get to the bottom. Let's find out
20 what occurred and how this -- how this happened and how do we make sure this never
21 happens again.

22 Q What, if anything, did Mr. Schaffer and Mr. Rawson find out about how the
23 Costa Rica incident occurred?

24 A It -- say that again, please.

25 Q What, if anything, did Mr. Schaffer and Mr. Rawson find out about what

1 occurred related to the Costa Rica incident?

2 A Well, they found out that it -- we put the cheerleaders in a more than
3 awkward situation. We put them in an embarrassing and compromised situation and
4 that, you know, they were disturbed. When I say "they," you know, specific ones.
5 Every -- if I remember correctly, they all had different impressions of everything.

6 And they said that, you know: Who came up with the game plan to do this?
7 Whose concept was it?

8 And that's what we had. We had to find someone because there was going to
9 accountability for it.

10 Q Just so the record is clear, what specifically was the awkward and
11 compromising situation that some of those cheerleaders were put in?

12 A I don't have any of my documents from when I'm there, by the way. So I'm
13 trying to do this from memory.

14 I remember one thing with the passports. They took every -- all the
15 cheerleaders' passports. And that made some feel uncomfortable.

16 Some said the parties were voluntary. Others felt they were forced to go to
17 social events in the evening.

18 These calendar shoots, which wasn't unique to the Redskins, were supposed to be
19 a reward for the cheerleaders. And it's an opportunity to make money because they got
20 the royalties. They got royalties from the calendar sales, the cheerleaders did.

21 So it wasn't supposed to be a situation where anyone's awkward or feeling
22 uncomfortable. It's rewarding for the people who want to participate.

23 Q When you say that they felt forced to go to social events, with whom did
24 they feel forced to go to social events?

25 A I believe they -- I believe there were people invited to go and hang out at a

1 cocktail reception with the cheerleaders, if my memory serves me correctly.

2 Q And who were those people?

3 A They were either suite holders or possibly sponsors or potential -- it could
4 have been potential suite holders.

5 Q Male?

6 A I would -- I believe so, yes, I believe.

7 Q When the news broke about the Costa Rica incident in 2018, do you recall if
8 Mr. Snyder was made aware of those allegations?

9 A Yes.

10 Q Was Mr. Snyder aware of the allegations before they were made public?

11 A I do not know that.

12 Q What was Mr. Snyder's reaction, if any, to the allegations against the team?

13 A Well, it's handle it. The call -- I don't know if he was on the call with the PR
14 firm and Eric and Tony Wyllie. We knew we had to put out a statement, I remember
15 that, about what we're going to do. The PR firm was trying to answer questions of some
16 form from the media, and Eric immediately went into investigation mode.

17 Q Do you recall if Dan believed Mr. Snyder believed the allegations once they
18 were brought to his attention?

19 A I don't know what he -- I don't know what he thought.

20 Q Do you recall the reaction of sponsors when the allegations were made
21 public?

22 A I remember a few. I don't -- I don't know all of them.

23 [REDACTED] I'd like to direct your attention to what has been marked AL.

24 That's A, as in Angela; L, as in Larry.

25 [Exhibit AL

1 Was marked for identification.]

2 The Witness. AL. Got it. Okay.

3 [REDACTED] Give you a moment to review this document which was produced
4 to the committee by the NFL. Please let me know when you're done.

5 The Witness. Okay. I see it.

6 [REDACTED] Do you recognize this document?

7 Ms. Quincy. Do you recognize the document?

8 The Witness. Yes. It looks like a email from Chris Bloyer?

9 BY [REDACTED]

10 Q Who's Chris Bloyer?

11 A He ran our stadium operations at FedEx Field and customer service.

12 Q This email was sent from Chris Bloyer to you on Monday, May 7th, 2018.

13 The subject of the email is "Calendar Shoot."

14 Now the contents of the email is basically Mr. Bloyer detailing the pros and cons
15 of potential responses to the Costa Rica allegations.

16 I want to direct your attention to the third to last paragraph, beginning with "after
17 writing this." Do you see that?

18 A Yes.

19 Q The sentence reads: After writing this, I think the decision is larger than
20 the calendar shoot. If we want to continue business as usual, we need to do the shoot
21 in Mexico. Maybe lose the body paint and any opportunity to be topless but do the
22 shoot.

23 Now, in response to this email on the same day, maybe an hour or so, 45 minutes
24 later, you respond to Mr. Bloyer: On phone with Dan.

25 Who is the "Dan" that you're referring to?

1 A Dan Snyder.

2 Q And, when you wrote this email, if you recall, were you -- was this making
3 mention of the fact that you were on the phone with Dan in relation to the Costa Rica
4 allegations and how it would be handled, as you specified earlier?

5 Ms. Quincy. I don't want to interrupt your questioning, but I don't think this is
6 the pros and cons of the investigation and the allegations. I think this is a pro and con
7 about whether or not to do the trip again. And you can certainly correct me if I'm
8 wrong. But I want to make sure we're clear, because there were -- there's two
9 questions that you've asked that I think misunderstand what this pros and cons memo is
10 about.

11 [REDACTED] And I apologize. For the record, I believe the date, May 7, 2018,
12 coincides with the date that the allegation -- The New York Times article was revealed.
13 So, based on the documents that have been produced to the committee, there were a
14 series of discussions around the Costa Rica allegation and handling cheerleader photo
15 shoots going forward?

16 So the committee has reason to believe they were related based on the other
17 documents that have been provided to date.

18 Ms. Quincy. By the way, I'm not arguing with you. It's just I think there was a
19 discussion going on about what to do about the trip, which was scheduled to take place
20 around this time. It wasn't -- this wasn't meant to be a pros and cons of the
21 investigation. It's pros and cons of whether to cancel the shoot or continue it.

22 [REDACTED] Yes. Understood. But the --

23 The Witness. Do you want to -- do you want me to give you a chance here? I
24 think I understand everyone's point.

25

BY [REDACTED]

1 Q Okay. Yes, please, please respond. I'm trying get a sense of what was
2 happening and what you were discussing with Dan Snyder at the time, what was
3 happening at the same time.

4 A When I responded, I'm guessing, I was on the phone with Dan, I had no idea
5 what I'm talking to Dan at the point there. To me, this is a very long email that's
6 looking -- that has a question. So I'm -- I see this email when I'm on the phone.

7 And it's really saying I'm -- I'll get back to you after the -- after the phone call, after
8 I get a chance to read this, because I -- I -- I couldn't read this and have a conversation on
9 the phone.

10 His email, Chris', he is talking about an upcoming calendar shoot, after the
11 repercussions of the publicity, suggesting different types of options from canceling it
12 to -- to eliminating different things they had been doing in the past.

13 And so, after hanging up, Chris and I did have a conversation. And I believe the
14 calendar shoot did go on because the cheerleaders wanted it. I remember asking for
15 Prince George or Prince George's County policewomen to go on the trip. There was no
16 one else. And I believe they had a very successful trip because they wanted to. And it
17 was a reward for them.

18 But we cut out all the other stuff that was still being investigated on the Costa Rica
19 one from previous years. If they had thought about what they were doing in previous
20 years like this thing, they wouldn't have had the issues that they had.

21 Does that make sense?

22 Q I do. It does. But I did also just want to clarify for the record, this
23 document, the opening paragraph does say that -- Mr. Bloyer writes: I also have one
24 general comment on the situation.

25 The committee understands that situation to be referring to the Costa Rica

1 incident. And he says, goes on to say: Regardless of whether cheerleaders were told
2 to do something or volunteered to do something, one, two, or more have said that
3 something made them feel uncomfortable. Regardless of what happened and how
4 that -- and how, that sentiment is something we need to deal with.

5 A Yes.

6 Q And so, going back to your conversations more generally with Dan Snyder
7 about the Costa Rica allegations, is this an example of Mr. Snyder's involvement in
8 issues -- you would consider this a workplace issue, something negative that happened
9 with regard to employees, the terms and conditions of their employment -- is this an
10 example of Mr. Snyder's involvement in that type of scenario?

11 A Oh, yeah, he was aware of it. And then, obviously, when we met with
12 Dennis Green to ask him to resign, Dan knew that's it. You know, put the -- we were
13 talking. I don't know -- I forget who I was talking to about conduct detrimental to the
14 league. This was conduct detrimental to the team that occurred, the decisionmaking
15 that went into the Costa Rica trip.

16 Q And who made the decision to let Mr. Green go from the team?

17 A Dan. I informed him, but Dan said let him go.

18 Q What was Mr. Green's response when he was notified of his termination?

19 A Oh, we he felt like he was being singled out and thought it would hurt his
20 reputation.

21 Q Why did he feel he was being singled out?

22 A What did what?

23 Q Why did he think he was being singled out?

24 A Well, the other person who was in charge of the trip had already left the
25 organization earlier or else there would have been two people. So --

1 Q And who --

2 A That was Lon Rosenberg, who preceded Chris Bloyer from that email you just
3 pointed out.

4 Q Did Mr. Green inform you that he acted on his own accord, that he made his
5 decisions to do what he did, as alleged in The New York Times article?

6 A Yeah, he said everybody -- everyone knew, blah, blah, blah, and not -- you
7 know, he was trying to say nothing bad happened. He was trying to defend himself.

8 Q When you -- when he said everyone knew, did you understand him to be
9 referring to Dan Snyder as part of that tranche of people?

10 A I think he was -- I think he was hinting toward that. But -- and I mention -- I
11 remember mentioning it to Dan and Dan says: I did not know about it.

12 Q Do you know who approved having sponsors go on trips like the Costa Rica
13 photo shoot?

14 A No, I do not.

15 Q Was Mr. Snyder involved in that -- the decisions to allow sponsors to travel
16 to photo shoots?

17 A I do not know.

18 Q Now, earlier, you had testified that -- you had testified that the Covington
19 law firm collected your phone in connection with some matter. I wanted to make sure
20 the record was clear. And this is in relation to you saying this is the fourth time you've
21 had to hire a lawyer to essentially defend yourself against something related to
22 Mr. Snyder and/or the Commanders.

23 So what were you referring to when you testified about the collection of your cell
24 phone?

25 A During -- during the same time as the Beth Wilkinson investigation is going

1 on, a lawyer from Covington, the NFL's law firm, requested that I help the league in a
2 grievance by a former NFL player against the league and, thinking I was doing the league a
3 favor and no reason not to help, said yes.

4 In the midst of it, I had to hire a lawyer to represent me because he said he
5 couldn't do that. But, you know, I was the NFL's witness, but for some reason he
6 couldn't represent me. So I had to hire a lawyer.

7 And part of it, he asked me, he goes: Can I get your phone so I can take to see if
8 there's any emails regarding this player or any of the other teams?

9 And I said: You want my phone? He's not even accusing me of anything. No,
10 you don't get my phone.

11 But what bothered me about that is subsequently I find out they have a common
12 interest agreement. And I don't know why Covington is asking for my phone in a deal
13 that has supposedly -- well, it had nothing to do with any of the owners or any of this
14 stuff. It was just a player grievance that I was just testifying on behalf of the league, but
15 he asked for my phone. I did not give him my phone. I did not.

16 So I'm just saying, just in my pyramid, it's just another block out there.

17 Q The player you're referring to, was that [REDACTED]?

18 A Yes, ma'am.

19 Q And the matter you're referring to, was that an arbitration where [REDACTED]
20 [REDACTED] alleged racial discrimination?

21 A I believe that was one of his accusations, yes.

22 Q Is there also an accusation related to domestic violence and being
23 blackballed?

24 A I believe so. And I think the reason they asked me to testify is we were the
25 only team that made him an offer.

- 1 Q By "we," do you mean you?
- 2 A The Redskins, the Redskins.

1

2 [8:20 p.m.]

3

BY [REDACTED]

4

Q So you personally were involved in extending an offer?

5

A Yes. Yes.

6

Q Was Mr. Snyder also involved in extending an offer to [REDACTED]?

7

A Yeah, we probably discussed it with him. Yes. He turned it down,

8

thinking he was going to make -- well, I don't want to put words in his mouth. But he

9

turned down our offer.

10

Q And to make sure that I understand, was the idea that you would testify on

11

behalf of the NFL as an NFL witness, as you said, to demonstrate that this player had not

12

been blackballed, as evidenced by the fact that he had been extended an offer by a team,

13

which he chose to turn down?

14

A Generally, I think that's the concept, yes. And so why would you ask for my

15

phone, and why would you not disclose to me that you have a common interest

16

agreement with the team? I don't understand that.

17

Q Do you recall when you were asked to participate as the NFL's lawyer?

18

A It's before they asked for a -- what's it called, RFP? -- request for production

19

on the partner's lawsuit. It's before then.

20

Q And I apologize. I think I meant to say testify as their witness, not their

21

lawyer.

22

And as my colleague Will established earlier, I believe that the request for

23

production of documents, as sent to you by Mr. Snyder, was on September 30, 2020. So

24

that would necessarily mean that this arbitration that was filed by [REDACTED] would've

25

happened prior to September but during the pendency, presumably, of Mr. Snyder's

1 dispute with the owners, which I understand had begun well before.

2 A Yes.

3 Q Now, when you said he asked for your phone, who is the "he" you're
4 referring to?

5 A The lawyer from Covington.

6 Q Did that lawyer ask you to search your own phone and produce to him any --

7 A Yeah, he --

8 Q -- relevant documents before he asked to collect your phone?

9 A No. He said, Well, will you look into it and see if you have any texts from
10 Junior Galette?

11 Q So he asked you to look into your phone, but did he also ask you to turn it
12 over to him?

13 A Initially said, Will you give us your phone so we can do -- whatever that
14 phrase is -- a --

15 Q Forensic examination?

16 A Yeah. I had never heard that word until then, but yeah. And I said, I'm
17 not giving you my phone.

18 Q Around the time that you were asked to participate in an arbitration, do you
19 recall if you had had a conversation with Lisa Friel in relation to the Wilkinson
20 investigation, your concerns about Mr. Snyder, or anything of that nature at that time?

21 A This is way -- this is before then. This is before he files that 1782 thing.

22 Q But as I understand it, you had at least three conversations with Lisa Friel,
23 one of which occurred after Dan Snyder propounded discovery in connection with his
24 minority owner dispute. Is that correct?

25 A Yeah, I don't know when the minority owner dispute ends. The league

1 extended Dan some extra credit to buy out the partners, but, once again, I don't know the
2 dates.

3 All of these things are within the last 24 months. They're confusing. If I had a
4 calendar, I could probably track it down better. My able counsel here will be able to get
5 you a timeline.

6 Q I also wanted to ask you about Jason Friedman. Do you know who that is?

7 A Yes.

8 Q And how do you know Jason?

9 A He was in our ticket offices as a ticket salesman and also a club seat
10 salesman.

11 Q What type of employee was Jason? How would you describe him as an
12 employee?

13 A Jason was enthusiastic. In my interaction and from our season ticket
14 holders, what I'd heard, very dedicated, enthusiastic. I think he got a Redskin tattoo on
15 him. I think he did get one. But I remember, before a playoff game, he shaved the
16 emblem into the back of his head or on the side of his head. But he was an enthusiastic
17 worker.

18 Q Now, earlier, you mentioned that Dan Snyder would've had involvement in
19 the hiring of employees on the business side if they had a certain level of seniority, so
20 managers of particular departments. Would you put Mr. Friedman in the category of
21 employee that Mr. Snyder would've had an involvement in his promotion, his hire?

22 A I would believe so. You know, Jason had people above him at different
23 times, but he was a senior-level position. I don't know -- you know, there was people
24 above him, but he's the next line of people. A very critical revenue source for the team.

25 Q Mr. Friedman, as I understand it, was employed with the Commanders even

1 prior to Mr. Snyder purchasing the team, but for a total of 24 years. Do you think that's
2 by accident, that Mr. Friedman was employed working for Mr. Snyder for so long, nearly
3 21 years?

4 A Well, a few of the people we've mentioned, you know, Mitch and
5 Dennis Green, had worked with Dan prior to buying the Redskins, so they were with him a
6 long time as well.

7 But Jason actually, you know, he really -- he cared about his customers, and he
8 knew them. And I think by being there so long, you know, and talking to the same
9 people over those years -- we have season ticket holders who have been there longer
10 than Jason. So they probably had a friendly voice to talk to and enjoyed interacting with
11 him.

12 Q Are you familiar with the allegations made by Mr. Friedman to the
13 committee regarding certain acts of malfeasance by the Washington Commanders?

14 A I've read them.

15 Q One of those allegations was that the team engaged in the practice of
16 concealing revenue that would otherwise have had to be shared with the teams. Do
17 you recall reading about that?

18 A I am unaware of that.

19 Q Do you recall reading about it, specifically?

20 A Yes, I've read it. Yes.

21 Q And I believe you just testified you were unaware of this practice occurring
22 during your tenure. Is that correct?

23 A Yes, ma'am. I had not heard that when I was working for the team.

24 Q Do you have any reason to believe that Mr. Friedman was untruthful in the
25 statement that he provided to the committee about his experience?

1 A All I can say is, I always had a professional relationship with him. From time
2 to time, I would get a fan call complaining about something. If it had anything to do
3 with the seats, whether it was his jurisdiction or not, I would give it to Jason, and people
4 would come back and tell me, "Thank you. He helped us out." Even if it wasn't -- he
5 was in club seats, but it could've been somebody who had regular general admission.

6 So I only had a good working relationship. I have no idea what this accusation is.

7 Q Do you recall who the auditor of the Washington Commanders was during
8 your employment at the time that you left the team?

9 A No, ma'am.

10 Q Does BDO sound familiar?

11 A Yeah. They were also -- yeah, they were a sponsor of ours, so that would
12 make sense.

13 Q And when you say they're a sponsor of yours, what do you mean by that?

14 A I think they had a -- I think they -- if I remember correctly, there was a sign
15 with their logo on it.

16 Q And is that to say that BDO, the company that conducts the independent
17 audits of the team's financial statements, had purchased a suite with the Commanders or
18 rents a suite?

19 A They could have. I wouldn't know that. I've heard that name; that's all
20 I'm telling you.

21 Q Are you familiar with the Washington Charitable Foundation?

22 A The Washington Charitable Foundation?

23 Q Yeah. I believe it's now the Washington Commanders Charitable
24 Foundation. Prior to that, I think it was the Redskins --

25 A Yes.

1 Q -- Charitable Foundation.

2 A Yes.

3 Q Were you a member of the board of directors?

4 A Yeah, I was -- I believe I was the president of the Washington Redskins
5 Charitable Foundation.

6 Q Was [REDACTED] the head of the Washington Commanders Charitable
7 Foundation?

8 A She was our executive director.

9 Q Are you familiar with the Leadership Council?

10 A Yes.

11 Q And what does the Leadership Council do?

12 A The Leadership Council was [REDACTED] idea. I understand it to be her idea.
13 Business leaders from different fields -- or different companies, and different fields, who
14 were not only actively involved economically with donations to the foundation but
15 actually wanted to participate in a lot of the programs that we did for the youth in the
16 area.

17 Q Do you recall if the minority owners were on the Leadership Council?

18 A Do I remember who?

19 Q The minority owners, Dwight Schar, Fred Smith?

20 A I remember Dwight being at a meeting. I think Bob came to a meeting or
21 two. I don't know if they were actually on the board or the Leadership Council, but they
22 did come to meetings, yes. I'm not saying they came to every meeting, but I remember
23 them at a meeting or two.

24 Q Are you aware that BDO, the team's auditor, was part of the Leadership
25 Council?

1 A Maybe that's where I remember the name. What's the -- who was the
2 person?

3 Q Wayne Berson.

4 A Yeah, I know Wayne.

5 Q Was Wayne Berson on the Leadership Council?

6 A Yes, he could've been, and I remember him being in -- helping out on
7 different events.

8 Q And now that you recall who is the head of BDO, do you recall if
9 Wayne Berson had a suite at the Washington Commanders in FedEx Field?

10 A If they did, I didn't -- I didn't go in people's suites during the games, except
11 for Dan's.

12 Q You also testified earlier -- when my minority counterparts were asking you
13 about the Wilkinson investigation, I believe you testified that you had not participated in
14 the Wilkinson investigation. Is that correct?

15 A Correct.

16 Q Are you aware that Tiffani Johnston, the individual who revealed in
17 February 2022 that Mr. Snyder had tried to push her into his limousine back in or around
18 2005, that she also did not speak to Ms. Wilkinson about her allegations? Are you
19 aware of that?

20 A I believe I read it in a story, but I -- I've read about her allegations. There
21 must be a reason the league is saying they're investigating again, so I don't know.

22 Q Are you aware that Jason Friedman told the committee that, while he talked
23 to Ms. Wilkinson, he did not tell her everything that he knew about Dan Snyder? This
24 was while he was still employed with the team, before he was terminated.

25 A Please repeat that.

1 Q Are you aware that Jason Friedman, who participated in an interview with
2 Ms. Wilkinson while he was still employed with the team, told the committee that he did
3 not tell Ms. Wilkinson everything that he knew about his time with the Commanders and
4 about Mr. Snyder specifically? Are you aware of that?

5 A No, I'm not.

6 Q Are you surprised to hear that?

7 A Yeah. There's a little math problem with that, yeah. That didn't add up
8 very well.

9 Q What do you mean by that?

10 A It seems that, if he did that, then there should've been a conversation with
11 Tiffani.

12 Q If he did what?

13 A What you just said. Because I'm unaware of it. You said he told Beth
14 Wilkinson about the incident, but then Beth Wilkinson didn't ask Tiffani about the
15 incident?

16 Q No, I apologize. What I said is: Mr. Friedman told the committee that he
17 sat for an interview with Beth Wilkinson, and even though he sat for an interview, he was
18 not 100 percent forthcoming with her --

19 A Oh.

20 Q -- about everything he had experienced during his employment under
21 Dan Snyder.

22 So my question to you is: Does it surprise you that Mr. Friedman would not have
23 told Beth Wilkinson about all of his experiences, including that which involved
24 Mr. Snyder, while he was still employed with the team? Is that surprising for you to
25 hear that?

1 A It's -- I don't -- I -- I don't like hearing it, because I don't like that Jason -- that
2 people are feeling so uncomfortable, but I don't know what to believe with any of that
3 stuff. I don't. I don't know what to believe.

4 Q Do you, based on your experience working for the Commanders and with
5 Mr. Snyder more specifically, do you believe that all of the employees who would have
6 participated in the Wilkinson interview would have felt comfortable telling Ms. Wilkinson
7 everything they knew about Dan Snyder and the team?

8 A I don't feel comfortable talking to you all, and I'm under a subpoena. And I
9 can't imagine, for younger folks, the apprehension. I mean, you wouldn't see me here if
10 you didn't make me come here. Yeah, I can feel apprehension. I feel it. I don't want
11 to speak for anyone else.

12 Q Based on your experience, do you believe there are employees out there
13 who were too scared to come forward due to credible fear of retaliation and intimidation
14 from Dan Snyder?

15 A Well, I know the coworkers I've worked with have expressed kind thoughts
16 to me about what the hell I've had to go through. And it's been quite public, because it
17 took a while for anyone to see through all of this. Yeah, I'm sure they see things and
18 read things, and of course people are going to be nervous. I can, once again, just speak
19 for myself, but it's not a comfortable feeling.

20 Q Now, I want to talk about your separation from the Washington
21 Commanders. I believe you testified a bit earlier about what you believed led to the end
22 of your tenure. And, if you could indulge me, what were the reasons you believe you
23 were terminated from the Washington Commanders in December 2019?

24 A And I'm not blaming Alex, all right, but we were in first place the year before.
25 Halfway through the season, we had a two-game lead in the division, and he has a terrible

1 injury. And, quite frankly, that was a very tough time for a lot of people. Just, what he
2 went through is a miracle. What he accomplished is a miracle. And I'd kiss him on the
3 lips if I saw him right now. It's just amazing. But we, as an organization, we never
4 responded. And we went from first to last.

5 And the next season, we started off slow, we fired a coach after week five, and we
6 finished in last place. And I understand football, appreciate football, appreciate the
7 game, and that -- that gets people fired. And that's what I think I was fired about.
8 That's what I think.

9 Q Did you notice a change in Mr. Snyder's behavior after Mr. Smith was
10 injured?

11 A A change in him? No, not really. You know, everybody was excited. I
12 mean, the town was excited; everybody was excited. We were playing good football.
13 And Alex, besides being a talented athlete, is an impeccable leader, and he brought such
14 a great attitude and direction to our football team. Really thought we were going to be
15 just fine.

16 Q Now, on October 4, 2019, there was a video released purporting to show
17 then-head-coach Jay Gruden smoking a cigarette -- the contents of the cigarette remain
18 unknown -- and then sitting on a sidewalk with a young woman.

19 Do you recall the video that I'm referring to?

20 A Yeah, I remember when that came out. Yes.

21 Q What, if anything, do you recall about the video and the surrounding
22 incident?

23 A I don't know how early it was on a Saturday morning, but I -- and I don't
24 know if our PR department -- I don't know who gave it to me or showed it to me first.
25 And I was like, what? And I looked at it, like, five or six times just trying to understand

1 what I'm looking at, and it made no sense.

2 And I walked down the hall to see Jay and say, Hey, what the heck is this?

3 Because I was thinking, is this from last night? And where in the heck is this? And

4 he -- he explained it.

5 Q What did he explain?

6 A That it happened 2 years -- it feels like it was longer than a year, but this was

7 an old incident, 2 to 3 years old. I don't know how come this surfaces right now.

8 I still didn't understand what I was even looking at and how it made sense. That

9 is a -- that's amazing. Whatever that -- and how it comes out the Saturday we're

10 playing, the day before we're playing New England, I was like -- made no sense. And I

11 knew it was going to distract the team; I knew it was going to distract the fans. I just

12 knew -- it was like, what is this?

13 Q Did anyone ever find out who leaked that video?

14 A I do not know. I do not know. I don't know if Jay knows. He said he was

15 aware of it. That's why he knew it was possibly 2 years old. It could be 3 years old.

16 But it feels like he had said to me more than a year. I think I was just more in shock

17 trying to figure out who, what, where is going on in this video.

18 Q Was there ever an investigation done into whether or not Mr. Gruden was

19 smoking something other than a cigarette?

20 A No. No.

21 Q What happened to Mr. Gruden after the video emerged?

22 A We lose the game the next day, and on Monday morning he's fired.

23 Q Why was Mr. Gruden fired?

24 A Dan wanted to go in a different direction. He didn't -- now we're 0 and 5,

25 and he just said he thought we ought to shake it up.

1 Q Were you provided any instructions or guidance from anyone on the team
2 regarding how to respond to media inquiries after the video was made public?

3 A I don't remember talking to our PR agency or our PR guy. In fact, he might
4 be the one who brought it to me. It might have come from our PR department, saying
5 it's on a local website or something like that. But I don't know if I ever responded to it.

6 I told Jay he needed to be ready to respond and that, obviously, he's going to see
7 the media before the game casually, but after the game you're going to have a press
8 conference; someone's going to ask you about this, and you've got to come up with some
9 concepts or answers to answer this. Because I have no idea -- I really didn't know what I
10 was even looking at.

11 [Exhibit No. 12
12 Was marked for identification.]

13 BY [REDACTED]

14 Q I want to direct you to what has been pre-marked as document or exhibit A
15 as in "Amy," S as in "Sam." This will be marked as exhibit 12.

16 A Okay.

17 Ms. Quincy. AS.

18 The Witness. Hang on.

19 Ms. Quincy. There you go.

20 BY [REDACTED]:

21 Q This is the Washington Post article dated October 7, 2019, by Adam Kilgore.
22 Do you see it?

23 A Yes.

24 Q I'll give you a moment to review. Please let me know when you're done.

25 [REDACTED]. Hey, [REDACTED], this is [REDACTED]. Sorry, just while he's reading that, do

1 you have an idea of how much longer you're going to go? Because I believe you're
2 almost 15 minutes past your hour. Is that right?

3 [REDACTED]: That's possibly correct, but I'm almost done, so --

4 [REDACTED]: Okay. Thank you.

5 [REDACTED]: Uh-huh.

6 The Witness. Okay.

7 BY [REDACTED]:

8 Q So, Mr. Allen, have you seen this document before?

9 A In this discovery, but I probably read it when The Post published it in
10 our -- there's a clipping thing that goes around the office.

11 Q The title of this Washington Post article is "Bruce Allen defends Redskins'
12 tenure, says 'the culture is actually damn good.'"

13 I want to direct your attention to the third paragraphs -- actually, second
14 paragraph, second-to-last sentence, beginning with, "He dismissed the notion." Do you
15 see that?

16 A The third paragraph.

17 Q Second paragraph.

18 A Second -- yes.

19 Q Beginning with -- well, let's back up -- beginning with, "He was speaking on
20 behalf of owner Dan Snyder." Do you see that?

21 A Yes, I see that.

22 Q It says, "He was speaking on behalf of owner Daniel Snyder, Allen said, but
23 added that Snyder makes himself available frequently. He dismissed the notion that
24 Washington has built a losing culture, in part based on its 6-3 record midway through last
25 season."

1 Then, skipping down to the next paragraph, it begins with, "'You know.'" Do you
2 see that?

3 A Where am I skipping to?

4 Q The paragraph that begins with, "'You know,' Allen said," third paragraph.

5 A Yes, I see that.

6 Q "'You know,' Allen said, 'the culture is actually damn good.'"

7 Mr. Allen, what were you referring to when you said "the culture is actually damn
8 good"?

9 A Who I was talking to at that press conference -- I appreciate that the media
10 is the audience, but my audience was our players and coaches.

11 And I see what is written about us and all of that, and I didn't -- it didn't bother me
12 to take shots. But when you say to a locker room that your culture is bad, that means
13 people aren't working hard, that the players aren't trying to win, they aren't doing
14 everything, they're not studying. It's saying that the coaches don't care about the
15 results.

16 Well, I lived day and night with those people, and they did care, and they all were
17 trying to win. We just -- we didn't have the proper talent level to accomplish it.

18 And I didn't want the players and coaches -- because we're 5 games into a season,
19 and we have 11 more games. I'm not going to answer a question to say, "You're right,
20 the culture sucks here with the Redskins," and have every player just check out for the
21 entire season.

22 I'm speaking to them. And I want our fans to appreciate just the players and
23 coaches. And I know the media is going to take shots at me, which -- I'd rather have
24 them take the shot at me than our fourth-string quarterback who's having to play.

25 Q Mr. Allen, if I'm understanding your testimony correctly, when you said "the

1 culture is actually damn good," you were not referring to the Washington Commanders'
2 front office or the business side of operations. Is that correct?

3 A Oh, not at all. No, this is -- the 53 men and the coaches were trying to win
4 a game, and even though we just fired a coach on Monday, we have to get ready and we
5 have to go play the Miami Dolphins in 6 days. And, by the way, we won that game. So
6 the spirit that week was very important to get everybody to work together in that locker
7 room.

8 Q I want to direct your attention to the second page, third paragraph,
9 beginning with, "Last year." Do you see that?

10 A Yes.

11 Q It says, "Last year, Washington fired top marketing executive Brian Lafemina
12 eight months after hiring him. Many around the franchise and close to Lafemina believe
13 Allen's undermining led to Lafemina's ouster. After his departure, which led to Allen
14 returning to overseeing both the football and business sides of the franchise, roughly 40
15 business-side employees left the organization."

16 Mr. Allen, what is your reaction to the characterization, one, of your undermining
17 Mr. Lafemina and, two, the fact that you returned to overseeing both business and
18 operations after Lafemina's departure, as well as the fact that 40 employees left?

19 And that's a compound question, so take it as you need.

20 A Number one, I loved when Brian Lafemina came to the team. Dan invited
21 me over to his house, it felt like, almost a year before he hired Brian, to meet him.
22 Anybody -- well, let me go back.

23 Brian is very capable in knowing what to do. And as I think I already said, he
24 loved the business side and the process and the administration as much as I loved the
25 game between the lines, football. So I appreciated that. I didn't want him to leave. I

1 wish it worked out, because it'd make life easier in many ways. And he's capable. I
2 mean, his resume -- he's a capable folk.

3 So the fact that they're writing that, I think it's probably because I -- I don't know if
4 I ever talked to [REDACTED] or not, but somebody put a rumor out there that I didn't like
5 him. That's untrue.

6 I think you had a second part of the question that I've forgotten.

7 Q Well, I had asked about the 40 employees who had departed shortly after
8 Mr. Lafemina's departure and what your reaction was to that.

9 A Okay.

10 Q Is that true?

11 A About?

12 Q Forty employees departing shortly after Mr. Lafemina's tenure.

13 A I don't understand. I heard you say, did we have a party?

14 Q No, no, no. Did 40 employees leave --

15 A Oh.

16 Q -- the Washington Commanders --

17 A I don't know. I don't know. I saw that in there. I don't -- I don't know
18 what the count would be.

19 Q Would you say that there was an issue with morale with the front office staff
20 of the Washington Commanders during your employment?

21 A Oh, yes. At different times for different reasons, but yeah.

22 And I assume that the employees liked Brian, because what they were looking for
23 was some direction and Brian had a game plan of what to do with that. I sat in his first
24 meeting -- he asked me to come to it -- when he addressed the entire staff, and he was
25 received very well.

1 Q But the morale issues, was any of that, in your experience, tied to the way
2 that Mr. Snyder ran his organization?

3 A Yes, in various ways. Yes.

4 Q And can you describe what those ways were?

5 A There was -- the compensation element seemed like it was an annual battle
6 for the business side of it. And Brian was trying to address that as well.

7 Q By "compensation," do you mean that employees were underpaid?

8 A Well, I don't think -- I had never heard an employee complain about being
9 overpaid.

10 But I think it was more than that, of maybe some of the commissions changed or
11 something -- the formulas. They didn't appreciate the formulas that were being used or
12 something like that. I can't really -- I shouldn't even try and guess. But it was
13 compensation issues.

14 Q And who approved of those formulas that were used?

15 A Pardon me?

16 Q Who approved of the formulas that were used that affected compensation?

17 A Dan.

18 Q Now, after you made the statement that the culture was actually damn
19 good, there was a Wall Street Journal article that was published in June 29, 2021, where
20 Mr. Snyder said that that was the beginning, for him, of realizing there was something
21 wrong with the team.

22 Do you recall the article that I'm referring to?

23 A Yes.

24 Q What is your reaction to Mr. Snyder's position that your statement was the
25 impetus for him to begin a culture of change within the Washington Commanders

1 organization?

2 A It means nothing. I think that was all part of a PR plan and orchestrated
3 week for them.

4 Q And what do you think the PR plan was?

5 A Well, they announced that Tanya was going to take over or become co-CEO,
6 and then on July 3rd, 4 days later, Roger sent out this press release that I just read with
7 the findings of the Wilkinson thing. So it feels like it's all part of a PR plan for the week.

8 Q And just so the record is clear, is your testimony that Mr. Snyder
9 manufactured the reason for the culture of change that ensued after the Wilkinson
10 investigation as part of some type of PR ploy?

11 A What I'm saying is that I don't believe it's a coincidence that within 3 days
12 after he's in New York the commissioner announces on a dead day, July 3rd, to announce
13 the discipline. It seems like it's part of a plan.

14 Him criticizing me, it doesn't affect me.

15 Q Did Mr. Snyder speak to you -- after you made that statement about the
16 culture being actually damn good, did he ever express to you any concern about your
17 statement, admonish you or reprimand you in any way for making that statement?

18 A Never.

19 Q Did he ever discuss with you, reprimand you, or punish you for Mr. Gruden's
20 video revealing that he was caught smoking something on tape?

21 A Did he do anything to me?

22 Q Correct.

23 A No. No. He fired Jay 48 hours later.

24 Q Did he ever express to you that he blamed you for Jay Gruden's actions or
25 your failure to act, your failure to publicly admonish or reprimand Jay Gruden?

1 A No. Was that in that article?

2 Q No. I'm just asking you for your --

3 A Oh, no.

4 Q -- experience.

5 So, sitting here today, is it fair to say that you do not view Mr. Gruden's video and
6 the release of the video with him smoking something and your termination as in any way
7 related? Is that correct?

8 A Yeah, I don't even know -- I don't know if he even brought that up once Jay
9 was fired. But, no, I don't see that connection, no. He'd never brought that up to me.

10 Q How did you learn of your termination?

11 A How did I --

12 Q How did you learn that you were being terminated?

13 A We had played the last game of the season in Dallas. We were flying back.
14 And when we got into Dulles airspace, I noticed on my phone I got a text. And it's from
15 Dan, saying, come over to the hangar where he kept his airplanes at Dulles Airport and
16 let's have a chat. So we landed, I went over there, and he told me he was gonna let me
17 go.

18 Q Did he explain to you at that time the reason for him letting you go?

19 A No. It was more he knew who he wanted to get as a coach and he was
20 going to give him all the power.

21 Q Around the time that you were terminated, were you aware that Mr. Snyder
22 was interviewing or interested in hiring coach Ron Rivera?

23 A Yes.

24 Q And how did you --

25 A I knew he was looking for coaches, yes. I knew that.

1 Q Did you know specifically about Mr. Rivera?

2 A Did I what?

3 Q Did you know specifically that he was looking or considering Ron Rivera as
4 the next head coach?

5 A Yeah, because he had been fired -- after we beat him, which is ironic. I
6 never thought about that.

7 Q Wait, can you repeat what you just said? He had been fired --

8 A He got fired from Carolina after we beat him. So he got fired on a
9 Monday -- I don't know what day of the week it was, but we had won the game, and he
10 got fired. And I knew that, that Dan was interested in him.

11 Q And were you involved in any of the discussions surrounding the hire of
12 Ron Rivera?

13 A No.

14 Q Do you believe your termination had anything to do with the campaign by
15 disgruntled fans who had launched some type of "fire Bruce Allen" campaign?

16 A No.

17 Q Why don't you think it was connected to that?

18 A Oh, if we were in first place, it wouldn't be a problem. I think some fan and
19 media criticism is earned when you come in last place.

20 Q Did Mr. Snyder tell you he was gonna issue a press statement about your
21 separation from the team?

22 A No. He had told me that he had already let a reporter know and he was
23 holding it till 7:00 a.m. It was around midnight, or it might've been 1:00 in the
24 morning -- it was some time like that when we got back.

25 Q So the announcement of your departure was within 24 hours of him telling

1 you that you were, in fact, fired. Is that correct?

2 A No. More like 5 hours. Because we got back at, say, midnight, and he
3 said, the reporter's not gonna report it till 7:00 a.m.

4 Q In Mr. Snyder's statement, he said, and I quote: "Like our passionate fan
5 base, I recognize we have not lived up to the high standards set by great Redskins teams,
6 coaches, and players who have come before us. As we reevaluate our team leadership,
7 culture, and process for winning football games, I'm excited for the opportunities that lie
8 ahead to renew our singular focus and purpose of bringing championship football back to
9 Washington, D.C."

10 Mr. Allen, what's your reaction -- what was your reaction to that statement?

11 A That's a good statement.

12 Q That was the reaction you had at the time?

13 A I did. Yeah. That's a good statement.

14 Q When Mr. Snyder referred to the culture, the team leadership and culture,
15 did you understand that to mean you and your involvement in the front office
16 operations?

17 A No.

18 Q Or the culture of the front office?

19 A No. I have some limitations, I can imagine, but I prided myself in talking
20 always to the people. We're all teammates, so let's always be good teammates and
21 treat each other with respect. And I felt that from my coworkers.

22 So, no, I never took that personal, if that's what you're asking.

23 Ms. Quincy. I hate to bug, but how much more do you have? I may need to
24 take a brief break.

25 [REDACTED] I have probably about 15 minutes more.

1 Ms. Quincy. Okay. Let's keep going.

2

BY [REDACTED]

3 Q Mr. Allen, did you ever make a statement to the press about your
4 termination or separation from the team?

5 A I don't think I have talked to -- I don't think I have made a statement.
6 That's 2 years, or a year and a -- I don't think I have.

7 Q Mr. Allen, in the September 30th declaration that you filed in connection
8 with -- and I'm sorry, I think I'm misquoting the date. In the declaration that you filed in
9 connection with your 1782 petition, you wrote that "Mr. Snyder requested that I not have
10 a press conference related to my departure, a request I've honored."

11 Do you recall that?

12 A Yeah. Yeah. I thought you asked me a different -- but, yeah, they
13 didn't -- I was willing to do one when I'd left and give everybody an opportunity to ask me
14 whatever the hell they wanted to ask me. But he did not want it. And Karl Schreiber
15 told me, No, just go, let it go.

16 But I still -- I don't think I've ever -- I don't know if I've talked to the media about
17 my departure since I left.

18 Q Who's Karl Schreiber?

19 A He's Dan's chief of staff.

20 Q Was he on --

21 A Or, he's CFO, but he really is a -- serves as his operating officer or his chief
22 of -- I think it is called chief of staff.

23 Q Is he on the Commanders' payroll?

24 A No, he's on Dan's, which is same. But I think he's at -- he's not -- it was my
25 understanding he was not on the Redskin payroll.

1 Q Was he involved in the operations of the Washington Commanders during
2 your employment?

3 A When I was there, yes.

4 Q Was he very involved in the operations of the Washington Commanders
5 during your tenure?

6 A Yes.

7 Q Now, you testified earlier that your compensation was -- well, Mr. Snyder
8 attempted to reduce your compensation, or the team attempted to reduce your
9 compensation, pointing to a force majeure clause in your contract. Is that correct?

10 A Yes.

11 I don't know if I'm going to make it 10 minutes.

12 Ms. Quincy. Okay.

13 We need to take a 5-minute break. I'm sorry. I misread my client. Can we
14 just do a quick 5?

15 [REDACTED] Sure.

16 Off the record.

17 Ms. Quincy. Okay. Thanks.

18 [Recess.]

1

2 [9:16 p.m.]

3 [REDACTED] Back on the record.

4

BY [REDACTED]

5

6 Q Mr. Allen, before we broke I believe you said that Mr. Schreiber was very
7 involved, and I just want to make sure I understand the ways in which Mr. Schreiber was
8 involved in the operations of the team. Can you please describe for me his level of
9 involvement?

10 A I think he cared about the team. I never had an issue with anything Karl did
11 with me personally or any observations he made to me personally. He went to many,
12 many meetings with me and searching for our new stadium site.

13 And so I had a pretty good, I thought a pretty good working relationship with him.
14 I knew that he would let Dan know.

15 And I think that's why Dan wanted him, to make sure Bruce doesn't commit me to
16 XYZ without me knowing or something. And I don't mean that negatively, but he would
17 be able to fill in Dan on different things. Which is fine with me. If I don't have to fill
18 him in, I don't care who's filling him in. Fill him in.

19 And I don't mean that mean, by the way. I just -- I'd focus on more other -- some
20 other things than that.

21 Q Would Mr. Schreiber be involved in, like, personnel-related matters,
22 whether it's complaints, compensation? Would he be involved in that level of
23 operations?

24 A I don't know what you're asking. He would not be involved in football
25 personnel. That's a phrase we use on selecting players and stuff like that. He
would not be involved in that. But I don't know on the other side.

1 Q And when you say that you would fill him in, so you would at times report to
2 Karl Schreiber, who would then report to Dan about your job duties, things
3 that -- decisions you were making. Is that correct?

4 A I would not say I reported to Karl ever. I knew if Karl asked me a question
5 that, you know, Dan would like to know XYZ, I knew he would share with Dan. I believe
6 Dan trusted him and that he would share the information with him.

7 Q Did he have any decision-making authority?

8 A With the football team?

9 Q On the business operation side.

10 A I don't think -- no, I wouldn't say he had. He didn't have any title with us,
11 so no. Could he suggest to people things? Probably did. But I wouldn't know.

12 Q Now, going back to your -- the salary reduction, I believe you mentioned you
13 had to retain counsel to dispute the actions by the team. Did you engage in any sort of
14 arbitration against Mr. Snyder related to your compensation?

15 A Yes, we filed for arbitration with the commissioner's office.

16 Q So you filed for arbitration, but was there an actual arbitration proceeding?

17 A It got rectified before then and my pay was reinstated.

18 Q Were other NFL teams reducing compensation based on the coronavirus
19 pandemic?

20 A No. And that includes the ex-employees, which makes no sense, but that's
21 okay.

22 Q I'm sorry. I'm not sure I'm following.

23 A Well, the coronavirus prevented people who were working from coming to
24 the office. People who don't work for you really shouldn't come to the office, whether
25 there's a coronavirus or not. So --

1 Q Was that the basis for the reduction, that you would not be coming to the
2 office and, therefore, we will reduce your pay by 50 percent?

3 A No, no. I'm being a little facetious.

4 There was no basis to lower it on coronavirus for an ex-employee.

5 Q And in connection with you receiving your compensation, did you sign any
6 kind of settlement agreement with Mr. Snyder?

7 A No.

8 Q Do you recall if you had received the request for production of documents in
9 connection with the owners' dispute around the same time you were engaged -- or you
10 had filed for arbitration connected to your salary?

11 A That was after. The request for production was after that was resolved.

12 Q Did you view the request for production of documents as retaliatory due to
13 your filing of arbitration?

14 A Please repeat.

15 Q Did you view Mr. Snyder propounding the discovery request in connection
16 with the owners' dispute, did you view that as retaliatory, because you had filed the
17 arbitration?

18 A Maybe somewhere in my mind I thought that at the time. Once again,
19 sitting here 24 months later, I really don't understand the strategy of blaming me for
20 other people's mistakes. It's like telling it's Beth Wilkinson's fault that she shredded the
21 documents that she was ordered to shred. So how is that her fault? It isn't. It's
22 goofy.

23 There's no connection to any of the stuff that goes on in the last 24 months. I
24 can't figure it out.

25 Q Mr. Allen, it has been widely reported that Mr. Snyder was upset that you

1 failed to congratulate him about his hiring of Coach Ron Rivera. This is months after
2 your termination.

3 Are you familiar with that reporting?

4 A Yes, I've seen that.

5 Q And the reporting essentially is that, as a term of some type of settlement or
6 some type of agreement between you and Mr. Snyder, you would send him a message
7 congratulating him on the hire of Coach Ron Rivera since you had, in fact, congratulated
8 Coach Ron Rivera directly.

9 Is that true? Was that ever a term of some type of settlement between you and
10 Mr. Snyder or some type of agreement that you would, in fact, send him a congratulatory
11 text in exchange for something else?

12 A The reporting of all of that isn't necessarily accurate, so I don't know how to
13 answer your question, because it's based on reporting that's been in the media. I
14 obviously don't want to talk about it. So I'll say that the reporting that you're quoting is
15 inaccurate.

16 Q When you say you don't want to talk about it, what is the "it" you're
17 referring to?

18 A I'm not trying to aggravate anybody.

19 Q When you say you're not trying to aggravate anyone, are you talking about
20 Dan Snyder?

21 A Yes.

22 Q Are you concerned that your testimony before the committee in regards to
23 something that happened between you and Mr. Snyder will cause him to react negatively
24 toward you?

25 A Yes.

1 Q What do you think Mr. Snyder would do if you were to testify about what
2 really happened between you and him in relation to the reporting about Coach Ron
3 Rivera?

4 A I think answering the subpoena and not leaving the country has already
5 probably activated whatever train is coming my way.

6 But to be -- so what -- what is -- I sort of drifted off after that. So what is the
7 question? I'll try and answer it and let's see if I get it.

8 Q My question to you was, what happened between you and Mr. Snyder
9 related to a text message regarding Coach Ron Rivera after your termination?

10 A Dan said that he -- which I did. I text Ron's agent when they were -- before
11 he was going to do the press conference, he was being announced as head coach,
12 congratulations, hope you guys did well or hope you guys are happy or something like
13 that and good luck to his agent, who's been a friend of mine for 40 years.

14 Dan says I didn't congratulate him I think because he was standing next to the
15 agent when he received the text and he thought for sure I would also text him and
16 congratulate him.

17 I did not know that Frank -- that's the agent -- was standing next to Dan when I
18 text him. I was in Arizona and the press conference was in Virginia. And I did not
19 watch the press conference, so I had no idea, but it was before that went on.

20 Q Did Mr. Snyder ask, as a term of some type of a settlement or resolution of
21 the matter, that you send him a congratulatory text?

22 A No. I pointed out to him that I congratulated him on getting Ron when he
23 fired me. He told me that's where he was going with his decision.

24 I don't -- I haven't looked for a while. The end of that was his email and my
25 counsel exchanging emails saying it's over, the arrangement. And I'd have to go back

1 and look at that email to see what's in there. But I didn't sign anything. It was just the
2 two attorneys confirming that the money would be restored.

3 Q Mr. Allen, are you still in touch with current Commander employees?

4 A The current --

5 Q Commander employees.

6 A Some of them.

7 Q Do you have any understanding of what Mr. Snyder's current role is in the
8 team's day-to-day operations?

9 A Never asked.

10 Q Do you have any understanding of Mrs. Snyder's role in the day-to-day
11 operations of the team?

12 A Never asked.

13 Q Now, you testified earlier that Ms. Friel stated that Mr. Snyder's actions
14 toward you, filing your email in the 1782 dispute and subsequently leaking them, that
15 that is conduct detrimental. Is that correct?

16 A Yeah, she confirmed. I believe the conversation was, "How is this not
17 conduct detrimental to the league?" And she said, "Yes, I see that."

18 Q And what specifically did she acknowledge about Mr. Snyder's conduct was
19 conduct detrimental?

20 A Using employee emails, private conversations, and sharing them with the
21 public. I don't know if it's the personal conduct policy about retaliation. I
22 don't -- you'd have to ask her. I don't know why she agreed.

23 Q And I believe that your testimony was that -- did you view the use of your
24 emails that were collected -- without your permission, obviously -- as retaliation against
25 you?

1 A Yeah, but I -- yeah, it's -- I don't know what you're retaliating for, though. I
2 didn't -- I haven't -- I didn't do anything.

3 But it is -- I'd hate to point out how old I am, but I have been around three
4 different leagues. I've been in college football and I've been around NFL teams since I
5 was 6 years old. And I've never seen anything like this ever.

6 Q I believe you also testified -- and correct me if this was not your
7 testimony -- that Mr. Snyder's actions in the 1782 petition were also an attempt to
8 intimidate you. Is that correct?

9 A It was also with what?

10 Ms. Quincy. An attempt to intimidate you.

11 The Witness. You know, it's -- I'm only speculating, because it doesn't add up, or
12 maybe it's part of this grand PR plan that someone came up with. But it doesn't add up.

13

BY [REDACTED]

14 Q Do you believe that Mr. Snyder has turned a new page, that he's a new
15 person who has divorced himself of the behavior that he previously engaged in?

16 A I would have no idea. I would have no idea.

17 Q The emails that were sent to the committee yesterday evening were then
18 turned over to your attorney. Do you view that as a pattern of Mr. Snyder's trying to
19 retaliate or intimidate individuals like yourself who may speak out against him?

20 A You know, ma'am, I've heard a bunch of comments and I heard Stephanie
21 mention something. And I've heard from -- what do you all call it? -- minority side on
22 your committee.

23 I don't know why he has say on your committee at this moment, and no one -- I
24 don't know who sent you all suggestions of what to ask him when you're talking to him.
25 This whole process becomes foggier and foggier the longer we go on trying to add it all

1 up.

2 But it feels like, as I said at the beginning, that the congressional report is right.
3 They're trying to make a scapegoat for their actions.

4 Now, whose actions? Who forced the other or who suggested the common
5 interest agreement? I do not know that. I don't know why they did all those things
6 they did.

7 I've tried not to pay attention to it, because I want to focus on going forward.
8 But you just keep getting reeled back for something. Every month there's something
9 new, it feels like.

10 And I can't explain it. I don't know. I don't know what he's like now. I don't
11 have a clue. I really -- and it's none of my business how they're running their team right
12 now.

13 Q Do you feel that NFL has done enough to protect you and other employees
14 who have been targets of Mr. Snyder?

15 A I told you about the three conversations with Lisa Friel, and I haven't had
16 anything else from them. No. I can see them -- but, once again, it goes back to that
17 common interest agreement. I don't know what they're allowed to do. I have no idea.

18 Q Do you believe the other owners are concerned about holding Mr. Snyder
19 accountable?

20 A I can't speak for them. I like, as I already mentioned, a supermajority of
21 them. And I've talked to them in the last 2 years. I intentionally do not bring up this
22 subject. And I root for a lot of them, because I like them, to do well. But I have not
23 asked anyone anything near that, because I want to talk about football.

24 Q Do you believe the league office should release the findings of the Wilkinson
25 investigation if it's committed to holding owners to a higher standard?

1 A I think they need to explain it a little bit better to the world why they did it.
2 But they don't care what my opinion is. So I don't -- I think the people who testified
3 need answers. They need answers. They deserve answers.

4 ██████████ One moment.

5 [Discussion off the record.]

6 ██████████ We have no further questions.

7 The Witness. Have a good evening.

8 ██████████ Off the record.

9 [Whereupon, at 9:38 p.m., the deposition was concluded.]

ERRATA SHEET

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	
Witness Name	
Date of Interview	

PAGE	LINE	CORRECTION	APPROVED*
23	20	STRIKE - "IN 2000"	
28	15	MR. ALLEN - NOT Mr. Snyder	
70	21	STRIKE "FLOW"; ADD "ME to"	
46	11	STRIKE "6"	
48	23	1998	
48	20	STRIKE JOHN - " <u>JON</u> " EVERYWHERE.	
53	8	STRIKE "BABY" - ARGUE	
89	24	STRIKE "RON" - "LOH"	
90	6	ADD "LET" prior to GO	
100	19	"KNOW" - NOT "How"	
127	5	STRIKE "LEAD" - LEAVE	
128	19	STRIKE "HAVE" -	
187	20	JOHN MORGAN	

* For COR Majority Staff use only.

