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 YARMUTH WILSDON PLLC

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**INVESTIGATIVE REPORT  
RE: BELLEVUE HIGH SCHOOL  
FOOTBALL PROGRAM**

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**Carl  
Blackstone**

**Robert  
Westinghouse**

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(Exhibit 37 at BSD\_002565). Mr. Lowell told us that this payment came from BHS assistant coach Dan Cerillo. Mr. Lowell further admitted that both the player's father and Mr. Cerillo had said that the \$3,000 payment was a gift. Mr. Cerillo subsequently changed his story and said that the payment had actually been a "loan." Mr. Lowell's final report reflected only that Mr. Cerillo "loaned" \$3,000 to the player's father. Mr. Lowell omitted from his final report that player's father had called the payment a "gift" and that Mr. Cerillo had made inconsistent statements about the payment.

5. The draft report stated that Tracy Ford's business "was created through the Wolverine Football Boosters," (Exhibit 37 at BSD\_002565) but this information was omitted from the final report.

The actual violation report which Mr. Lowell orally presented to the KingCo Committee on June 1, 2015, did not include any information relating to the Booster Club's payments to coaches, and free tuition at the Academic Institute for at least one player. (Exhibit 35). Mr. Lowell's report also did not mention the fact that the father of a player claimed that Coach Goncharoff had provided him with \$1,200 and that Assistant Coach Cerillo had made "a gift" of \$3,000 to the same player's father.<sup>78</sup>

Although Mr. Lowell claimed that District officials made a "collective decision"<sup>79</sup> not to include this information in the Violation Report, the evidence suggests that Coach Goncharoff and John Connors played a role in keeping some or all of this information out of the District's report to KingCo.

Mr. Lowell admitted to us that on May 26, 2015, he met alone with Coach Goncharoff, (Exhibit 34) and during that meeting he provided Coach Goncharoff with copy of his draft report, which is attached as Exhibit 37. Mr. Lowell claims he provided his draft report to no one else other than Coach Goncharoff. It appears that Coach Goncharoff provided the draft report to John Connors, the President of the Booster Club. On May 29, 2015, Mr. Connors sent a letter to Mr. Lowell and Ms. McDaniel complaining about some of the allegations in the draft report.<sup>80</sup> (Exhibit 17). Mr. Connors' letter contained direct quotes from the draft report, clearly indicating that he had read a copy of the draft report.<sup>81</sup> In that letter, Mr. Connors claimed that the Booster

<sup>78</sup> Mr. Lowell claimed that he orally advised the KingCo Committee that the family "could have received more money" from Coach Goncharoff and that Dan Cerrillo had initially called the \$3,000 payment "a gift."

<sup>79</sup> Mr. Lowell said those involved in making this decision were himself, Dr. Mills, Annie Cole, John Harrison and Lauren McDaniel.

<sup>80</sup> It is also worth noting that on May 28, 2015, Dan Cerillo submitted a letter to the District stating that his \$3,000 payment to a player's family which he had told Shawn Flood was "a gift" was in fact a "loan."

<sup>81</sup> For instance the draft report states that "None of the payments [to coaches] were approved by the school board and none of the payments demonstrated any **distinct information regarding the work completed for the compensation.**" (Exhibit 37 at BSD\_002563) (emphasis added). Mr. Connors letter includes the following phrase in quotes "**distinct information regarding the work completed for compensation.**" (Exhibit 17 at 2) (emphasis added). The draft report also states that a family received a \$3,000 "gift." (Exhibit 37 at BSD\_002565). Mr. Connors in his letter refers to this allegation and places the work "gift" in quotation marks. (Exhibit 17 at 2). The draft report further alleges that Tracy Ford's business was "created" through the Booster Club. (Exhibit 37 at