

**Congress of the United States**  
**House of Representatives**

COMMITTEE ON OVERSIGHT AND REFORM

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<https://oversight.house.gov>

July 12, 2022

Ms. Karen Patton Seymour  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004

Dear Ms. Seymour:

I write regarding the Committee's efforts to obtain testimony from your client, Daniel Snyder, concerning the toxic work environment at the Washington Commanders over the last two decades as well as efforts to silence victims and witnesses of this misconduct. The Committee has worked diligently to secure Mr. Snyder's testimony since June 1, 2022, when I first invited him to appear voluntarily at the Committee's hearing.<sup>1</sup> Unfortunately, Mr. Snyder declined my invitation. Since then, he has refused to allow you to accept service of the Committee's subpoena for a deposition, even after the Committee offered to reschedule.

Nevertheless, the Committee remains committed to obtaining Mr. Snyder's testimony. You indicated in your July 7 letter that he is available on July 28. The Committee accepts your offer for Mr. Snyder to testify on the subjects under investigation by the Committee on July 28.<sup>2</sup>

As you know, a subpoena for Mr. Snyder's testimony was issued on June 24 for a deposition scheduled on June 30. For the reasons explained below, the Committee will proceed with a subpoena in place to ensure that Mr. Snyder's testimony will be full and complete and will not be restricted in the way it would be if the deposition were conducted voluntarily. You have made clear to Committee staff that a voluntary appearance would exclude matters covered by non-disclosure agreements (NDA). Mr. Snyder has a troubling history of using NDAs to cover up workplace misconduct—behavior that is central to our investigation—and it would be highly

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<sup>1</sup> Committee on Oversight and Reform, *Press Release: Oversight Committee Invites Roger Goodell, Daniel Snyder to Testify at Hearing on Washington Commanders' Hostile Workplace Culture* (June 1, 2022) (online at <https://oversight.house.gov/news/press-releases/oversight-committee-invites-roger-goodell-daniel-snyder-to-testify-at-hearing-on>).

<sup>2</sup> We will make every effort to conduct this deposition expeditiously and in a manner respectful of the busy schedules of all involved. In light of the time difference between Washington, D.C. and Israel, where you have indicated your client is available on both July 28 and the following day, he should plan to hold open July 29 in the event additional time is necessary to complete his deposition.

inappropriate for him to employ the same tactic to withhold information from the Committee.<sup>3</sup> Other former Commanders employees have participated in Committee depositions under subpoena, and Mr. Snyder should not be treated any differently.<sup>4</sup>

Voluntary testimony would also be inappropriate in light of Mr. Snyder's month-long refusal to cooperate with the Committee. He had a previous opportunity to testify voluntarily at the Committee's June 22 hearing, but he declined, apparently because he was attending an awards event on the French Riviera.<sup>5</sup> During the hearing, the Committee heard testimony from National Football League (NFL) Commissioner Roger Goodell that, in his nearly 16 years as Commissioner, he had "not seen a workplace in the NFL that is anywhere near what we saw" at the Commanders under Mr. Snyder's leadership.<sup>6</sup> The Committee also uncovered new evidence of Mr. Snyder's central role in creating this hostile work environment and his efforts to influence the silence and discredit victims and witnesses.<sup>7</sup> At the hearing, I announced my intent to issue a subpoena for Mr. Snyder's deposition.<sup>8</sup>

When Committee staff asked whether you would accept service of the Committee's subpoena on Mr. Snyder's behalf for a deposition on June 30, 2022, you declined, indicating you were not authorized to do so because your client was "unavailable" and you had a "professional conflict" on that date.<sup>9</sup> Committee staff offered to reschedule Mr. Snyder's deposition for the following week on either July 6 or July 8. You then indicated that you were unavailable on those dates as well, but you refused to provide specifics on Mr. Snyder's schedule. You also declined to identify when Mr. Snyder plans to return to the United States.

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<sup>3</sup> Committee on Oversight and Reform, *Press Release: Ahead of Hearing, Oversight Committee Releases New Evidence of Dan Snyder's Role in Creating a Hostile Workplace and His Efforts to Undermine Investigations* (June 22, 2022) (online at <https://oversight.house.gov/news/press-releases/ahead-of-hearing-oversight-committee-releases-new-evidence-of-dan-snyder-s-role>).

<sup>4</sup> The Committee is committed to protecting the privacy of victims and witnesses of workplace misconduct and is prepared to take steps to address privacy issues that may be raised by Mr. Snyder's deposition. For example, the Committee redacted certain information for privacy reasons before releasing transcripts from previous depositions in this investigation. *See id.*

<sup>5</sup> On a June 27 call with Committee staff, you confirmed that Mr. Snyder refused to appear at the Committee's hearing in order to attend the Cannes Lions Festival of Creativity.

<sup>6</sup> Committee on Oversight and Reform, *Press Release: At Hearing with NFL Commissioner, Oversight Committee Seeks Accountability for Workplace Misconduct at Washington Commanders and the NFL's Failed Response* (June 23, 2022) (online at <https://oversight.house.gov/news/press-releases/at-hearing-with-nfl-commissioner-oversight-committee-seeks-accountability-for>).

<sup>7</sup> Committee on Oversight and Reform, *Press Release: Ahead of Hearing, Oversight Committee Releases New Evidence of Dan Snyder's Role in Creating a Hostile Workplace and His Efforts to Undermine Investigations* (June 22, 2022) (online at <https://oversight.house.gov/news/press-releases/ahead-of-hearing-oversight-committee-releases-new-evidence-of-dan-snyder-s-role>).

<sup>8</sup> Committee on Oversight and Reform, *Press Release: At Hearing with NFL Commissioner, Oversight Committee Seeks Accountability for Workplace Misconduct at Washington Commanders and the NFL's Failed Response* (June 23, 2022) (online at <https://oversight.house.gov/news/press-releases/at-hearing-with-nfl-commissioner-oversight-committee-seeks-accountability-for>).

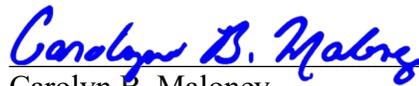
<sup>9</sup> Email from Karen Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Majority Staff, Committee on Oversight and Reform (June 24, 2022).

Your July 7 letter notes that following Mr. Snyder's time in France, he plans to be in Israel for a family memorial service and religious observance.<sup>10</sup> The Committee has taken steps to avoid interfering with those events. As you acknowledged in your letter, my staff asked you to identify the dates of these events so we could ensure the deposition did not conflict with them. Unfortunately, you refused to do so. Nevertheless, I trust the Committee has now resolved any remaining scheduling concerns by agreeing to hold the deposition on the date you proposed, July 28.

In addition to postponing the deposition by nearly a month, the Committee is willing to provide the additional accommodations previously offered to your client to address concerns you raised with my staff. In particular, the Committee will (1) allow Mr. Snyder to testify remotely; (2) give Mr. Snyder access to the exhibits used in prior Committee depositions and transcribed interviews of other witnesses in advance of his deposition; and (3) provide a description of the types of information redacted by the Committee in each of these prior transcripts.<sup>11</sup>

In light of your commitment that Mr. Snyder is engaged in "good faith efforts to cooperate with the Committee" and that the Commanders are now "a model of how to make extraordinary improvements in workplace culture," please confirm by Wednesday, July 13 at 12 p.m. ET that you will accept service of the Committee's subpoena and that Mr. Snyder will appear for a recorded Zoom deposition on July 28, 2022.<sup>12</sup>

Sincerely,



Carolyn B. Maloney  
Chairwoman

cc: The Honorable James Comer, Ranking Member

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<sup>10</sup> Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (July 7, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-07-07%20Letter%20from%20K%20Seymour%20re%20Deposition.pdf>).

<sup>11</sup> Email from Majority Staff, Committee on Oversight and Reform, to Karen Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP (June 29, 2022).

<sup>12</sup> Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (July 7, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-07-07%20Letter%20from%20K%20Seymour%20re%20Deposition.pdf>); Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-15%20Letter%20from%20KPS.pdf>).