# Investigative Report Concerning Attempt By Little League International To Strip 2014 World Series Title From Jackie Robinson West Little League, Inc.

By: HENDERSON ADAM, LLC

Victor P. Henderson Rebecca R. Kaiser

Dated: June 24, 2015

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#### SUMMARY

In the summer of 2014, Jackie Robinson West Little League, Inc., ("JRW") electrified people all over the South Side of Chicago, the United States and the world with their unprecedented run to the Little League International ("Little League") World Series. JRW, comprised of 11 and 12 year olds, was the first all-black team in history to win the World Series. Little League and their corporate partner, ESPN, reaped a tremendous increase in viewership and advertising dollars based, in large part, on the historic run of JRW. (See, "Exhibits A, B and C").

Then, on or around February 11, 2015, and without any advance notice to JRW, Little League publicly announced its decision to strip JRW of the 2014 World Series title. According to Little League, one or more of the JRW players was ineligible to be on the team. Naturally, the children on JRW and their families were publicly humiliated, especially because they got no advance notice from their *friends* at Little League. Most parents would agree that, even if Little League had some concerns about JRW, the mothers and fathers of the children should have been notified first instead of getting the news from ESPN on their way to work and school. Publicly, Little League indicated that it would be open and fair in terms of helping JRW understand the facts behind its decision (*See*, "Exhibit O").

JRW subsequently retained Henderson Adam LLC for legal representation. The law firm contacted Little League through a series of letters asking for all relevant information. Contrary to the position it took in public, Little League refused to be transparent by giving JRW the information supporting its decision. The only significant information that Little League gave to JRW was information that JRW had previously given to Little League (e.g., player applications, etc.).

Furthering the attempt to understand the rules and reasons behind Little League's decision, JRW Treasurer William Haley asked to meet privately with Little League officials, including CEO Stephen Keener. Little League refused. As an alternative, JRW suggested that the parties meet privately before retired federal judges who serve as mediators. Again, Little League refused. Accordingly, without assistance from Little League, JRW conducted its own investigation into the facts and circumstances surrounding Little League's announcement. JRW's major observations and conclusions, which are subject to change if and when additional material information becomes available, are as follows:

Like all other teams competing in Little League baseball tournaments, pursuant to the 2014 Baseball Official Regulations With Playing And Tournament Rules (hereinafter referred to as the "Rule Book"), JRW was required to, and did, submit boundary maps and player information. According to the Rule Book, Little League was required to review information submitted by all

<sup>&</sup>lt;sup>1</sup>The letters were exchanged under the guise of settlement negotiations, which are not typically released to the public unless both parties agree. Henderson Adam told Little League that the letters exchanged between the parties may be released to the public. Henderson Adam sent letters to Little League dated February 17, 2015, March 2, 2015, March 10, 2015, March 20, 2015 and April 1, 2015. Little League sent letters to Henderson Adam dated February 17, 2015, February 19, 2015, March 9, 2015, March 12, 2015, March 19, 2015, March 27, 2015 and April 9, 2015.

teams *before* certain games to determine player eligibility. So, in this case one of three things must have happened: first, Little League failed to review the information submitted by JRW; or, two, Little League reviewed the information submitted at the tournament and determined that there were no ineligible players; or, three, Little League determined that there were ineligible players and allowed the team to play anyway.

The rules regarding player ineligibility operate on a prospective basis, requiring that protests regarding the eligibility of tournament players be raised on a timely basis *before* tournament play continues. This requirement avoids negatively affecting children by engaging in revisionist actions after games have been played. There were no timely protests made against JRW. Accordingly, Little League had no right to challenge the eligibility of the players on JRW. Hence, it was improper for Little League to attempt to strip the title from JRW.

Upon information and belief, it was not until after the World Series, in or around September 2014, that Chris Janes of Evergreen Park (Illinois) Little League raised a protest regarding JRW. JRW defeated Evergreen Park earlier in the season 43 to 2. On or around September 9, 2014, Little League informed JRW that at least two of its players were ineligible to be on the 2014 World Series team. Little League then publicly cleared JRW, at least twice, between September 2014 and December 2014. Little League also arranged a tour for JRW to visit the President of the United States in the Oval Office on November 6, 2014.

On January 31, 2015, Little League officials traveled to Chicago, ostensibly to speak with all six leagues in Illinois District Four, including JRW, about overlapping boundary issues. Little League claimed that the purpose of the meeting was to resolve boundary issues for the 2015 season. At no time during these meetings did Little League indicate that prior eligibility issues were being considered or that it was considering stripping the title from JRW.

Less than two weeks later, on February 11, 2015, without giving JRW or its players any notice or opportunity to be heard, Little League announced through a press release that it was stripping JRW of its title. The news was first announced by ESPN (See, "Exhibit K"). It was not until the next day, February 12, 2015, that Little League communicated its decision in writing to JRW (See, "Exhibit L"). Neither the press release nor the official league communication mention the Rule Book. Instead, Little League raised general allegations of violations undertaken by JRW.

After Little League announced its decision, it was discovered that Chris Janes himself was involved with allowing ineligible players to participate in the Evergreen Park Little League. Janes also publicly stated that he was involved with obtaining private information regarding parents of JRW team members. Janes and others may have used the police to run unauthorized searches of vehicle registration information (*See*, "Exhibit P"). This information was provided to Little League in an attempt to establish that certain JRW players were ineligible to play in the World Series.

Given the refusal by Little League to meet with JRW, its failure to provide notice and the opportunity to be heard, and its refusal to be transparent and provide material information regarding its decision to strip JRW of the title, JRW was compelled to file suit in the Circuit

Court of Cook County, Illinois, on June 23, 2014. The purpose of the lawsuit, filed pursuant to Illinois Supreme Court Rule 224, is to force Little League to provide the information it would not voluntarily disclose.

#### OBSERVATIONS AND CONCLUSIONS

Player eligibility and ineligibility issues appear to be regular and recurring issues in Little League baseball as evidenced by the extensive and detailed section regarding Player Eligibility included in the Rule Book. Conversely, if player eligibility issues were novel and unique, they presumably would not be addressed so extensively. Accordingly, JRW should be treated like all other teams in this context. There should not be one of set rules governing player ineligibility for JRW and another set for other teams.

In both its press release dated February 11, 2015 and its official communication to JRW dated February 12, 2015, Little League failed to mention any specific violation of the rules based on the Rule Book. This is especially significant because Little League's official communication to JRW dated February 12, 2015 refers to Patrick Wilson, who is listed as the Chairman of the Rules Committee in 2014. Little League CEO Stephen Keener is listed as sitting on the Rules Committee that same year.

JRW is not being challenged for on-the-field violations. Rather, Little League is challenging JRW for off-the-field violations. The National Football League ("NFL") recently cited New England Patriots Quarterback Tom Brady for on-the-field violations, yet it did not strip the New England Patriots of any game victories, much less the Super Bowl. Major League Baseball has cited many players for on-the-field violations, including for the improper use of steroids. Yet, Major League Baseball did not require such teams to forfeit games. Thus, even if there were violations by JRW, the penalty announced by Little League was too harsh, especially in light of any contributory negligence or intentional failures by Little League, including, but not limited to, Little League's failure to enforce its own rules regarding player ineligibility.

As a general rule, when an organization has engaged in no wrong-doing and has nothing to hide, it will be open to a meeting request. Here, JRW Treasurer William Haley asked to meet with Little League multiple times, yet his meeting requests were denied.

JRW is in the third largest television market in the country (*i.e.*, Chicago). The 2014 Tournament also featured player Mo'Nee from Philadelphia, which is also a major television market. The 2014 Tournament attracted new viewers to Little League games that were televised on ESPN, including African-Americans and female athletes, resulting in significantly increased television ratings and advertising dollars for both entities. Accordingly, both Little League and ESPN had significant financial interests at stake during all relevant times.

Ostensibly, Chris Janes was the person who initially complained about JRW claiming that his protest was about the rules. Yet, it was not until after Little League announced its decision to strip JRW that it was publicly reported that Janes and his league also violated eligibility rules. Moreover, it may be that Janes and others violated the rights of JRW team parents and federal law by improperly gaining access to their private car registration and home information.

It was and is fair for Little League to hold all of its teams, including JRW, to high standards. Little League, however, should also hold itself to those same high standards. Little League has not been willing to meet with JRW to discuss what it did, or did not do, regarding the 2014 Tournament. As such, Little League's own actions have escaped scrutiny thus far.

### QUESTIONS UNANSWERED BY LITTLE LEAGUE<sup>2</sup>

Whether Little League complied with its own rules during the Indianapolis and Williamsport Tournaments in July and August 2014 by examining the residency and boundary maps for all teams that appeared, including JRW.

Whether Little League determined in Indianapolis that one or more players on JRW were ineligible to play in the tournament.

Whether Little League determined in Indianapolis that one or more players on JRW were ineligible to play and intentionally waived the eligibility requirements.

Why did Little League publicly and repeatedly clear JRW of eligibility issues after notifying JRW on September 9, 2014 that at least two players were ineligible to be on the team.

Whether Little League reviewed and considered the Rule Book regarding player ineligibility before announcing a sanction against JRW.

Whether Little League orchestrated the meeting with District Four officials on January 31, 2015 to create the impression that District Four officials were to blame for JRW being stripped of the title when, in fact, Little League notified JRW on September 9, 2014 that there were eligibility issues.

Whether Little League's failure to act before or after September 9, 2014, and leading up to February 11, 2015, was the result of its desire to capitalize on the ratings and financial bonanza resulting from the summer of 2014.

<sup>&</sup>lt;sup>2</sup> This list does not contain all relevant and unanswered questions.

#### TIMELINE

- **April 30, 2014** JRW submitted its 2014 boundary map (the "Original Map") to Illinois District Four. District Four emailed the Original Map to Little League Central Region Headquarters in Indianapolis. Little League Central Region responded via email that the Original Map had been received. This is the same map the team travelled with to the Great Lakes Regional Tournament on August 1, 2014.
- May 1, 2014 June 30, 2014 JRW regular season games. Teams from specific age groups play each other. These games are sometimes referred to as "in-house games."
- Mid-June 2014 JRW Coaches Butler, Houston and Little select the members of the "Tournament Team" based on the performance during the in-house games. The Tournament Team is the all-star team that plays in the post-season or playoffs leading to the World Series. Following the selection of the Tournament Team, players' residency documents and birth certificates were collected and kept in a binder along with the Original Map. Head Coach Butler was responsible for maintaining the binder from the beginning to the end of the Tournament.
- July 3, 2014 July 7, 2014 Illinois District Four Tournament hosted by JRW. JRW won the Tournament and advanced to the next round.
- July 14, 2014 July 21, 2014 Illinois Section Three Tournament in Hegewisch, Illinois. Leagues participating were JRW, Lansing, Hegewisch and Evergreen Park. It was during this Tournament that JRW encountered Evergreen Park and Chris Janes. JRW won this tournament and advanced to the next round.
- July 22, 2014 July 27, 2014 Illinois State Championship in Manteno, Illinois. Teams participating included Tri Cities, JRW, Western Springs and Olney. JRW won the Illinois State Tournament and advanced to the Great Lakes Regional Tournament in Indianapolis. The tournaments are directed by volunteers from local leagues at the District, Section and State levels. The volunteers are responsible for preparing the fields, assigning umpires, reporting results to state directors and verifying the eligibility of the players on each team.
- July 31, 2014 August 9, 2014 Great Lakes Regional Tournament in Indianapolis. State champions representing Indiana, Kentucky, Michigan, Ohio, Wisconsin and Illinois appeared. In this round the Tournament was operated by paid Little League employees. Games were also televised on ESPN. Coach Butler was required to submit the residency binder for approval to the Little League Central Region Tournament Director with residency information along with the Original Map. Little League was responsible for reviewing, and approving, all eligibility information before each game. To wit:

#### **Tournament Eligibility Affidavit**

Eligibility Affidavit must be certified by the District Administrator or his or her designated appointee and presented by the team manager to the Tournament Director before every game. Each Tournament Team must have twelve (12) eligible players for the District Administrator to certify. EXCEPTION: A District Administrator may certify the Eligibility Affidavit for those teams that provide a justifiable reason for not having twelve (12) players. NOTE: The Eligibility Affidavit becomes official once the team plays its first tournament game. (Emphasis added). (See, the Rules, page T-4, attached as "Exhibit T").

Games were televised on ESPN and JRW started to receive attention from the general public. Articles appeared in Chicago newspapers and there was also coverage on local television stations. JRW also became popular on social media and attracted the attention of major league baseball players, politicians and celebrities.

**August 9, 2014** – JRW defeated Indiana to win Great Lakes Championship. This victory qualified JRW to advance to the Little League World Series Tournament ("LLWS") in Williamsport.

**August 10, 2014 – August 23, 2014** – JRW participated in the LLWS Tournament playing against teams from Washington, Nevada, Texas and Rhode Island.

August 23, 2014 – JRW defeated Las Vegas, Nevada to win the United States Championship.

August 24, 2014 – South Korea defeated JRW in the International Championship game.

At no time prior to JRW playing its last game against South Korea did any person lodge a protest indicating that JRW had used one or more ineligible players. According to the Rule Book:

#### The Use Of An Ineligible Player

- 3. If the facts establishing or verifying the ineligibility of a player become known AFTER a game, and the ineligible player participated in the game, that team shall forfeit the game in question, subject to the following conditions:
- (a) A protest may be lodged by the manager or coach with the Tournament Director or District Administrator. Such protest must be made before either team affected by the protest begins another game. (Emphasis added.)
- (b) The Tournament Director or District Administrator must contact the Regional Director (or his/her appointed agent), who shall contact the Tournament Committee for a decision. The decision of the Tournament Committee shall be final and binding.

In addition to the penalties described above in A, B and C, the Tournament Committee may disqualify a player, team or entire league from tournament play. The Tournament Committee may take action as a result of a protest or on its own initiative. Disqualification of a team or player(s) and/or forfeiture of a game must be the decision of the Tournament Committee at Williamsport, and such decisions will be made prior to the continuation of the affected team(s) or player(s) in further tournament play. (Emphasis added.) (See, the Rules, page T-11, attached as "Exhibit T").

The purpose of the protest rule seems to be at least three fold. First, this rule promotes finality and establishes that protests must be raised in a timely manner and not weeks, months or years after a game has been played. Second, this rule forces teams that are going to raise protests to do it as early as possible and not linger. Third, the rule gives teams that are subject to protests time to recover; they can substitute another player for one who has been deemed ineligible, thereby not penalizing the whole team if one or more players should not have played.

October 24, 2014 – JRW travels to San Francisco during the Major League Baseball World Series as the guest of Major League Baseball. JRW had lunch with Little League CEO Stephen Keener. Keener did not mention the residency protest raised by Chris Janes.

**November 6, 2014** – JRW travels to Washington, D.C. to visit President Obama in the White House. This trip was organized by Little League.

**January 31, 2015** – Nina Johnson and Scott Spillman of Little League visit Chicago to meet with officials from the six leagues in District Four regarding boundary issues. Little League Vice President Pat Wilson participated in the meeting from Williamsport by telephone. The stated purpose of the meeting was to fix boundary issues for 2015. No mention was made of penalizing JRW for boundary or ineligibility issues for 2014.

**February 11, 2015** – Little League publicly announces its decision to strip JRW of the World Series title with no notice or opportunity to be heard. Little League does not cite any specific rule violations according to its Rule Book. JRW retains Henderson Adam, LLC.

**February 12, 2015** – Little League sends a notification to JRW about its decision after it has already notified ESPN and the public.

**February 12, 2015** – Chris Janes publicly admits that the Evergreen Park Little League has allowed ineligible players to play. He also states that he provided vehicle registration information, which is not available to the public, to Little League in order to check the eligibility of JRW players.

**February – May 2015** – JRW conducts its own investigation after Little League refuses to be transparent with the information it used to attempt to sanction JRW.

June 23, 2015 – JRW files a petition asking the Court to force Little League to be transparent.

# PERSONS HENDERSON ADAM MET WITH OR INTERVIEWED BETWEEN FEBRUARY 11, 2015 AND JUNE 23, 2015<sup>3</sup>

JRW League President Annie Haley, Treasurer William Haley, Coach Darold Butler, Coach Jerry Houston, Coach Jason Little, The 13 Little League World Series Players and Their Parents

Without exception, everyone affiliated with JRW indicated that they were never notified by Little League that the team's championship status was in jeopardy. Furthermore, no one affiliated with the team was asked any questions by Little League, including questions about residency.

#### Little League Attorney Scott Schutte of Morgan Lewis & Bockius LLP

Mr. Shutte personally presented information from Little League to JRW, or the team's attorney, on at least two occasions. JRW determined this information to be wholly lacking, including in the context of the sanctions announced by Little League.

#### **District Four Administrator Michael Kelly**

JRW communicated with Mr. Kelly through lawyer Nicholas Gowen of Honigman Miller Schwartz and Cohn LLP. Based on these conversations, it appears that Little League failed to communicate with Mr. Kelly regarding the sanction it intended to impose on him in the same way that Little League failed to communicate with JRW.

# District Four League Presidents, Including Presidents From the South Side Little League, Roseland Little League, and Rosemore Little League.<sup>4</sup>

Henderson Adam also asked to meet with officials from District Four. During that meeting, Henderson Adam was told that all six District Four teams, including JRW, met with Little League officials in separate meetings in Chicago on January 31, 2015. The core topic discussed during those meetings was how to better address overlapping boundary issues between the South Side leagues during 2015. At no time did Little League speak with the league officials about penalizing JRW for boundary issues relating to 2014.

<sup>4</sup> No Official from the Near South Little League or the Bronzeville Little League attended.

<sup>&</sup>lt;sup>3</sup> Henderson Adam was retained on February 11, 2015. Prior to that time, the firm had not met with or interviewed any of the persons listed above, except attorney Scott Schutte of Morgan Lewis & Bockius LLP. Henderson Adam had one prior case involving Morgan Lewis, which was unrelated to this matter.

## PERSONS HENDERSON ADAM DID NOT MEET WITH OR INTERVIEW BETWEEN FEBRUARY 11, 2015 AND JUNE 23, 2015

William Haley, through Henderson Adam, asked at least twice, in writing, to meet with Little League CEO Stephen Keener to discuss relevant facts and rules regarding Little League's announcement. Keener refused. Haley subsequently requested, in writing, that the parties meet privately with one or more retired federal judges in order to mediate their dispute. Keener rejected this request as well.

#### **EXHIBITS**

August 22, 2014 – Little League Means Big Business as Revenues Soar (See, "Exhibit A").

August 28, 2014 – Most-watched Little League World Series Ever on ESPN Networks (See, "Exhibit B").

**September 2014** – The Official Newsletter of Little League Baseball and Softball: The Little League Baseball World Series is a Home Run for ESPN (*See*, "Exhibit C").

September 5, 2014 – JRW received an email from Little League stating that it failed to make a copy of the Original Map, despite the fact that Little League acknowledged receiving the Original Map in April 2014. It is the responsibility of Little League to keep accurate maps on file. In response to the request by Little League, JRW sent an updated or "Amended Map" with an expanded set of boundaries. Upon information and belief, this is also around the time of the initial protest filed by Chris Janes of Evergreen Park (See, "Exhibit D").

**September 9, 2014** – JRW is first informed of player eligibility issues during a series of emails with the Little League Central Region (*See*, "Exhibit E").

September 11, 2014 – Email From Little League Central Region (See, "Exhibit F").

September 20, 2014 – Email From Illinois District Four (See, "Exhibit G").

**December 16, 2014** – DNAINFO publishes the first article alleging that JRW used ineligible players. Little League officials state in the same article they have done a review and all JRW players were eligible. This is the first of two times that Little League publicly clears JRW relating to any eligibility issues (*See*, "Exhibit H").

**December 18, 2014** – Little League issues a detailed public statement regarding the Amended Map (See, "Exhibit I").

**December 23, 2014** – DNAINFO publishes another article stating JRW and District Four administrator Mike Kelly created a boundary map that overlapped with the other leagues in District Four. Little League publicly clears JRW of any boundary issues for the second time (*See*, "Exhibit J").

**February 11, 2015** – Little League publicly announces that it is stripping JRW of its U.S. Championship title. *The press release issued by Little League fails to mention any provisions from the Rule Book (See*, "Exhibit K").

**February 12, 2015** – Little League: Action of the Charter/Tournament Committee Memorandum. After it has already taken action, Little League sent a letter to JRW Treasurer William Haley announcing its decision to strip JRW of the title. Like the earlier press release, the official notification from Little League fails to mention the Rule Book. The letter mentions Little League Executive Patrick Wilson who was listed as the Chairman of the Rules Committee.

Little League CEO Stephen Keener is also listed as sitting on the Rules Committee (See, "Exhibit L").

**February 12, 2015** – JRW Rival Denies Forging Documents So Chicago Kid Could Play In Evergreen Park (See, "Exhibit M").

**February 12, 2015** – Evergreen Park Whistleblower Answers Allegations of Cheating (See, "Exhibit N").

February 12, 2015 – Did Jackie Robinson West's Punishment Fit The Offense (See, "Exhibit O").

**February 13, 2015** – On Jackie Robinson West And Coming to Terms With The Use (or Misuse) of Public Data (See, "Exhibit P").

March 2, 2015 – Correspondence to Illinois State Police (See, "Exhibit Q").

March 3, 2015 – Correspondence to Illinois Attorney General Office (See, "Exhibit R").

May 4, 2015 – Correspondence From Illinois Attorney General (See, "Exhibit S").

#### Undated

18 U.S. Code § 2721 – Prohibition on Release and Use of Certain Personal Information From State Motor Vehicle Records (*See*, "Exhibit T").

Excerpts From Little League 2014 Baseball Official Regulations With Playing And Tournament Rules (See, "Exhibit U").

# IN THE CIRCUIT COURTOF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

JACKIE ROBINSON WEST LITTLE LEAGUE, INC.,	) )
Petitioner,	) Case No. 2015L006409
v.	) CALENDAR/ROOM E
	TIME 00:00
LITTLE LEAGUE INTERNATIONAL	Discovery
and STATE OF ILLNOIS,	)
	) 2
Respondents.	
VERIFIED PETITION FOR DI	SCOVERY BEFORE SUIT TO
IDENTIFY RESPONSIBLE	PERSONS AND ENTITIES
<b>PURSUANT TO ILLINOIS S</b>	

NOW COMES the Petitioner, Jackie Robinson West Little League, Inc. ("JRW" by its attorneys, HENDERSON ADAM, LLC, and states the following as to Respondents in Discovery, Little League International ("Little League") and the State of Illinois (Illinois State Police):

#### **Background**

- 1. On February 11, 2015, Little League claimed that JRW violated rules and regulations, suspended JRW, attempted to revoke JRW's U.S. championship title, and named a special district administrator.
- 2. Little League also announced its decision to vacate JRW's Great Lakes Regional win, suspend JRW team manager Darold Butler, remove Illinois District 4 Administrator Michael Kelly, and place JRW on probation and suspend its tournament privileges indefinitely.
- 3. Little League took this action after claiming to have investigated JRW since September 2014.
- 4. Little League did not notify JRW of the allegations and it did not afford JRW or any of the affected parties an opportunity to be heard or present any evidence in opposition to the penalties before it reached a decision.

- 5. Little League's failure to provide notice of the allegations and an opportunity to be heard violates its own rules and basic notions of due process.
  - 6. Little League did not provide any notice to JRW of the intent to impose penalties.
- 7. Instead, Little League surreptitiously issued a press release informing the media and general public of its decision.
- 8. Accordingly, JRW learned of Little League's imposition of penalties at the same time it was announced to the general public.
- 9. JRW, its players and families have suffered significant reputational and emotional damage due to Little League's lack of notice and due process.
- 10. JRW has attempted to learn what information Little League used to reach its decision, but Little League refused to disclose any material information.
- 11. Upon information and belief, JRW also understands that Little League was supplied information, directly or indirectly, that was improperly and even illegally obtained from the Illinois State Police in potential violation of the rights of team parents.
- 12. JRW requested this information directly from Little League, but Little League refused to provide it.
- 13. JRW then issued Freedom of Information Act ("FOIA") requests to the Illinois State Police to learn how non-public information may have been obtained from the State Police and supplied to Little League.
  - 14. The State Police refused to answer the FOIA requests.
- 15. Finally, JRW asked the Office of the Illinois Attorney General to intervene and give JRW access to the requested information, but that entity also refused.

#### **Petition for Discovery:**

#### A. <u>Little League International</u>

#### The Alleged Initial Investigation

- 1. The identity of all persons, including but not limited to the league official from a neighboring district, who raised concerns about the residences of JRW players.
- 2. The identity of paid Little League personnel who reviewed the allegation and information.
- 3. The identity of all Little League paid personnel who were responsible for verifying age and residency/school attendance and boundary documentation during the 2014 tournament in Indianapolis and in Williamsport.
- 4. The identity and location of any documents that were provided in connection with the alleged September 2014 investigation.

#### **Subsequent Investigation(s) - December 2014**

- 5. The identity of all persons who raised concerns about the residences of JRW players after the alleged initial investigation in September 2014.
- 6. The identity of all persons who provided information or documentation about the residences of JRW players after the alleged initial investigation in September 2014.
- 7. The identity of Little League personnel involved in the subsequent investigation.
- 8. The identity and location of any documents that were provided after the initial investigation in September 2014.
- 9. The identity of everyone who participated in meetings with Little League regarding the residence and boundary issues regarding JRW.
- 10. The identity of the league and persons at the league alleging misconduct by JRW.

#### The Decision - 2015

- 11. The identity of all persons who supplied information that was used, or not used, to impose penalties against JRW.
- 12. The identity of Little League personnel who decided to impose penalties against JRW.

13. The identity and location of any documents that were obtained by Little League, whether they were used or not, to impose penalties against JRW.

14. The identity of Little League personnel who decided to communicate the decision of Little League regarding JRW to the media.

#### B. <u>Illinois State Police</u>

15. The identity of persons who obtained information about JRW team parents.

16. The identity of Illinois State Police personnel who provided information to anyone, including Chris Janes, about JRW team parents.

17. The identity and location of the records accessed and provided about JRW.

WHEREFORE, Jackie Robinson West, Inc. prays that Respondents in Discovery permit counsel for Petitioner to examine witnesses and documents for the purposes of identification within thirty days of receipt of this Petition, that the Court enter an Order requiring Respondents to preserve and to maintain all of the original records, documents and artifacts set forth above and prevent their loss or destruction until further order of Court, and for such other relief as the Court deems just.

Respectfully submitted,

JACKIE ROBINSON WEST
Petitioner for Discovery

One of its Attorneys

Victor P. Henderson Rebecca R. Kaiser HENDERSON ADAM, LLC 330 West Wells Street Suite 300 Chicago, IL 60606

Phone: 312-262-2900

#### **VERIFICATION**

William H. Haley, being duly sworn on oath, deposes and states that he is the Treasurer of Jackie Robinson West Little League, Inc., Petitioner for Discovery; that he verifies the foregoing Petition and is duly authorized to bring this Petition; that he is familiar with the foregoing and knows the contents thereof; that the allegations set forth in the Petition for discovery are true to the best of his knowledge, information and belief.

Wellia Haley

SUBSCRIBED AND SWORN to before me, a Notary Public,

this 23rd day of June, 2015

Notary Public

Mary Pub Card Commence Propose

August 12, 2017 (Sac

# Little League means big business as revenues soar

Josh Peter, USA TODAY Sports 12:29 p.m. EDT August 22, 2014

1

The images remain quaint — kids sprinting around the basepaths, fans watching from grass hills, Norman Rockwell-like scenes abound at the Little League World Series in Williamsport, Pa., which culminates Sunday with the championship game. But make no mistake, Little League is big business.

Little League Inc. reported revenue of almost \$25 million and assets of more than \$85 million in 2012, according to the most recent publicly available tax return it must file to maintain tax-exempt status as a 501(c)(3) non-profit organization.

Over a five-year period, compensation for Little League Inc.'s CEO, Steve Keener, nearly doubled to \$430,000 a year. And in 2012, the 100-person full-time staff made almost \$7.5 million in salaries — a year before ESPN agreed to more than double broadcast fees as part of an eight-year, \$76 million contract to televise the games during the two-week tournament.

"That's a lot of money when all the grunt work is volunteer," said Randy Stevens, president of the Little League in Nashville, Tenn., whose all-star team qualified for the World Series each of the past two years. "Now I'm wondering where it's all going."

Keener, elected as CEO in 1996, said revenue has grown at a steady pace and said new money is going back into the program.

"I'm not going to apologize for generating revenue to support the programming issues of this organization," he told USA TODAY Sports. "But I would apologize if I felt we were not using it to the best of our ability in a prudent manner and getting the most out of the money to benefit this program."

Keener said the majority of the organization's costs stem from maintaining the national headquarters in Williamsport, five regional centers — in Connectcut, Georgia, Texas, California, Indiana — a full-time facility in Poland and offices in Hong Kong, Puerto Rico and Canada.

When Little League signed its contract with ESPN in 2007, Keener said, it lowered affiliation fees for the local leagues. He also said Little League pays for 125 criminal background checks for each local league and provides training program for coaches.

"Those are ways we try direct the funds right back to the local programs," he said.

Little League also pays for travel, lodging and food costs for 16 teams, each of which include 13 players and three coaches. But Stevens, affiliated with the Nashville-based league, said families of the players should receive financial help for travel costs.

He estimated the parents of his players needed up to \$35,000 to cover those expenses. A father with the team from Chicago said parents were unsure how they would pay for the trip until five Major League Baseball players offered to cover all travel expenses for the parents.

Keener said the idea of travel assistance is not under consideration.

"I've learned never to say never, but it's unlikely at this point," he said. "Our responsibility is to provide the travel, the accommodations and all the expenses related to participating in the World Series for the players and the coaches and the umpires who are here working the World Series."

FOR THE WIN

The Little League World Series puts everything in perspective once again

Keener said giving the players money that could be used for scholarships is not under consideration.

"Anything we would do for one group of kids, we would do for all of the kids. And it's just not feasible to think that they're all going to head off to college when they're getting out of high school, particularly with the kids from the international region," he said. "It's just not something we feel is necessary for us to be thinking about when they're 12 or 13 years old."

Little League does not charge admission for games at the World Series, but officials do solicit donations while passing around cans during games.

"Whatever money they're getting, they're looking for more," said Ellen Siegel, affiliated with the team from Philadelphia.

But Keener said the \$25 million a year pales in comparison to organizations such as the Boys Scouts of America, which reported revenue of \$240 million in 2012. He said Little League could not operate without the support of about 1,250,000 volunteers in 7,500 communities.

As far as his salary is concerned, he declined to comment other than to say his compensation is set by a committee of Little League Inc. board members.

Davie Jane Gilmour, Little League International Board of Directors Chairman, said Keener's salary — and that of the other senior staff members, who in 2012 earned between \$100,000 and \$250,000 apiece — are in line with salaries at comparable non-profits.

"To be perfectly honest with you, there are many board members on that (compensation) committee who think that our senior staff, and in particular Steve, are underpaid at this point in time," Gilmour said. "There's a pretty strong feeling on the compensation committee that they are highly marketable based on their success here in their work here at Little League."

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# Press Releases

## **Most-watched Little League World Series Ever on ESPN Networks**



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The 2014 Little League World Series was the most-watched ever on ESPN networks (ABC, ESPN and ESPN2 combined) according to Nielsen. The average audience of 1,724,000 viewers (P2+) is up 71 percent from 2013. The Little League World Series across ABC, ESPN and ESPN2 consisted of 54 games, including the regionals and the Williamsport, Pa. competition.

Additionally, the 2014 Little League World Series is the highest-rated on ESPN networks (ABC, ESPN and ESPN2 combined) since 2002. It averaged a 1.1 U.S. rating, which is up 57 percent from 2013.

#### Little League World Series Championship weekend highlights:

- · Little League World Series Championship weekend (World Championship, U.S. Championship, International Championship) averaged 4,163,000 viewers and a 2.7 U.S. rating, the best in both categories since 2002. The weekend saw a 36 percent viewership increase and a 35 percent ratings increase from 2013.
- · The South Korea versus Chicago, III. World Championship game on ABC, Aug. 24, averaged 5,343,000 viewers and is the most-watched World Championship broadcast since 2003. It is up 35 percent from 2013.

**EXHIBIT** 

- The Las Vegas, Nev. versus Chicago, Ill. U.S. Championship game on ABC is the mostwatched U.S. Championship broadcast since 2002, averaging 5,191,000 viewers. It is up 65 percent from 2013.
- The South Korea versus Japan International Championship game, Aug. 23, is the mostwatched and highest-rated International Championship game ever on ABC. It averaged 2,094,000 viewers and a 1.4 U.S. rating, up 21 percent in both categories from 2013.

#### Additional highlights:

- Las Vegas, Nev. versus Philadelphia, Pa. on Aug. 20, with starting pitcher Mo'ne Davis, delivered nearly five million viewers (4,988,000) making it ESPN's largest audience ever for a Little League World Series game. It was also the most-watched Little League World Series game ever on WatchESPN with more than 107,000 live unique viewers.
- WatchESPN viewership for the average Little League World Series game on ESPN and ESPN2 this year more than doubled in live unique viewers (172 percent) and more than tripled in live minutes viewed (209 percent) compared to 2013.
- In total, there were 29.1 million live minutes viewed for ESPN and ESPN2 Little League World Series games on WatchESPN, up 203 percent.

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#### Recent Releases

ESPN Weekly Enterprise jOURnalism Release (http://espnmediazone.com/us/press-releases/2015/06/espn-weekly-enterprise-journalism-release-3/)

(htt;

NFL Analytics Expert Brian Burke Joins ESPN (http://espnmediazone.com/us/press-releases/2015/06/nfl-analytics-expert-brian-burke-joins-espn/)

Most-Watched & Highest-Rated NBA Finals Ever on ABC through Three Games (http://espnmediazone.com/us/press-releases/2015/06/most-watched-highest-rated-nba-finals-ever-on-abc-through-three-games/)

#### **ESPN PR Twitter Feed**

#### **ESPN PR**

Tweets from a list by ESPN PR Members of ESPN PR on Twitter



A #TBT to @NewhouseMag ... and my beloved professor, Bill Glavin's dedicated Magazine lab. #Cuse pic.twitter.com/ziGXt/BtG0



#### **ESPN Images**

#### THE OFFICIAL NEWSLETTER OF LITTLE LEAGUE® BASEBALL AND SOFTBALL

# **ELITTLE LEAGUER®**



Volume 32 | Issue 9 | September 2014 | Archive

Little League Reduces Charter Fees for Teams, Little League® Honors One Got What It Takes to Be a of Its Finest Graduates -- World Series Umpire?

Helping Everyone in the Little League Family

Derek Jeter

The Little League Baseball® World Series Is a Home Run for ESPN

The 2014 Little League Baseball® World Series ranked as the mostwatched programming ever on ESPN networks (ABC, ESPN and ESPN2 combined), according to Nielsen numbers. The average audience of 1,724,000 viewers was up 71 percent from 2013, via 54 games. In addition, the 2014 Little League Baseball World Series ranked as the highest-rated on ESPN networks since 2002, with an average 1.1 U.S. rating, up 57 percent. The Little League Baseball World Series Championship weekend averaged 4,163,000 viewers and a 2.7 score, the best in both categories since 2002. Cynopsis Media – Aug. 29, 2014



#### More Stories

- Mo'ne Davis Visits Cooperstown, Donates LLBWS Jersey to Baseball Hall of Fame
- 1964 LLBWS Champs from Staten Island to Gather for 50th Anniversary
- Victoria Challenger League Breeds Confidence in Special Needs Players
- Want to Be Part of Little League®? Start the Chartering Process
   Now

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Little Leaguer® | September 2014 | Archive

Date: September 5, 2014 at 9:36:25 AM CDT

To: Jackie Robinson West < jackierobinsonwest@hotmail.com>

Subject: RE: Map

Thank you! We had copies of everything else, so we should be good.



From: Jackie Robinson West [mailto:jackierobinsonwest@hotmail.com]

Sent: Friday, September 05, 2014 10:25 AM

To:

Subject: Re: Map

I will send it this weekend. Is there anything else regarding the team that you want me to send?

Bill

Sent from my iPhone

On Sep 5, 2014, at 8:15 AM, '

Hi Bill,

I know you are beyond busy right now, but could you forward me a copy of the boundary map the team used? We make copies of all of the documentation for WS teams for our records, but somehow we failed to make a copy of the boundary map.

Thanks for your help!

Date: September 9, 2014 at 9:36:17 AM CDT

To: Jackie Robinson West < jackierobinsonwest@hotmail.com>

Subject: RE: Map

Bill,

Just following up on the map.

Thanks,



From: Jackie Robinson West [mailto:jackierobinsonwest@hotmail.com]

Sent: Friday, September 05, 2014 10:25 AM

To: [

Subject: Re: Map

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Thanks for your help!

**EXHIBIT** 

E

Date: September 9, 2014 at 3:27:46 PM CDT

To: Jackie Robinson West < jackierobinsonwest@hotmail.com>

Subject: RE: Map

Bill,

Thanks, got it. Can you help me out with the N/S Streets? What are the street names for 100 West, 500 East and 2000W?



From: Jackie Robinson West [mailto:jackierobinsonwest@hotmail.com]

Sent: Tuesday, September 09, 2014 3:43 PM

To:

Subject: Re: Map

Just faxed a hand copy of our map with President and DA signatures.

Hopefully, this will help resolve any questions about our kids.

Bill

Sent from my iPhone

On Sep 9, 2014, at 9:36 AM, 5

Bill,

Just following up on the map.

Thanks,

From: Jackie Robinson West [mailto:jackierobinsonwest@hotmail.com]

Sent: Friday, September 05, 2014 10:25 AM

To

Subject: Re: Map

I will send it this weekend. Is there anything else regarding the team that you want me to send?

Bill

Sent from my iPhone

On Sep 5, 2014, at 8:15 AM, '\square\text{wrote:}

Hi Bill,

I know you are beyond busy right now, but could you forward me a copy of the boundary map the team used? We make copies of all of the documentation for WS teams for our records, but somehow we failed to make a copy of the boundary map.

Thanks for your help!

Date: September 11, 2014 at 1:41:39 PM CDT

To:

Cc: Bill Haley < jackierobinsonwest@hotmail.com>

Subject: RE: Maps for IL District 4

Thank you!



From:

Sent: Thursday, September 11, 2014 7:38 AM

To:

Cc: Bill Haley

Subject: Re: Maps for IL District 4

It was a very exciting August. I will work on this over the weekend. I just wanted to let you know that I did receive the request.

To my knowledge there are no over laps. We did submit new maps this season because Skyline Little League didn't charter.

Sent: Wednesday, September 10, 2014 3:19 PM

To: Cc:

Subject: Maps

I hope you have started to recover from all of the celebrations! What an exciting August!

Now that things have slowed down, I'm spending some time on boundary maps and attempting to address any potential issues with overlapping boundaries. In reviewing IL-4, the maps in the league files indicate that there may be some overlap between some of the leagues. Can you please send me the most recently approved boundary maps you have for each league? If there are any overlaps, we will need to work on rectifying that.

Thanks,



Fwd Jackie Robinson West

From:

Date: September 20, 2014 at 9:04:03 AM CDT

To: Jackie Robinson West < jackierobinsonwest@hotmail.com>

Subject: Re: District 4 Boundaries Map 2014

Yes.

On Sep 20, 2014, at 9:01 AM, Jackie Robinson West < jackierobinsonwest@hotmail.com > wrote:

Do you have time for quick conversation?

Sent from my iPhone

On Sep 20, 2014, at 8:58 AM,

On Sep 19, 2014, at 6:24 PM, Jackie Robinson West

Sent from my iPhone

On Sep 19, 2014, at 6:23 PM, "IL District 4"

From: Jackie Robinson West

Sent: Friday, Sentember 19, 2014 6:14 PM

To,

Subject: Re: District 4 Boundaries Map 2014

Probably need to resolve before January. Let's see how it goes at next District meeting.

**EXHIBIT** 

#### Sent from my iPhone

#### There was no message.

**From:** <u>Jackie Robinson West</u> **Sent:** Friday, September 19, 2014

5:53 PM

To

Subject: Re: District 4 Boundaries

Map 2014

Sent from my iPhone

On Sep 19, 2014, at 5:40 PM, "IL District 4"

wrote:

Bill how should we proceed from here? Do you still just want to wait til January?

#### From:

Sent: Thursday, September 18, 2014 12:55 PM

To: 1

Subject: RE: District 4 Boundaries Map 2014

First step is to submit maps for all leagues in the district. They need to be signed and dated by the DA and President. The leagues need to understand that they can only accept players that live within or attend school within those boundaries. At tournament time,

each league should be using that same map, with players addresses plotted on the map. The DA needs to be familiar with the league boundaries and when signing off on tournament affidavits, ensuring that the players listed fall within the approved boundaries.

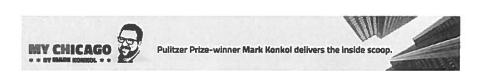
Here is the problem:

See the map below. The blue outline is the map that you submitted to me in April for JRW.

The red map is the other map that I previously referenced that was signed on the same day. Only 11/13 players live within the boundaries of that map. Although when this map was used for the team all of the players were plotted within the boundaries of that map, when I plugged their actual addresses in, two fell outside of the boundary. The green map was the most recent map in the JRW league file. which was dated 2007.

We have been consistently receiving complaints regarding the players on the team not residing within the

boundaries, which is what prompted the inquires. We are attempting to ascertain which map is the actual boundary map for the league and work out any potential overlaps. Please review with and start to work with the leagues on a resolution. Thanks.



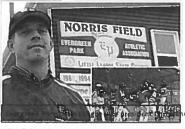


Beverly, Mt. Greenwood & Morgan Park (//www.dnainfo.com/chicago/beverly-mt-greenwood)
Sports & Outdoors (//www.dnainfo.com/chicago/topics/sports-outdoors)

#### Jackie Robinson West Broke Residency Rules, Suburban League Claims



us/ourteam/editorial-



nes noticed news reports during and after the World Series that quoted suburban officials celebrating various players as hometown h

MORGAN PARK - The Jackie Robinson West

(http://www.dnainfo.com/chicago/tags/jackie-robinson-west) sluggers from Chicago's struggling South Side became national celebrities this summer when they hit and pitched their way to the Little League World Series and took home the U.S title.

But now the adults who put together the team — parents, coaches and league administrators — face allegations they violated Little League residency rules by stacking the lineup with All-Star ringers from the suburbs to create a "super team" that became champs.

In an email to Little League International obtained by DNAinfo.com Chicago, a neighboring south suburban league called on Little League officials to investigate whether Jackie Robinson West engaged in "manipulating, bending and blatantly breaking the rules for the sole purpose of winning at all costs."

#### **EXHIBIT**

Н

TIMELINE: Follow the Jackie Robinson West saga from the earliest boundary disputes to the Little League International decision to strip the team of its U.S. title

(http://www.dnainfo.com/chicago/20150211/roseland/jackie-robinson-west-timeline-key-dates-little-league-scandal)

"We have very good reason to believe that [there] were several members of this team that did not live within JRW's boundaries and, per Little League residency requirements, should not have been allowed on this team," Evergreen Park Athletic Association vice president Chris Janes wrote.

Evergreen Park league officials say they decided to speak out despite the risk of being criticized in hopes of protecting the integrity of Little League baseball — a once small-town organization that's now worth more than \$80 million — and keep their league, as well as others, alive.

Jackie Robinson West league officials say they fully complied with residency rules — and Little League International's request for additional supporting documentation last month — pointing to a finding of no wrongdoing.

"Oh my goodness, we did not cheat. We did not recruit these guys," Jackie Robinson West president Bill Haley said. "Nothing was done to put these kids together. We absolutely did not cheat."

Little League residency rules require players to either reside or attend school within a league's boundaries with very few exceptions, and specifically state it is unacceptable for a parent to establish residency to qualify for tournament play.

According to a league map obtained by DNAinfo.com, the Jackie Robinson West boundaries include sections of the Morgan Park, Washington Heights, Auburn Gresham, Englewood and New City neighborhoods of Chicago — but do not include any suburbs.

Janes and fellow Evergreen Park league board members said news reports during and after the World Series that quoted suburban officials celebrating various players as hometown heroes exposed some of Jackie Robinson West players as suburbanites and confirmed what some Evergreen Park Little League volunteers had suspected for years — preteen blue-chip players were being recruited to join the team.

"Due to their success this year — and getting on TV — all of the information [about the players] became so readily available," Janes said. "All you had to do was Google any one of the players' names and their hometowns outside of Chicago pop up. ... It was all just there."

Jackie Robinson West coach Darold Butler said those news reports didn't prove his lineup consisted of any ineligible players. "Nothing was done that should not have been done," he said. "The thing is until anyone really sits down and reads Little League's rules ... it doesn't make sense to entertain questions. It sounds like they don't have a clue. It sounds like there's a little hate going on and that comes with the territory."

Little League International officials have sided with Jackie Robinson West, but told DNAinfo.com the door remains open to further probing player eligibility if additional evidence is presented. The burden of proving a league violated rules rests with the accuser, officials said.

According to Janes, a senior Little League official who responded to the Evergreen Park league's formal complaint by phone told Janes that Jackie Robinson West submitted the appropriate documentation required to prove player residency.

But Little League "never addressed any of our specific questions," saying only that the paperwork turned in by Jackie Robinson West "met their standards and they were satisfied," Janes said.

"It seems like a vague response to very specific questions which is why we continue to pursue answers."

#### "Best Little League Team I've Ever Seen"

While Janes has questions over the players' residency, he said there's no doubt about one thing — those kids sure could play.

Before Jackie Robinson West burst onto the national scene, they dominated the local competition.

In the sectional playoffs, they outscored opponents 55-6, including an opening game slaughter-rule win over Evergreen Park Little League by a score of 43-2 in four innings.

Outfielder Trey Hondras hit two home runs in the first inning of that game and four total. Star pitcher Joshua Houston hit three homers. And two other players hit two home runs each.

"That was one for the record books," Janes said. "The loss was so lopsided it was almost comical."

Janes said the lopsided loss in the sectional playoffs had nothing to do with the Evergreen Park League's decision to file the formal complaint against Jackie Robinson West.

Jackie Robinson West coach Butler disagreed.

"Maybe they've seen us on TV too much and maybe they're sick of us. It's part of what happens when good things are happening," Butler said. "I'm not mad at it whatsoever. It is what it is."

After easily winning the sectional tournament, Butler's team continued to roll through the state tournament, besting their rivals 53-3. In the title game, they crushed the Tri-Cities All-Stars 29-2.

"I gotta say they sure were a fun team to watch," Janes said.

And even more than their skill on the ball diamond, Janes said the Jackie Robinson West players, just 11 and 12 years old, impressed him off the field by acting with maturity beyond their years.

"Every time I saw that team play, whether it was on TV or in person, those kids were fantastic — high degree of sportsmanship, well-behaved and obviously well-coached. I don't have a single bad thing to say about any one of those kids," Janes said.

"They're an extremely talented group, best Little League team I've ever seen. They just shouldn't have been able to play together."

#### **Suburban Connections**

All it took was a simple Internet search to find that a congresswoman, a suburban mayor, an elite traveling baseball league and *Sports Illustrated* posted details about the players' suburban roots.

Even before the team won the title, U.S. Rep. Robin Kelly took to Twitter to cheer on Jackie Robinson West players who live and attend school in suburban towns within her district.

The congresswoman boasted on Twitter that two members of the team were students at McKinley Junior High School in South Holland and another was from Dolton.



South Holland village officials congratulated the two as "alumni" in the village newsletter that's mailed to residents and available online.

Sports Illustrated reported in its popular feature "Faces in the Crowd" that one player attended a school in suburban Homewood.



baseman also played in the inaugural Tee Ball on the South Lawn All-Star Game at the White House in 2008.



TREY HONORAS

Chicago > Jackie Robinson West All-Stars

Trey, a seventh-grader at James Hart School, had two of his team's six hits, including a two-run homer in the first inning of the U.S. tille game. The first baseman helped Jackle Robinson West become the first Chicago team

since 1967 to reach the international final. Trey had nine hits, two home runs, eight RBIs and batted .429 in the tournament.



DAVE BELISLE

Cumberland, R.I. > Cumberland American All-Stars

On the village of Lansing's official Facebook page, the south suburb laid claim to one player as a student at the local Memorial Junior High.



Village of Lansing shared ABC 7 Chicago's photo.

August 21 - Edited (A)

Congratulations to Memorial Junior High Student Ed Howard who is a player on the Jackie Robinson West team!

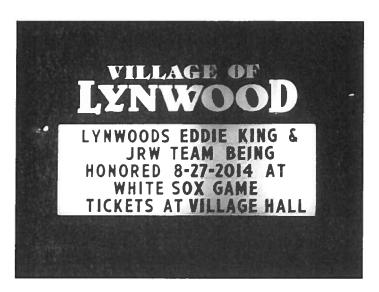
JRW WINS! Chicago's Jackie Robinson West stays alive in the Little League World Series, beating Texas 6-1.

Go Jackie Robinson West!

Lynwood Mayor Mayor Gene Williams told the *Times of Northwest Indiana* newspaper of plans to celebrate "our own" Jackie Robinson West player — who the mayor is quoted as saying lives with his parents in the south suburban village — so Chicago's mayor couldn't take all the credit for honoring the champs.

"We're not going to let Rahm Emanuel steal everything," Williams told the newspaper. (http://www.nwitimes.com/news/local/illinois/lynwood/village-hopes-to-pay-tribute-to-local-player-on-jackie/article\_926fobe9-17aa-5dof-856a-b70351bca8b3.html)

A lighted sign outside the village hall announced plans to celebrate "Lynwoods" player and sold tickets to a Chicago White Sox game celebrating the Jackie Robinson West team's big win.



Janes said he also was surprised to see news reports indicating that players even lived on Chicago's Northwest Side.

The Austin Weekly News proclaimed one player as the "Pride of the West Side." (http://www.austinweeklynews.com/Community/Blogs/9-2-2014/National-Little-League-player-from-Jackie-Robinson-West-All\_Stars-is-honored/)

The Rev. Ira Acree of Greater St. John Bible Church hailed another player as a "life-long West Sider" when he presented the boy with the proceeds of a special offering. And Burr Elementary in Bucktown proudly counted a player among their students on the school website.

#### The Rules

The Little League rules concerning residency are specific:

- \* "Players will be eligible to play ... only if they reside or the physical location of the school where they attend classes is within the boundaries provided to and approved by Little League baseball."
- \* " 'Residence' ... refers to a place of bona fide continuous habitation."
- \* "It is unacceptable if a parent moves into a league's boundaries for the purpose of qualifying for tournament play."
- \* "Residence shall be established and supported by documents" including driver's licenses, voter's registration and school records, among others.
- \* Players can obtain a waiver if parents provide documented proof they previously lived in the league boundaries.

Getting caught breaking those rules can result in disqualification of a player, team or entire league from regular season and/or tournament play.

If a player's residency is challenged, parents must provide those documents, an affidavit of residency or school attendance and any other "additional documentation" requested by Little League Baseball, according the rules.

#### "Not At Liberty To Say"

Patrick Wilson, Vice President of Operations and International Tournament Director for the Williamsport, Penn.-based Little League International, said he took seriously the allegations in Janes' letter challenging residency of Jackie Robinson West players.

Wilson said Little League officials reviewed evidence Janes sent, which included Web links to news stories, Facebook pages, crowd-funding websites and roster information from the Chicago White Sox ACE program, a travel team organization that a number of Jackie Robinson West players had participated in.

Wilson said Little League checked Jackie Robinson West paperwork to verify that the players "live in Chicago or go to school in Chicago" and asked for additional information to verify residency. Little League officials, however, did not ask Jackie Robinson West parents to sign affidavits — legal binding documents signed under oath — to verify residency or school attendance as required according to Little League's rules, Wilson said.

Wilson declined to answer specific questions about player residency information, would not say whether the league filed residency waivers for specific players and refused to provide the map of Jackie Robinson West's league boundaries the national organization used to verify residency.

Wilson said that Little League International followed up on the "very specific complaints" made by Evergreen Park by rechecking the documents Jackie Robinson West submitted to prove player residency. He said Little League International also asked for additional documentation to support residency and school enrollment claims.

Wilson declined to elaborate on details of the investigation but said, "We checked the documentation and the addresses that the Evergreen Park folks sent from Lynwood, South Holland and Dolton." He said that the organization looked at documents provided by Jackie Robinson "to support the residency and school enrollment requirements."

Wilson said privacy concerns prevented him from disclosing information about specific player documentation and that it is Little League policy not to disclose individual league boundary maps.

"We don't publish those maps," Wilson said. "Leagues share them how they decide to. We do not."

Janes said he was disappointed that Little League International conducted what he considered a less-than-thorough investigation especially given the organization's significant financial resources. Last year, Little League signed a \$60 million deal extending ESPN's exclusive television broadcast rights to the World Series tournament.

"We thought what we sent them was the smoking gun. ... It seems to me with all the big money people involved, the television rights and all of that, if they were legitimately concerned that they would have done their homework," Janes said.

"If they were concerned about everybody playing by the same rules that Little League publishes on its website, their responses would have been a lot more specific. I think there's a lot at stake and there are a lot of people involved in this that are concerned the truth may come out."

Jackie Robinson West's Butler and Haley also refused to provide DNAinfo.com with their league map, which is not published on the Jackie Robinson West website.

District 4 administrator, Michael Kelley, who is the gatekeeper charged with certifying Jackie Robinson West's tournament eligibility documents, including the league boundary map, declined to be interviewed.

Haley said that the league has complied with Little League International's requests.

During the team's trip to visit President Obama at the White House in November, he asked some parents to provide additional residency verification documents requested by Little League. And that should be enough, he said.

"The map that we have shows all kids in the boundaries. I don't think we should have to defend ourselves against Evergreen," Haley said. "And we've proven all this to the people in Williamsport. We don't have to prove ourselves to another league."

#### 'I've got nothing to hide'

Carlton Hondras of South Holland, whose son Trey previously played in that town's Little League program and joined Jackie Robinson West this year, said there are several reasons residency is a complicated issue: Some kids come from broken homes, some families have multiple properties and, frankly, the Jackie Robinson West league's winning tradition is a draw for African-American families.

"If any black kid wants to play baseball they use Jackie Robinson West because it has been around and it's not going anywhere. It's like a tradition if you are from the city, whether you move out or not," he said.

Hondras said "we went over there because of the way the league was structured."

"The biggest issue with South Holland [Little League] was they never saw the bigger picture of getting kids to develop to make a push for a district title to go Downstate. It was too many guys playing daddy ball, dragging coaches' kids [on the All-Star team] who are not good enough," he said.

Hondras said it's no secret his son now attends James Hart Elementary School in suburban Homewood.

"I've got nothing to hide. My stuff is legit. My son has got three different homes," Hondras said. "He goes to James Hart in Homewood. It was in *Sports Illustrated*."

Hondras said he registered his son to play for Jackie Robinson West using the address of a house within the league boundaries that he owns with his wife, who is his son's stepmother.

And when Little League International asked for more documentation in November, he provided a copy of his marriage license.

"I'll speak the truth. It's no different than when Michael Jordan's son was playing at Whitney Young and people were complaining. What did he go do? He went and bought a condo Downtown so his son could play for Whitney Young," he said. "You're paying for the gas and the lights and the mortgage. ... Now whether or not someone is sleeping there we don't know. But at the end of the day you have the documentation."

Several other Jackie Robinson West parents facing questions about whether their boys were eligible to play for the league told DNAinfo.com Chicago that they did not violate Little League rules.

Tammy King, whose child Eddie King Jr. was hailed as a proud son of south suburban Lynwood by the village's mayor, said her family lives within the Jackie Robinson West boundaries.

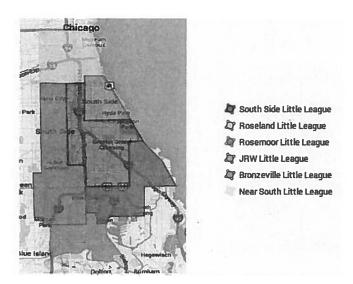
"We used to live there years ago, but do not live in Lynwood anymore," she said. "I'm in the city of Chicago but do not have to disclose where I live."

Jackie Robinson president Haley said King provided documentation showing her son lived in the league boundary.

In June 2013, Tammy King changed her address on her driver's license to a house owned by her parents near 88th and Cottage Grove Avenue in Chicago, public records show.

However, that address is not in the Jackie Robinson West boundary, according to a district map a source provided to DNAinfo.com.

She and her husband, Eddie L. King, are registered as active voters in Lynwood and cast ballots there in the Nov. 4 election, public records show.



The home address of Christopher Green and Dr. Venisa Beasley-Green, whose son Brandon was on the team, is outside the Jackie Robinson West boundary, according to the map obtained by DNAinfo.com.

"We don't know about boundaries," Beasley-Green said. "We know it's a city of Chicago requirement ... no specific coordinates to play on a particular team."

Another player's parents, Ed and Calandra Howard, both live in suburban Lansing, according to public records. Their son, Ed Howard, is listed as living in Lansing on the 2014 roster for the Chicago White Sox ACE team he played on this year. He is currently a seventh-grader at a Lansing junior high school. His parents did not respond to messages seeking comment.

One player's Facebook page and the White Sox ACE roster both list the boy's hometown as Dolton. The player, Joshua Houston, attends a Chicago charter school near 115th and Prairie Avenue, according to published reports. That school is located outside of the Jackie Robinson West boundary according to the map obtained by DNAinfo.com.

In 2011, the player's mother, Myrtle Houston, changed the address on her driver's license to a house owned by Theresa Johnson in the Jackie Robinson district. However, she remains a registered voter at the same address where husband, Jerry, lives in Dolton and cast a ballot in that precinct in the Nov. 4 election.

The player's father declined to answer questions about where his son lives or goes to school.

Coach Butler, whose son DJ also played on his team, confirmed that both his driver's license and voting registration are listed to an address in suburban Calumet Park.

Still, he says, "I live in Chicago."

"You can have multiple addresses and I have a wife, so..." Butler said.

Butler's wife's driver's license is registered to an address in Morgan Park within Jackie Robinson West boundaries. That same address is listed as the headquarters for the West Englewood Tigers traveling baseball team that Butler also coaches.

#### A Travel Team 'Masquerade'?

Many of the Jackie Robinson West parents who are facing questions about their residency have one thing in common — their boys also play travel ball for elite teams.

Five of the Jackie Robinson West players facing questions about their residency were on the 2014 Chicago White Sox ACE 12-year-old All-Star travel team. Only one of those ACE players had Chicago listed as his hometown on that roster.

# Chicago White Sox ACE 12U



# PG Super25 12u Great Lakes Regional 5/23/2014 - 5/26/2014

.,	Diament Steel		3-3	142	IÇIK	2020		Cricago, IL
27	Brandon Green	C C	5-5	145	R/R	2020		Chicago, IL
6	Jason Hodges	1B/OF, RHP	5-6	150	R/R	2019		Park Forest, IL
15	Joshua Houston	18	5-4	120	R/R	2019		Dolton, IL
24	Carlton Honduras	OF/RHP	5-7	100	R/R	2019		South Holland, IL
23	Marquis Jackson	OF	5-8	145	L/R	2021		Chicago, IL
9	Edward Howard	SS	4-9	88	R/R	2019		Lansing, IL
8	Cameron Bufford	SS	5-1	95	R/R	2019		South Holland, IL
5	Eddle Ell	OF	5-6	130	L/L	2019		South Holland, IL
5	Micah Gowens	38	5-4	140	L/R	2020		South Holland, IL
4	Kevin Coe	28	5-1	100	L/R	2021		Chicago, IL
3	Christopher Henry	OF	4-8	82	R/R	2019		Richton Park, IL
2	Maximus Bullock	RHP	5-6	110	R/R	2020		Chicago, IL
No.	Name	Pos.	Ht	Wt	B/T	Yr.	School	Hometown



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This year, Eddie King Jr. played for the Lou Collier Stars, a team that Joshua Houston and Brandon Green played on in 2012 and 2013, managed by Green's father.

Jackie Robinson West's coach, Butler, also managed the 2013 West Englewood Tigers 12-year-old travel team that included his son and four other members of this year's Little League U.S. championship team.

The appearance that the Jackie Robinson West team is comprised of "travel players from outside their boundaries" remains at the heart of Evergreen Park's formal complaint, Janes said.

When parents ask him how his suburban league can remain competitive against Jackie Robinson West, Janes says he doesn't have a good answer.

"As long as they are allowed to select players from outside their boundaries to make a team largely comprised of travel players and we continue to only allow players within our boundary, it's going to be difficult," Janes alleged.

Janes said he "wouldn't be surprised that other leagues do the same thing particularly if circumventing the rules is as easy as it appears to be now."

"But I think it's wrong no matter who does it," Janes said. "In the end Jackie Robinson West is in our backyard and they've been so well-publicized that it's obvious that they're doing it, at least in my eyes."

Janes said Evergreen Park volunteers genuinely fear that the continued existence of an unlevel playing field might kill their league.

"The intent of Little League is everybody plays. There are no cuts. It's a childhood experience, not a stepping stone to play high school ball or college,"

Janes said.

Travel ball exists for the players whose parents "thought their kids were a little better and it might be good to play a more competitive brand of baseball on a day-to-day basis," he said.

Travel teams are not restricted by boundaries. "They have tryouts and cut players," Janes said. "They don't have the same rules as Little League."

The travel teams, he said, "really don't want anything to do with Little League — until it's time to play on TV."

"All the sudden they're a travel ball team masquerading as a Little League team," he said.

Little League vice president Wilson understands concerns with travel squads but said there's nothing Little League can do to prevent boys from simultaneously playing on travel teams.

"We were taken to court and a judge told us it's the parents' decision and we can't govern what kids do outside Little League programs," he said.

Wilson said that he would review any additional information, including Jackie Robinson West boundary maps, sent to Little League International regarding player eligibility, but for now the case was closed.

In his letter to Little League International, Janes wrote, "In the event we do not receive a detailed response explaining how these players were eligible to play for JRW we are strongly considering obtaining outside representation to see this matter through to the end."

Janes said the Evergreen Park league considered the negative reaction that their formal complaint might generate but forged ahead anyway with a slogan that for years appeared on team jerseys at the World Series that read, "I will not cheat."

"We're not putting the kids in the middle of this. I didn't break the rules. I don't think the kids knowingly or intentionally did. But the people responsible for those kids did and they need to be called out," Janes said.

He added, "There's something wrong with a process that seems to be very easily manipulated."

"Shame on the coaches, parents and the district administrator who may have signed off on this process and signed off on it, because all they did was put the kids in the middle of it," Janes said.

Several Jackie Robinson West parents, coaches and volunteers questioned about the allegations said they believed Evergreen Park's allegations are born of jealousy and a desire to tarnish the accomplishment of a group of talented kids who made history.

"It's amazing how they could try to take this achievement and tear it down to say someone cheated," parent Tammy King said. "To me it's a waste of time. It's the boys' talent that got them there. At this point, don't take fame from the kids."

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Over the course of this week, Little League International has received multiple requests from the media to clarify our determination on the qualification of the Jackie Robinson West Little League team that competed in the 2014 Little League Baseball World Series.

After thorough review of the current and approved Jackie Robinson West boundary map and players' school and/or residency documents, Little League International has no reason to question the eligibility of the players on Jackie Robinson West team.

For the 2014 Little League season, a new regulation went into effect allowing children who attend a school within a local league's boundaries to register for that league. Many families have benefited from this new regulation, which has resulted in more children playing baseball and softball with their friends. It has also allowed local Little League programs to provide a meaningful experience to children that might not have had the opportunity previously. In advance of the 2014 season, Jackie Robinson West Little League made the decision to expand its boundaries to give that opportunity to more children. Working with the Illinois District 4 Administrator, the league submitted an approved, new boundary map to the Little League Regional Office, in effect for the 2014 season. The new boundary extended the geographic area of Jackie Robinson West Little League to include the area to the west of South Cottage Grove Avenue and South Eberhart Avenue and to the north of 119<sup>th</sup> Street.

After several reviews, the 13 players who played on the Jackie Robinson West Little League team at the 2014 Little League Baseball World Series meet the requirements based on either their birth records and their school attendance or residency of at least one of their parents and/or guardians. Eleven of the players' eligibility was established using a parent and/or guardian's residency information, while two players used school attendance information. A parent and/or guardian must present three different forms of verification to establish residency: driver's license, voter's registration, school records, welfare/child care records, federal records, state records, local (municipal records), support payment records, homeowner or tenant records, utility bills, financial records, insurance documents, medical records, military records, Internet/cable/satellite records, vehicle records, or employment records. School attendance is verified using one of the following: official/certified school enrollment form, school-issued report card or performance record, or a Little League-issued school attendance form completed by the principal, assistant principal, or administrator.

Personal privacy is an extremely important issue to Little League International. It is the organization's policy to not release any documentation pertaining to any individuals who participate or volunteer within the Little League organization, as it contains sensitive, personal information.

Based on the documentation provided to Little League International and multiple reviews of that information, Little League International considers this issue a closed matter and will have no further comment on it.





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#### Jackie Robinson West Secretly Changed Boundary To Add Star Players: Sources

By Mark Konkol (//www.dnainfo.com/chicago/about-us/our-team/editorial-team/mark-konkol) | December 23, 2014 7:59am @KonkolsKorner (http://twitter.com/KonkolsKorner)





val of neighboring districts to qualify certain players for the team t DNAInfo/ Mark Konkol; John Green/www.johngreen.photography

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MORGAN PARK - Jackie Robinson West officials and the newly minted

administrator overseeing the district they play in expanded the league's boundaries this year — overtaking sections of three sister leagues and allowing them to pick up all-star players who helped them win the U.S. title.

But fellow league presidents within District 4 did not give permission for Jackie Robinson West's boundaries to be expanded, and were unaware of the changes, sources told DNAinfo.com.

Little League International officials said the boundaries were shifted "to include the area to the west of South Cottage Grove Avenue and South Eberhart Avenue and to the north of 119th Street."

**EXHIBIT** 

By redrawing the map, Jackie Robinson West officials laid claim to territory already used by chartered leagues within District 4-a move that requires the OK by the president of each impacted league, according to Little League rules and veteran volunteers familiar with remapping district boundaries.

When it comes to league maps, the rules state: "A league's boundaries must not overlap or encroach on another chartered Little League's boundaries."

News of Jackie Robinson West's boundary expansion became public last week when Little League International issued a statement intended to clear the Jackie Robinson West league of violating residency rules after a formal complaint filed by a rival baseball league in south suburban Evergreen Park.

# TIMELINE: Follow the Jackie Robinson West saga from the earliest boundary disputes to the Little League International decision to strip the team of its U.S. title

(http://www.dnainfo.com/chicago/20150211/roseland/jackie-robinson-west-timeline-key-dates-little-league-scandal)

The official statement — which deemed the "matter closed" — noted, "In advance of the 2014 season, Jackie Robinson West Little League made the decision to expand its boundaries … Working with the Illinois District 4 Administrator, the league submitted an approved, new boundary map to the Little League Regional Office, in effect for the 2014 season."

The last time the six separate District 4 league presidents all signed off on changes to league boundary maps was prior to the 2013 season.

District 4 sources told DNAinfo.com that the map submitted to Little League International expanding Jackie Robinson West's boundaries this year was turned in without the permission of the presidents of the other leagues — including the Roseland, Rosemoor and South Side leagues — that were affected by the changes.

District 4 Administrator Michael A. Kelley did not return several messages and emails seeking comment on the map changes that Little League International said he helped facilitate.

Jackie Robinson West president Bill Haley and manager Darold Butler also did not return calls seeking comment. And no league officials from the six leagues within District 4 responded to questions and interview requests related to changes made to Jackie Robinson West boundaries sent via email by DNAinfo.com Chicago.

#### 'Something is not right here'

After Evergreen Park Athletic Association vice president Chris Janes formally challenged the residency of some players on the Jackie Robinson West team, Haley said his league absolutely did not cheat, saying "We didn't do anything that we don't do every year."

But a shift in District 4 leadership before the 2014 season did change the gatekeeper in charge of submitting league documentation and tournament qualifying affidavits to Little League International.

And the new district boss, Michael Kelley, had a long history with Jackie Robinson West.

Kelley, a Chicago firefighter, told ESPN Chicago that he has coached in the Jackie Robinson West league for 25 years and served as league vice president for 20 years before taking over as district administrator this year.

Kelley replaced Victor Alexander Sr., who resigned after serving five years in the volunteer post.

Alexander told DNAinfo.com that he resigned for work-related and "personal" reasons in 2013 — a year when he refused to sign off on affidavits certifying player residency for Jackie Robinson West and "several leagues" in the district because certain players did not have proper paperwork showing they lived within league boundaries.

"I had a rule: Paperwork had to be valid and submitted on time," Alexander said.
"It's a stance I took and never backed away from."

Previous administrations "let things happen that were at least questionable" and he worked to bring collaboration and cooperation back to the district and eliminate as much animosity as possible so kids could play baseball regardless of which league they play in, he said.

"Win or lose, we can at least we can be friends. We still live in the same neighborhoods. We're part of the same community," Alexander said. "I know my decision disappointed people, but I would not back down from what I believed in."

Alexander said he helped adjust District 4 boundaries prior to the 2013 season when Jackie Robinson West fell one game short of qualifying for the Little League World Series.

District 4 sources said the process of adjusting league boundaries prior to the 2013 season was an extremely brutal negotiation — a battle over heavily populated areas and beautiful ball diamonds — ultimately smoothed over by Alexander, who urged league presidents to "be team players" and come to a compromise. And that was the last change league presidents approved, sources said.

Alexander said the Jackie Robinson West expansion described by Little League International "most definitely" encroached on other existing league boundaries.

"Even if the district administrator were to submit a revised boundary map for a league that encroached on another chartered league it has to be approved by that league," Alexander said. "The verbiage in Little League's rules is 'the boundary is protected.' No league, no district administrator can encroach on another without approval from the league president."

Alexander said he has not been involved in District 4 decisions since resigning his post, but he's certain about one thing: "If nobody agreed to it and [Jackie Robinson West's] boundaries were expanded, my personal opinion is something is not right here."

#### Little League: Case closed

Little League International has offered minimal insight into how officials have conducted the investigation into the allegations raised by the Evergreen Park league.

In an email to a reporter, Little League International President and CEO Stephen Keener said he called a Friday morning meeting with top brass to again discuss the allegations levied against the U.S. champs.

"Speaking with Illinois District 4 officials over the last several days, we were able to once again confirm that not only was a new boundary map for Jackie Robinson West Little League drawn and submitted to the Regional Office through the appropriate process, but also the boundary maps for several other leagues in the District," Keener wrote on Friday. "Also there were no protests or issues regarding the JRW team during its District 4 Tournament. That is where issues like this tend to rise most frequently."

Then, Keener wrote that the case is closed.

Later Friday, follow-up questions sent to the Little League boss received this automated email response: "I'm away from my office for an extended period and have limited access to email. Have a safe and happy holiday season." Other email and telephone requests seeking comment from Little League International officials also were not answered.

Back in Chicago, District 4 sources told DNAinfo.com that the information provided by Little League International regarding new maps filed on behalf of Jackie Robinson and "several other leagues" in 2014 has raised serious questions about who gave the OK — and affixed signatures — to revised boundary maps that encroached on territory claimed by other charter leagues as required by Little League rules.

In an email, Little League International did shed light on how Jackie Robinson West established their roster's residency without naming names to protect player privacy.

The eligibility of 11 players on the roster was established using a parent or guardian's residency information. "School attendance information" was used to verify residency of two players under a 2014 change to Little League's rules, according to a statement from Little League International.

Little League International's statement made no mention of parents using residency waivers to certify their kids as eligible for tournament play.

Under Little League rules at least one parent or guardian must prove residency by presenting three of the following forms of proof: driver's license, voter's registration, school records, welfare/child care records, federal records, state records, local (municipal records), support payment records, homeowner or tenant records, utility bills, financial records, insurance documents, medical records, military records, Internet/cable/satellite records, vehicle records or employment records.

Last week, DNAinfo.com reported that several sets of parents of Jackie Robinson West players have valid driver's licenses and active voting records that state they both live — and in some cases voted in the Nov. 4 election — in suburban Dolton, Lansing, Lynwood and South Holland.

Parent Tammy King, who voted in suburban Lynwood along with her husband Ed King last month, told DNAinfo.com that she lived in the league territory but declined to say where. Her driver's license is registered to a house owned by her parents near 88th Street and Cottage Grove Avenue in Chicago.

Before Jackie Robinson West extended its boundaries this year, that address was located in territory belonging to a separate league — the South Side Little League, according to a District 4 map obtained by DNAinfo.com.



- South Side Little League
  Roseland Little League
- Rosemoor Little League

  JRW Little League
- Bronzeville Little League
  Near South Little League

The home address of Christopher Green and Dr. Venisa Beasley-Green, whose son was on the title team, also was located within South Side Little League's district—just blocks from the league's Tuley Park field—before Jackie Robinson West changed its boundaries.

Another player's Facebook page and the White Sox ACE traveling team roster both list his hometown as Dolton. The player, Joshua Houston, attends a Chicago charter school near 115th and Prairie Avenue, according to published reports.

That school is located in the heart of the Roseland neighborhood and was within the Roseland Little League boundary before Jackie Robinson West changed its map before the championship season.

#### "Two black eyes on Little League"

In October, Chris Janes, of the Evergreen Park Little League, sent a letter to Little League International asking officials to investigate whether Jackie Robinson West engaged in "manipulating, bending and blatantly breaking the rules for the sole purpose of winning at all costs."

Janes and fellow Evergreen Park league board members said news reports during and after the World Series that quoted suburban officials celebrating various players as hometown heroes exposed some of Jackie Robinson West players as suburbanites and confirmed what some Evergreen Park Little League volunteers had suspected for years — preteen blue-chip players were being recruited to join the team.

"Due to their success this year — and getting on TV — all of the information [about the players] became so readily available," Janes said earlier this month. "All you had to do was Google any one of the players' names and their hometowns outside of Chicago pop up. ... It was all just there."

On Monday, Janes said, "I can't fathom any little league wanting to change their boundary like that in a day and age when each league is doing the best they can to stay afloat," Janes said.

"This lends credence that Jackie Robinson West has done an awesome job of gaming the system in terms of playing residency and player eligibility," Janes said. "It seems one more step in what seems to be a series of steps that have been taken to bend and manipulate the rules and do everything they can to get the players that they want."

Janes said he was "surprised that Jackie Robinson West would go to those lengths — and I'm deeply surprised that Little League would allow this to occur."

"In my mind this is two black eyes on Little League's face," he said.

Janes said his league — a Jackie Robinson West rival — and every other charter member of the youth baseball league deserves to have the case reopened by Little League International. He said after DNAinfo reported his concerns last week, he had "numerous Little League officials reach out to me and every one expressed the same concern: How is this being allowed to happen?" Janes said.

"Quite frankly, it's befuddling that we started this in late August and the response has always been nonchalant and very nonspecific without trying to connect the dots. Honestly, I feel deceived. ... You can't help but think there's some homecooking going on here," Janes said.

One of those league officials who contacted Janes is Kevin Ricketts, a coach on the New Albany, Ind., team Jackie Robinson West beat with late-inning heroics to qualify for the World Series in Williamsport.

"Nothing Little League could do would make us whole again. Nothing gives us Williamsport. There's no next year in Little League baseball. But if Jackie Robinson West changed its map without other presidents signing off on it ... it smells like cheating," Ricketts said. "If it's true they did it to get specific kids on their team, that's not in the spirit of Little League. ... And it's sad if they did that."

Ricketts said if JRW created an illegal boundary map to strengthen their lineup, "In my opinion, Jackie Robinson West should have their title stripped."

"Little League should take action and not bury their head in the sand."

#### "Our choices have consequences"

Several people contacted by DNAinfo.com said they were unwilling to answer questions because they did not want to tarnish the amazing accomplishment of a special group of kids who became America's sweethearts.

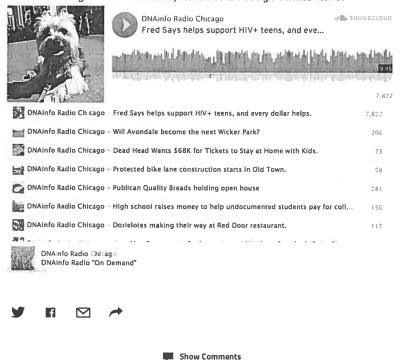
But Alexander, the former District 4 boss, said that the accusations did not reflect or take away from the on-the-field play of kids on the Jackie Robinson West team.

"Kids have no say into what adults do or not do. They come out, get trained to play the game and have an opportunity to go out on the field and execute," he said. "Adults make decisions and adults should follow the rules. ... But people don't follow the rules in many areas, not just Little League. I don't encourage or condone that. ... If winning is the most important thing then you're doing it for the wrong reason ... at this level anyway. These are not professionals. These are kids."

If the accusations against Jackie Robinson West and District 4 leaders are true, Alexander says it'll be a harsh life lesson for everyone involved.

"Kids are learning that in the real world and real society people don't always do what they're supposed to do. That's the reality whether it's in Little League baseball or corporate America," he said. "We have choices that we make and our choices have consequences. Some good. Some bad."

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For Immediate Release

February 11, 2015

# Little League<sup>®</sup> International Finds Jackie Robinson West Little League Violated Rules and Regulations

Suspensions Handed Out, U.S. Championship Title Revoked, Special District Advisor To Be Named

SOUTH WILLIAMSPORT, Pa. (February 11, 2015) – After an extensive review of the operations of Jackie Robinson West Little League and Illinois District 4, the Little League International Charter/Tournament Committee has determined that the Jackie Robinson West Little League and Illinois District 4 Administrator knowingly violated Little League International Rules and Regulations by placing players on their team who did not qualify to play because they lived outside the team's boundaries.

The Charter/Tournament Committee has decided to vacate the league's wins from the 2014 Little League Baseball® International Tournament, including its Great Lakes Regional and United States Championships, and suspend team manager, Darold Butler, from Little League activity. Illinois District 4 Administrator, Michael Kelly, has also been removed from his position. Jackie Robinson West Little League has been placed on probation with its tournament privileges suspended until such a time that new leadership in the positions of President, Anne Haley, and Treasurer, Bill Haley, have been elected or appointed, and that the league is fully compliant with all Little League International Regulations.

Little League International found that Jackie Robinson West Little League used a falsified boundary map for their 2014 tournament, and that Jackie Robinson West Little League officials met with other leagues in Illinois District 4 to try to get the territory they wrongfully claimed was theirs for their 2014 tournament.

"For more than 75 years, Little League has been an organization where fair play is valued over the importance of wins and losses," said Mr. Stephen D. Keener, Little League International President and CEO. "This is a heartbreaking decision. What these players accomplished on the field and the memories and lessons they have learned during the Little League World Series tournament is something the kids can be proud of, but it is unfortunate that the actions of adults have led to this outcome. As our Little League operations staff learned of the many issues and actions that occurred over the course of 2014 and prior, as painful as this is, we feel it a necessary decision to maintain the integrity of the Little League program. No team can be allowed to attempt to strengthen its team by putting players on their roster that live outside their boundaries."

#### **TIMELINE**

In September 2014, following the conclusion of the Little League Baseball World Series, a league official from a neighboring district in Illinois first expressed concerns pertaining to players' residencies to the attention of the Little League Central Region staff in Indianapolis, Ind. At the end of October, that local league official then provided additional documentation to support his allegations. Little League International operations staff fully reviewed the allegation and information. Using age and residency/school attendance and boundary documentation provided to Little League International by Jackie Robinson West Little League and verified by the District Administrator, Little League International determined the players' eligibility based on all of the information that had been provided at that time. In mid-December, during this process, however, Little League began to learn of multiple issues with boundary maps and operational process with multiple leagues in Illinois District 4. In an effort to be fair to all the leagues in Illinois District 4, Little

League International began organizing one-on-one, private meetings with leagues in the district where they could discuss their concerns and work on preparing for the 2015 season. In early January, through a media report, Little League first learned of a league within Illinois District 4 alleging misconduct by Jackie Robinson West Little League.

On January 31, Little League International officials held meetings with Illinois District 4 officials and the leagues in the district. During these meetings, Little League International learned of several operational issues within the entire District that have occurred over the course of many years under different leadership at the District level. These issues are spread amongst leagues throughout the district and include a breakdown in communication of roles and responsibilities among District and league leadership and misunderstandings in multiple league boundaries. Various local league officials confirmed that the boundary issues stem from a boundary map redrafting process that started prior to the 2013 season and includes maps that were agreed upon amongst all the leagues, but had never been properly submitted to Little League International through the official process. Little League International also learned that Jackie Robinson West Little League knowingly expanded its boundaries to include territory that belonged to other leagues in the district without approval from the other leagues or the Little League International Charter Committee, as stated in Little League's Official Regulations and Playing Rules. Little League International also found that Jackie Robinson West Little League used a falsified boundary map for their 2014 tournament, and that Jackie Robinson West Little League officials met with other leagues in Illinois District 4 to try to get the territory they wrongfully claimed was theirs for their 2014 tournament. The decision is based on falsifying documents and illegally expanding boundaries to include residences that would verify the players' eligibility.

"Little League takes these matters very seriously and has spent countless hours gathering information about the many issues facing Jackie Robinson West Little League and Illinois District 4," said Mr. Keener. "During our review, it became clear that both Jackie Robinson West officials and District Administrator, Mike Kelly signed documents to make players eligible who should not have been."

Within Little League's operational structure, it is the District Administrator's responsibility to verify player eligibility based on documents supporting participation, age, and residency/school enrollment that are signed by the League President, League Player Agent, and Team Manager. Those signatures and documents are then reviewed at every level of the tournament, based on the District Administrator's initial verification. During tournament play, if any league has a question about player eligibility on an opposing team, they are encouraged to file an official protest, which is reviewed by the Little League International Tournament Committee. At no point during the 2014 regular season, tournament season, or since allegations of misconduct began to be reported, has Little League International been contacted by a league in Illinois District 4 about the use of illegal players within the Jackie Robinson West Little League. It wasn't until the meetings in January, 2015 that local league officials confirmed that they had direct knowledge of this rule violation, but never reported it to Little League International, as is common with local league operations.

"Little League relies heavily on the commitment of principled volunteers to serve as a system of checks and balances in preparation of and throughout Little League International Tournament Play," said Mr. Keener. "Unfortunately, no allegations against Jackie Robinson West Little League were made until well after the tournament ended, contributing to the difficulty of resolving these many complex issues. As an organization, Little League has faced issues similar to this in the past, and we felt that we must take the appropriate action set by that precedent."

This is the third time in the 68-year history of the Little League Baseball World Series that punitive actions have led to vacating wins from a league – first in 1992 with the disqualification of Zamboanga (Philippines) City Little League and again in 2001 with Rolando Paulino Little League from Bronx, N.Y.

By default, the 2014 championships vacated by Jackie Robinson West Little League will be given to the other finalists in those games, with Mountain Ridge Little League (Las Vegas, Nev.) handed the 2014 United States Little League Baseball World Series Championship; New Albany (Ind.) Little League handed the 2014 Great Lakes Regional Little League Baseball Championship; Tri-Cities Little League (West Dundee, Ill.) given the 2014 Illinois State Little League Baseball Championship; Lansing (Ill.) Little League handed the 2014 Illinois Section 3 Little League Baseball Championship; and Rosemoor Little League (Chicago) given the 2014 Illinois District 4 Little League Baseball Championship.

"Little League is committed to helping all of our volunteers in more than 80 countries provide positive baseball and softball experiences for children in more than 7,000 communities," said Mr. Keener. "As there are many issues to resolve within Illinois District 4, our operations staff is committed to working with local volunteers to ensure that all the leagues in the district are operated fairly and under full compliance of Little League International's rules and regulations and that the children in the Chicago area have a meaningful Little League experience in 2015 and beyond."

Little League operations staff will be appointing a special advisor to Illinois District 4. The advisor will be veteran District Administrator with knowledge of the Chicago area. The Little League operations staff and the special advisor will work with Illinois District 4 Officials and league leadership to ensure all operations and boundary issues fully comply with Little League International rules and regulations and properly communicated through the appropriate channels with the Little League Charter Committee, at which point, Jackie Robinson West Little League's probation will be lifted.

Little League International is committed to providing the best youth baseball and softball experience in the world, and will continue to work with its volunteers, parents, and players to ensure that Little League remains the premier youth sports organization in the world.

### About Little League®

Little League® Baseball and Softball is the world's largest organized youth sports program, with 2.4 million players and one million adult volunteers in every U.S. state and more than 80 other countries. Founded in 1939, more than 35 million people around the world, from a U.S. president to community leaders to professional athletes, can call themselves Little League graduates. And every year, millions of people follow the hard work, dedication, and sportsmanship that the Little Leaguers display at our nine baseball and softball World Series events, the premier tournaments in youth sports. For more information, visit LittleLeague.org, or follow Little League on Facebook (facebook.com/LittleLeague), Twitter (twitter.com/LittleLeague), and Instagram (Instagram.com/LittleLeague).

###

#### For more information contact:

Brian McClintock, Director of Media Relations, Little League Baseball & Softball
Office: 570-326-1921, ext. 2252; Cell: 570-772-2431;
E-mail: <a href="mailto:bmcclintock@LittleLeague.org">bmcclintock@LittleLeague.org</a>; Website: <a href="mailto:LittleLeague.org">LittleLeague.org</a>

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#### <u>MEMORANDU</u>M

TO: JACKIE ROBINSON WEST LITTLE LEAGUE

FROM: LITTLE LEAGUE BASEBALL, INCORPORATED

DATE: FEBRUARY 12, 2015

RE: ACTION OF THE CHARTER/TOURNAMENT COMMITTEE

After an extensive review of the operations of Jackie Robinson West Little League and Illinois District 4, the Little League International Charter/Tournament Committee has determined that the Jackie Robinson West Little League and Illinois District 4 Administrator knowingly violated Little League International Rules and Regulations by placing players on their team who did not qualify to play because they lived outside the league's boundaries.

The Charter/Tournament Committee has decided to vacate the league's wins from the 2014 Little League Baseball International Tournament, including its Great Lakes Regional and United States Championships, and suspend team manager, Darold Butler, from Little League activity. Illinois District 4 Administrator, Michael Kelly, has also been removed from his position. Jackie Robinson West Little League has been placed on probation with its tournament privileges suspended until such a time that new leadership in the positions of President, Anne Haley, and Treasurer, Bill Haley, have been elected or appointed, and that the league is fully compliant with all Little League International Regulations.

Little League International found that Jackie Robinson West Little League used a falsified boundary map for their 2014 tournament team, and that Jackie Robinson West Little League officials discussed with other leagues in Illinois District 4 to try to get the territory they wrongfully claimed was theirs for their 2014 tournament.

By default, the 2014 championships vacated by Jackie Robinson West Little League will be given to the other finalists in those games, with Mountain Ridge Little League (Las Vegas, Nev.) handed the 2014 United States Little League Baseball World Series Championship; New Albany (Ind.) Little League handed the 2014 Great Lakes Regional Little League Baseball Championship; Tri-Cities Little League (West Dundee, Ill.) given the 2014 Illinois State Little League Baseball Championship; Lansing (Ill.) Little League handed the 2014 Illinois Section 3 Little League Baseball Championship; and Rosemoor Little League (Chicago) given the 2014 Illinois District 4 Little League Baseball Championship.

Little League operations staff will be appointing a special advisor to Illinois District 4. The advisor will be a veteran District Administrator with knowledge of the Chicago area. The Little League operations staff and the special advisor will work with Illinois District 4 Officials and league leadership to ensure all operations and boundary issues fully comply with Little League International rules and regulations and properly communicated through the appropriate channels with the Little League Charter Committee, at which point, Jackie Robinson West Little League's probation will be lifted.

Please direct all inquiries concerning this matter to Patrick Wilson, Senior Vice President, Operations and Program Development.

# JRW Rival Denies Forging Documents So Chicago Kid Could Play In Evergreen Park

February 12, 2015 12:12 PM

**CHICAGO (CBS)** — The Evergreen Park Little League official whose raised concerns about the eligibility of some players on the Jackie Robinson West all-star team has vehemently denied allegations from a Chicago woman that Evergreen Park officials forged documents so her son could play there in 2011.

"We have never ever done that with anybody," Evergreen Park Little League vice president Chris Janes said Thursday.

According to broadcast reports, Renee Cannon-Young of Chicago claimed Evergreen Park Little League officials forged paperwork so her son could play there in 2011. She accused the league of hypocrisy, as Janes raised concerns about the eligibility some of of JRW's players after they won the Little League national title last summer.

On its way to the national title, Jackie Robinson West defeated the Evergreen Park team 43-2 in a slaughter-rule win in the sectional playoffs.

Little League officials have since stripped JRW of its national and regional titles, saying team officials used a bogus map to cover up the fact they were using ineligible players who lived outside the JRW boundaries.

Janes said the Evergreen Park league <u>does allow a few kids from Chicago to play on its teams</u> <u>during the regular season</u>, usually because their parents work in Evergreen Park, but he insisted those parents are warned up front their children are ineligible for official tournament all-star teams, because they don't live within the league's boundaries.

"Somebody dug up some garbage witness. They put up some garbage story, and it got on the news," he said. "We spent two days assassinating my character. That's fine, but I'll be damned if I let them go after a league that's been around for damn near 70 years, and hasn't done a g\*\*\*\*\*\*\* thing wrong. It's garbage, and it's wrong."

Janes said Evergreen Park officials never recruit players for their league.

"Kids sign up, we let them play," he said. "We don't recruit anybody. We never have. We have signups. We have like eight of them. People sign their kids up. If they meet the eligibility, we let them play."

He said the league keeps records of all its players, including where they live.

"Anybody who would like, submit a request. We'll sit down, we'll go over kid by kid. Ninety-nine percent of the kids in our league walk to practice. We take pride in it," he said.

Janes said he has received dozens of threatening phone calls since JRW was stripped of its title. He said he had his home phone number changed Wednesday after getting at least 52 messages.

"A lot of it was just expletive-laden rants, but some of them were 'I hope you die,' 'I hope you burn in hell,' things of that sort," he said.

# Evergreen Park whistleblower answers allegations of cheating

Posted: 02/12/2015, 01:40pm | Seth Gruen



Evergreen Park Athletic Association vice president Chris Janes — the whistleblower in the Jackie Robinson West saga — told the Sun-Times on Thursday his Little League has violated residency rules, but only so the league didn't have to turn kids away from its house league.

Janes stressed Evergreen Park has never violated residency rules in picking its All-Star teams, which is why the rules exist.

Renee Cannon-Young alleged on a Channel 7 report that her son, Jacoby, was recruited to play in the Evergreen Park Little League in 2011.

Janes said he "vaguely" remembers the child in question.

"Looking at him in the picture and trying to remember who he was, if he played in our league he was about 7 or 8 years old in 2011," Janes said.

Little League rules mandate that any participant in a given Little League must either live within the boundaries of that league or go to school within its boundaries. That rule includes a league's All-Star and house-league teams.

But Janes said that Evergreen Park isn't in the business of turning kids away from playing baseball.

"Full disclosure: There is a Little League rule buried somewhere that says if a kid doesn't live in your boundary, he shouldn't play baseball for you at all," Janes said. "Forget about tournament teams and all that. Every year, we have a handful of kids from Chicago that end up playing in our league. We're just like this oasis in the middle of Chicago," Janes said.

"What happens is we have a boatload of Chicago people that drive to Evergreen every day and work here, and as result, they drop their kids off either with another relative or in a day care facility in Evergreen. So every year we get a handful of folks saying, "We don't live here, but we'd like to play baseball for you here."

In each of those cases, Janes said that Evergreen Park Little League volunteers meet with each of those parents and explain that they will be allowed to play in their house league. But because they do not live inside the Evergreen Park Little League boundaries, they cannot play on any of Evergreen Park's All-Star teams.

"I will tell you 1,000 percent that we have never, ever, ever had a kid on one of our All-Star teams that wasn't in our boundaries," Janes said.

Janes said the volunteer who has the league's records is currently in California training for work. He declined to give the name of that person. Janes said when that person returns, he would be willing to provide the residency information of Evergreen Park's All-Star teams.

He said the Little League has told several talented players, who have played in the Evergreen Park house league, they could not participate on the All-Star teams.

While Janes did admit that Evergreen Park has in the past broken residency rules because he doesn't want to "turn anyone away" from playing in Evergreen Park's house league, it is widely understood that residency rules are in place primarily to create fairness among the All-Star teams.

House league teams play only within their own league. So Janes scoffs at the notion that Evergreen Park would have recruited the child in question — there's no benefit to recruiting for a house league.

"I have spent the last day and a half just absolutely getting my character assassinated," Janes said. "And you know what? That is fine. That's OK. That's fine. This Little League organization

here, it's been here for 60-plus years and has done nothing but good things for this community, and I'll be damned if I let some jerk try to tear it down."

Email: sgruen@suntimes.com

Twitter: @sethgruen

# Did Jackie Robinson West's punishment fit the offense?



Eric Zorn
CHICAGO TRIBUNE
ericzorn@gmail.com

FEBRUARY 12, 2015, 5:01 PM

here's evidently no question that the coaches and administrators who oversaw the Jackie Robinson West Little League team broke the rules when they assembled the team of plucky all-stars that stole our hearts last summer.

Not only did they poach players from neighboring districts, but they also tried retroactively to redraw district maps in an effort to fool those who were investigating allegations against the team, according to news reports.

This wasn't a case of honest confusion about where some kids lived but a case of outright fraud committed in an effort to stack the team for tournament play.

Not to pile on, but shame on them. Little League regulations are an effort, however vain, quaint and seemingly arbitrary, to preserve the "our community's kids against your community's kids" spirit that animates youth sports at its best.

Ringers are the bane of friendly competition, which is what Little League is supposed to be all about.

And any time ringers join a team, they shoulder aside eligible players who either don't make the team or are denied playing time.

Someday we may learn the identity of the "several children" who played for Jackie Robinson West during its national championship run last summer even though they lived outside district boundaries. But we'll almost certainly never learn the identity of the players who were cut from that squad to make room for the outsiders.

Beyond that, though, is a question that strikes me as sharply relevant to the calibration of our civic indignation:

Did this cheating give the JRW team an unfair advantage in the tournament?

Much of the coverage of this sad tale has assumed so, as the expression "unfair advantage" crops up repeatedly.

It assumes that, in having an illicitly larger district, JRW was able to draw on a larger population of eligible boys than was available to the other teams in the tournament.

Logically though not inevitably, an all-star team drawn from a larger population area will have a talent advantage

over an all-star team drawn from a smaller population area.

So did JRW's bogus district have more people in it — or more young ballplayers — than the district that defines Las Vegas Mountain Ridge, the runner-up team that was awarded the national championship Wednesday when Little League International stripped JRW of all its tournament victories?

Did JRW draw on a bigger talent pool than the team from South Korea that beat them in the final game?

The query is relevant because it addresses the key issue of significance.

Was JRW's sin closer to a technical violation — like wearing steel cleats or having a bat that's one inch too long — that would give the team such a minor advantage that it wouldn't require ripping up the record books?

Think of "Deflategate," for example, the controversy over the New England Patriots' use of less-than-fully-inflated footballs in a playoff game. Not good. But not a cause for the NFL to nullify the Patriots' victory in that game or the subsequent Super Bowl.

Or think of all the admitted spitballers and steroid users who've played in Major League Baseball. Their teams' victories remain on the record.

Or was JRW's sin closer to a scandal — like doctoring birth certificates in order to use 15-year-old players when the age limit is 13 — that would obviously create an "unfair advantage" to undermine the fundamental integrity of the competition?

Little League International did not return my repeated requests for this information Thursday afternoon.\*

My follow-up question would have been: Are league sleuths now intending to conduct a similar audit of the Las Vegas and South Korean rosters?

Because if lack of geographical roster integrity is a disqualifying offense — if it gives a team not simply an advantage but a manifestly *unfair* advantage, it would be only fair to make sure that all rule-breakers are equally sanctioned.

Absent this comprehensive level of scrutiny on all the teams in the tournament and given the impossibility of knowing which team would have won the national championship if JRW had never entered, a better resolution comes to mind:

Little League should plant a big asterisk next to JRW's record, institute a lifetime ban on the adults responsible for the roster shenanigans and, next time, perform due diligence before the series begins, and the potential for heartbreak, embarrassment and rage soars.

Twitter @ericzorn

\*After my deadline, Little League spokesman Brian McClintock sent me the same no-comment comment that he sent to many other reporters. It read:

"Little League International stands by the difficult decision that was announced on February 11.

As Jackie Robinson West Little League has retained counsel, we will not be granting any additional media interviews or issuing additional public statements for the time being. Little League International will be working with its counsel to ensure Jackie Robinson West Little League officials and their attorney are fully educated regarding the factual basis of the

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# On Jackie Robinson West and Coming to Terms With the Use (or Misuse) of Public Data

BY JESSICA MCKENZIE | Friday, February 13 2015



These are boundaries in Chicago. (urbanoasis.org)

Earlier this week a Little League baseball team was stripped of their championship title because of a whistleblower. That is what Chris Janes is: a concerned citizen who perceived an injustice and acted accordingly, trawling through public records until he had the evidence to take to the appropriate authorities. So why does his triumph make people feel so bad?

To be clear: this was no David and Goliath story. Jackie Robinson West made history last year as the first all-black Little League team to win the national title. A Chicago Magazine story heralding the team as Chicagoans of the Year characterized them as "a collection of no-name underdogs [transformed] to a national phenomenon." Their dethroning is a devastating disappointment for the city and for their fans (even President Obama has reaffirmed his support for the kids).

Chris Janes is the Vice President of the Evergreen Park Athletic Associations and the Little League coach of a rival team that lost a game to Jackie Robinson West 43 – 2 in just four innings last year. Janes says he noticed, as the team began garnering praise from media outlets and local politicians, that people from the suburbs "were laying claims to these kids." Little League teams are supposed to be made up only of kids who live or attend school within specific geographic areas. Janes found that some of the Jackie Robinson West players were from adjacent suburbs.

"We worked diligently, we found a bunch of records, voter registration, vehicle registration, things of that sort and we submitted the complaint," Janes told ABC7 Chicago. He took that information to Little League International, pushing for the investigation that eventually led to the decision to strip the team of the title and belatedly award it to a team from Las Vegas, formerly the runners-up.

"The Evergreen Park coach is a regular resident who used public data to answer a question— to achieve his civic goals," writes Daniel O'Neil, executive director of the civic organization Smart Chicago Collaborative, in an email to techPresident.

I asked O'Neil both for his thoughts as a Chicagoan and as a civic technologist who encourages others to use public data for public good. He responds, "This is reasonably construed as civic engagement. He is also a legit whistleblower, in every sense of the word. What he alleged is true. He used public facts to bring information to the attention of the Association, in an attempt to address a rule violation."

"It just doesn't feel good," O'Neil adds.

At best, Chris Janes' critics call him a sore loser. At worst, they send him death threats.

At a press conference this week, Rev. Jesse Jackson and Rev. Michael Pfleger asked whether Chris Janes' actions were motivated by racism.

"When you're going over to voter registration and going to birth certificates and doing all this time of hunting and a witch hunt that's been going on for the last number of months," Pfleger said, "I can't help but wonder the question if the same thing would have been done with another team from another place, another race."

Jackson was more succinct: "Is this about boundaries or race?"

## Let's Talk About Boundaries, Briefly

Perhaps this title loss wouldn't smart so much if Chicago didn't have a fraught history of using boundaries to segregate and oppress black communities. Practices like redlining and steering have made modern-day Chicago "America's most segregated city."

(This is not the place for a more in-depth treatment of these shameful practices and their impact. For more context, see Ta-Nehisi Coates' landmark *Atlantic* piece, "The Case for Reparations," and ProPublica's investigation into the US government's decades-long refusal to fight segregation through either neglect or outright sabotage.)

Segregation, it should go without saying, has a profound affect on quality of life, and access to things like education, health care and, yes, youth athletics.

Dave Zirin, The Nation magazine sports writer, argues:

The fact that the adults in charge of JRW felt the need to breach this rule [regarding boundaries] perhaps has something to do with the fact that today's urban landscape supports baseball about as well as concrete makes proper soil for orchids...In Chicago particularly, which under Mayor Rahm Emanuel has seen school closures and brutal cuts to physical education programs, their success made people believe that—with apologies to Tupac—flowers could in fact grow in concrete.

Zirin reached the Chicago Teachers Union Vice President Jesse Sharkey for comment:

Mayor Rahm closed half a dozen schools in Jackie Robinson West's part of the city, and tried to close the school, Marcus Garvey, where the founder of JRW—Joe Haley—worked. Then Chicago Public Schools cut funding for high school freshman sports, laid off a thousand teachers. CPS put forty kids in physical education classes and doesn't even put a librarian in most of the school libraries in [the South Side district of] Auburn Gresham.

In an opinion piece for Red Eye Chicago, Evan Moore referred to the same decision: "Remember when Mayor Emanuel closed 50 schools last year? Not only were schools closed, but after-school programs, including baseball, fell by the wayside as well."

Moore also alluded to the fact that one of the players was at one point homeless: "Let's not forget Jaheim Benton's living situation. Do you think his parents cared about residency rules when they were homeless?"

"Geography is often destiny," Daniel O'Neil wrote on his blog after he heard the decision. "We have to break that."

## Defending Public Data for Public Good

Reflecting further on the controversy for techPresident, O'Neil writes:

All of this (researching public records, doxing people, and fetishizing singular pieces of info) has been something I've been ruminating on for a while. We focus on so many things that lead to less joy. That have no relation to the will of the people. That merely leads to the glorification of individuals without regard to mass joy.

I see it every week—some new app/ new thing/ new fact that has nothing to do with the needs of the masses. Based on no discussion with regular residents, no methods of engagement that have any integrity. Instead, they are based on very a similar process we saw here—a single person (to our knowledge) taking it upon themselves to highlight particular facts in the vastness of public data....

As a movement, we have to talk more deliberately about what we want to make, and we have to see ourselves in the context of all users of public data—the scoundrels of [the] background check business, the deep-targeting of political campaigns, all of it.

Of course, not everything "civic" needs to be joyous. Life is hard. It's just that I believe in using data and technology to help people live together in large municipalities, to come together in joy to solve common problems.

The sad story of Jackie Robinson West is a reminder that the tools and resources that civic technologists want to give the world will not always be used in ways that they anticipated, or of which they approve. That, frankly, they just won't always be used for what one might call "good."

### Henderson Adam

The Insurance Center Building
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T 312.262.2900 | F 312.262.2901
Henderson Adam, LLC | www.hendersonadam.com

March 2, 2015

### VIA FACSIMILE

Courtney N. Beasley Office Associate Illinois State Police 801 South 7th Street Suite 300 S Springfield, Illinois 62703

Dear Ms. Beasley:

I represent 13 Illinois drivers who believe that their license plates and registrations may have been improperly accessed between July 1, 2014 and December 31, 2014. I am attaching a list of their license plate numbers and releases, which give me the authority to make this request on their behalf. Please, therefore, give me any and all information you can provide as it relates to who accessed their license plate information and when it was done. If there is other relevant information besides what I have requested, please share it. I can be reached at 312.262.2903. Thank you in advance for your help.

Very truly yours,

HENDERSON ADAM, LLC

Whilethe

Victor P. Henderson

VPH:smr Enclosures

### Henderson Adam

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March 3, 2015

### VIA FACSIMILE

Lisa Madigan Attorney General Office Of The Attorney General 100 West Randolph Street Chicago, IL 60601 Anita Alvarez State's Attorney Cook County State's Attorney 69 West Washington Suite 3200 Chicago, IL 60602

Re: Jackie Robinson West Little League, Inc.

Dear Attorney General and State's Attorney:

My firm has been retained to represent Jackie Robinson West Little League, Inc., as well as the parents and children who represented Chicago in the Little League World Series last summer. In that regard, several articles have appeared in the media which suggest that Chris Janes of Evergreen Park, Illinois and others may have improperly or illegally accessed public data. On page two of the enclosed article entitled, On Jackie Robinson West and Coming to Terms With the Use (or Misuse) of Public Data, Janes is quoted saying, "We worked diligently, we found a bunch of records, voter registration, vehicle registration, things of that sort and we submitted the complaint," Janes told ABC 7 Chicago.

Among other things, we are concerned that vehicle registration or license plate information was improperly or even illegally searched to determine where parents or children live and that this information was sent across state lines to Little League International in Williamsport, Pennsylvania; other information, including school records, may have also been improperly searched. Such acts, of course, could call into question violations of both federal and state law.

We have been informed that both the State and County have access to the Law Enforcement Agency Data Systems ("LEADS"), which may go back at least five years and can indicate who accessed vehicle registration information for any particular person and when they did so. Accordingly, I am sending you releases for the 13 parents and children who were on the JRW team that went to the World

Lisa Madigan and Anita Alvarez March 3, 2015 Page 2

Series. Please do not share the releases or the vehicle registration information that I am sharing as the information is private. I would ask that you determine from July 1, 2014 through December 31, 2014, whether any of the attached license plates were run, and by whom, and share that information with me. Or, if you cannot or will not share that information with me, I would ask that you conduct an investigation to determine whether such information was improperly accessed, used and disseminated. If so, then I would ask that your proceed accordingly.

I have sent these same releases to the General Counsel of Little League International, Thomas Marshall, asking him to give me any and all records he may have regarding the investigation conducted into the backgrounds of the parents and children. I will share with you whatever I receive from him.

If possible, please be kind enough to have someone in your office contact me in order to determine whether we need to take additional steps regarding this request. Thank you in advance for your assistance.

Very truly yours,

HENDERSON ADAM, LLC

Victor P. Henderson

VPH:smr

cc: Thomas C. Marshall, Esq. McNerney, Page, Vanderlin & Hall 433 Market Street Williamsport, PA 17701



# OFFICE OF THE ATTORNEY GENERAL STATE OF ILLINOIS

Lisa Madigan ATTORNEY GENERAL

May 4, 2015

Mr. Victor P. Henderson Henderson Adam, LLC 330 South Wells Street, Suite 300 Chicago, Illinois 60606

Master Sergeant Kerry Sutton Legal Counsel Illinois State Police 801 South 7th Street, Suite 1000-S Springfield, Illinois 62703

RE: FOIA Request for Review - 2015 PAC 34360

Dear Mr. Adam and Master Sergeant Sutton:

This determination is issued pursuant to section 9.5(f) of the Freedom of Information Act (FOIA) (5 ILCS 140/9.5(f) (West 2012), as amended by the Public Act 98-1129, effective December 3, 2014). For the reasons stated below, the Public Access Bureau concludes that the Illinois State Police (ISP) did not improperly deny Mr. Victor P. Henderson's March 2, 2015, FOIA request.

On that date, Mr. Henderson submitted a letter to ISP, along with signed releases, seeking all information that identified the person or persons who accessed the license plate information of 13 of his clients between July 1, 2014, and December 31, 2014, and when that information was accessed. ISP treated the letter as a FOIA request, and on March 11, 2015, ISP denied that request pursuant to section 7(1)(a) of FOIA (5 ILCS 140/7(1)(a) (West 2013 Supp.), as amended by Public Act 98-695, effective July 3, 2014), which exempts from disclosure "[i]nformation specifically prohibited from disclosure by federal or State law or rules and regulations implementing federal or State law." ISP asserted that disclosure of the information is specifically prohibited by Part 1240 of title 20 of the Administrative Code (20 Ill. Adm. Code Part 1240). Mr. Henderson disputes the denial of his request.

**EXHIBIT** 

Mr. Victor P. Henderson Master Sergeant Kerry Sutton May 4, 2015 Page 2

On March 27, 2015, this office sent a copy of the Request for Review to ISP and asked it to provide copies of the withheld records for our confidential review together with a detailed explanation of the factual and legal bases for the assertion of section 7(1)(a) of FOIA. In particular, this office asked ISP to clarify whether all the information relating to who accessed the requested license plate information and when it was accessed is maintained in the Law Enforcement Agencies Data System (LEADS). On April 7, 2015, ISP furnished the responsive records and stated in its written response that accessing license plate information, "as well as determining who accessed the information, is only possible by using" LEADS. In his reply to that response, Mr. Henderson contended that the records in question are subject to disclosure if the personal information of his clients was improperly accessed:

For example, if the information of all 13 [clients] was accessed on the same day or in the same time frame, and by the same law enforcement department or person, then that would establish that the information was improperly accessed, because there is no legitimate reason that all 13 [clients] would have had their license plate information accessed under such circumstances. The statute, of course, was not designed to protect improper or illegal activity.<sup>2</sup>

Mr. Henderson further stated that if his clients' information was lawfully accessed, the records he is seeking must be disclosed unless there is an ongoing criminal investigation because his clients have a constitutional right to know that they were the subject of an investigation that did not result in criminal charges.

### **DETERMINATION**

All public records in the possession or custody of a public body are "presumed to be open to inspection or copying." 5 ILCS 140/1.2 (West 2012); see also Southern Illinoisan v. Illinois Dept. of Public Health, 218 Ill. 2d 390, 415 (2006). A public body "has the burden of proving by clear and convincing evidence" that a record is exempt from disclosure. 5 ILCS 140/1.2 (West 2012).

Section 1240.80(d) of title 20 of the Administrative Code (20 Ill. Adm. Code § 1240.80(d) (2012), old Part repealed and new Part adopted at 23 Ill. Reg. 7521, effective June

<sup>&</sup>lt;sup>1</sup>Letter from Master Sergeant Kerry Sutton, Legal Counsel, Illinois State Police, to Steve Silverman, Assistant Bureau Chief, Public Access Counselor, Office of the Attorney General (April 7, 2015).

<sup>&</sup>lt;sup>2</sup>Letter from Victor P. Henderson, Henderson Adam, LLC, to Steve Silverman, Assistant Bureau Chief, Public Access Bureau, Office of the Attorney General (April 20, 2015).

Mr. Victor P. Henderson Master Sergeant Kerry Sutton May 4, 2015 Page 3

18, 1999) provides that "LEADS data shall not be disseminated to any individual or organization that is not legally authorized to have access to the information." That provision implements the Criminal Identification Act (20 ILCS 2630/0.01 et seq. (West 2012)).

The Public Access Bureau has previously determined that information generated by LEADS – including the names of the agencies and individuals who requested the information and the time and date of the queries – is exempt from disclosure pursuant to section 7(1)(a) of FOIA based on section 1240.80(d) of title 20 of the Administrative Code. Ill. Att'y Gen. PAC Req. Rev. Ltr. 12865, issued June 2, 2011. That provision, which expressly prohibits the disclosure of LEADS data to unauthorized parties, contains no exception for data related to queries that did not result in criminal charges. Even if the provision could be construed to permit the disclosure of LEADS data generated for improper purposes, there is no indication from this office's review of the records that the license plate information was accessed in the manner Mr. Henderson suggested or obtained for an improper or illegal activity.

Accordingly, because an administrative rule implementing a State law specifically prohibits disclosure of LEADS data, we conclude that ISP has sustained its burden of demonstrating that the records in question are exempt from disclosure pursuant to section 7(1)(a) of FOIA.

The Public Access Counselor has determined that resolution of this matter does not require the issuance of a binding opinion. If you have any questions, please contact me at (312) 814-6756. This letter serves to close this file.

Very truly yours,

STEVE SILVERMAN Assistant Bureau Chief Public Access Bureau

34360 f 71a proper sa pd

# 18 U.S. Code § 2721 - Prohibition on release and use of certain personal information from State motor vehicle records

Current through Pub. L. <u>113-296</u>, except <u>113-287</u>, <u>113-291</u>, <u>113-295</u>. (See <u>Public Laws for the current Congress</u>.)

- US Code
- Notes

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- (a) **In General.** A State department of motor vehicles, and any officer, employee, or contractor thereof, shall not knowingly disclose or otherwise make available to any person or entity:
- (1) personal information, as defined in <u>18</u> U.S.C. <u>2725 (3)</u>, about any individual obtained by the department in connection with a motor vehicle record, except as provided in subsection (b) of this section; or
- (2) highly restricted personal information, as defined in  $\underline{18}$  U.S.C.  $\underline{2725}$  (4), about any individual obtained by the department in connection with a motor vehicle record, without the express consent of the person to whom such information applies, except uses permitted in subsections (b)(1), (b)(4), (b)(6), and (b)(9): Provided, That subsection (a)(2) shall not in any way affect the use of organ donation information on an individual's driver's license or affect the administration of organ donation initiatives in the States.
- **(b) Permissible Uses.—** Personal information referred to in subsection (a) shall be disclosed for use in connection with matters of motor vehicle or driver safety and theft, motor vehicle emissions, motor vehicle product alterations, recalls, or advisories, performance monitoring of motor vehicles and dealers by motor vehicle manufacturers, and removal of non-owner records from the original owner records of motor vehicle manufacturers to carry out the purposes of titles I and IV of the Anti Car Theft Act of 1992, the Automobile Information Disclosure Act (15 U.S.C. 1231 et seq.), the Clean Air Act (42 U.S.C. 7401 et seq.), and chapters 301, 305, and 321–331 of title 49, and, subject to subsection (a)(2), may be disclosed as follows:
- (1) For use by any government agency, including any court or law enforcement agency, in carrying out its functions, or any private person or entity acting on behalf of a Federal, State, or local agency in carrying out its functions.
- (2) For use in connection with matters of motor vehicle or driver safety and theft; motor vehicle emissions; motor vehicle product alterations, recalls, or advisories; performance monitoring of motor vehicles, motor vehicle parts and dealers; motor

vehicle market research activities, including survey research; and removal of nonowner records from the original owner records of motor vehicle manufacturers.

- (3) For use in the normal course of business by a legitimate business or its agents, employees, or contractors, but only—
- (A) to verify the accuracy of personal information submitted by the individual to the business or its agents, employees, or contractors; and
- **(B)** if such information as so submitted is not correct or is no longer correct, to obtain the correct information, but only for the purposes of preventing fraud by, pursuing legal remedies against, or recovering on a debt or security interest against, the individual.
- (4) For use in connection with any civil, criminal, administrative, or arbitral proceeding in any Federal, State, or local court or agency or before any self-regulatory body, including the service of process, investigation in anticipation of litigation, and the execution or enforcement of judgments and orders, or pursuant to an order of a Federal, State, or local court.
- (5) For use in research activities, and for use in producing statistical reports, so long as the personal information is not published, redisclosed, or used to contact individuals.
- **(6)** For use by any insurer or insurance support organization, or by a self-insured entity, or its agents, employees, or contractors, in connection with claims investigation activities, antifraud activities, rating or underwriting.
- (7) For use in providing notice to the owners of towed or impounded vehicles.
- (8) For use by any licensed private investigative agency or licensed security service for any purpose permitted under this subsection.
- (9) For use by an employer or its agent or insurer to obtain or verify information relating to a holder of a commercial driver's license that is required under chapter 313 of title 49.
- (10) For use in connection with the operation of private toll transportation facilities.
- (11) For any other use in response to requests for individual motor vehicle records if the State has obtained the express consent of the person to whom such personal information pertains.
- (12) For bulk distribution for surveys, marketing or solicitations if the State has obtained the express consent of the person to whom such personal information pertains.
- (13) For use by any requester, if the requester demonstrates it has obtained the written consent of the individual to whom the information pertains.
- (14) For any other use specifically authorized under the law of the State that holds the record, if such use is related to the operation of a motor vehicle or public safety.
- (c) Resale or Redisclosure.— An authorized recipient of personal information (except a recipient under subsection (b)(11) or (12)) may resell or redisclose the information only for a use permitted under subsection (b) (but not for uses under subsection (b)(11) or (12)). An authorized recipient under subsection (b)(11) may resell or redisclose personal information for any purpose. An authorized recipient under

subsection (b)(12) may resell or redisclose personal information pursuant to subsection (b)(12). Any authorized recipient (except a recipient under subsection (b)(11)) that resells or rediscloses personal information covered by this chapter must keep for a period of 5 years records identifying each person or entity that receives information and the permitted purpose for which the information will be used and must make such records available to the motor vehicle department upon request.

- (d) Waiver Procedures.— A State motor vehicle department may establish and carry out procedures under which the department or its agents, upon receiving a request for personal information that does not fall within one of the exceptions in subsection (b), may mail a copy of the request to the individual about whom the information was requested, informing such individual of the request, together with a statement to the effect that the information will not be released unless the individual waives such individual's right to privacy under this section.
- **(e) Prohibition on Conditions.** No State may condition or burden in any way the issuance of an individual's motor vehicle record as defined in <u>18</u> U.S.C. <u>2725 (1)</u> to obtain express consent. Nothing in this paragraph shall be construed to prohibit a State from charging an administrative fee for issuance of a motor vehicle record.

### Section 2722. Additional unlawful acts

- (a) Procurement for Unlawful Purpose -- It shall be unlawful for any person knowingly to obtain or disclose personal information, from a motor vehicle record, for any use not permitted under section 2721(b) of this title.
- (b) False Representation -- It shall be unlawful for any person to make false representation to obtain any personal information from an individual's motor vehicle record.

### Section 2723. Penalties

- (a) Criminal Fine -- A person who knowingly violates this chapter shall be fined under this title.
- (b) Violations by State Department of Motor Vehicles -- Any State department of motor vehicles that has a policy or practice of substantial noncompliance with this chapter shall be subject to a civil penalty imposed by the Attorney General of not more than \$5,000 a day for each day of substantial noncompliance.

### Section 2724. Civil action

- (a) Cause of Action -- A person who knowingly obtains, discloses or uses personal information, from a motor vehicle record, for a purpose not permitted under this chapter shall be liable to the individual to whom the information pertains, who may bring a civil action in a United States district court.
- (b) Remedies -- The court may award --
- (1) actual damages, but not less than liquidated damages in the amount of \$2,500;
- (2) punitive damages upon proof of willful or reckless disregard of the law;
- (3) reasonable attorneys' fees and other litigation costs reasonably incurred; and
- (4) such other preliminary and equitable relief as the court determines to be appropriate.

# CITTLE LEAGUE.org





FOR ALL DIVISIONS OF LITTLE LEAGUE BASEBALL®

### SIGNIFICANT CHANGES FOR 2014

(NOTE: Unless noted otherwise, these apply to all baseball divisions)

Residence Eligibility Requirements – Modified residency to include players who attend a school physically located in the league boundaries. Pages 16–17.

### REGULATIONS

Regulation I(c)(9) – Modified Note 1 and 2 to highlight options if the Sex Offender Registry becomes unavailable. Page 25.

Regulation II — Modified residency to include players who attend a school physically located in the league boundaries. Page 30.

Regulation IV(g) – Revised wording to have player data submitted by April 1. Page 37.

Regulation VI(d) — Revised the pitching threshold exception to include if the game is completed. Page 40.

Regulation IX(f) – Added language allowing Tournament teams to participate in Special Games two weeks prior to the start of tournament within their respective division. Page 44.

Regulation XIV(e) – Revised wording to prohibit the possession of firearms and use of cigarettes on the playing field, benches or dugouts. Page 46.

### TOURNAMENT RULES AND GUIDELINES

Tournament Eligibility Affidavit – Removed wording mandating a Tournament team carry copies of players' birth certificates. Page T-4.

League Eligibility – Removed wording mandating Regular Season rosters be submitted by April 1. Page T-5.

Tournament Rule 4(e) – Revised the pitching threshold exception to include if the game is completed. Page T-13.

Financial Responsibility – Revised language concerning travel of 150 miles or more to the Section level and beyond for one roundtrip. Page T-20.

### APPENDIX

Appendix F – Revised the Privacy Policy to include information about website cookies.

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## Your League Receives 125 Free Background Checks Per Year

Each year, Little League' International provides 125 free background checks. Information on how to utilize this benefit, as well as how to conduct background checks, can be found on the Little League website at:

 $http://www.LittleLeague.org/Learn\_More/programs/childprotection.htm$ 

LITTLE LEAGUE® BASEBALL Incorporated P.O. Box 3485, Williamsport, PA 17701 (570) 326-1921

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### LITTLE LEAGUE FIELD CENTERS

Little League Field Centers are fully staffed year round to provide assistance and direction to Little League volunteers. All general questions, written suggestions for improving this rulebook, tournament inquiries, rule interpretation requests and supply orders should be directed to the appropriate field center in your region as indicated.

### **U.S. REGIONS**

Central Region Hdqts. 9802 E. Little League Drive Indianapolis, IN 46235 PHONE: 317-897-6127 FAX: 317-897-6158

E-MAIL:

centralregion@LittleLeague.org

Eastern Region Hdqts. PO Box 2926 Bristol, CT 06011 PHONE: 860-585-4730 FAX: 860-585-4734 E-MAIL:

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Western Region Hdqts. 6707 Little League Drive San Bernardino, CA 92407 PHONE: 909-887-6444 FAX: 909-887-6135

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westregion@LittleLeague.org

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southeastregion@LittleLeague.org

Southwestern Region Hdqts. 3700 South University Parks Drive Waco, TX 76706 PHONE: 254-756 1816

FAX: 254-757-0519 E-MAIL:

southwestregion@LittleLeague.org

To access Little League on the Internet: www.LittleLeague.org

Tournament Rules and Guidelines for
Little League Baseball, 9-10 Year Old Division Baseball,
10-11 Year Old Division, Intermediate (50-70) Division, Junior League, Senior
League and Big League Baseball

### Points of Emphasis in Bold Italic

Tournament play started in Little League in 1947. Conduct of tournament play by District Administrators began in 1956 following the first Little League International Congress. Today, responsibility for scheduling and supervising all district tournament games comes under jurisdiction of the District Administrator. Little League International has the right to appoint Tournament Directors at other levels of tournament play.

The Tournaments of Little League have grown year by year until today they have become the outstanding, in fact, the only exposure that the majority of the public sees. In many cases, they are the criterion by which Little League is judged. Proper conduct at tournament time imposes a large responsibility upon all concerned. Good judgment and exemplary disciplines are demanded if Little League tournaments of the future are to remain worthwhile in the public esteem.

The Little League Baseball Tournament, 9 10 Year Old Division Baseball Tournament, 10:11 Year Old Division Baseball Tournament, Intermediate (50-70) Division, Junior League, Senior League and Big League Baseball Tournaments are authorized by the Little League International Board of Directors. Leagues which exercise the option to participate in Tournament Play must pledge they will do so with full knowledge of the rules and in agreement that the rules will be upheld.

Rules: Except where noted in these Tournament Rules and Guidelines, the Little League Baseball Regulations and Playing Rules will be used in the conduct of the 9-10 Year Old Division Tournament, the 10-11 Year old Division Tournament, the Little League Baseball Tournament, Intermediate (50-70) Division, Junior League, Senior League and Big League Baseball Tournaments.

9-10 Year Old Division & 10-11 Year Old Division: The objective of the 9-10 Year Old Division & 10-11 Year Old Division Tournament is to provide nine and ten year old players, and ten and eleven year old players, the opportunity to participate in a baseball tournament at the District, Sectional, and State levels at the conclusion of the regular season. Leagues are strongly encouraged to place the maximum number of players (14) on the Tournament Affidavit, thereby giving more players the opportunity to participate.

### Responsibility and Chain of Command

It should be clearly understood by Tournament Directors and league presidents that operation of the annual tournaments in Little League come under a different authority and jurisdiction from that normally observed during the playing season. It is, in fact, a whole new ball game. Once the tournament season starts, authority is vested solely in the Tournament Committee at Williamsport.

There will be no waivers or resorting to local rules or other variation unless granted explicitly from Williamsport. To administer the tournament properly and scale down thousands of teams to two finalists in the limited time afforded by the tournament season is an undertaking requiring considerable disciplines.

Once the tournament starts, it must proceed without interruption. If protests or disputes occur which cannot be settled by the umpires or

Tournament Director through immediate and concise application of the rules, an appeal must be made through proper channels promptly to prevent a major blockage or loss of momentum.

Revocation of tournament privileges or forfeiture of a tournament game may be decided only by the Tournament Committee at Williamsport. Should a problem arise that cannot be resolved while a game is in progress, the game must be suspended by the umpire-in-chief and the problem referred immediately to the Tournament Director. If not resolved, it must be referred to the Regional Director. If still unresolved, it will be referred to the Tournament Committee in Williamsport. If the Tournament Committee deems any player to be ineligible, by league age, residency, participation in other programs, or participation in less than sixty (60) percent the regular season games, it may result in forfeiture of tournament game(s), and/or suspension or removal of personnel from tournament play, and/or suspension or removal of teams from further Little League activities, and/or suspension or revocation of the local league's charter. These actions can only be taken by the Tournament Committee in Williamsport.

The Tournament Committee and the individual Regional Directors may appoint agents to act on their behalf, and any person so appointed shall have the authority to act as, and exercise the duties of, the Tournament Committee or the individual Regional Directors.

The Tournament Committee also reserves the right in its sole discretion to impose any of the above penalties if, in its judgment, any player, manager or coach displays unsportsmanlike conduct or repeatedly/willfully violates any rules, regulations or policies contained herein during the game, at the game site, or at any event related to the International Tournament. The committee also reserves the right to impose any penalty the committee deems appropriate, if the committee determines action is necessary to correct a situation brought to its attention, regardless of the source of that information. The decision of the Tournament Committee is final and binding.

Knowledge of the rules must be guaranteed before a Tournament Director is declared qualified. All Tournament Directors will undergo a thorough and instructive briefing session prior to taking on their duties, must signify that they understand the rules and regardless of personal feelings, they are in full agreement and can interpret them properly. At the time of the district tournament meeting, it will be required that each league president or the representative in attendance signify that the league and tournament team managing personnel are knowledgeable of Tournament Rules and are in full agreement with these conditions.

### Selection of Tournament Teams (Recommended Method)

Little League would gain immeasurably in esteem of the public if all tournament teams were selected by the players themselves. Players relish the challenge of competition, but their anxiety to excel is in balance with an intuitive respect and admiration for teammate and opponent alike who demonstrate superior ability and skill.

- It is not required that players be selected for the position they occupy during the regular season. For example, a pitcher who is also a good outfielder or infielder may be placed on the roster and used in whatever position the manager deems to be of advantage.
- Tournament team candidates should be selected upon their playing ability and eligibility. The roster should include sufficient pitching strength to meet tournament schedules.

3. The following plan was presented to the International Congress, Washington, D.C., 1965, as a guideline, taken from the experience of the International Advisory Council. The principle is to have all components of a league determine and participate in fair and democratic selection of the tournament team. This would eliminate many of the complaints, abuses, pressures and charges of favoritism which are directed toward the league president. The following groups should each select its tournament team.

Group 1 - Players

Group 2 - League Officers

Group 3 - Team Managers

Group 4 - Team Coaches

Group 5 - Volunteer Umpires

Every player on the eligible teams is entitled to vote. Each group submits its list of players at a meeting of the board of directors of the league. The names are to be read and counted from each of the groups, and the players in the order of total votes received will become eligible for the tournament team.

Where more than one player has an equal number of votes to qualify for the

Where more than one player has an equal number of votes to qualify for the last position or positions, final selection should be made by a majority vote of the board of directors at the time of the meeting.

**NOTE:** Method of selection is to be determined by the local league board of directors.

### TOURNAMENT ORGANIZATION

### Teams

Each chartered league shall be eligible to enter a team. Alternates are not authorized.

(NOTE: In the 9-10 Year Old Division and 10-11 Year Old Division, a league may enter more than one tournament team with the District Administrator's approval.)

Where two or more charters have combined to form a single program, a tournament team must be selected for each charter composed of players from within its own chartered area. Exceptions can only be made by the Charter Committee.

Tournament teams and Eligibility Affidavit shall consist of, and must be limited to, a maximum of fourteen (14) players, one (1) manager and a maximum of two (2) coaches.

Senior League: Teams and Eligibility Affidavit shall consist of, and must be limited to, a maximum of sixteen (16) players, one (1) manager and a maximum of two (2) coaches.

**Big League:** Tournament teams may be selected from all league teams in a district or may be a regular season unit team. Teams and Eligibility Affidavit shall consist of, and must be limited to, a maximum of seventeen (17) players, one (1) manager and a maximum of two (2) coaches.

### **Managers and Coaches**

The president of the league, the District Administrator or District Staff shall not serve as manager or coach.

Little League: The manager and coach(es) shall be regular season team managers and/or coaches from the Little League Baseball (Majors) Division.

**9-10 Division & 10-11 Year Old Division:** The manager and coach(es) shall be regular season team managers and/or coaches from the Little League Baseball (Majors) Division or Minor League Division.

Intermediate (50-70) Division: The manager and coach(es) shall be regular season team managers and/or coaches from the Intermediate (50-70) Division.

Junior League: The manager and coach(es) shall be regular season team managers and/or coaches from the Junior Division or Senior Division.

Senior League: The manager and coach(es) shall be regular season team managers and/or coaches from the Junior Division, Senior Division or Big League Division.

Big League: The manager and coach(es) shall be regular season team managers and/or coaches from the Senior Division or Big League Division.

### **Umpires**

The Tournament Director shall have full responsibility for providing volunteer Little League umpires for tournament play. Umpires from leagues involved in the game should not be assigned. The District Administrator shall not umpire.

There should be at least two umpires in each game. More are recommended when available.

The designated Umpire-in-Chief for each game must be an adult.

### **Tournament Eligibility Affidavit**

It shall be the league president's responsibility to review and certify the birth records (league age) by viewing the original birth record and residence (as defined by Little League Baseball, Incorporated) of all players. When the league finally decides on the makeup of the team, names must be entered on the league's Eligibility Affidavit. Once the District Administrator certifies the Eligibility Affidavit, the tournament team will be required to have in its possession:

- 1. the Eligibility Affidavit:
- a map showing the actual boundaries of the league, with locations noted for the residences of the parent or legal guardian (court appointed) or location of the school for every participant named on the affidavit:
- 3. tournament verification form for each player (strongly recommended);
- three or more documents to determine residency of the parent(s) or legal guardian (court appointed) or a document to support school attendance/ enrollment for each player named on the tournament affidavit;
- waivers (i.e. II(d), IV(h), Charter Committee, etc...)

IMPORTANT: Alternates are not authorized. They shall not accompany the team and shall not be listed on the Eligibility Affidavit.

Eligibility Affidavit must be certified by the District Administrator or his or her designated appointee and presented by the team manager to the Tournament Director before every game. Each Tournament Team must have twelve (12) eligible players for the District Administrator to certify. EXCEPTION: A District Administrator may certify the Eligibility Affidavit for those teams that provide a justifiable reason for not having twelve (12) players. NOTE: The Eligibility Affidavit becomes official once the team plays its first tournament game.

### Participation In Other Programs

Participation in other programs during the International Tournament is permitted, subject to the provisions of Regulation IV (a) NOTE 2.

### Release of Names

The release of names of players selected for the tournament team shall not be made before June 15, or two weeks prior to the start of the tournament within their respective division (whichever is earlier), and not until the availability and eligibility of all prospective team members have been

### CONDITIONS OF TOURNAMENT PLAY

### Protests

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This rule replaces Rule 4.19.

No protest shall be considered on a decision involving an umpire's judgment. Equipment which does not meet specifications must be removed

### Protest shall be considered only when based on:

### The violation or interpretation of a playing rule;

When a manager claims that a decision is in violation of the playing rules, the following steps must be taken:

- A formal (verbal) protest must be made to the umpire-in-chief at once by the manager or coach.
- The umpire-in-chief must immediately call a conference of all umpires working the game.
- If the problem cannot be resolved to the satisfaction of the managers, the umpire-in-chief shall be required to consult with the Tournament Director or District Administrator.
- If the managers do not accept the decision of the Tournament Director, either manager may elect, without penalty, to discontinue play until the matter is referred to the Regional Headquarters. Either the umpire-in-chief, Tournament Director or District Administrator will call the Regional Headquarters at this time.
- If the managers do not accept the decision of the Regional Director (or his/her designated agent), either may insist that the matter be referred to the Tournament Committee in Williamsport. The decision of the Tournament Committee shall be final and binding.
- NOTE 1 PROTESTS INVOLVING PLAYING RULES NOT RESOLVED BEFORE THE NEXT PITCH OR PLAY SHALL NOT BE CONSIDERED.
- NOTE 2 UMPIRES, TOURNAMENT DIRECTORS AND DISTRICT ADMINISTRATORS DO NOT HAVE THE AUTHORITY TO DECLARE A FORFEITURE UNDER ANY CIRCUMSTANCES.

### The use of an ineligible pitcher.

Ineligibility under this rule applies to violations of Tournament Playing Rule 4. If an ineligible pitcher delivers one or more pitches to a batter, that game is subject to protest and action by Tournament Committee in Williamsport.

- If the facts establishing or verifying an ineligible pitcher become known DURING a game, and the ineligible pitcher participates in the game, subject to the following conditions:
  - (a) A protest may be lodged by the manager or coach with the umpire-in-chief, who shall consult with the Tournament Director or District Administrator.
  - The Tournament Director or District Administrator must contact the Regional Director (or his/her appointed agent), who shall contact the Tournament Committee for a decision. The decision of the Tournament Committee shall be final and binding.
- If the facts establishing or verifying an ineligible pitcher become known AFTER a game, and the ineligible pitcher participated in the game, subject to the following conditions:

- (a) A protest may be lodged by the manager or coach with the Tournament Director or District Administrator. Such protest must be made before either team affected by the protest begins another game.
- (b) The Tournament Director or District Administrator must contact the Regional Director (or his/her appointed agent), who shall contact the Tournament Committee for a decision. The decision of the Tournament Committee shall be final and binding.

### C. The use of an ineligible player.

Ineligibility under this rule applies to league age, residence (as defined by Little League Baseball, Incorporated), participation in other programs, participation as an eligible player for sixty (60) percent of the regular season in the proper division, or violation of Regulation I-XVII.

- If the facts establishing or verifying the ineligibility of a player are known to the complainant PRIOR TO the game, the following steps must be taken:
  - (a) The complainant shall present the matter to the Tournament Director and/or District Administrator.
  - (b) The matter SHALL be resolved with the Regional Director and, through the Regional Director and the Tournament Committee BEFORE the first pitch of the game. The decision of the Tournament Committee shall be final and binding.
- 2. If the facts establishing or verifying an ineligible player become known **DURING** a game, and the ineligible player participates in the game, subject to the following conditions:
  - (a) A protest may be lodged by the manager or coach with the umpire-in-chief, who shall consult with the Tournament Director or District Administrator.
  - (b) The Tournament Director or District Administrator must contact the Regional Director (or his/her appointed agent), who shall contact the Tournament Committee for a decision. The decision of the Tournament Committee shall be final and binding.
- 3. If the facts establishing or verifying the ineligibility of a player become known AFTER a game, and the ineligible player participated in the game, that team shall forfeit the game in question, subject to the following conditions:
  - (a) A protest may be lodged by the manager or coach with the Tournament Director or District Administrator. Such protest must be made before either team affected by the protest begins another game.
  - (b) The Tournament Director or District Administrator must contact the Regional Director (or his/her appointed agent), who shall contact the Tournament Committee for a decision. The decision of the Tournament Committee shall be final and binding.

In addition to the penalties described above in A, B, and C, the Tournament Committee may disqualify a player, team or entire league from tournament play. The Tournament Committee may take action as a result of a protest or on its own initiative. Disqualification of a team or player(s) and/or forfeiture of a game must be the decision of the Tournament Committee at

Williamsport, and such decisions will be made prior to the continuation of the affected team(s) or player(s) in further tournament play.

NOTE 1: All officials, including all managers, coaches, scorekeepers, umpires, Tournament Directors, District Administrators, etc., should make every effort to prevent a situation that may result in the forfeiture of a game or suspension of tournament privileges. However, failure by any party to prevent such situations shall not affect the validity of a protest.

### Must Play To Advance

A team shall not advance from one level of Tournament to a higher level of tournament play without first having competed against and defeated a scheduled opponent at the tournament level from which it is seeking to advance. Any team advancing without play must do so with the approval of the Regional Director.

### TOURNAMENT PLAYING RULES

The Little League, Intermediate (50-70) Division, Junior League, Senior League and Big League Baseball Playing Rules shall govern tournament play except as noted below:

- BASEBALLS: Buseballs licensed by Little League with the "RS T" (regular season and tournament) designation must be used.
   NOTE: The preferred ball of tournament play is Little League licensed Spalding\* brand RS-T baseballs. Specific models for tournament play can be found here: www.LittleLeague.org/tournamentballs.
- 2 FIELDS: All fields are considered neutral. The home team shall be determined by the toss of a coin, the winner having the choice.
- PLAYING RULES: A copy of the Little League, Intermediate (50-70) Division, Junior League, Senior League and Big League Baseball Regulations and Playing Rules and the Tournament Rules and Guidelines must be available at each tournament site and at the time the game is to be played. This is the responsibility of the Tournament Director. Written ground rules established by the Tournament Director or assistant must be reviewed with both managers and umpire in chief at least ten (10) minutes before the start of the game. It is suggested the same be available to news media if requested.
  - a. In all Tournament levels and divisions, the penalty for use of an illegal bat [see Rule 6.06 (d)], if discovered before the next player enters the batter's box following the turn at bat of the player who used an illegal bat, is:
    - The batter is out (NOTE: The manager of the defense may advise the plate umpire of a decision to decline this portion of the penalty and accept the play. Such election shall be made immediately at the end of the play), and;
    - ii. The manager of the team will be ejected from the game, the batter who violated the rule will be ejected from the game, and the offensive team will lose one eligible adult base coach for the duration of the game.
  - b. 10-11 Tournament Division: The batter may advance on an uncaught third strike (6.05/6.09). This rule will not apply for the 9-10 Tournament Division.
- 4. PITCHING RULES LITTLE LEAGUE BASEBALL, 9-10 YEAR OLD, 10-11 YEAR OLD DIVISION, INTERMEDIATE (50-70) DIVISION AND JUNIOR LEAGUE These rules replace the regular season pitching regulations. Violation of these pitching rules is subject to protest and action by the Tournament

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- i. Failure to remove a pitcher who has reached his/her maximum number of pitches required by league age or use of an ineligible pitcher is basis for protest. Violation protested or brought to the attention of the Tournament Committee, shall result (by action of the Tournament Committee) in the suspension of the team's manager for the next two scheduled tournament games, even if those games are played at the next tournament level. Additional penalties (up to and including forfeiture of a game and/or disqualification of the team, managers or coaches from further tournament participation) may be imposed if, in the opinion of the Tournament Committee:
  - a manager or coach takes any action that results in making a travesty of the game,
  - a team fails to meet the requirements of this rule more than once during the International Tournament, which begins with District play and ends at the World Series level or;
  - a manager willfully and knowingly disregards the requirements of this rule.

A manager or coach suspended for any reason is not permitted to be at the game site and must not take any part in the game, nor have any communications whatsoever with any persons at the game site. This includes pregame and postgame activities. Violation may result, by action of the Tournament Committee, in further suspension, forfeiture of a game and/or disqualification of the team, managers or coaches from further tournament participation.

- 5. FORFEITS: No game may be forfeited or a team disqualified without the authorization of the Tournament Committee. Violations which may result in forfeiture or disqualification must be reported immediately to the Regional Director before further play takes place which would involve a team or teams affected by such action.
- BENCH/DUGOUT: No one except the players, manager and coach(es) shall occupy the bench or dugout during a game. Base coaches may be players or adults. Two (2) adult base coaches are permitted at all levels subject to playing rule 4.05 (2).
- 7. VISITS: A manager or coach may not leave a dugout for any reason during a game without receiving permission from an umpire. The manager or coach may be removed from the field for the remainder of the game for violation of this rule. When permission is granted the manager or coach will be permitted to go to the mound to confer with the pitcher or any defensive player(s). A manager or coach who is granted a time out to talk to any defensive player will be charged with a visit to the pitcher.

A manager or coach may come out twice in one inning to visit with the pitcher, but the third time out, the player must be removed as a pitcher. The manager or coach may come out three times in a game to visit with the pitcher, but the fourth time out, the player must be removed as a pitcher. The rule applies to each pitcher who enters a game.

NOTE: Only one offensive time-out will be permitted each inning.

- INJURY/ILLNESS: If a player is injured or becomes ill during a game, the
  decision of a doctor (if present) or medical personnel will be final as to
  whether or not the player may continue in the game.
- MANDATORY PLAY: 9-10 Year Old Division, 10-11 Year Old Division, Little League, Intermediate (50-70) Division, Junior League: If a tournament team has thirteen (13) or more eligible players in uniform at a game, then every player on a team roster shall participate in each game for a

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### REGIONAL DIRECTORS

The following Regional Directors or their appointed agents should be contacted by the Tournament Director when protests cannot be resolved at the tournament level.

### U.S. EAST

Director - Don Soucy; Assistant Director - Corey Wright; Assistant Director - Pat Holden P.O. Box 2926; Bristol, CT 06011; PHONE: 860 585-4730

### U.S. CENTRAL

Director - Nina Johnson; Assistant Director - Scott Spillman 9802 E. Little League Drive; Indianapolis, IN 46235 PHONE: 317-897-6127

### U.S. SOUTHEAST

Director - Jennifer Colvin; Assistant Director – Matt Weber PO Box 7557; Warner Robins, GA 31095; PHONE: 478-987-7227

### U.S. WEST

Director – Dave Bonham - Interim; Assistant Director - Dave Bonham; Assistant Director – Brian Pickering 6707 Little League Drive; San Bernardino, CA 92407;