

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

COMMITTEE ON OVERSIGHT AND REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5051  
MINORITY (202) 225-5074  
<https://oversight.house.gov>

June 17, 2022

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

Dear Ms. Seymour:

This letter responds to your June 15, 2022, letter stating that your client, Daniel Snyder, the longtime owner of the Washington Commanders (Commanders) football team, is declining the Committee's invitation to testify at a hearing on June 22, 2022, based on several purported concerns that you have raised.<sup>1</sup> The Committee intends to move forward with this hearing and uncover the truth about the toxic workplace culture at the Commanders under Mr. Snyder's leadership. I write today to address certain mischaracterizations and demands in your letter and to offer additional accommodations to address concerns that you raised. In light of these accommodations and the importance of Mr. Snyder's testimony, I urge Mr. Snyder to reconsider his decision to decline public testimony and by doing so refusing to accept accountability for his actions and the culture he has fostered within his team.

For the past eight months, the Committee has investigated the toxic work environment at the Commanders and the National Football League's (NFL) response. As the investigation has progressed, it has become clear that, given his longstanding ownership of the team and high degree of involvement in its daily operations, Mr. Snyder is uniquely positioned to offer key information regarding this matter. According to his attorneys, he sat for seven hours of interviews in the internal investigation of the Commanders' toxic workplace—the results of which the NFL and the Commanders have refused to share with the Committee.<sup>2</sup> Mr. Snyder's refusal to testify at the June 22 hearing would be inconsistent with his repeated commitments to cooperate with the Committee and cast doubt on your assertion that the Commanders are now "a model of how to make extraordinary improvements in workplace culture."<sup>3</sup>

---

<sup>1</sup> See Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan and Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf>).

<sup>2</sup> Letter from John Brownlee, Counsel for the Commanders, Holland & Knight, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (Dec. 28, 2021).

<sup>3</sup> Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at [https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-](https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf)

### ***The Committee's Invitation and Accommodations to Mr. Snyder***

On June 1, 2022, the Committee invited Mr. Snyder, along with NFL Commissioner Roger Goodell, to testify at a hearing on June 22.<sup>4</sup> The Committee provided three weeks' advance notice of the hearing, which is ample time for him to prepare and reschedule any personal conflicts. This advance notice exceeds the Committee's customary practice.

Mr. Snyder was aware of the Committee's interest in these topics well before he was invited to testify. The Committee launched this investigation nearly eight months ago, issued several public statements regarding the investigation, and held a public roundtable with victims of workplace misconduct at the Commanders in February 2022.<sup>5</sup>

In addition, the Committee has offered to accommodate Mr. Snyder's plans to attend an awards ceremony in France by permitting him to appear remotely. Mr. Snyder has not identified any scheduling challenges that would prevent him from testifying before the Committee while out of the country. Nor has Mr. Snyder asserted that he is unable to return to the United States prior to the hearing, should he prefer to testify in person.

Mr. Snyder is no different than any other witness whose testimony the Committee seeks as part of an important investigation. Any suggestion that the Committee has treated Mr. Snyder unfairly is unfounded, especially given that NFL Commissioner Roger Goodell has agreed to testify voluntarily at the same hearing.

### ***Mr. Snyder's Refusal to Testify***

Your June 6 and June 15 letters to the Committee contain a number of inaccurate assertions and demands but do not include any valid reason for Mr. Snyder's refusal to appear at the June 22 hearing.<sup>6</sup>

---

15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf).

<sup>4</sup> Committee on Oversight and Reform, Press Release, *Oversight Committee Invites Roger Goodell, Daniel Snyder to Testify at Hearing on Washington Commanders' Hostile Workplace Culture* (June 1, 2022) (online at <https://oversight.house.gov/news/press-releases/oversight-committee-invites-roger-goodell-daniel-snyder-to-testify-at-hearing-on>).

<sup>5</sup> See, e.g., Letter from Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform, to Roger Goodell, Commissioner, National Football League (Oct. 21, 2021) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Final%202021-10-21.CBM%20RK%20to%20Goodell-NFL%20re%20WFT%20Investigation.pdf>); Committee on Oversight and Reform, *Press Release: At Committee Roundtable, Former Washington Commanders Employees Detail Widespread Sexual Harassment by Top Executives* (Feb. 3, 2021) (online at <https://oversight.house.gov/news/press-releases/at-committee-roundtable-former-washington-commanders-employees-detail-widespread>).

<sup>6</sup> See Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 6, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/KPS%20June%206%202022%20Letter%20Maloney%20and%20Krishnamoorthi%20%28Redacted%29.pdf>); Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6->

*First*, your letter incorrectly stated that “any alleged workplace misconduct under investigation by the Committee occurred more than a decade in the past.”<sup>7</sup> To the contrary, the Committee is investigating a troubling pattern of serious misconduct at the Commanders spanning two decades, including as recently as 2019. For example, one victim of sexual harassment under Mr. Snyder’s leadership at the Commanders informed the Committee:

I was employed at the Washington Football Team from March 2015 to January of 2019. ... During my time with the Team, I was sexually harassed by multiple male employees, including top executives. ... Everyone knew about their mistreatment and even saw it happening, but no one did anything about it.<sup>8</sup>

*Second*, as reasons for Mr. Snyder’s refusal to appear before the Committee, your letter cited two investigations by state attorneys general as well as an internal investigation conducted by the NFL. As previously explained by Committee staff, the existence of parallel investigation by other entities does not bar Congress from conducting investigations or receiving testimony from witnesses. Congress has long investigated matters subject to parallel proceedings, including matters subject to investigations by state attorneys general.<sup>9</sup> Even with respect to criminal investigations, the Supreme Court has held:

[S]urely a congressional committee which is engaged in a legitimate legislative investigation need not grind to a halt whenever responses to its inquiries might be potentially harmful to a witness in some distinct proceeding, or when crime or wrongdoing is disclosed.<sup>10</sup>

In this case, the existence of other investigations does not preclude Mr. Snyder from appearing before the Committee for a public hearing.

*Third*, your letter erroneously claimed that the Committee “declined to provide any additional information about the nature and scope of its investigation.”<sup>11</sup> The Committee has been clear about the purposes and aims of its investigation. For example:

---

15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf).

<sup>7</sup> *Id.*

<sup>8</sup> See, e.g., Committee on Oversight and Reform, Statement of Ana Nunez, *Roundtable on Examining the Washington Football Team’s Toxic Workplace Culture* (Feb. 3, 2022) (online at [https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Nunez%2C%20Ana%20-%20Opening%20Statement.220302.Final\\_.pdf](https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Nunez%2C%20Ana%20-%20Opening%20Statement.220302.Final_.pdf)).

<sup>9</sup> See, e.g., Committee on Oversight and Reform, *Press Release: Committee to Hold Hearing Next Week on Role of Purdue Pharma and Sackler Family in Fueling Opioid Epidemic* (Dec. 8, 2020) (online at <https://oversight.house.gov/news/press-releases/committee-to-hold-hearing-next-week-on-role-of-purdue-pharma-and-sackler-family>); Committee on Oversight and Reform, *Press Release: Oversight Committee to Hold Hearing on McKinsey & Company’s Key Role in Nation’s Opioid Epidemic* (Apr. 22, 2022) (online at <https://oversight.house.gov/news/press-releases/oversight-committee-to-hold-hearing-on-mckinsey-company-s-key-role-in-nation-s>).

<sup>10</sup> *Hutcheson v. United States*, 369 U.S. 599, 618 (1962) (internal citations omitted).

<sup>11</sup> See Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to

- In October 2021, the Committee sent a public letter to the NFL explaining that it was investigating the team's "hostile workplace culture and the [NFL's] investigation into this matter."<sup>12</sup>
- At the February 2022 roundtable with victims of workplace misconduct at the Commanders, I explained that the Committee is examining "the need to finally end sexual harassment and misconduct in the workplace." I further noted the Committee is "exploring legislative solutions to rein in the use of non-disclosure agreements that prevent workers from speaking out about sexual harassment and discrimination in the workplace" and is examining "ways to promote accountability and strengthen protections for all workers."<sup>13</sup>
- The June 1, 2022, invitation letter to Mr. Snyder stated that the June 22 hearing will "address the Washington Commanders' toxic workplace culture and the NFL's handling of that matter."<sup>14</sup>

The invitation to Mr. Snyder also provided further details on the purpose of the Committee's investigation and the June 22 hearing. The letter explained that the ongoing investigation will inform legislative efforts to strengthen protections for employees across all workplaces, including efforts to prevent and address toxic work environments and workplace investigation processes; strengthen protections for workers experiencing misconduct in the workplace; and address the use of non-disclosure agreements to prevent the disclosure of unlawful employment practices, including sexual harassment.

---

Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf>).

<sup>12</sup> Letter from Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform, to Roger Goodell, Commissioner, National Football League (Oct. 21, 2021) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Final%202021-10-21.CBM%20RK%20to%20Goodell-NFL%20re%20WFT%20Investigation.pdf>).

<sup>13</sup> Committee on Oversight and Reform, *Press Release: At Committee Roundtable, Former Washington Commanders Employees Detail Widespread Sexual Harassment by Top Executives* (Feb. 3, 2021) (online at <https://oversight.house.gov/news/press-releases/at-committee-roundtable-former-washington-commanders-employees-detail-widespread>).

<sup>14</sup> Letter from Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform, to Daniel Snyder, Owner, Washington Commanders (June 1, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-06-01.CBM%20RK%20to%20Snyder-WC%20re%20Witness%20Invitation%20FINAL.pdf>).

The Committee’s investigation falls well within Congress’s broad authority to investigate<sup>15</sup> and follows prior investigations by the Committee conducted under Chairs of both parties examining conduct in professional sports.<sup>16</sup>

Your June 15 letter appears to be demanding that the Committee go beyond explaining the investigation’s scope and purpose with highly unusual and inappropriate requests to access internal Committee investigative materials, including “the identity of any other witnesses that have testified about the team and/or my client, whether any such witnesses have made allegations about the team and/or my client, and the substance of any such allegations.”<sup>17</sup> While the Committee has conducted this investigation with great transparency—in contrast to how the team and the NFL have addressed these issues—these demands seek to intrude on congressional prerogatives and are not consistent with the Committee’s past practices.

### *The Committee’s Additional Accommodations*

You have asked that, as a “courtesy,” the Committee “provide copies of documents that members of the Committee intend to question Mr. Snyder about.”<sup>18</sup> Although the Committee has no obligation to provide witnesses copies of documents prior to hearings, the Committee is willing to make an additional accommodation in this unique instance to secure Mr. Snyder’s voluntary participation. If Mr. Snyder commits, in writing, to appear at the hearing on June 22, the Committee is willing to provide Mr. Snyder and his counsel, prior to the hearing, with copies

---

<sup>15</sup> See *Barenblatt v. U.S.*, 360 U.S. 109, 111 (1959) (“The power of inquiry has been employed by Congress throughout our history, over the whole range of the national interests concerning which Congress might legislate or decide upon due investigation not to legislate; it has similarly been utilized in determining what to appropriate from the national purse, or whether to appropriate. The scope of the power of inquiry, in short, is a penetrating and far-reaching as the potential power to enact and appropriate under the Constitution.”); see also *Trump v. Mazars USA, LLP*, 591 U.S. \_\_\_ (2020) (“This ‘power of inquiry—with process to enforce it—is an essential and appropriate auxiliary to the legislative function.’ Without information, Congress would be shooting in the dark, unable to legislate ‘wisely or effectively.’ The congressional power to obtain information is ‘broad’ and ‘indispensable.’ It encompasses inquiries into the administration of existing laws, studies of proposed laws, and ‘surveys of defects in our social, economic or political system for the purpose of enabling the Congress to remedy them.’”) (citations omitted). The Constitution’s Rulemaking Clause vests each House of Congress with the authority to “determine the Rules of its Proceedings.” U.S. Const. art. I, § 5, cl. 2. The House has exercised that authority to structure its investigations, including how it conducts congressional hearings and what specific rights it grants to witnesses.

<sup>16</sup> For example, under Chairman Darrell Issa, the Committee investigated the NFL’s workplace practices and failure to implement testing for human growth hormone in its players. See, e.g., Committee on Oversight and Government Reform, *Hearing on HGH Testing in the NFL: Is the Science Ready?* (Dec. 12, 2012) (online at <https://republicans-oversight.house.gov/hearing/hgh-testing-in-the-nfl-is-the-science-ready/>). Under Chairman Jason Chaffetz, the Committee investigated the NFL’s claim of federal tax-exempt status, which the NFL later relinquished. See, e.g., Letter from Chairman Jason Chaffetz, Committee on Oversight and Government Reform, to Roger Goodell, Commissioner, National Football League (Mar. 25, 2015) (online at <https://republicans-oversight.house.gov/wp-content/uploads/2015/05/3-25-15-JEC-EEC-to-Goodell-NFL.pdf>).

<sup>17</sup> Letter from Karen Patton Seymour, Counsel for Daniel Snyder, Sullivan & Cromwell LLP, to Chairwoman Carolyn B. Maloney, et al., Committee on Oversight and Reform (June 15, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-6-15%20Letter%20from%20KPS%20%28Redacted%29%20final.pdf>).

<sup>18</sup> *Id.*

Ms. Karen Patton Seymour

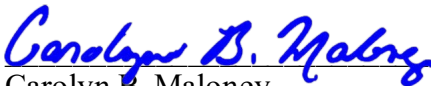
Page 6

of any of the team's documents produced by the NFL that the Committee expects to use during the hearing.

Please inform the Committee by Monday, June 20, 2022, at 9:00 a.m. ET whether Mr. Snyder accepts these additional accommodations and will appear before the Committee on June 22, 2022.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. Thank you for your prompt attention to this matter.

Sincerely,

  
Carolyn B. Maloney  
Chairwoman

cc: The Honorable James Comer, Ranking Member