

**CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS**

**STATE OF LOUISIANA**

**NO. 2019-1226**

**SECTION: 15**

**DIVISION "J"**

**ANTONIO LE MON, A PROFESSIONAL LAW CORPORATION, SUSAN S.  
BOUDREAUX, AND JANE N. PREAU WIFE OR/AND WILLIAM J. PREAU, III,**

**Versus**

**NATIONAL FOOTBALL LEAGUE, ROGER GOODELL, IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF THE NATIONAL FOOTBALL LEAGUE, NFL  
PROPERTIES LLC, AS SUCCESSOR-IN-INTEREST TO NFL PROPERTIES, INC.**

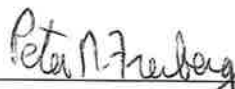
**FLED: \_\_\_\_\_**

**DEPUTY CLERK**

**DEFENDANTS' MOTION FOR A PROTECTIVE ORDER**

NOW INTO COURT, through undersigned counsel, come Defendants, National Football League, Roger Goodell, Commissioner of the National Football League, NFL Properties LLC, Patrick O. Turner, Jr., Gary P. Cavaletto, and William J. Vinovich, III's (collectively, "Defendants"), who move for a protective order pursuant to Louisiana Code of Civil Procedure Article 1426 regarding the location and means of taking the depositions of Goodell, Turner, Cavaletto, and Vinovich, requiring that those depositions occur either in New York and California or by telephonic or other electronic means, all for the reasons more fully set forth in Defendants' Memorandum in Support of this Motion for a Protective Order.

Respectfully submitted,



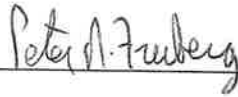
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Gladstone N. Jones, III (La. Bar No. 22221)  
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(504) 523-2500  
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**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above Motion for a Protective Order was served on counsel of record, as follows, by email transmission on August 7, 2019:

Antonio Le Mon  
512 East Boston Street  
Covington, LA 70433  
llemonlawyer@aol.com

  
\_\_\_\_\_

**CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS**

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CAPACITY AS COMMISSIONER OF THE NATIONAL FOOTBALL LEAGUE, NFL  
PROPERTIES LLC, AS SUCCESSOR-IN-INTEREST TO NFL PROPERTIES, INC.**

**FLED: \_\_\_\_\_**  
**DEPUTY CLERK**

**RULE TO SHOW CAUSE**

Considering the Motion for a Protective Order filed by Defendants National Football League, Roger Goodell, Commissioner of the National Football League, NFL Properties LLC, Patrick O. Turner, Jr., Gary P. Cavaletto, and William J. Vinovich, III's pursuant to Louisiana Code of Civil Procedure Article 1426,

IT IS ORDERED that Plaintiffs appear and show cause why the Motion for Protective Order filed by National Football League, Roger Goodell, Commissioner of the National Football League, NFL Properties LLC, Patrick O. Turner, Jr., Gary P. Cavaletto, and William J. Vinovich, III should not be granted on the 22<sup>nd</sup> day of August, 2019 at 3:00 p.m.

THUS DONE AND SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2019, New Orleans,  
Louisiana.

\_\_\_\_\_  
JUDGE

**PLEASE SERVE:**

Plaintiffs, through their Counsel of Record:

Antonio Le Mon  
512 East Boston Street  
Covington, LA 70433  
llemonlawyer@aol.com

**CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS**

**STATE OF LOUISIANA**

**NO. 2019-1226**

**SECTION: 15**

**DIVISION "J"**

**ANTONIO LE MON, A PROFESSIONAL LAW CORPORATION; SUSAN S. BOUDREAUX; AND JANE N. PREAU WIFE OF/AND WILLIAM J. PREAU, III,**

**Versus**

**NATIONAL FOOTBALL LEAGUE; ROGER GOODELL, IN HIS OFFICIAL CAPACITY AS COMMISSIONER OF THE NATIONAL FOOTBALL LEAGUE; and NFL PROPERTIES LLC, AS SUCCESSOR-IN-INTEREST TO NFL PROPERTIES, INC.**

**FILED: \_\_\_\_\_**  
**DEPUTY CLERK**

**MEMORANDUM IN SUPPORT OF**  
**DEFENDANTS' MOTION FOR A PROTECTIVE ORDER**

Defendants, National Football League ("NFL"); Roger Goodell, Commissioner of the NFL ("Goodell"); NFL Properties LLC, Successor-in-Interest to NFL Properties, Inc. ("NFL Properties"), Patrick O. Turner, Jr. ("Turner"), Gary P. Cavaletto ("Cavaletto"), and William J. Vinovich, III ("Vinovich"), respectfully submit this Memorandum in Support of their Motion for a Protective Order regarding the location and means of taking the depositions of Goodell, Turner, Cavaletto, and Vinovich.

At the status conference on July 29, 2019, Defendants expressed their objections to Goodell, Turner, Cavaletto, and Vinovich having to appear in New Orleans for their depositions. While the Court expressed its initial view that the depositions should take place in New Orleans, the Court also allowed Defendants the opportunity to formally move to conduct the depositions elsewhere. By this motion, Defendants seek an order of the Court requiring Plaintiffs to complete all less-intrusive means of discovery first, and that, once that discovery is completed, the requested depositions occur either in New York and California or by telephonic or other electronic means. Such an order is necessitated by the provisions of Code of Civil Procedure article 1426 and by Louisiana's courts' application of those provisions to attempts to compel the in-state depositions of out-of-state parties.

Code of Civil Procedure article 1426 provides that, for good cause shown, the court "may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense," including an order that the discovery not be had. It is well established that trial courts in Louisiana have broad discretion when regulating pre-trial discovery.

*Moak v. Illinois Central R.R. Co.*, 631 So. 2d 401, 406 (La. 1994). A motion for a protective order may be made “by a party or by the person from whom discovery is sought,” La. C.C.P. art. 1426(A).

There are three subsections of article 1426(A) that apply here:

- (1) That the discovery not be had.
- (2) That the discovery may be had only on specified terms and conditions, including a designation of the time or place.
- (3) That the discovery may be had only by a method of discovery other than that selected by the party seeking discovery.

La. C.C.P. art. 1426(A)(1), (2) and (3).

None of the Defendants who Plaintiffs seek to depose in New Orleans live or work in New Orleans or the State of Louisiana. Goodell resides and works in New York; Turner, Cavaletto, and Vinovich reside and work in California. None has contacts with the State of Louisiana other than, with respect to Goodell, serving as the Commissioner of the NFL (which is headquartered in New York, New York), one member of which is the New Orleans Saints, and, with respect to Turner and Cavaletto and Vinovich, officiating games around the country, occasionally traveling to Louisiana when assigned by the League to do so.

Appearance by a non-resident defendant in Louisiana for deposition is not mandatory, but rather should be imposed only in limited situations: “[A] nonresident defendant **can, under some circumstances**, be forced to travel to Louisiana in order to submit to a deposition.” *In re Medical Review Panel of Hughes*, 2001-2313 (La. App. 4 Cir. 1/23/02), 807 So. 2d 1074, 1076 (emphasis added). Plaintiffs here have made no attempt to make the necessary showing to establish that in-state depositions of out-of-state parties Goodell, Turner, Cavaletto, and Vinovich are warranted. The same factors that go into deciding whether a nonresident plaintiff can be forced to appear for deposition in Louisiana apply to nonresident defendants, namely: (i) the cost involved in travel to Louisiana, (ii) the complexity of the case, (iii) the potential recovery, and (iv) whether any other discovery methods have been attempted. *Id.*<sup>1</sup>

Before analyzing the four factors, Defendants note two points. First, as parties-defendants, they did not invoke the jurisdiction of the Court. Second, as very recently set forth in the decision of United States District Court Judge Susie Morgan in *Ryan, et al. v. National Football League, et al.*, Docket No. 2:19-cv-01811-SM-DMD, 2019 WL 3430259 (E.D. La. 7/30/2019), the merits of

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<sup>1</sup> The First Circuit recently questioned the proposition that a nonresident party can be compelled to appear for deposition in Louisiana. *See Henry v. Norman*, 2018-0697 (La. App. 1 Cir. 10/17/18), 2018 WL 5095792 (“This court questions whether the jurisprudence of the Fourth Circuit correctly interpreted the provision of the Louisiana Code of Civil Procedure governing depositions, specifically directed to ordering an appearance of a non-resident defendant.”).

Plaintiffs' case are seriously in question and less intrusive discovery should proceed before the depositions of four out-of-state defendants, including the NFL's chief executive, are even considered. In *Ryan*—also brought by Saints fans disappointed with the outcome of the January 20, 2019 NFC Championship Game—the court dismissed, with prejudice, for failure to state a claim the plaintiffs' causes of action against the NFL, Goodell, NFL Properties, Turner, Cavaletto, and Vinovich for detrimental reliance, negligent and/or intentional misrepresentation, breach of fiduciary duty, and conspiracy and solidary liability, the allegations and elements of which correspond to the same theories of recovery advanced in this case.

Application of the four factors outlined in *Hughes* shows that if Defendants' depositions are to be taken, those depositions should only take place where they reside or work:

**(i) The Cost to Travel to New Orleans:**

Each of the proposed deponents would be required to incur the expense to fly from New York or California to New Orleans, and for ground transportation, lodging, and meals while in New Orleans. While this factor does not require a "means test" to determine financial ability to pay such costs or to compare that against the means of the Plaintiff to travel to the location of the deponents, it is worth noting that Turner, Cavaletto, and Vinovich, all of whom are NFL game officials, are employed on a part-time basis by the League, and all have other professions on which they rely for compensation, the interruption of which would be magnified by the travel time required to come to Mr. Le Mon's chosen location. By contrast, the cost to Mr. Le Mon would be less: instead of four people incurring travel costs to New Orleans, Mr. Le Mon could conceivably only incur two sets of travel costs—once to New York and, if he is willing to coordinate the deposition schedule for a time when all three referee deponents are available, once to California. Mr. Le Mon complained to this Court at the May 30, 2019 hearing that the expenses of this discovery would be great because he would be donating any recovery, including of attorneys' fees, to charity; but that is his choice, not an inherent barrier to his ability to bear the costs of the depositions that he seeks.

**(ii) The Complexity of the Case:**

Despite the voluminous pages filed by Plaintiffs in numerous repetitive pleadings and briefs in this matter, this case is very simple. This suit arises from one play in one football game, the events of which lasted a matter of seconds. While Plaintiffs derive from the failure of the officials to call a penalty on that play a conspiracy to defraud them of their wish to see the Saints compete in the Super Bowl, the lack of any particularized factual allegations on which Plaintiffs base those

claims do not justify requiring multiple witnesses to travel here from both coasts, where less intrusive and burdensome discovery would be sufficient to address Plaintiffs' claims.

**(iii) The Potential Recovery:**

The potential recovery to Plaintiffs is minimal, at best. While they ask for damages, they have pled in their Petition that they will not use any recovery to remedy their alleged injuries but instead direct any recovery of monetary damages or attorney's fees go to charity. They ask for an "apology" from the NFL, which is undoubtedly not something that a person can sue for because an apology is non-pecuniary and non-economic and therefore not compensable in court. *See, e.g., Mendy v. Bryant*, 2017-964 (La. App. 1 Cir. 2/21/2018), 2018 WL 1007341, \*4.<sup>2</sup> And, they ask for the NFL to conduct "an investigation," but clearly lack any ability to compel the NFL to take such action.<sup>3</sup> *See Badeaux v. NFL, et al.*, 358 F. Supp. 3d 562 (E.D. La. 2019) (rejecting the plaintiffs' attempt to compel, by way of a writ of mandamus, the NFL to administer the NFL rules in a particular fashion, finding that the plaintiffs were not within the class of persons who could compel the NFL to do so). Plaintiffs have no cognizable claim to force an apology or to require the NFL to conduct an investigation, and have disclaimed money damages by alleging that any recovery will be donated to charity. At the end of the day, therefore, Plaintiffs stand to receive no remedy for their alleged damages. Forcing out-of-state Defendants to incur the expense of traveling to and

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<sup>2</sup> *See also Kitchen v. Essex Cty. Corr. Facility*, 2012 WL 1994505, at \*4 (D. N. J. 5/31/2012) ("The remedy of 'apology,' however, is not cognizable, either within the meaning of a [42 U.S.C. ]§ 1983 action or as a general legal remedy that a court has the power to order, under any provision."); *Woodruff v. Ohman*, 29 F. App'x 337, 346 (6th Cir. 2002) ("Here, the district court exceeded its equitable power when it ordered [the defendant] to apologize. As the Ninth Circuit noted when faced with a similar situation '[w]e are not commissioned to run around getting apologies.' ... Neither the district court nor [the plaintiff] cites to any authority, and we have found none, that would permit a court to order a defendant to speak in a manner that may well contravene the beliefs the defendant holds."); *Rumbles v. Hill*, 182 F.3d 1064, 1066–67 (9th Cir. 1999) ("The district court correctly held that it had no power to ... compel a party to apologize").

<sup>3</sup> Despite not having asked for any mandamus relief in his Petition for Damages, his First Supplemental and Amending Petition for Damages or his Second Supplemental and Amending Petition for Damages, Mr. Le Mon's motivations for bringing this suit were laid bare at a press conference he gave on July 22, 2019, where he stated:

We also believe that because the NFL and because Mr. Goodell failed to apologize to the New Orleans fan base and to the Saints organization as a whole, apparently have not taken any—have not given any reparation to the team at all that I've seen and have not taken any steps, corrective steps to either discipline these officials or to take other corrective steps that would ensure this will not happen again, that there's been a lack of accountability.

And their organization is such that it's behind closed curtains and there's no there's nothing really revealed about what they do internally, but I think there needs to be some public attention to—to taking steps to discipline the NFL officials to the extent that they need to be disciplined and any other bad apples in the NFL, whatever the disciplinary matter is, that there needs to be a cleaning up of the bad apples in the NFL.

(Exhibit A). As a spectator and fan, Mr. Le Mon does not have any standing or right to compel the NFL to do any of these things.

staying in hotels in New Orleans in connection with Plaintiffs' quixotic quest is inequitable and demonstrates that the depositions, if they are to proceed at all, should be conducted where the witnesses reside or work.

**(iv) Whether Any Other Discovery Methods Have Been Attempted:**

Plaintiffs have already served a whole host of other discovery: 32 interrogatories each to the NFL, Goodell, and to NFL Properties, which number is multiplied drastically when the sub-parts of those interrogatories are tallied; 35 requests for production of documents each to the NFL, Goodell, and to NFL Properties; 27 requests for admission of fact each to the NFL, Goodell, and to NFL Properties; 27 interrogatories to each of Turner, Cavaletto, and Vinovich, many of which include numerous unrelated sub-parts; 39 requests for production of documents to each of Turner, Cavaletto, and Vinovich; 25 requests for admission of fact to each of Turner, Cavaletto, and Vinovich; and a request to each of Turner, Cavaletto, and Vinovich for a Health Insurance Portability and Accountability Act of 1996 (HIPAA) release of their medical records. Plaintiffs also have indicated in correspondence to Defendants' counsel that they will seek the depositions of eleven total entities and individuals; and have issued a subpoena duces tecum to a third party (New Orleans Louisiana Saints, LLC).<sup>4</sup> Plaintiffs' own extensive discovery efforts clearly evidence that they can obtain the information they seek before and without resort to any depositions. The Plaintiffs should be required to do so before seeking to compel out of state parties to expend resources to travel across the country from their places of residence and work to be deposed at a location desired by Mr. Le Mon.

Furthermore, Plaintiffs have available to them the opportunity to serve written deposition questions pursuant to Code of Civil Procedure article 1448, which is certainly a less burdensome means of having these parties be compelled to travel from out of state to New Orleans. And, telephone and Skype depositions are expressly provided for under the Code of Civil Procedure. *See* La. C.C.P. art. 1436.1 ("If agreed upon by every party to a suit *or if ordered by the court*, a deposition may be taken by telephone or other remote electronic means."). There are multiple less-burdensome means for Mr. Le Mon to take these depositions, other than requiring the deponents to

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<sup>4</sup> One item Plaintiffs seek from the Saints is the "full name, address, contact information, and Section, Row and Seat/Box/Suite Number of the Mercedes-Benz Superdome of all individuals who purchased tickets for the 2018 season of the New Orleans Saints and all those individuals who purchased tickets for the National Football Conference ("NFC") Championship Game on 20 January 2019," demonstrating how overbroad and unreasonable Plaintiffs' discovery demands are.



travel to New Orleans.<sup>5</sup> These alternatives of course would mitigate, if not entirely remove, any financial argument that Mr. Le Mon might make for why he should not travel to New York or California.

Independently of the *Hughes* factors, this court should not order the depositions to take place in New Orleans in light of the numerous threats to the physical safety of the deponents. As shown in the Affidavits submitted in support of this Motion, Goodell and the game officials have received death threats, by both direct contact and social media postings, one of which posts a bounty on Vinovich and the other game officials.<sup>6</sup> Immediately after the NFC Championship game, due to threats to the game officials' safety, the NFL had the game officials change hotels for the evening of the game, stationed armed security personnel throughout the new hotel, and had the game officials accompanied by armed security to the airport the next day.<sup>7</sup> Afterwards, Vinovich (and his son) received numerous calls to their offices in which they were threatened with death.<sup>8</sup> Cavaletto received hundreds of threatening voicemails and text messages, including ones that referenced his wife, children, and mother by name; and had an incident of an irate fan pounding on his neighbor's door asking to see him.<sup>9</sup> People have taken to social media to threaten the physical safety of the proposed deponents, including death threats. This is what has been directed to them:

"@nflcommish Don't ever think about stepping foot in the state of Louisiana. Because we will kill you. WILL KILL YOU."

"I want to [expletive] KILL BILL VINOVICH"

"Bill vinovich. That's the name. Murder him and you get 5,000 dollars. Find the other ones and get 1,000 dollars extra for each one"

"[Expletive] need to find one of Roger Goodell [expletives] family members and hold em hostage til he give us a [expletive] rematch."

"Boutta just take one for the team and go kill Roger Goodell and the REFS from the game [expletive] it."

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<sup>5</sup> Specifically as to Goodell, when a party seeks the deposition of a high-level executive (a so-called "apex deposition"), courts have "observed that such discovery creates a tremendous potential for abuse or harassment." Courts have discretion to limit discovery where the discovery sought "can be obtained from some other source that is more convenient, less burdensome, or less expensive." *Apple Inc. v. Samsung Electronics Co., Ltd.*, 282 F.R.D. 259, 262-263 (N.D. Cal. 2012) (citations omitted). Courts routinely recognize that it may be appropriate to limit or preclude depositions of high-ranking officials because "high[-]level executives are vulnerable to numerous, repetitive, harassing, and abusive depositions, and therefore need some measure of protection from the courts." *See Sher v. Raytheon Co.*, No. 8:08-CV-889-T-33AEP, 2010 WL 11507786, at \*1 (M.D. Fla. Mar. 10, 2010) (quoting *In re Mentor Corp. Obsolete Transobturators Sling Prods. Liab. Litig.*, No. 4:08-MD-2004(CDL), 2009 WL 4730321, at \*1 (M.D. Ga. Dec. 1, 2009) ).

<sup>6</sup> *See* Affidavit of Robert Alder (Aug. 6, 2019), attached as Exhibit B.

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

<sup>8</sup> *See* Affidavit of William Vinovich (Aug. 6, 2019), attached as Exhibit C.

<sup>9</sup> *See* Affidavit of Gary Cavaletto (Aug. 6, 2019), attached as Exhibit D.

The game officials attest that they have never before received these types of threatening communications or been subjected to increased security precautions of the kind that followed the NFC Championship game.<sup>10</sup> These are very direct statements, and regardless of the actual threat posed by these particular comments, given the fervor surrounding the Saints' loss and the very public nature of these proceedings, as outlined below, we ask the Court to consider the prospect of harassment, intimidation, renewed threats, or fomented violence against these individuals that could result from an order compelling them to appear for depositions in New Orleans. Such an order would require the deponents to incur additional expenses for security details to help protect themselves. These individuals should not be compelled to appear in a locale where they have been subject to threats to their life, particularly in light of Plaintiffs' failure to make any showing under the *Hughes* factors and the availability of alternate, less burdensome ways to conduct such discovery.

Indeed, it has already been widely publicized that the depositions have been scheduled to take place in New Orleans. For example:

New Orleans Advocate July 29, 2019: "Orleans Parish Civil District Court Judge Nicole Sheppard scheduled the depositions for Goodell and the refs during a Monday status conference. The judge also said the depositions should take place in New Orleans." (Exhibit E)

WWL TV July 29, 2019: "Attorney Antonio LeMon, who filed a lawsuit over the game that advanced the Rams to the Super Bowl, said he and league attorneys will pick a mutually agreeable date for depositions in New Orleans – barring any league appeals that might delay or cancel the questioning." (Exhibit F)

Los Angeles Times July 30, 2019: "Attorney Antonio LeMon, who filed a lawsuit over the game that advanced the Rams to the Super Bowl, said he and league attorneys will pick a mutually agreeable date for depositions in New Orleans – barring any league appeals that might delay or cancel the questioning." (Exhibit G)

CBS News July 30, 2019: "Attorney Antonio LeMon, who filed a lawsuit over the game that advanced the Rams to the Super Bowl, said he and league attorneys will pick a mutually agreeable date for depositions on New Orleans – barring any league appeals that might delay or cancel the questioning." (Exhibit H)

ESPN July 29, 2019: "During a Monday status conference, Orleans Parish Civil District Court Judge Nicole Sheppard scheduled the depositions and said they would take place in New Orleans." (Exhibit I).

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<sup>10</sup> See Affidavits of Vinovich and Cavaletto.

Much of the publicity surrounding the prospect of these individuals being deposed in New Orleans comes from Mr. Le Mon himself. His public announcements that the referees are scheduled to be in New Orleans to testify heightens the officials' very reasonable concerns of safety.<sup>11</sup>

Article 1426 specifically allows the Court to enter a protective order to prevent a party from annoyance, embarrassment, or oppression. The deponents should not have to run the risk of being threatened or intimidated by individuals in New Orleans who are still upset with the Saints' loss in the 2019 NFC Championship game. The fervor of such individuals may very well intensify if the deponents are required to appear in New Orleans pursuant to the desire of an attorney who is simultaneously appealing to the public via social media to physically show up and "DEMAND[] WHO DAT JUSTICE," and which exposes them not only to harassment and annoyance, but potentially to physical harm.

For these reasons, as well as for the failure of Plaintiffs to make any showing under the *Hughes* factors—the expense of the travel and security costs to be imposed, the simplicity of the issues involved, the failure to engage first in alternative means of discovery to narrow and streamline the deposition testimony, the failure to explore alternative and less burdensome means to conduct the depositions, and the disclaimer by Plaintiffs of the use of any recovery to redress their injuries—Defendants respectfully request that a protective order be granted with regard to the depositions of Goodell, Turner, Cavaletto, and Vinovich, ordering: (1) that other means of discovery be completed first such that the scope of the depositions may be appropriately focused and streamlined; and (2) that the depositions then be scheduled to occur in New York and in California, or, alternatively, that they be ordered to occur by telephonic or other electronic means.

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<sup>11</sup> Mr. Le Mon has previously encouraged people to come out and support his cause against the NFL. In a Facebook posting in early March of 2019, Mr. Le Mon wrote about the proceedings and the date that the Court scheduled a hearing, concluding as follows:

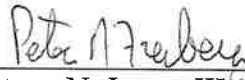
We are asking that we have a COURTROOM FULL OF WHO DAT SUPPORTERS at the hearing on April 16th at 10:30 AM. We want to show Judge Shepard that we can be respectful to her Court & the NFL lawyers but that by our numbers that we will NEVER FORGET and that WE WANT JUSTICE!! If you have SAINTS BLACK & GOLD running thru your veins & can be there in your BLACK & GOLD, we not only want you there but we NEED YOU IN THAT COURTROOM:

Civil District Court  
421 Loyola Avenue  
4th Floor  
Division "J"  
New Orleans, LA 70112

This may be your one & only chance to show your support for DEMANDING "WHO DAT" JUSTICE. PLEASE BE THERE! The NFL & Commissioner Goodell owe reparation to us. ENOUGH!!

(Exhibit J, emphasis in the original).

Respectfully submitted,



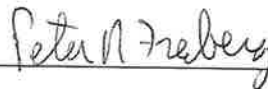
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**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above Memorandum in Support of Defendants' Motion for a Protective Order was served on counsel of record, as follows, by email transmission on August 7, 2019:

Antonio Le Mon  
512 East Boston Street  
Covington, LA 70433  
llemonlawyer@aol.com



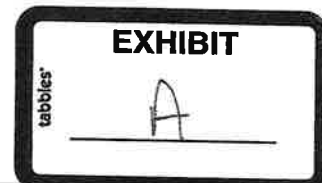
# Transcript of the Testimony of

## **PRESS CONFERENCE**

July 22, 2019



P.O. Box 1554 • Hammond • Louisiana 70404  
**(Toll Free) 866.870.7233 • 985.542.8685 • (Fax) 985.419.0799**  
office@amersonwhite.com • www.amersonwhite.com



TAPE TRANSCRIPTION OF PRESS CONFERENCE  
REGARDING NFL LAWSUIT

REPORTED BY:CHERIE' E. WHITE

CCR (LA), CSR (TX), CSR (MS), RPR  
CERTIFIED COURT REPORTER

## PRESS CONFERENCE

MR. LeMON:

First, I want to thank everybody for coming in this afternoon. I want to thank God for -- you know, because all things flow through him and this has been an incredible morning with this ruling by Judge Shepard to allow the NFL, the case against the NFL by the four ticket holders to go forward.

So we are very fortunate to have this opportunity to put on the case and to do discovery in the case, which, as you know, will include the depositions of Roger Goodell and the three NFL officials, who they are photographed which appear to be looking directly at the play that's taking place.

First of all, after -- you know, of course, I want to thank God because I think it's very important. All things flow through him. And then I want to thank the other complaints -- plaintiffs in this NFL lawsuit who had the fortitude

1 and courage to step up and take on the  
2 NFL. And to my left, I have Mary Grace  
3 Knapp and I have Sue Boudreaux. We are  
4 all from the New Orleans area. You know,  
5 we have lived in New Orleans a very long  
6 time, been long time season ticket holders  
7 or attendees of games, and -- and, you  
8 know -- so, you know, it was great to have  
9 the support of these three individuals. I  
10 also want to thank Judge Shepard because  
11 she had the -- you know, she was thorough  
12 in what she did. She was patient, she  
13 took her time, and she wrote a very  
14 detailed opinion relating to the denial of  
15 the NFL's claim to dismiss the case and  
16 the -- the ruling to compel discovery.  
17 And we do have a great deal of discovery  
18 and it needs to be done, so I do want to  
19 thank her for that and for all the  
20 courtesies that she's extended to -- to --  
21 to me and to the NFL attorneys who have  
22 been participating.

23 And then I want to address a couple  
24 of things here. First of all, there's  
25 been a misconception in some people's mind

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1 about what the purpose is of this lawsuit.  
2 It has nothing to do really with damages,  
3 although we have to make a claim for  
4 damages for the case to go forward, so we  
5 have stipulated in the record that all of  
6 these damages and my attorneys' fees will  
7 go to local charities in New Orleans, but  
8 the real purpose of this lawsuit is to get  
9 to the truth, is to -- to hold the NFL  
10 accountable for bad behavior. And we do  
11 believe that there is going to be evidence  
12 that this is not a case of a missed  
13 called, this is a case of a no call,  
14 that -- you know, that there will be ample  
15 evidence that there was an -- an intent  
16 not to call the penalty in this case and  
17 that would be contrary to the  
18 representations the NFL makes in its  
19 website and everywhere else relating to  
20 the integrity and the uniform enforcement  
21 of the NFL rules by their officials.

22 These officials are employed by the  
23 NFL, so we are -- we are going to now seek  
24 to get to the truth of the matter. And,  
25 you know, some people say well, heck, the

1 season's over. The next season's  
2 beginning. The Saints training camp is a  
3 few weeks away. Why are you going forward  
4 with this lawsuit? Well, we will never be  
5 made whole again, we will never get total  
6 reparation for what happened to the  
7 Saints, there won't be no way to go back  
8 and replay the Superbowl, but what we can  
9 get is we can get answers to our questions  
10 that New Orleanians have and we can get  
11 accountability. Without that, what's to  
12 stop the NFL from doing this over and over  
13 again.

14 So, as I see it, this has to do with  
15 the integrity of the game itself, the  
16 integrity of the NFL game, and when you go  
17 to a game believing that the officials  
18 will be uniform in their enforcement of  
19 the rules. A lot of people say well, this  
20 is second guessing the officials. It's  
21 not. This is not second guessing the  
22 officials. We are not saying that there  
23 aren't -- there aren't situations where  
24 NFL officials miss calls. That happens  
25 and it's part of the game. What we are

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1 saying is that if they do observe an  
2 infraction on the field, that they are  
3 going to throw a flag and they are going  
4 to enforce it. And in this particular  
5 case, you know the circumstances of this  
6 case obviously was because that flag  
7 didn't get thrown, we believe that there  
8 was a significant change in the outcome of  
9 the game. And statistically so that it's  
10 accurate, what we want to do is we want to  
11 ensure that this never happens in any  
12 other NFL game again; there are going to  
13 be checks and balances.

14 We also believe that because the NFL  
15 and because Mr. Goodell failed to  
16 apologize to the New Orleans fan base and  
17 to the Saints organization as a whole,  
18 apparently have not taken any -- have not  
19 given any reparation to the team at all  
20 that I've seen and have not taken any  
21 steps, corrective steps to either  
22 discipline these officials or to take  
23 other corrective steps that would ensure  
24 this will not happen again, that there's  
25 been a lack of accountability.

1                   And their organization is such that  
2                   it's behind closed curtains and there's no  
3                   -- there's nothing really revealed about  
4                   what they do internally, but I think there  
5                   needs to be some public attention to -- to  
6                   taking steps to discipline the NFL  
7                   officials to the extent that they need to  
8                   be disciplined and any other bad apples in  
9                   the NFL, whatever the disciplinary matter  
10                  is, that there needs to be a cleaning up  
11                  of the bad apples in the NFL.

12                 I'm a New Orleanian. I was born in  
13                 New Orleans; and you can see here, I'm  
14                 kind of a Saints fan. I have an entire  
15                 room devoted to the New Orleans Saints.  
16                 My passion for the Saints started when I  
17                 was throwing newspapers for the Times  
18                 Picayune and I was cutting lawns so I  
19                 could get a few bucks and buy a youth  
20                 ticket to go to the Saints games at  
21                 Tulane, at Tulane stadium, so I'm not only  
22                 -- I mean, we all here -- and I can tell  
23                 you that Sue and Mary Grace also and my  
24                 wife Elizabeth here, we all bleed black  
25                 and gold and we also bleed red. And, I

1 mean, what I mean to that, to a standpoint  
2 is that we have -- we give our hearts to a  
3 team like the Saints. We are passionate  
4 about the Saints. They are part of our  
5 culture. And when you take that away from  
6 us, when you -- when you create a mortal  
7 wound like I believe this was a mortal  
8 wound that was inflicted on the Saints and  
9 you basically rob us of a Superbowl  
10 opportunity, there needs to be some  
11 accountability taken. And that's the  
12 reason that motivated me to file this  
13 lawsuit and to turn to Sue Boudreaux and  
14 Mary Grace Knapp and ask them with -- with  
15 others to join in and to -- to file this  
16 lawsuit.

17 So the bottom line is that there  
18 were 72,000 plus fans sitting there in the  
19 dome that -- that -- that observed these  
20 clear blatant infractions and yet nothing  
21 was done about them. And if we are going  
22 to stop this from ever happening again,  
23 there needs to be answers to our questions  
24 which have never been answered. They need  
25 to restrict or understand our press in

1 press conferences in terms of what we  
2 could ask commissioner Goodell. There  
3 needs to be an investigation of what  
4 happened. There needs to be a  
5 determination of who was at fault for  
6 this, who was involved in this -- in this,  
7 pardon me, robbery, and there needs to be  
8 some accountability and disciplinary  
9 action taken by the NFL.

10 We are never going to replace what  
11 happened to us, but at least we can -- at  
12 least we have the opportunity to gain an  
13 investigation, get information and facts  
14 about what happened and accountability,  
15 and that's the purpose of this.

16 Any questions?

17 UNKNOWN SPEAKER:

18 Yes. One second. Let me just reset  
19 my shot here.

20 FEMALE SPEAKER:

21 So, Tony, if you could maybe explain  
22 a little bit about what the theory of the  
23 case is, it has to do with fraud and what  
24 the language is on the back of the  
25 tickets?



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1 MR. LeMON:

2 Right.

3 FEMALE SPEAKER:

4 Could you address that for a second?

5 MR. LeMON:

6 Yeah, I'd be happy to. Okay. So  
7 one of the theories we have is there is a  
8 body of law here in Louisiana, which by  
9 the way, to my knowledge, I have not seen  
10 a federal or state law that gives the NFL  
11 any kind of immunity from liability, from  
12 any type of liability, but what they do  
13 have is they have a limitation on the back  
14 of their tickets as to what your remedy is  
15 if you are not happy with the way  
16 something happens after you buy a ticket.  
17 They claim, if you are a ticket holder,  
18 here is your limited remedy.

19 There is a statute in Louisiana and  
20 there is public policy that's written by  
21 -- that you cannot in and of an event, you  
22 cannot waive that -- a party of  
23 purchaser's right to bring a claim for  
24 fraud or real practices or gross fault.  
25 It would be against public policy if you



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1           were able to -- were able to have me sign  
2           a document that said look, if I can make  
3           gross fault on you, you are buying this  
4           ticket from me, but if I commit gross  
5           fault on you or I commit an intentional  
6           act or I commit fraud upon you, I'm not --  
7           you can't hold me responsible.

8           That is the case. The theory of  
9           fraud in this case is that, you know,  
10          there are a million photographs of this --  
11          of this play and it's clear from many of  
12          these photographs that -- of the play  
13          itself that the officials, at least one of  
14          them, appear to be looking directly at the  
15          play when it happened; and it appears that  
16          there was another official just a few feet  
17          away as this first one was who also had a  
18          very good angle of the infractions, and  
19          then there's a backfield judge who appears  
20          to be looking at the infraction as it's  
21          happening.

22          And to prove this, all I really need  
23          to do is prove to a jury that one of these  
24          officials was in a position and did in  
25          their mind clearly observe an infraction



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1 and then, upon that infraction, did not  
2 throw a flag. If that's proven, I think  
3 the case is proven; but it could even be  
4 gross fault or gross negligence.

5 Louisiana law did not let you  
6 contract away gross negligence as well;  
7 and so if you -- if you have a situation  
8 where these guys were just not paying  
9 attention and doing their jobs, then  
10 theoretically there's a recovery as well.  
11 But the point of this lawsuit is not to  
12 get damages, as I pointed out. It is to  
13 get to the truth of the matter now, and  
14 the judge is allowing this now.

15 The judge is allowing us to take the  
16 depositions of Roger Goodell and the  
17 officials. She's allowing us to do  
18 discovery, and that was the primary point  
19 of this lawsuit, to get answers and to  
20 make the NFL accountable. If I'm able to  
21 do that, great. I do expect that the NFL  
22 is going to take an appeal of this case or  
23 supervisory writ to the First Circuit  
24 Court of Appeal; and, if they aren't  
25 successful there, to try to go to the

1 Supreme Court of Louisiana to try to  
2 overturn Judge Shepard's position. I do  
3 believe, though, that that decision will  
4 probably withhold any attack that is going  
5 to be made upon it, and I'm going to ask  
6 the NFL one thing: What's the big deal?  
7 Let us have the facts. Let us do our  
8 investigation. Is it really that  
9 difficult for you-all? Do you have to  
10 deal with all this legal wrangling back  
11 and forth here? Let us -- let us know  
12 what the facts are in this case, take  
13 disciplinary action, apologize to us. You  
14 owe us that, and that's what I'm asking  
15 for and that's not a lot to ask. Thank  
16 you.

17 UNKNOWN SPEAKER:

18 At the time of the incident, it was  
19 not a reviewable play and the coaches were  
20 not allowed to challenge, but they changed  
21 the rules in the off season so that now  
22 Sean Peyton could have thrown his red flag  
23 and they could have reviewed it upstairs  
24 by the booth. Do you think that that is  
25 sufficient to prevent this from ever

1           happening again or do you think that more  
2           is necessary?

3           MR. LeMON:

4           I think more is necessary, and I'm  
5           going to address a comment you made just  
6           now because I think it's too general of a  
7           comment. Well, yes, it's true that maybe  
8           some of the officials could not review  
9           this play when it happened. I believe  
10          that the NFL rules -- and I've argued this  
11          in this case -- the NFL rules would have  
12          allowed the commissioner to have reviewed  
13          this play to a stop play when it happened.  
14          He could have done it any time during  
15          those 15 or 20 minutes after it happened  
16          all the way through to the end of overtime  
17          until they allowed the NFL officials to  
18          officially declare the Los Angeles Rams  
19          the winner. He could have stopped, he  
20          could have brought the play back, he could  
21          have brought it in the time, and he could  
22          have given the Saints a first down by the  
23          goal line and that could have remedied  
24          this problem. He claims it couldn't be  
25          done, and I disagree. And the ironic

1           thing is the NFL rules say that he -- as  
2           the commissioner can interpret the rules  
3           however he wants, so I find it kind of  
4           convenient for him to say I couldn't do  
5           anything when he has sole power to  
6           interpret the rules.

7           So, but in answer to your question  
8           as to what else could have been done, I do  
9           think that there are some other corrective  
10          measures. When you have four NFL  
11          officials on the field that are from the  
12          Los -- greater Los Angeles area out of  
13          seven, that's a problem. That's a problem  
14          for me. There shouldn't have been any  
15          officials from the Los Angeles area or  
16          greater Los Angeles area that were  
17          officiating this game. That needs to be  
18          addressed and it needs to be fixed.

19          You know, there needs to be  
20          mechanisms by which if the commissioner  
21          can't say he can't stop the game, rewrite  
22          the rules and make sure that can -- can be  
23          done or that there's some kind of  
24          procedure to stop the game when there's  
25          this type of injustice and fix it. Any



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1 other questions?

2 FEMALE SPEAKER:

3 All of you were there at the game,  
4 so maybe you could share a little bit what  
5 your reaction was.

6 MS. KNAPP:

7 It was absolutely heartbreaking.

8 MR. LeMON:

9 I would like to let Mary Grace talk  
10 about what they -- how -- what their  
11 experience was and my wife Elizabeth here.

12 MS. KNAPP:

13 Well, it was -- for me looking  
14 around at fans, it was such a somber  
15 moment. It was almost as if everyone was  
16 in shock; and for me, the disappointment  
17 of people pouring out of the Superdome was  
18 tragic. It shouldn't have happened, and I  
19 -- I think what's amazing is that Tony  
20 has, through his passion for the Saints,  
21 taken the time and the energy and taken  
22 this matter into court to demand justice  
23 and to demand what's right and to seek the  
24 truth and help, did an exceptional job  
25 arguing this case, and I'm just so

1 impressed with the results.

2 UNKNOWN SPEAKER:

3 Can you state your name before we --  
4 before we go on, so I have it on tape,  
5 please?

6 MS. KNAPP:

7 Mary Grace Knapp.

8 UNKNOWN SPEAKER:

9 And standard spelling, K-N-A-P-P?

10 MS. KNAPP:

11 That's it, the standard spelling,  
12 yeah. Two words.

13 UNKNOWN SPEAKER:

14 Okay.

15 MS. BOUDREAUX:

16 Well, I'm Sue Boudreaux, with an X,  
17 and long time Saints season ticket holder  
18 since Tulane stadium. I was there when  
19 Tom Dempsey kicked his kick. I had one  
20 dollar, so season tickets until we moved  
21 to the Superdome and then I went picked  
22 out my seats at the Superdome and I've had  
23 the same seats, even though my husband  
24 went -- back in the bad days, he said we  
25 are not renewing them, I said, well, don't

1           renew yours, but I'm renewing mine.

2           Any way, I've seen a lot. We have  
3           seen Hail Marys, Big Bens, we have lost by  
4           a lot of different ways, but losing the  
5           way we lost on a no call was not  
6           acceptable. I mean, it wasn't a bad call,  
7           it was a no call. And, like I said, I've  
8           seen the Saints lose many different ways,  
9           but this was a bad way to lose.

10          And like Tony said, accountability.  
11          Just tell us why. What was -- you know,  
12          give us an apology. Maybe that would  
13          work.

14          MS. IMPASTATO:

15                 The truth.

16          MR. LeMON:

17                 What do you think?

18          MS. IMPASTATO:

19                 Well, when I was at the game, I  
20                 haven't been -- I've been a Saints fan my  
21                 whole life, but attending the game is  
22                 still fairly new to me. Like I enjoy  
23                 watching the dance team and the crowds and  
24                 the people, but I watched that and looked  
25                 at that and even I could see that there

1 was a no call; there was a big problem.  
2 And I turned to Tony with my mouth open,  
3 like did you see, did you see that, I  
4 can't believe this. So I think it was  
5 really obvious. And, you know, to think  
6 how hard the Saints worked, you know, all  
7 year. And they are very professional, so  
8 they handled the disappointment, but to  
9 the fans, you know, they make a lot of  
10 sacrifices in order to afford their season  
11 tickets, in order to go to the Saints  
12 game.

13 And I think that Tony has a lot of  
14 passion for the Saints and for anything  
15 that he does, so whenever he told me what  
16 he had planned, I encouraged and supported  
17 and I'm proud that he stepped up to the  
18 plate because somebody needed to hold them  
19 accountable. And I'm Elizabeth Impastato,  
20 Tony LeMon's wife.

21 MR. LeMON:

22 And, you know, I agree with her  
23 that, you know, the NFL, you know, they  
24 didn't just take this away from the fans,  
25 they took it away from the Saints



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1 organization, from the coaches, from the  
2 players, from the support staff, and the  
3 owner of the team. And, you know,  
4 Ms. Gayle Benson has a lot of class and,  
5 of course she's not going to, you know,  
6 get into a wrangle with the NFL and nor  
7 would any of the other individuals that  
8 are affiliated with the organization  
9 because they have careers to worry about.  
10 But we fans, we can step up and we did;  
11 and we are going to step up and we are  
12 going to get these depositions taken and  
13 we are going to fight the fight until we  
14 get answers, until we get the truth, until  
15 we get some accountability.

16 \* \* \*

## REPORTER'S PAGE

I, CHERIE' E. WHITE, Certified Court Reporter, in and for the State of Louisiana, the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, before whom this sworn testimony was transcribed, do hereby state on the record;

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for the court reporter's transcription of a proceeding, and that dashes (--) do not indicate that words or phrases have been left out of this transcript; also, that any words and/or names which could not be verified through reference material have been denoted with the phrase "(spelled phonetically)."

CHERIE' E. WHITE, CCR(LA NO. 96002)  
CSR (TX NO 10720)  
CSR (MS NO. 1514)  
RPR (NATIONAL NO. 839452)

## REPORTER'S CERTIFICATE

This certification is valid only for a transcript accompanied by my original signature and original seal on this page.

I, CHERIE' E. WHITE, Certified Court Reporter, in and for the State of Louisiana, do hereby certify that this transcription of a Press Conference, as hereinbefore set forth in the foregoing 22 pages; that this testimony was reported by me in the stenotype reporting method, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding; that I am not related to counsel or the parties herein, nor am I otherwise interested in the outcome of this matter.

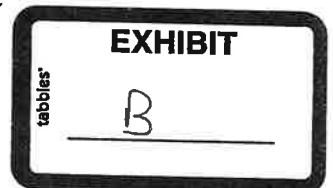
CHERIE' E. WHITE, CCR (LA NO. 96002)  
CSR (TX NO. 10720)  
CSR (MS NO. 1514)  
RPR (NATIONAL NO. 839452)

STATE OF NEW YORK                     )  
  ) ss.:  
COUNTY OF NEW YORK                )

**AFFIDAVIT OF ROBERT ALDER**

Robert Alder, being duly sworn, deposes and states under oath as follows:

1. I am the Director of Investigations and Security Services for the Southern Region of the National Football League. I have held this position for over two years. In my capacity as Director of Investigations and Security Services, I am responsible for overseeing security-related issues for the Southern Region of the National Football League, which region includes Louisiana, and also for monitoring investigations in the Southern Region. If called to testify in this matter, I could and would testify competently and truthfully to the matters set forth in this Affidavit.
2. Immediately after the January 20, 2019 NFC Championship Game in New Orleans, Louisiana, we recognized that the game officials who officiated the game were potentially in danger from upset fans. Just after the game ended, we bussed them to the hotel where they were staying to pick up their belongings, so they could be moved to a different hotel in Metairie that was not associated with the National Football League. We stationed six security guards and a Jefferson Parish Sheriff's Deputy working a detail at the hotel throughout that night in order to protect the game officials.
3. The National Football League contracts with a third-party to monitor social media sites for threats against National Football League employees. The third-party vendor, WorldAware, monitors social media sites and then alerts the National Football League of social media postings that are considered to be threatening to the National Football League and its employees.
4. Following the NFC Championship Game, WorldAware alerted us to numerous social media postings that contained threats against the Commissioner of the National Football League, Roger Goodell, and some of the game officials that officiated the game. The



threatening postings that we received from WorldAware are attached hereto as Exhibits 1 through 5. The identities of the people (including photographs of those persons and their other identifying information) who made these posts has been redacted from the Exhibits, but unredacted versions of the postings are available if the Court requests them.

4. The postings state:

"@nflcommish Don't ever think about stepping foot in the state of Louisiana. Because we will kill you. WILL KILL YOU."

"I want to [expletive] KILL BILL VINOVICH"

"Bill vinovich. That's the name. Murder him and you get 5,000 dollars. Find the other ones and get 1,000 dollars extra for each one"

"[Expletive] need to find one of Roger Goodell [expletives] family members and hold em hostage til he give us a [expletive] rematch."

"Boutta just take one for the team and go kill Roger Goodell and the REFS from the game [expletive] it."

Further Affiant sayeth not.

  
\_\_\_\_\_  
Robert Alder

SWORN TO AND SUBSCRIBED BEFORE  
ME THIS 7<sup>th</sup> DAY OF AUGUST, 2019.

  
NOTARY PUBLIC

JEANNETTE THOMPSON  
Notary Public, State of New York  
No. 01TH6138240  
Qualified in Bronx County  
Commission Expires Dec. 19, 20 21

①

Alder, Robert

From: Intel <intel@worldaware.com>  
Sent: Thursday, January 31, 2019 12:49 PM  
To: Lanier, Cathy; Burrus, David; McCain, David; Miller, Janelle; Carpenter, Jordan; Bandy, Lenny; Alder, Robert; Langenstein, Billy; Gummer, Robert; Joseph Grassia  
Subject: NFL Incident Report - Threat Against Roger Goodell - New Orleans, LA



NFL Incident Report

Incident Severity: Severe

Security: Disgruntled Saints fan posts that he will kill Commissioner Goodell if he comes to Louisiana.

This Incident Report affects: Roger Goodell

Location: New Orleans, Louisiana

Summary:  
Early this morning, Twitter user @ [redacted], a disgruntled Saints fan, posted, "**@nflcommish Don't ever think about stepping foot in the state of Louisiana. Because we will kill you. I WILL KILL YOU.**" The post has since been deleted by the user or removed by Twitter. The user's identity is [redacted] Of New Orleans, LA.

Phone: (504) [redacted]

Possible Addresses: [redacted], New Orleans, LA [redacted]  
[redacted], New Orleans, LA [redacted]



Source: Babel Street

EXHIBIT  
1

**Social Media Pages**

Facebook: <https://www.facebook.com/> [REDACTED]

Twitter: <https://twitter.com/> [REDACTED]

Regards,

**Beau Gordon**

Intelligence Analyst, Managed Risk Services

T: 01-667-401-1217

[gordonb@worldaware.com](mailto:gordonb@worldaware.com)

[www.worldaware.com](http://www.worldaware.com)

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2

**Bandy, Lenny**

**From:** Intel <intel@worldaware.com>  
**Sent:** Sunday, January 20, 2019 9:24 PM  
**To:** Schultz, Andrea; Lanier, Cathy; Burrus, David; Gardi, David; McCain, David; Aponte, Dawn; Miller, Janelle; Carpenter, Jordan; Beaty, Joseph; Jennings, Kendra; Bandy, Lenny; Alder, Robert; Durante, Stephanie; Adden, Tom; Vincent, Troy; Joseph Grassia; Jones, Todd; Perlman, Tracy; Langenstein, Billy; Gummer, Robert; Anjali Sniadowski  
**Subject:** NFL Incident Report - Moderate - Twitter user has made multiple threats against Bill Vinovich



**NFL Incident Report**

**Incident Severity: Moderate**

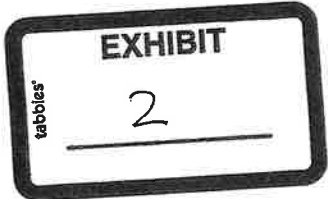
**Security:** Twitter user has made multiple threats against NFL official Bill Vinovich.

**This Incident Report affects:** NFL Officiating

**Summary:**  
Twitter user @ [REDACTED] has posted multiple threats against NFL official Bill Vinovich on Facebook and Twitter. The Twitter user has been identified as [REDACTED] from Natchez Mississippi. While [REDACTED] has posted multiple threats on social media accounts, the threat is likely not credible.

Twitter: [https://twitter.com/\[REDACTED\]](https://twitter.com/[REDACTED])

Facebook: [https://www.facebook.com/\[REDACTED\]](https://www.facebook.com/[REDACTED])



Source: Facebook

Source: Facebook

20 mins · 🌐

I want to fucking  
KILL BILL VINOVICH

👍 Like

💬 Comment



➦ Share

Source: Facebook




Tweets

Tweets & replies

Media

 @ · 13m  
@NFLOfficial I want to kill  
Bill Vinovich



 @ · 13m  
Replying to @  
I want to fucking kill Bill Vinovich



 @ · 20m  
I want to fucking  
KILL BILL VINOVIH



Source: Twitter

Babel Street Person of Interest Search

Regards,

**Kara Gronborg**  
Intelligence Analyst, Managed Risk Services

T: 01-410-573-7833  
M: 01-814-3274836  
[gronborgk@worldaware.com](mailto:gronborgk@worldaware.com)  
[www.worldaware.com](http://www.worldaware.com)



Tweet

[REDACTED]  
@ [REDACTED]

Bill vinovich. That's the name. Murder him and you get 5,000 dollars. Find the other ones and get 1,000 dollars extra for each one

3:42 PM · 1/20/19 · Twitter for iPhone

3 Likes



Show additional replies, including those that may contain offensive content

Show

Tweet your reply



3

(4)

Alder, Robert

**From:** Intel <intel@worldaware.com>  
**Sent:** Friday, January 25, 2019 7:15 PM  
**To:** Lanier, Cathy; Burrus, David; McCain, David; Miller, Janelle; Carpenter, Jordan; Bandy, Lenny; Alder, Robert; Langenstein, Billy; Gummer, Robert; Joseph Grassia; Anjali Sniadowski  
**Subject:** NFL Incident Report - Threat Against Commissioner Goodell's Family



**NFL Incident Report**

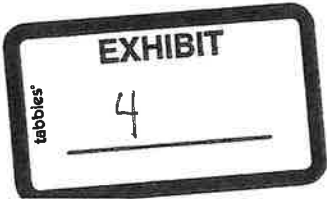
**Incident Severity: Severe**

**Security:** Twitter user suggests taking a member of Roger Goodell's family hostage until he orders a Saints-Rams rematch.

**This Incident Report affects:** Roger Goodell

**Summary:**  
Earlier today, Twitter user "[redacted]" (@[redacted]) posted, "Nigga need to find one of Roger Goodell bitch ass family members and hold em hostage til he give us a a fucking rematch." The user is clearly a disgruntled Saints fan; therefore, the post is likely a case of venting, rather than a legitimate threat. We believe the identity of this user is [redacted] of Baton Rouge, Louisiana (see further details in public records search screenshot below). He may have revealed his Louisiana license plate number in an Instagram photo: [redacted]

Source: Instagram





Source: Twitter

**Social Media Pages:**

Twitter: [https://twitter.com/\[REDACTED\]](https://twitter.com/[REDACTED])

Instagram: [https://www.instagram.com/\[REDACTED\]](https://www.instagram.com/[REDACTED])

Facebook: [https://www.facebook.com/\[REDACTED\]](https://www.facebook.com/[REDACTED])

Regards,

**Beau Gordon**

Intelligence Analyst, Managed Risk Services

T: 01-667-401-1217

[gordonb@worldaware.com](mailto:gordonb@worldaware.com)

[www.worldaware.com](http://www.worldaware.com)

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5

Alder, Robert

**From:** Intel <intel@worldaware.com>  
**Sent:** Tuesday, January 22, 2019 1:29 PM  
**To:** Lanier, Cathy; Burrus, David; McCain, David; Miller, Janelle; Carpenter, Jordan; Bandy, Lenny; Alder, Robert; Langenstein, Billy; Gummer, Robert; Joseph Grassia; Anjali Sniadowski  
**Subject:** NFL Incident Report - Moderate - Twitter User Posts Threat Against Commissioner Goodell and NFL Officials



**NFL Incident Report**

**Incident Severity: Moderate**

**Security: Twitter user makes threat against Commissioner Goodell and NFL Officials.**

**This Incident Report affects:** Commissioner Goodell, NFL officials

**Summary:** Twitter user @ [redacted] has posted a threat against Commissioner Goodell and NFL officials form the Saints Vs Rams game. The Twitter user has been identified as [redacted] from Marreno, LA. Taylor appears to have graduated from [redacted] High School in 2018. A Babel Public Records Search did not return any further information on Taylor.

[redacted] @ [redacted] · 45m  
Boutta just take one for the team and go kill Roger Goodell and the REFFS from the game fuck it

🗨️ 🔄 ❤️ 2 📧

Source: Twitter



<http://www.hudl.com/profile/> [REDACTED]

<https://twitter.com/> [REDACTED]

Regards,

**Kara Gronborg**

Intelligence Analyst, Managed Risk Services

T: 01-410-573-7833



M: 01-814-3274836

[gronborgk@worldaware.com](mailto:gronborgk@worldaware.com)

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CIVIL CODE § 1189

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State of California

County of

Orange

On

August 6, 2019

before me,

Terri M. Rasmussen, Notary Public

Date

Here Insert Name and Title of the Officer

personally appeared

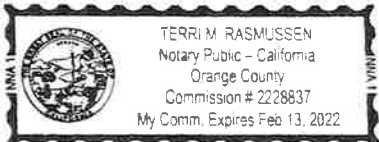
William Joseph Vinovich III

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

[Handwritten Signature]

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

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Individual Attorney in Fact

Trustee Guardian or Conservator

Other:

Signer Is Representing:

Signer's Name:

Corporate Officer — Title(s):

Partner — Limited General

Individual Attorney in Fact

Trustee Guardian or Conservator

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Signer Is Representing:



[REDACTED]  
[REDACTED]

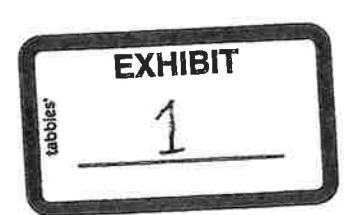
we demand Vinovich's and  
Riveron's heads on spikes, per the  
municipal code established by  
Jean Lafitte in 1810

 [REDACTED] @ [REDACTED] · 26 Jun

blah blah blah "russian interference" i want to  
talk about pass interference in the nfc  
championship months have passed and no  
one is held accountable

7:50 PM · 26 Jun 19 · Twitter for iPhone

1 Retweet · 5 Likes



STATE OF CALIFORNIA                    )  
  ) ss.:  
COUNTY OF SANTA BARBARA    )

**AFFIDAVIT OF GARY P. CAVALETTO**

Gary P. Cavaletto, being duly sworn, deposes and states under oath as follows:

1. I am one of the National Football League game officials who officiated the January 20, 2019 NFC Championship Game in New Orleans, Louisiana. If called to testify in this matter, I could and would testify competently and truthfully to the matters set forth in this Affidavit.
2. Following the January 20, 2019 NFC Championship Game, I received more than 200 voice mail messages on my cellular phone (and approximately the same number of text messages). Several of these voice mail messages were very concerning to me, because the persons leaving the messages said things to the effect of “we know where you live” and mentioned by name my wife, children, and mother, as well as made clear that they had my children’s cellular numbers. In addition, my wife and mother also received voice mail messages that were upsetting to them.
3. A few days after the NFC Championship Game, I observed a man driving a catering truck on the private street in my neighborhood, with writing on its side that said “Cajun Catering,” “Louisiana Catering,” or something similar. At one point, the driver pulled the vehicle into one of my two driveways, then left, and then at another point, drove down the private street I live on, past my house to my neighbor’s driveway where he emerged and pounded on my neighbor’s door, asked for me, then yelled, “I know he’s here,” referring to me, before leaving.
4. I have been a game official for over forty years, sixteen of those with the National Football League, and before the aftermath of the 2019 NFC Championship Game had never experienced any threat against my physical safety, and never experienced the type of animosity and hostility that I did after the NFC Championship Game. I am aware of the threats made against the game



officials on social media sites, including the \$5,000 bounty that is for William Vinovich and the \$1,000 bounties offered for the other officials of the game, and am truthfully concerned for my safety if I am required to be deposed in New Orleans.

Further Affiant sayeth not.

  
Gary P. Cavaletto

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 6 DAY OF AUGUST, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

 see attached

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

## CALIFORNIA ALL-PURPOSE CERTIFICATE OF ACKNOWLEDGMENT

State of California )

County of Santa Barbara )

On August 6, 2019 before me, JoAnn Cavaletto, Notary Public  
(here insert name and title of the officer)  
personally appeared Gary P. Cavaletto

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

JoAnn Cavaletto



(Seal)

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Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this acknowledgment to an unauthorized document and may prove useful to persons relying on the attached document.

#### Description of Attached Document

The preceding Certificate of Acknowledgment is attached to a document

titled/for the purpose of Affidavit of

Gary P. Cavaletto

containing 2 pages, and dated August 6, 2019

The signer(s) capacity or authority is/are as:

☒ Individual(s)

☐ Attorney-in-Fact

☐ Corporate Officer(s)

Title(s)

☐ Guardian/Conservator

☐ Partner - Limited/General

☐ Trustee(s)

☐ Other:

representing:

Name(s) of Person(s) or Entity(ies) Signer is Representing

#### Method of Signer Identification

Proved to me on the basis of satisfactory evidence:

☒ form(s) of identification ☐ credible witness(es)

Notarial event is detailed in notary journal on:

Page # 51 Entry # 8

Notary contact: JoAnn Cavaletto

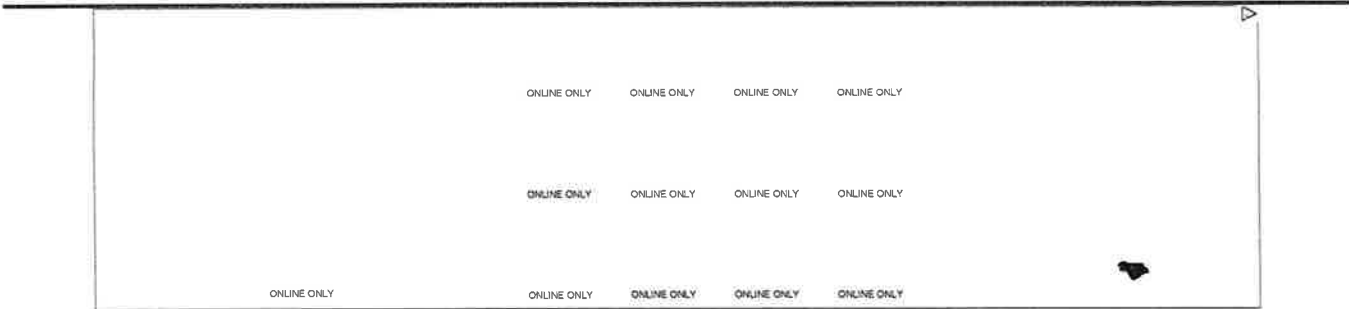
Other

☐ Additional Signer(s)

☐ Signer(s) Thumbprint(s)

☐





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# Roger Goodell, refs set to be deposed in September over Saints-Rams no call, judge says

STAFF REPORT JUL 29, 2019 - 12:48 PM

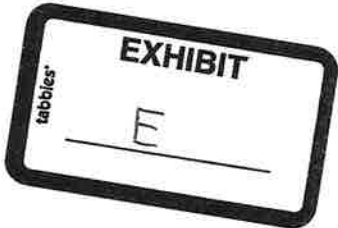


NFL Commissioner Roger Goodell answers a question during a news conference for the NFL Super Bowl 53 football game Wednesday, Jan. 30, 2019, in Atlanta.  
David J. Phillip

NOLA.com  
staff report

A New Orleans judge said Monday that NFL Commissioner Roger Goodell and three referees from the infamous “no-call” NFC championship game should answer questions about the game under oath in September.

Orleans Parish Civil District Court Judge Nicole Sheppard scheduled the depositions for Goodell and the refs during a Monday status conference.



The judge also said the depositions should take place in New Orleans.

The scheduling conference took place days after a Louisiana 4th Circuit Court of Appeal panel unanimously upheld Sheppard's decision to allow a lawsuit filed by Saints superfan Tony LeMon against the NFL to proceed.



*Can't see video below? [Click here.](#)*



LeMon and his co-plaintiffs were among many fans who filed suits after the Saints game against the Los Angeles Rams in the Mercedes-Benz Superdome in January, when officials failed to call blatant pass interference by Rams defender Nickell Robey-Coleman.

The “no call” denied the Saints a likely touchdown and set the stage for the Rams to advance to the Super Bowl.

Legal observers gave most of the lawsuits against Goodell and the league little chance of success. One challenge was thrown out in federal court. But LeMon crafted his suit with the aim of keeping it in state court.

**RELATED**  
**Roger Goodell a step closer to sworn answers in Saints fans' 'no-call' lawsuit thanks to court ruling**

With the depositions in hand, LeMon and his co-plaintiffs will be able to continue to press their case against the league ahead of a potential trial.

However, the NFL still has weeks to mount an appeal to the Louisiana Supreme Court seeking to have the lawsuit dismissed altogether. If that succeeds, Goodell's deposition would never take place.



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## Goodell, NFC Championship officials to face questions on no-call

Spurned Saints fans may finally get what they've been waiting for

NEW ORLEANS — A Louisiana judge ordered that NFL Commissioner Roger Goodell and three officials from January's NFC title game be questioned under oath in September about the infamous "no-call" that helped the Los Angeles Rams beat the New Orleans Saints in January's NFC title game, a lawyer said Monday.

Attorney Antonio LeMon, who filed a lawsuit over the game that advanced the Rams to the Super Bowl, said he and league attorneys will pick a mutually agreeable date for depositions in New Orleans — barring any league appeals that might delay or cancel the questioning.



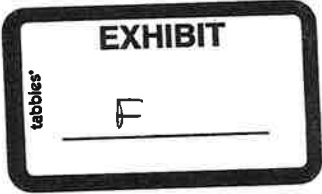
Fumble Q&A With Johnson & Chris C

FEATUR

A league spokesman declined comment.

LeMon's lawsuit seeks \$75,000 in damages — to be donated to charity — over the failure to flag a pass interference or roughness penalty against Rams cornerback Nickell Robey-Coleman for his helmet-to-helmet hit on receiver Tommylee Lewis well before a pass arrived. The no-call came at a crucial point in the game against the New Orleans Saints. The Rams won and advanced to the Super Bowl.

State Civil District Court Judge Nicole Sheppard of New Orleans ruled earlier this month that LeMon's lawsuit could proceed. She also ruled then that LeMon can request documents and ask questions of NFL officials. She said Monday that depositions should take place in September. She also set Aug. 22 for the next hearing in the lawsuit, according to LeMon.







Los Angeles Times

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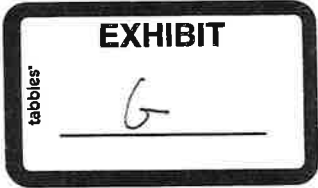
Roger Goodell and game officials to face questions under oath on Saints-Rams no-call



Rams cornerback Nickell Robey-Coleman seems to deliver an early hit to Saints receiver Tommylee Lewis late in the fourth quarter of the NFC championship game. (Robert Gauthier / Los Angeles Times)

By ASSOCIATED PRESS

JULY 30, 2019  
7:27 AM



A Louisiana judge ordered that NFL Commissioner Roger Goodell and three officials from January's NFC title game be questioned under oath in September about the infamous no-call that helped the Los Angeles Rams beat the New Orleans Saints in January's NFC title game, a lawyer said Monday.

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A league spokesman declined comment.

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State Civil District Court Judge Nicole Sheppard of New Orleans ruled earlier this month that LeMon's lawsuit could proceed. She also ruled then that LeMon can request documents and ask questions of NFL officials. She said Monday that depositions should take place in September. She also set Aug. 22 for the next hearing in the lawsuit, according to LeMon.

Other suits dealing with the blown call have wound up in federal court, where they have failed. They included one long-shot effort to have the game or a crucial part of it played over before the Rams met the New England Patriots in the Super Bowl, which the Patriots won.

LeMon, whose lawsuit alleges fraud by NFL officials, has crafted his lawsuit to avoid having it taken over by a federal court, in part by keeping the damages sought low. He said Monday that he intends for any money won to go to former Saints star Steve Gleason's charity to aid people with neuromuscular diseases. Gleason was diagnosed with ALS in 2011.

SPORTS

Associated Press

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## Roger Goodell, 3 NFL officials to face queries under oath on still-controversial "no-call"

JULY 30, 2019 / 4:51 AM / CBS/AP

*New Orleans* -- A Louisiana judge ordered that NFL Commissioner Roger Goodell and three officials from January's NFC title game be questioned under oath in September about the controversial "no-call" that helped the Los Angeles Rams beat the New Orleans Saints in January's NFC title game, a lawyer said after a status conference Monday.

Attorney Antonio LeMon, who filed a lawsuit over the game that advanced the Rams to the Super Bowl, said he and league attorneys will pick a mutually agreeable date for depositions in New Orleans - barring any league appeals that might delay or cancel the questioning.

"I think the city of New Orleans and the Saints organization and the fan base, they deserve to know what happened in that NFC Championship game," CBS New Orleans affiliate WWL-TV quotes LeMon as saying. "So we can get some level of truth, some information, so we can all heal a little better."



LIVE

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- Eric Garner Cop Verdict

"As far as I'm concerned, we can't move on until there's been some reparation and some consequence for what happened."

A league spokesman declined comment.

LeMon's lawsuit seeks \$75,000 in damages - to be donated to charity - over the failure to flag a pass interference or roughness penalty against Rams cornerback Nickell Robey-Coleman for his helmet-to-helmet hit on receiver Tommylee Lewis well before a pass arrived. The no-call came at a crucial point in the game. The Rams won and advanced to the Super Bowl.

State Civil District Court Judge Nicole Sheppard of New Orleans ruled earlier this month that LeMon's lawsuit could proceed. She also ruled then that LeMon could request documents and ask questions of NFL officials. She said Monday that depositions should take place in September. She also set Aug. 22 for the next hearing in the lawsuit, according to LeMon.

Other suits dealing with the blown call have wound up in federal court, where they have failed. They included one long-shot effort to have the game or a crucial part

of it played over before the Rams met the New England Patriots in the Super Bowl, which the Patriots won.

LeMon, whose lawsuit alleges fraud by NFL officials, has crafted the suit to avoid having it taken over by a federal court, in part by keeping the damages it is seeking low.

He said Monday that he intends for any money won to go to former Saints star Steve Gleason's charity to aid people with neuromuscular diseases. Gleason was diagnosed with ALS in 2011.

*First published on July 30, 2019 / 4:51 AM*

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**U.S.**

**ESPN.com: NFL**[\[Print without images\]](#)

Monday, July 29, 2019

## Depositions scheduled for Goodell, refs in suit

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ESPN

Depositions for NFL commissioner Roger Goodell and three referees from last season's NFC Championship Game have been scheduled for September.

During a Monday status conference, Orleans Parish Civil District Court Judge Nicole Sheppard scheduled the depositions and said they should take place in New Orleans.

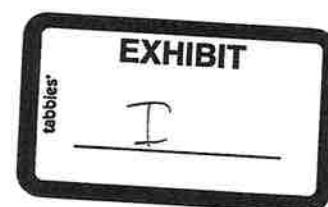
The scheduling conference comes nearly two weeks after Sheppard ruled that the damage lawsuit against the NFL over the playoff non-call that helped the [Los Angeles Rams](#) beat the [New Orleans Saints](#) and advance to the Super Bowl could continue.

Sheppard also ruled at the time that attorney Antonio "Tony" LeMon could request documents and ask questions of NFL officials. LeMon said at the time that meant he would be able to question Goodell and the game officials in depositions.

LeMon said money isn't the object of the February suit he and three others filed, which alleges fraud by NFL officials. It seeks only \$75,000, which LeMon said would go to charity.

"The purpose of the lawsuit is not to get some minuscule amount of money. They won't even notice that," LeMon said. "It's to get at the truth."

---







Antonio LeMon shared a post.  
March 4 ·

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NFL/GOODELL LAWSUIT UPDATE  
WE NEED YOU IN COURT APRIL 16TH-10:30 AM

On April 16, 2019 at 10:30 AM, we will have our first skirmish with the NFL & Commissioner Goodell with State Civil District Court Judge Nicole Shepard, Div J of the Civil District Court presiding. This is a special setting by the Court.

At that hearing in 43 days, the NFL will argue that the back or reverse side of the Saints' ticket contains language that allows it to "in advance" escape liability for its conduct, however bad or offensive, and face no liability beyond possibly a return to the ticket holder of the face value of the ticket. They want to dismiss our lawsuit. We will argue to the contrary & believe that the law is on my side. We will not elaborate as we have no doubt that the NFL attorneys will read anything we post in advance about my argument and legal strategy.

In addition to this argument, the NFL has filed a motion to disallow or at least delay us in getting sworn answers from the NFL and Commissioner Goodell to our written questions or interrogatories & requests for admissions of fact and from having to produce any records & evidence primarily targeting the No Call Play. The NFL and Commissioner Goodell also want to stop or at least delay us from taking the depositions of Commissioner Goodell & the 7 member NFL officiating crew. They are hoping that none of this discovery will ever have to be answered by them as they hope to get our lawsuit dismissed before they are forced to finally give any accounting to The Who Dat Nation. Not only do we believe that our lawsuit has MERIT but that we are ENTITLED to get sworn answers to the INJUSTICE done to us.

We are asking that we have a COURTROOM FULL OF WHO DAT SUPPORTERS at the hearing on April 16th at 10:30 AM. We want to show Judge Shepard that we can be respectful to her Court & the NFL lawyers but that by our numbers that we will NEVER FORGET and that WE WANT JUSTICE!! If you have SAINTS BLACK & GOLD running thru your veins & can be there in your BLACK & GOLD, we not only want you there but we NEED YOU IN THAT COURTROOM:

Civil District Court  
421 Loyola Avenue  
4th Floor  
Division "J"  
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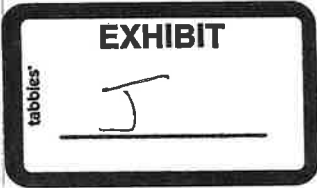
Jose Balli is with Antonio LeMon and Dino Behier.  
March 4 ·



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