

MEMORANDUM

T 206.516.3800
F 206.516.3888

TO: John Miller
Assistant Executive Director
WIAA

Brian Smith
Assistant Executive Director
WIAA

FROM: Carl Blackstone
Robert Westinghouse

DATE: May 25, 2016

RE: WIAA Response to Bellevue School District's Violation Report dated May 23, 2016

On March 22, 2016, Carl Blackstone and Robert Westinghouse submitted an Investigative Report to the Washington Interscholastic Activities Association ("WIAA") relating to the Bellevue High School ("BHS") football program. The WIAA Investigative Report ("Investigative Report") contained findings that BHS and the Bellevue School District ("BSD") had violated a number of WIAA rules. WIAA provided the Investigative Report to BSD on April 1, 2016. On May 11, 2016, BSD/BHS presented a WIAA Violation Report ("Violation Report" or "District's Report") to the KingCo League during a self-report hearing. On May 13, 2016, George Crowder, KingCo League President, requested that WIAA and its investigators evaluate the information contained in the BSD/BHS Violation Report.

The May 11 Violation Report identifies 10 allegations in the Investigative Report. The Violation Report provides substantive responses to only six of the allegations. On May 18, 2016, the WIAA investigators submitted a response to the six allegations addressed in BSD's Violation Report.

On May 23, 2016, BSD presented a supplemental Violation Report to KingCo addressing the four remaining allegations. On the same day, George Crowder requested that the WIAA and its investigators evaluate the information contained in BSD's supplemental Violation Report.

coaches or to enhance the camp experience for players in other ways, is unique and totally distorts the concept of a level playing field for athletic competition among high schools.

- The WIAA Investigative Report also notes that in 2008, the year after WIAA adopted Rule 23.1.1 regarding payments to coaches, the expenses for Ft. Worden increased from \$21,842 to \$80,989. (Investigative Report at 60). Although the BSD May 23 Violation Report provides no specific data regarding payments, it seems obvious that the increased cost of the camp is attributable to the inclusion of payments to coaches in the costs. This was clearly intended to circumvent the new WIAA rule, which was adopted in April 2007 and implemented on August 1, 2007. Pat Jones established Athletic Camps Northwest, LLC on July 19, 2007. The closeness of the two dates is arguably more than a coincidence. A reasonable conclusion is that this business was created by Pat Jones as a mechanism through which to funnel and hide the Booster Club payments to coaches.
- The Booster Club's tax returns for 2008 through 2012 report the following expenses for the Ft. Worden camp:

2008 -- \$80,000
2009 -- \$79,212
2010 -- \$82,891
2011 -- \$69,254
2012 -- \$78,631

(Exhibit 15)

In addition, these tax returns for 2008 through 2012 report the following payments for "coaches stipend:"

2008 -- \$63,000
2009 -- \$30,000
2010 -- \$70,000
2011 -- \$80,000
2012-- \$60,000

The only reasonable conclusion from this data is that Coach Goncharoff actually received payments during this five year period from both the Booster Club in the form of a coaches' stipend and from Pat Jones' business entity for coaching at the Bellevue High School sanctioned summer camp at Ft. Worden. Although the Booster Club and Coach Goncharoff apparently now maintain that the payments directly from