

IN RE FRANKLIN HIGH SCHOOL

REDACTED VERSION

REPORT OF
THE COMPLIANCE GROUP
FOR
CIF SAC-JOAQUIN SECTION

I. INQUIRY OVERVIEW

- A. Initiation of Inquiry – During the 2005-06 academic year, several student-athletes who previously were enrolled in high schools in American Samoa had enrolled in and were competing for Franklin High School (FHS) in the Stockton Unified School District. Several comments were made to Pete Saco, Section Commissioner of the California Interscholastic Federation (CIF), Sac-Joaquin Section, that questioned the influx of American Samoans on FHS's football team. These comments were more questions than information (e.g., Why are these Samoans going to FHS?; Are they recruiting from Samoa?; etc.).

On February 16, 2006, Saco met with Scott Luhn, the principal at FHS. Saco reported to Luhn that many questions had been raised about the numerous transfers of players from American Samoa to FHS. Luhn assured Saco that the transfers were in accordance with CIF legislation. He told Saco that he would continue to monitor the situation.

Later in 2006, Saco met in person with Joe Martin, who had recently been appointed as the Director of Athletics for the Stockton Unified School District. According to Saco, during the meeting, Saco relayed to Martin his concerns about the number of football athletes who have transferred from American Samoa to FHS. Martin told Saco that he personally would monitor the situation. [Martin recalled a meeting, but he was not sure if Samoan athletes were discussed.]

On March 23, 2007, the principal at Fagaitua High School in American Samoa sent an e-mail to Richard Nelson, the foreign exchange coordinator for CIF. A portion of this e-mail is below:

"I have a question about high school to high school recruiting, is this legal? The reason I ask is because I know of a California high school that is recruiting student-athletes from American Samoa (U.S. Territory) to play football for their school. These athletes and these athletes' airfares are being paid by someone who has relationship to the school."

Approximately three days later, Suase Taase, the head football coach at Fagaitua High School in American Samoa, left a message on Saco's telephone, which reiterated this same information. Taase reported during his recent interview with CIF representatives that the impetus for his call to the CIF was the request of him to sign a CIF form from FHS indicating that there was no "recruiting" of one of his athletes when he believed that recruiting did occur.

Saco consulted with Scott Donald, the legal counsel for CIF in this matter. Donald and Saco conducted a telephone call with the principal at Fagaitua High School and its head football coach. This call resulted in a meeting with these and other individuals from a few American Samoa high schools in early June in Las Vegas, as these individuals were in Las Vegas attending a football camp. During this in-person meeting, additional information was reported concerning possible violations of CIF legislation by representatives of FHS. Also, Saco advised the CIF Sac-Joaquin Executive Committee of the general nature of the information and the upcoming meeting in Las Vegas. The committee and Saco determined that Rick Spears, President of the Section, should accompany Saco and Donald to Las Vegas, which he did.

Prior to the Las Vegas trip, Saco and Donald retained Chuck Smrt with The Compliance Group (TCG) to assist in the review of information. It was determined that Smrt would report to Donald.

- B. Methodology – TCG conducted in-person and telephonic interviews and advised its client on various procedural issues.

Concerning the interviews, these were conducted with individuals either in American Samoa or in the California area. Smrt and Donald traveled to American Samoa in late June 2007 and conducted several interviews, including parents of athletes who attended FHS who are no longer enrolled, a parent of a current FHS athlete, and others who have knowledge of the situation.

TCG also conducted a few interviews in the California area. One interview was conducted on May 15 and a few were conducted on July 10 and 11. Subsequent to these interviews, Legal Counsel for the Stockton Unified District raised the issue whether Smrt should be considered a private investigator under the California Business and Professional Codes. In order to eliminate any issue, Smrt did not conduct any additional interviews from that point but served as a consultant to the law firm, including arranging interviews, reviewing information, and preparing this report. No information from the interviews conducted by Smrt on May 15, July 10, and July 11 in California is included in this report. Smrt has applied for a license.

On September 6, Donald conducted interviews with several individuals from either the Stockton Unified School District office or FHS. A few student-athletes also were interviewed. Smrt was present, served as the CIF "scribe" for the interviews, but did not ask any questions.

The vast majority of interviews conducted by Smrt or Donald were tape-recorded. A few individuals declined to be tape-recorded. TCG has transcribed the interviews of the following individuals:

Frances Tuitele
 [REDACTED] & [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 Suase Taase
 [REDACTED]
 Joe Martin

Tom Verner
 Scott Luhn
 Jeff Seumaala
 [REDACTED]
 [REDACTED]
 [REDACTED]
 Shawn Hayes
 [REDACTED]

The information obtained from the following individuals may be included in this report:

<u>Name</u>	<u>Relationship</u>	<u>Date of Interview</u>
Claire Poulmele	Director, Dept. of Education, American Samoa	06-22-07
Frances Tuitele	Former Head Football Coach at Leone High School	06-22-07
[REDACTED]	Parents of Former FHS Student-Athlete [REDACTED]	06-23-07
[REDACTED]	Mother of Football Student-Athlete at Fagaitua High School	06-23-07
[REDACTED]	Parent of Football Student-Athlete at Leone High School	06-24-07
[REDACTED]	Former FHS Student-Athlete	06-24-07
[REDACTED]	Mother of [REDACTED]	06-24-07
[REDACTED]	Father of Former FHS Student-Athlete [REDACTED]	06-25-07
[REDACTED]	Mother of Former FHS Student-Athlete [REDACTED]	06-25-07
[REDACTED]	Father of Former FHS Student-Athlete [REDACTED]	06-25-07
[REDACTED]	Mother of Former FHS Student-Athlete [REDACTED]	06-25-07
[REDACTED]	Father of Former FHS Student-Athlete [REDACTED]	06-25-07
[REDACTED]	Sister of Former FHS Student-Athlete [REDACTED]	06-25-07
Time Tagomalelagi	Assistant Football Coach at Samoan High School	06-25-07
[REDACTED]	Mother of Former Franklin SA [REDACTED]	06-26-07
[REDACTED]	Father of Current FHS Student-Athlete [REDACTED]	06-26-07
Suase Taase	Head Football Coach at Fagaitua High School	06-26-07
Gilda Niedo	Mabuhay Travel Agency	07-12-07
[REDACTED]	Parents of Former FHS Student-Athlete [REDACTED]	07-19-07
Joe Martin	Director of Athletics, Stockton Unified School District	09-06-07
Tom Verner	Head Football Coach, FHS	09-06-07
Scott Luhn	Principal, Franklin High School	09-06-07
Jeff Seumaala	Franklin High School Assistant Football Coach	09-06-07
[REDACTED]	Franklin High School Student-Athlete	09-06-07
[REDACTED]	Franklin High School Student-Athlete	09-06-07
[REDACTED]	Franklin High School Student-Athlete	09-06-07
Shawn Hayes	Chiropractor, Stockton	09-06-07

It also should be noted that Smrt requested information of the Stockton Unified School District in a July 19, 2007, letter, which is included in this report as Attachment #1. On September 4, 2007, David Lyon of Ruiz & Sperrow, who is representing the Stockton Unified School District, responded

to the July 19 letter. Smrt's July 19, 2007, letter specifically asked for information concerning football student-athletes at FHS who had transferred from high schools in American Samoa. The request for information was focused upon this group because the information received by Saco concerned American Samoa football student-athletes at FHS.

- C. Report Format – Section II of this report provides an overview of information. Section III summarizes the reported information into possible violation areas. If a few individuals reported information about a specific possible violation, that area is included in Section III. Section IV contains summaries of individual interviews that may contain information relevant to the possible violation area.

II. OVERVIEW OF INFORMATION

A. Transfers of American Samoa student-athletes to FHS – Jeff Seumaala is an assistant football coach at FHS. His mother, Eleimanu Seumaala, still lives in American Samoa. One of Jeff’s brothers is [REDACTED]. [REDACTED] attended Leone High School until the end of his sophomore year in the spring of 2003. Justin moved to the Stockton area and enrolled at FHS for the 2003-04 academic year.

[REDACTED] was in the same grade and a friend of [REDACTED] while both were enrolled at Leone High School. According to [REDACTED]’s sister, [REDACTED] and his mother began telephoning [REDACTED] and his family to encourage [REDACTED] to travel to California to enroll in FHS. [REDACTED]’s family agreed and he enrolled for the 2004-05 academic year.

This resulted in other student-athletes transferring from Leone High School to FHS, primarily for the 2005-06 academic year. There are five public high schools in American Samoa. Over the period of early 2006 to spring 2007, student-athletes at other high schools in American Samoa began to transfer to FHS.

Based upon the information provided to CIF representatives, below is a listing of those athletes who recently transferred to FHS from a high school in American Samoa. Not all were interviewed:

		<u>Actual (or Anticipated) Years of Competition at Franklin High School</u>
<u>Leone High School</u>	[REDACTED]	2005-06
	[REDACTED]	2005-06
	[REDACTED]	2005-06
	[REDACTED]	2005-06
	[REDACTED]	2005-06
	[REDACTED]	2005-06
	[REDACTED]	2006-07
<u>Fagaitua High School</u>	[REDACTED]	2006-07
	[REDACTED]	2007-08
	[REDACTED]	*
<u>Tufana High School</u>	[REDACTED]	2007-08
	[REDACTED]	2007-08
<u>Samoan High School</u>	[REDACTED]	2007-08
<u>Poly Tech High School</u>	[REDACTED]	2006-07

*[REDACTED] enrolled in February 2006 but returned to American Samoa after a few weeks.

The student-athletes from American Samoa participated during their senior year. It appears that all had competed in football during their junior year for a high school in American Samoa. These athletes moved to the Stockton area and enrolled at FHS either: (i) during the second semester of their junior year; or (ii) during the summer prior to their fall competition during their senior year at FHS.

Under the provisions of CIF Bylaw 214, if the student did not meet the normal transfer provisions of Bylaw 214.A(1) (the student moved with his or her parents – a bona fide residence transfer), a waiver must be obtained through the CIF office. The waiver process includes the submission of CIF Form 510 and Form 214 that must be completed by the student, student's parent, former school officials, and enrolling school officials prior to competition, regardless of court order or guardianship. The forms are submitted to the CIF office for approval. FHS attempted to complete Forms 510/214 for two athletes (██████████ and ██████████) at Fagaitua High School in the spring of 2007, both of whom transferred to FHS earlier in 2007. It was the receipt of this form by the head football coach at Fagaitua that prompted his telephone call to Saco.

- B. Individuals mentioned in the report – Dr. McLaughlin is the Superintendent of the Stockton Unified School District and assumed his position in 2006. Joe Martin is the director of athletics who was appointed by Dr. McLaughlin in the summer of 2006. Scott Luhn was appointed the principal at FHS during the 2005-06 academic year. Tom Verner has been the head football coach at FHS since approximately 1993.

The individuals mentioned frequently in Section III of this report are:

Jeff Seumaala – Jeff Seumaala works as a network technician with a local bank and has been the assistant football coach at FHS for approximately four years. Jeff graduated from Leone High School in American Samoa.

Steve Suemaala – Steve Seumaala is Jeff's brother. While he was referred to as a coach at FHS by a few athletes, FHS representatives indicated that he is not a coach. However, he is present on the sidelines at FHS games helping carry water. He is married to Gwendolyn.

Gwendolyn Seumaala – Gwen Seumaala is Steve Seumaala's wife. She is listed as either the guardian or caregiver for a few athletes.

Eleimanu Seumaala – Eleimanu Seumaala, often referred to as Manu during the interviews, resides in American Samoa and is the mother of Jeff and Steve Seumaala. She worked for the human resources department of the American Samoa Government for several years. She also currently is involved with a travel agency in American Samoa.

- C. Brief overview of information reported – American Samoa has five public high schools. For the 2005-06 academic year, six student-athletes transferred from Leone High School in American Samoa to FHS. Athletes from the other four high schools in American Samoa began transferring in the spring of 2006 and began competing for FHS in the fall of 2006 or are competing in 2007 for FHS.

In essence, there were three “groups”:

- i. During the spring or summer prior to the fall 2005 season, six athletes from Leone High School (_____, _____, _____, _____, _____, and _____) enrolled and competed in the fall of 2005;
- ii. During the spring or summer prior to the 2006 season, four student-athletes (_____, _____, _____, and _____) enrolled and three (_____, _____, and _____) competed; and
- iii. During the spring or summer prior to the 2007 season, four athletes (_____, _____, _____, and _____) enrolled and competed.

The parents frequently traveled with their sons to register them in FHS. None of these parents who were interviewed reported that they remained in the Stockton area for more than one week and none moved to the Stockton area. According to the athletes and parents, the athletes lived with Jeff or Steve Seumaala and paid no rent. According to the parents of the former athletes, none of the families are blood relatives of the Seumaala family. The majority of the families indicated that they were not related to Eleimanu. The athletes often traveled home at Christmas and the parents traveled to Stockton to attend the high school graduation.

Several of the parents and athletes allege that the airfare for the parents and the athletes were paid for by representatives of FHS, that they did not pay for lodging during the time in which they were in

the Stockton area enrolling their sons, that FHS representatives also paid the cost of airfare for their athletes to return to American Samoa for Christmas, and paid at least a portion of the cost of airfare for the parents to attend graduation.

FHS representatives dispute this contention. Jeff Seumaala indicated that none of the athletes resided with him except one, who did it only on a very occasional basis. Jeff Seumaala and Tom Verner indicated that they did not pay for the airfare for any parents or athletes to travel to Stockton.

In the information reported by former athletes and the parents, the majority said that the decision to move from American Samoa to Stockton was frequently the parents' choice. All of the parents of the former athletes who were interviewed reported that the trip from American Samoa to Stockton was to enroll their sons. Three of the current athletes at Stockton who enrolled in the spring of 2007 indicated that they had not heard of FHS until they arrived in Stockton and that their trip to California was for other reasons. The most common reasons cited were that FHS had a better academic and athletics program than their high school in American Samoa. The athletes frequently mentioned that they did not want to leave their high school and their football team, but it was a parental decision. The source of information for the parents on FHS was Eleimanu Seumaala.

D. Analysis of the credibility of the information – Some conflicts exist between the information reported by coaching staff members and student-athletes at Stockton with that information reported by parents. The vast majority of the parents of the athletes that were interviewed no longer had athletes at FHS. The following factors that commonly are reviewed when assessing credibility when attempting to resolve conflicts in information were examined:

1. Motivation of the individuals – The individual who is being accused often will deny any wrongdoing and reports that the person alleging the wrongdoing is lying, possibly because the accuser has negative feelings toward the accused.

The vast majority of the parents and athletes interviewed are no longer involved with the FHS program. The vast majority did not state negative feelings toward FHS or the coaches. In fact, several talked fondly of Coach Verner. A few negative feelings were expressed about Jeff Seumaala and Eleimanu. This displeasure primarily arose around high school graduation when the parents believed that Eleimanu did not fulfill her promises made during her initial discussions with them in which she allegedly stated that arrangements would be

made for the parents to fly to Stockton for their son's graduation at no cost to the parents. This issue arose with at least three parents in that the parents did not receive a ticket or several calls to Eleimanu or Jeff had to occur before these tickets were issued. Other than this displeasure, TCG did not denote any significant bias against FHS coaches or representatives. Coach Verner was asked whether he believed any former student-athletes or parents might have negative feelings toward him, and he responded that he was only aware of one, [REDACTED]. (No information from [REDACTED] is included in this report, although information from his parents is included).

2. Number of individuals who reported similar information – Numerous parents reported information that was similar to other parents in approximately five general areas. Below is a chart indicating the number of families that reported that they received a contact by or benefit from a representative of FHS:

Number of Families

▪ Contacted by Eleimanu while in American Samoa to encourage transfers to California or FHS.....	10
▪ Portion of travel for initial trip to California; paid in part by representatives of FHS.....	7
▪ Lodging provided by Jeff Seumaala.....	6
▪ Provision of airline ticket at Christmas to American Samoa paid in part by representatives of FHS.....	4
▪ Provision of airline ticket for trip to attend high school graduation for a family member to be paid by representatives of FHS.....	3

3. No information about a conspiracy – No individuals in American Samoa reported that they had been in communication with other individuals who had been interviewed. Similarly, several of the families in American Samoa did not remember the first or last names of some of the other Samoan families that they saw in Stockton (they often described them as a certain athlete's parents). No individual was identified as a "ring leader" in a vendetta against FHS nor has anyone been identified as having made contact with the families who have reported the information. Also, individuals from more than one high school and from different areas of the island provided information.
4. Some information possibly contrary to CIF bylaws was reported by a family of a current FHS student – One parent reported information that could be violations of CIF bylaws and their son currently attends FHS. While this information was similar to that reported by former

FHS athletes and parents, it contradicts in certain areas that information reported by the current athlete.

5. Some of the information reported by the enrolled student-athletes did not appear reasonable – Three of the four student-athletes that transferred from American Samoa during the second semester of 2007 were interviewed by CIF representatives. Generally speaking, each indicated that they were not aware of FHS prior to their trip to the Stockton area in the second semester of the 2006-07 academic year. One athlete indicated that he, his mother and father, and two siblings were on a family vacation in the Stockton area and visited Gwen Seumaala, the sister-in-law of Jeff Seumaala and relative of the student-athlete's family. The athlete indicated that the family then decided to live in the FHS district in Stockton and he enrolled. After one or two months, his family decided to move back to American Samoa. (The father of this athlete refutes the notion of a family vacation). Another athlete indicated that his family moved to the area in order for his mother to receive treatment for cancer. They resided in Stockton for a couple of months, his mother got better, and his parents returned to American Samoa. Another athlete indicated that he and his family were visiting relatives in the Stockton area and he decided to remain and enroll at FHS. The concern is the contention that all were not aware of FHS prior to their trip to California, none had intent to enroll but elected to do so after arriving, and that the parents of two of the three returned to American Samoa after a few months.

- E. Involvement of Department of Education in American Samoa – California Forms 510/214 were sent by FHS and received at Fagaitua High School for athletes ██████████ and ██████████ in February or March 2007 in order for Fagaitua High School officials to sign. Officials at Fagaitua High School refused and contacted CIF officials. According to Suase Taase, the head football coach at Fagaitua, the form was sent to the high school in care of the Department of Education. Taase and his principal contacted the CIF.

During the visit by Smrt and Donald to American Samoa, Dr. Claire Poulmele, the director of the Department of Education, was interviewed. The primary purpose of the interview was to discuss a letter on Department of Education stationary dated August 28, 2006, which is included in this report as Attachment #2. The letter indicates that it is in response to an August 24, 2006, request from Joe Martin. The letter indicates that students ██████████, ██████████, and ██████████ all departed American Samoa with their families in January 2006. It added that they were not recruited

by anyone and included information that the student-athletes in question “had not participated in what you call organized football” in that they only played rugby. It ended with a reference that the Department of Education was happy to respond knowing of Mr. Martin’s relationship with U.S. Congressman Richard Pombo. A signature for Claire Poulmele is on the letter.

The August 28 letter was faxed back to Joe Martin. The top of the letter indicates it was faxed on August 28 from the Human Resources Department in the American Samoan Department, not from the Department of Education.

During CIF’s interview with Poulmele, she indicated that it was “doubtful” that the signature on the letter was hers. Later in the interview, she stated she was fairly certain it was not her signature. Two individuals were also present with her during this discussion – Elia Savalai, the program director for secondary schools for the Department of Education; and Tumua Matuu, legal counsel for the Department of Education. Both indicated that they are very familiar with her signature and that was not signature. Poulmele also indicated that she did not know who Congressman Pombo is. (Note – Pombo was a U.S. Congressman for the 11th District in California from 1993 to January 2007. The 11th District includes Stockton.) Poulmele recalled that a student transferred from one of the American Samoa high schools to a high school on the mainland and the coach at that Samoan high school refused to endorse a form that was required for this transfer. Poulmele was puzzled why one of the American Samoa high school coaches would not sign the form and asked Savalai to quiz the coach on why he did not sign it. Savalai reported that he asked the coach and the coach stated that the athlete was recruited, so he did not want to sign the form. Savalai stated that the coach he talked with was Taase at Fagaitua High School.

Smrt and Donald also talked with Malu Mageo, the director of human resources for the American Samoan Government. Shortly thereafter, Mageo asked two supervisors in human resources (Esie and Enesi) to join the discussion. [After a few minutes, Esie, Enesi, Donald, and Smrt went to Esie’s office.] They confirmed that the fax number on the letter to Martin was from the Human Resources Department, not the Department of Education. There are two fax machines in the Human Resources Department and the number ending in 1139 (which was the alleged letter from the Department of Education) is located outside the director’s office. A log is kept of faxes, if the secretary is at her desk. The log was checked for August 28 and listed only one fax, which was to Hawaii. This log is handwritten by the secretary.

Since Smrt and Donald previously had heard from parents that Eleimanu worked for the Department of Human Resources, Mageo was asked whether he knew a possible human resources employee named Eleimanu, and he stated that he did. After Enesi and Esie joined the group, they indicated they knew Eleimanu's brother played or coached football. They also added that they were aware that Eleimanu was talking to parents of athletes in American Samoa about moving to California. They recalled overhearing her talking to these parents about lodging accommodations while she was at work.

Enesi reported that she taught at Leone High School and knew many people in that area. She indicated that on one occasion, Eleimanu asked her if she knew [REDACTED] from the Leone area. After Enesi responded that she did, Eleimanu asked her to obtain the name and telephone number of [REDACTED]. Enesi obtained the name and the telephone number for [REDACTED] and gave it to her. (NOTE: [REDACTED] is the mother of [REDACTED] who transferred from Leone to FHS for the 2005-06 academic year. Mrs. [REDACTED] indicated during her CIF interview that Eleimanu contacted her).

Concerning the date of the August 28, 2006, letter, Esie reported that Eleimanu was not on extended leave at that time. She did not know if Eleimanu worked on that day.

During his recent interview, Martin indicated that he attempted to determine whether three of the athletes who were enrolling in the fall of 2006 previously had competed for a varsity team in American Samoa. He contacted Poulmele by telephone to determine this information. He did not recall how he knew to contact Poulmele. He believed that Poulmele's letter to him was in response to his telephone call. He indicated that a short time later, in an attempt to obtain the signatures of the former high school officials from American Samoa on the 214 and 510 forms for several of the Samoan athletes, he again called the number he had for Poulmele. He began talking to an individual that, after a few minutes, he realized was Bob Tuiasosopo, as he had known Tuiasosopo in the past. (Bob Tuiasosopo is believed to be the brother of Eleimanu). Martin assumed that Tuiasosopo worked for the Department of Education, as he believed he called the same number in which he contacted Poulmele. He talked to Tuiasosopo on approximately four or five occasions about getting the forms signed.

F. Factors that influenced the inquiry

1. Refusal of Eleimanu Seumaala to interview – During the trip to American Samoa, several parents mentioned that they had been encouraged by Eleimanu to allow their sons to travel to California to attend high school. As a result, Smrt and Donald visited the home of Eleimanu in American Samoa. After identifying themselves, Eleimanu replied that she was under no obligation to interview. She also indicated that she had a sick husband. Smrt asked whether she would be available for an interview on the next day, and she said she would not. Smrt asked whether she was available in the future, and she stated she would not be.

This refusal eliminated the opportunity to provide her the opportunity to respond to questions about the events in which others indicated she was involved.

2. The lack of documentation at FHS – It is emphasized that no one reported information that FHS officials destroyed or withheld any information during the inquiry. However, if additional information would have been available at FHS, the available information would have assisted in the analysis, particularly in the determination of whether athletes competed while ineligible under the CIF transfer legislation during the fall of 2005. In its request of July 2007, information was asked concerning all Samoan athletes from September 1, 2004, to the present.

As noted earlier, for the first group of athletes that competed in the fall of 2005, FHS Principal Scott Luhn indicated there are no records at the high school of any 510/214 forms or any documents used to establish residency. (Luhn became the principal after the start of that academic year). Luhn indicated that for those athletes entering in the 2006 and 2007 seasons, he completed 510 and 214 forms and they were forwarded to the CIF.

For the three athletes who first competed in the fall of 2006 (██████████, ██████████, and ██████████), the materials did not contain any 510 or 214 forms for the three athletes.

For the athletes who are currently competing, the FHS response included 510/214 forms for ██████████, ██████████, and ██████████. Signatures from the appropriate official at the prior high school in American Samoa were contained only on the forms for ██████████ and ██████████, both from Tufana High School. Luhn indicated that the completed forms included

signatures of all high school officials in American Samoa and they were submitted to the CIF, but he did not have any copies of the information he forwarded to the CIF. Saco reported that he did not receive any 510/214 forms from FHS within the past several years for any American Samoan athletes.

Included in the FHS response was a chart that summarized what forms were completed for athletes competing during the 2006-07 and 2007-08 academic years and their address of residency. This form is included in this report as Attachment #3.

III. POSSIBLE VIOLATION AREAS

POSSIBLE VIOLATION AREA #1

[CIF Bylaw 510]

It was reported that on several occasions during the period of 2004 to 2007, Eleimanu Seumaala, the mother of FHS Assistant Football Coach Jeff Seumaala, contacted the parents of athletes who were attending high schools in American Samoa in order to encourage these parents to have their sons enroll at Franklin High School and compete in the sport of football. These contacts occurred both in person and by telephone.

Also, during some of these conversations, Eleimanu Seumaala offered to provide the parents or their sons with assistance with the cost of airline transportation between American Samoa and California upon the young men's initial travel to California, to register the young men in high school, over Christmas vacation, and high school graduation.

Further, on at least one occasion, Jeff Seumaala contacted one of the parents to encourage the parents to allow their sons to transfer.

Eleimanu Seumaala is the mother of Jeff Seumaala, an assistant football coach at FHS. Jeff began coaching at FHS approximately four years ago. She also is the mother of Steve Seumaala, Jeff Seumaala's brother and an individual who is on the sidelines for FHS at football games. For purposes of this report, Eleimanu would be considered a representative of FHS since she is the mother of two individuals involved with the FHS program and if she was encouraging the transfer to and enrollment in FHS of several athletes.

Several parents of athletes who attended high school in American Samoa reported that Eleimanu (who often is referred to as Manu) contacted them either in person or by telephone to encourage them to allow their son to transfer to FHS. On two occasions, the parents reported that they received a telephone call from Jeff Seumaala encouraging the transfer.

Some of the parents also reported that as part of these initial contacts with Eleimanu, she mentioned the possibility of the athlete's family receiving airline transportation for the parents and a son to travel to California for the initial move, for high school registration, for a return trip to American Samoa at Christmas, and for high school graduation. This will be discussed in more detail in Possible Violation Area #2.

During his interview with a CIF representative, Jeff Seumaala indicated that he was not aware of and never encouraged his mother to contact any football players in American Samoa high schools about attending FHS. He also indicated that he never contacted any players. He acknowledged obtaining video of American

Samoa high school games from an American Samoa television station to review since he was a former player at Leone High School.

Nearly all of the information corroborating this possible violation area was reported by parents of those athletes no longer enrolled at FHS or never attended FHS. A father of one of the current athletes also corroborated the area. The three athletes currently enrolled at FHS who were interviewed recently indicated that they were not contacted by Eleimanu.

The detailed information reported by each family (athlete and/or parent(s)) about this possible violation area is contained in Section IV of this report. Below is a listing of those individuals or families (athletes and/or parent(s)) that support or refute this possible violation area:

	Refutes or Has No Knowledge of Part or All of Possible Violations Area	Corroborates Part or All of the Possible Violations Area
[REDACTED]		X (Contact by Eleimanu)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu, Offer)
[REDACTED]		X (Contact by Eleimanu)
[REDACTED]		X (Contact by Eleimanu)
[REDACTED]	X (No promise of payment)	X (Contact by Eleimanu)
Jeff Seumaala	X	
Tom Verner	X	
[REDACTED]	X	
[REDACTED]	X	
[REDACTED]	X	

POSSIBLE VIOLATION AREA #2

[CIF Bylaw 510]

It was reported that on several occasions during the period of 2005 to 2007, FHS Assistant Football Coach Jeff Seumaala and Seumaala's mother, Eleimanu Seumaala, arranged for the cost of airline transportation and hotel lodging to be paid for certain members of high school football teams in American Samoa when they were transferring to FHS in Stockton; further, similar arrangements were made for parents of these student-athletes.

Also, upon enrollment in FHS, some of the athletes and their parents received the cost of airline transportation to travel between Stockton and American Samoa around Christmas and high school graduation.

More specifically, it was reported by several individuals that:

- a. One or both parents received round-trip airline transportation and their son received one-way transportation between American Samoa and California in order for their son to move to the Stockton area. Upon arrival, the parent(s) and son would reside at a local hotel, which they did not pay for. After a few days, the parent(s) would return to American Samoa. On a few occasions, the parent registered their son at FHS during this trip;*
- b. If the parent did not register their son on the initial trip, one parent received airline transportation to travel to California to enroll their son at Franklin. Lodging also was again provided at a local hotel;*
- c. Arrangements were made and paid by FHS representatives for the athlete to travel round-trip between California and American Samoa for Christmas; and*
- d. One or both parents received the cost of airline transportation to attend their son's high school graduation.*

Concerning the initial trip, a few athletes enrolled in FHS during the second semester of the athletes' junior year. On those occasions, the mother or father frequently accompanied the athlete to California and registered their son in FHS. Several athletes traveled to California following the completion of their junior year and resided in the Stockton area during the summer. On some of those occasions, a parent accompanied their son. On those occasions, the parent often returned to California in the fall in order to register their son in FHS.

Regardless of when the parents' trip occurred and its duration, the parents of eight athletes reported that: (i) they stayed at a hotel in Stockton and did not pay; (ii) they left the Stockton area after no longer than one or two weeks; and (iii) had no intent to move to the area at the time of the registration in that this trip was to accompany their son or enroll him but not to move to the Stockton area. All eight indicated that

representatives of FHS at least offered the opportunity for the cost of the airline flight for the parent or athlete to be paid by representatives of FHS.

Concerning the Christmas and high school graduation trips, several parents or athletes reported that they did not pay the cost of these trips and that Eleimanu or Jeff Seumaala handled the arrangements. A few parents paid the cost.

Below is a chart depicting the general information reported. The detailed information reported by each individual or family (athlete and/or parent(s)) is contained in Section IV:

Athlete	TRAVEL TO CALIFORNIA			CHRISTMAS TRIP		GRADUATION TRIP PARENTS	
	Who Went?	Who Paid?	Who Paid Hotel?	Travel Home?	FHS Paid?	Who Traveled?	Who Paid?
[REDACTED]	Both Parents and [REDACTED]	FHS	FHS	Yes	Yes	Both Parents	FHS
[REDACTED]	[REDACTED] initially, Mom Later	FHS	FHS	Yes	Yes	N/A	N/A
[REDACTED]	Mom and [REDACTED]	FHS	FHS	Yes	No	Mom	½ FHS
[REDACTED]	[REDACTED] and Dad	FHS Dad ½	FHS	Yes	Yes	Both Parents	1 ticket by FHS
[REDACTED]	[REDACTED] and Mom	FHS	FHS	Yes	Yes	Didn't go	N/A
[REDACTED]	Sister and [REDACTED]	FHS for ½ TT, Sister her own	No hotel (Cousin)	Yes	No	N/A	N/A
[REDACTED]	Mom and [REDACTED]	Father declined offer	No hotel (Cousin)	N/A	N/A	N/A	N/A
[REDACTED]	Mom and [REDACTED]	FHS ⁽²⁾	FHS	N/A	N/A	N/A	N/A

⁽¹⁾ This information was reported by the young man's father

⁽²⁾ According to [REDACTED], Eleimanu paid, but the family is repaying her.

During his interview, Jeff Seumaala denied providing or arranging the cost of any airline transportation to any parent or student-athlete from American Samoa to attend FHS. Head Football Coach Tom Verner denied any personal involvement in or arranging any airline transportation and was not aware of Jeff Seumaala providing any such arrangements.

POSSIBLE VIOLATION AREA #3

[CIF Bylaws 214 and 510]

It was reported that during the period of 2005 to 2007, FHS Assistant Football Coach Jeff Seumaala and his brother (Steve) provided meals and lodging in their residencies to numerous athletes who had moved from American Samoa to Stockton and were competing on the FHS football team. During this time period, the number of athletes living at either Jeff or Steve Seumaala's home ranged from one to four, depending upon the time of year. The athletes did not pay for this lodging or meals.

Further, Jeff or Steve Seumaala provided round-trip automobile transportation to the athletes between several houses and FHS on a daily basis during the academic year in order for the athletes to attend class or football practice.

All of the athletes who were interviewed, both those who no longer are enrolled and those enrolled, reported that during their enrollment at FHS, they were residing at the home of either Jeff or Steve Seumaala. Several parents of former athletes, one parent of a current athlete, and two former athletes reported that shortly after staying at a hotel upon arrival in the area, the athletes moved into the home of one of these individuals.

As noted previously in the report, Jeff Seumaala became an assistant football coach approximately four years ago, while Steve Seumaala was never an assistant football coach but has sideline responsibilities at some FHS football games.

The athletes arrived during FHS's second semester or during the summer and moved in with one of the brothers. They resided with these individuals during the next academic year and competed. They were provided round-trip automobile transportation between school, practice, and home. After high school graduation, the athletes would leave these residencies and either return to American Samoa, travel to see relatives in the United States, or move in with relatives/friends in the Stockton area.

The information reported by the former athletes or their parents is in conflict with that reported by Jeff Seumaala. Also, while confirming that they resided with Steve Seumaala and Steve's wife, the currently enrolled student-athletes reported that the reason for such an arrangement was due to their familial or legal relationship with Steve's wife (Gwen).

Concerning the six athletes who first competed during the 2005 season, CIF representatives talked with the parents (or the athlete) of four of the six. Each indicated that the athlete stayed with Jeff Seumaala for at

least one semester of the 2005-06 academic year. They reported that when the three athletes from American Samoa who initially competed in the 2006 season moved to the Stockton area during the second semester of the 2005-06 academic year, it was necessary for a few of the six to reside with Steve Seumaala in the spring of 2006. None of the four parents reported a family relationship with the Seumaalas.

Of the three who initially competed in the 2006 season, CIF representatives talked with the parent of one of the athletes. She reported that her son (██████████) lived initially with Jeff then moved with Steve. She reported no family relationship to the Seumaalas.

Of the four who transferred from American Samoan high schools and are competing for FHS this fall, all are residing with Steve and Gwen Seumaala at ██████████. The house is owned by Tom Verner, who reported that he rents the house to the Seumaalas. Steve Seumaala's wife (Gwen) is the court appointed or custodial guardian for one of the four.

Based upon information provided by the athletes or parents, no one paid the Seumaalas any money for lodging, meals, or transportation.

During his interview, Jeff Seumaala indicated he did not provide lodging to any athlete at FHS except for a short period of time for one athlete during the 2005-06 academic year, which occurred when the parents of an athlete was "out of town".

CIF representatives recently requested the address on file at FHS from district officials. For those athletes or parents who were interviewed, the following chart lists the location of residencies/addresses that were provided by the parents, student-athletes, or FHS officials for several of the athletes:

Name	Year of Competition	Lived at Residence of:		Source of Information	FHS Address on File
		Jeff Seumaala	Steve Seumaala		
██████████	2005	X		Parents	No information
██████████	2005	X		Parents	No information
██████████	2005	X		Parents	No information
██████████	2005	X	X	Parent & ██████████	No information
██████████	2006	X	X	Parent	✓ ██████████
██████████	N/A	X		Parent	✓✓ ██████████
██████████	2007		X	Parent & ██████████	Steve Seumaala
██████████	2007		X	██████████	Steve Seumaala
██████████	2007		X	██████████	*Steve Seumaala
██████████	2007		X	██████████	Steve Seumaala

* = FHS records indicate Gwen Seumaala received guardianship via court order on August 7, 2007

✓ = FHS records indicate PGE statement form used for residency for the young man's mother dated March 8, 2006

✓✓ = FHS records indicate PGE residency form used for residency for the young man's mother dated February 12, 2007. This is the address that Jeff Seumaala provided as his.

The Seumaalas are from the Leone High School area of American Samoa. Information was reported by several of the currently enrolled student-athletes that they are related to Steve's wife. However, nearly all of the individuals who were interviewed in American Samoa indicated they were not related to the Seumaalas.

The detailed information reported by each family (athlete and/or parent(s)) about this possible violation area is contained in Section IV of this report.

POSSIBLE VIOLATION AREA #4

[CIF Bylaws 214 and 301]

Based upon the information reported, it is appears that during the 2005-06, 2006-07, and 2007-08 academic years, FHS utilized at least one football student-athlete in competition that was not eligible because the athlete(s) did not meet CIF transfer eligibility legislation in that:

- a. During the 2005 season, six student-athletes who had transferred from high schools in American Samoa and first competed for FHS during the fall season. The parents of at least four of these athletes (██████, ██████, ██████, and ██████) did not reside in the Stockton school district and no information exists to indicate any waivers were provided;
- b. During the 2006 season, at least two athletes (██████ and ██████) appear to have been ineligible because their parents did not reside in the Stockton area. Further, no requests for hardship waivers or appropriate forms were submitted to the CIF office for these two; and
- c. For the 2007 season, at least three student-athletes (██████, ██████, and ██████) appear to be competing, even though they did not meet the requirements of the CIF transfer eligibility legislation.

Further, the available information questions whether representatives of FHS undertook sufficient review of information submitted to it concerning the residency and resulting eligibility of several football student-athletes from American Samoa.

ELIGIBILITY

The first of the two general issues identified in this possible violation area focuses upon CIF transfer legislation. Based upon the documents submitted by FHS, it is unclear about the specific legislation that was used by FHS to certify eligibility of several of the athletes. Specific questions were not asked during the inquiry about the means by which a certain athlete was certified under CIF legislation. Rather, a request was made of all available records. As a result of the information obtained during the CIF inquiry and the review of the records available at FHS, it appears FHS utilized at least one student-athlete who transferred from a high school in American Samoa to FHS that did not meet CIF transfer eligibility legislation for each of the past three years.

If a student meets the definition of a transfer, the CIF transfer eligibility legislation would apply. A transfer student may be deemed eligible if a bona fide change of residence occurs. CIF Bylaw 214(B) defines a bona fide residence as the location where the student's parents, guardian, or caregivers (with whom eligibility has been established) live with that student and have the use and enjoyment of that location. A student with his parents, guardian, or caregiver can only have one bona fide residence at one time. If a bona

bona fide change of residence does not occur, under the provisions of Bylaw 214c(4), each CIF section may establish a process to attain immediate eligibility. In order for that to occur, the Section Commissioner must approve a hardship waiver and Forms 510 and 214 must be forwarded as part of this process. The current operating practice for the Sac-Joaquin Section is for these forms to be submitted to the Section Commissioner for his approval and signature and then he provides the forms back to the high school.

Below is an overview of the eligibility/residency situation of the athletes:

2005 Football Season

[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED] -- CIF representatives interviewed parents of [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. The parent(s) indicated that they went with their son to the Stockton area, their son enrolled, and they returned to American Samoa. It was not their intent nor did they move to the Stockton area. FHS officials indicated no records were available for these athletes.

Based upon information from the parents, no bona fide change of residence occurred. They indicated their sons lived with Jeff Seumaala during the academic year until the spring when a few additional Samoans arrived and some of them were sent to live with Steve Seumaala. FHS could not locate any Forms 510 or 214 that were submitted to the CIF for these athletes and the CIF did not have any record of receiving any forms nor approving any hardship waivers from FHS.

While no records were available at FHS concerning these six athletes, parents of two of the athletes reported that Assistant Football Coach Jeff Seumaala or his brother (Steve) took them to a local utility company to obtain a residency form even though they were returning a few days later to American Samoa. The father of [REDACTED] said Steve Seumaala took him to a cable company in Stockton. The mother of [REDACTED] said Jeff and Steve Seumaala took her to an electric company to sign a form.

2006 Football Season

[REDACTED] -- The mother of [REDACTED] indicated during her interview that she did not change her residence. [REDACTED] reported that she flew to California in March 2006 and accompanying her on this flight were her son ([REDACTED]), [REDACTED], [REDACTED] mother ([REDACTED]), and [REDACTED]. ([REDACTED], [REDACTED], and [REDACTED] all enrolled at FHS in March.) [REDACTED] indicated that she spent approximately four to five days

in a hotel in Stockton. She registered her son and shortly thereafter, she traveled back to American Samoa. She said her son resided with Jeff, then Steve Seumaala. She is not related to the Seumaalas and she did not sign any guardianship papers.

FHS officials could not locate a copy of a 214 or 510 form for [REDACTED] and CIF officials indicated they have not received a form on [REDACTED]. The records recently submitted by FHS to the CIF included: (i) A PG&E residency form dated March 8, 2006, from [REDACTED]; and (ii) the student-athlete information record dated August 20, 2007, indicating a residence on [REDACTED] in Stockton with parent/guardian being [REDACTED] or [REDACTED], and an initial enrollment date of March 10, 2006.

[REDACTED] – Neither he nor his parents were interviewed. The records recently submitted by FHS included: (i) the student enrollment record listing Gwendolyn Leota in the parent/guardian section at Steve and Gwen Seumaala's address and an initial enrollment date of March 24, 2006; (ii) an Appointment of Caregiver Form indicating that the parents of [REDACTED] appointed Gwendolyn Leota as guardian until their arrival in the Stockton area "about the third week of April" 2006; and (iii) a PG&E verification form indicating that Gwen Leota had service in her name at [REDACTED] on March 23, 2006. No hardship waiver requests or Forms 510/214 were submitted as part of this inquiry nor in the fall of 2006.

The student enrollment record dated August 20, 2007, was similar to the record dated August 24, 2006, forwarded by FHS to the CIF at that time. Both appear to indicate the permanent record at FHS for [REDACTED] has Leota as his guardian. It also implies that the young man's parents never moved. Regardless, under Bylaw 220, a hardship waiver must be approved by the CIF office even with the Appointment of Caregiver Form.

[REDACTED] – Neither he nor his parents were interviewed. The records recently submitted by FHS to CIF included: (i) a student identification record that had his address as [REDACTED] and an enrollment date of March 14, 2006; and (ii) a PG&E service verification form in the name of [REDACTED] was included for this address dated March 8, 2006.

[REDACTED] – [REDACTED] enrolled in the spring of 2006 but left the Stockton area after a few weeks. Mr. [REDACTED] reported that his wife and son traveled to Stockton, enrolled [REDACTED] at FHS, his wife stayed a few days, and she left. Mrs. [REDACTED] reported that she stayed in the area for approximately two weeks and returned to American Samoa. She said [REDACTED] stayed with Jeff or Steve Seumaala for a few weeks and he got homesick and returned to American Samoa. He never competed for FHS.

It should be noted that in August 2006, prior to the initial competition of [REDACTED], [REDACTED], and [REDACTED], Joe Martin, the director of athletics for the Stockton Unified School District, contacted the Department of Education in American Samoa in August 2006. Shortly thereafter, he forwarded to Saco a copy of the Poulmele letter along with the student informational record for [REDACTED], [REDACTED], and [REDACTED]. The Poulmele letter indicates that the three athletes did not play "organized football" and that three "departed with their families in January 2006" from American Samoa to California. If the families moved, a bona fide residency change existed and no forms were necessary. Also, although CIF legislation provides a student who previously did not compete in high school with transfer opportunities, a hardship waiver must be forwarded to the CIF office. No waiver was forwarded, according to Saco.

2007 Football Season

[REDACTED] – The basis for [REDACTED] certification by FHS as eligible for this season is unclear. The records recently submitted by FHS included: (i) a student information record dated August 20, 2007, listing [REDACTED] address on [REDACTED], parent/guardian as [REDACTED], and an enrollment date of February 15, 2007; and (ii) a PG&E Account Information Statement indicating a closed account for [REDACTED] on [REDACTED] dated March 15, 2007.

During the recent interview with [REDACTED], he indicated that his family took a vacation to the Stockton area in January or February of 2007, and [REDACTED] decided at that point to reside in the area. According to [REDACTED], his family stayed one or two months in Stockton and then elected to return to American Samoa. [REDACTED] indicated he was staying with his aunt, Gwen Seumaala (on [REDACTED]). If the information reported by [REDACTED] is correct, the family residing in the area for only a few months and then returning to American Samoa would require a transfer waiver. A long-standing interpretation of the CIF office that recently was placed into legislation indicates that a student must live in their attendance area for one year with their parents. (See Attachment #4).

During the interview of the young man's father by CIF representatives in American Samoa, Mr. [REDACTED] reported that Jeff Seumaala's mother approached him about [REDACTED] continuing his education in California, that he and his wife talked about his son transferring to FHS, and the decision was made. Mr. [REDACTED] reported that his son and wife then traveled to California in late January or February 2007 with the purpose of enrolling [REDACTED] at FHS. He reported that [REDACTED] moved in with Steve Seumaala and his wife. He indicated that Gwen's cousin is Mrs. [REDACTED] s sister's husband. If the information reported by Mr.

██████████ is correct, there was no bona fide change of residence and completed and approved 510/214 forms are necessary. The 510/214 forms recently submitted to CIF by FHS did not have the signature of the appropriate representative of the young man's previous high school.

██████████ – The basis for Bruce's certification by FHS as eligible for this season is unclear. During his interview with a CIF representative, Bruce reported that he and his family came to the Stockton area to get medical treatment for his mother and he decided to enroll at FHS. His parents returned to American Samoa after a few months. He resides at 2310 Anita Street with Gwen Seumaala, which he indicated was his mother's sister. The records recently submitted by FHS as part of this inquiry included: (i) a PG&E Account Information Form with the name of Florita Seumanutafa for 2310 Anita Street dated February 21, 2007; (ii) a student information record dated August 20, 2007, with his address on Anita Street, his parent/guardian as Florita/Faan Seumanutafa, and an original enrollment date of February 22, 2007; and (iii) Forms 510/214, but they were not signed by officials at the previous high school.

Based upon the high school records, his family is residing on Anita Street, which was contrary to the young man's statement. If the family moved back to American Samoa, a hardship waiver was needed. No hardship waiver was filed by FHS. Based upon the interpretation mentioned above, it appears that Seamanutafa needed to reside with his parents for one year or obtain a hardship waiver.

Tim Tuioasosopo – Neither the athlete nor his parents were interviewed. The records recently submitted by FHS included: (i) a student information record dated August 20, 2007, indicating an initial enrollment date of February 15, 2007, an address of 2310 Anita Street, and the parents/guardian as Kolopa and Bob Tuioasosopo; (ii) a PG&E Account Information Form dated February 14, 2007, indicating an open account in the name of Bob Tuioasosopo at 2310 Anita Street; and (iii) completed Forms 510/214 signed by an official from the young man's previous high school.

Vincent Maene – The basis for Vincent's certification by FHS as eligible for this season is unclear. During his interview with a CIF representative, Maene reported that he was living with his grandparents in Samoa and came to the California area to visit his mother who was living in Dixon. He elected to stay in the area, moved in with his mom's cousin (Gwen Seumaala), and enrolled at FHS. The records recently submitted by FHS included: (i) a student information record dated August 20, 2007, indicating an enrollment date of February 15, 2007, an address of 2313 Nightingale Avenue, and parents/guardian as Afiafi/Victor Leelo; (ii) a PG&E Account Information Sheet for the Nightingale address, dated February 13, 2007, in the name of Afiafi Leelo; (iii) a court order dated August 7, 2007, awarding temporary guardianship to Gwendolyn

Seumaala at [REDACTED]; and (iv) Forms 510 and 214 that included the signature of an official from the young man's previous high school.

According to Saco, in order to attain immediate transfer eligibility, a hardship waiver must be approved by the CIF office and a court order by itself is not sufficient (Bylaw 220). No hardship waiver was filed.

ADAQUATE REVIEW

The second issue within this possible violation area concerns whether FHS officials undertook: (i) significant due diligence in its review of information; and (ii) sufficient monitoring of its program. This examination primarily focuses upon information contained in its records, and information reported to it about possible violations involving the American Samoan athletes by individuals outside of the school system. TCG is not familiar with the standard previously utilized by CIF to determine if a reasonable effort was undertaken by a high school concerning its responsibility to monitor its sports programs, review information concerning possible violations of CIF legislation, and determine whether FHS met that standard.

If additional scrutiny would have been undertaken by FHS officials, would "warning signals" have been identified? Stockton Unified School District and FHS officials contended during their recent interviews that all the athletes were treated similarly and that it is unfair for the FHS and the CIF to focus upon athletes from American Samoa. As noted earlier in this report, the information reported to the CIF about possible violations focused upon American Samoan athletes.

Also, it appears that the American Samoan football athletes comprised a significant portion of the male Pacific Islander population at FHS. For example, during the 2005-06 academic year, six senior football athletes transferred into FHS from American Samoa. According to the State of California Department of Education Demographics Unit, FHS had seven male seniors of Pacific Islander descent during that academic year. In 2006-07, according to the records, there were four seniors from the Pacific Islander population. It is believed that three of these four were football players from American Samoa, as mentioned earlier in this report.

The following is a summary of the information contained in records recently submitted by FHS to CIF as part of this inquiry for all athletes mentioned in the report:

Name	FHS File Address & Phone	Overview of Information Submitted by FHS
[REDACTED]	Not provided	N/A
[REDACTED]	Not provided	N/A
[REDACTED]	Not provided	N/A
[REDACTED]	Not provided	N/A
[REDACTED]	Not provided	N/A
[REDACTED]	[REDACTED] (209-[REDACTED])	PGE Verification form for [REDACTED] on 3/8/06. No 510/214 forms.
[REDACTED]	[REDACTED], Stockton (099-[REDACTED])	Gwendolyn Leota listed as guardian. PGE Verification Form for Leota indicating service at [REDACTED]. No 510/214 forms.
[REDACTED]	[REDACTED], Stockton (209-[REDACTED])	PGE Account Information Form in FHS files for [REDACTED] dated 3/8/06 for service on [REDACTED]. No 510/214 forms.
[REDACTED]	[REDACTED], Stockton ([REDACTED])	FHS chart indicates PGE residency form for [REDACTED] dated 2/12/07. 510/214 forms but not complete.
[REDACTED]	[REDACTED], Stockton (209-[REDACTED]) ²	PGE Account Information Form in FHS files for [REDACTED], dated 3/15/07 at this address, 510/214 forms but not complete; F/R [REDACTED] listed as parent/guardian in student record.
[REDACTED]	2310 [REDACTED] (209-[REDACTED])	PGE Account Information Form in FHS files for [REDACTED] dated 2/21/07 at this address, 510/214 forms but not complete. F/R [REDACTED] listed as parent/guardian in student record.
[REDACTED]	[REDACTED] e./ [REDACTED], Stockton (209-[REDACTED]) ^{2,1}	Gwen Seumaala appointed legal guardian via court order on 8/7/07, completed 510/214 forms submitted as part of inquiry.
[REDACTED]	2310 [REDACTED], Stockton (209-[REDACTED]) ^{2,1}	PGE Account Information Form in FHS files for [REDACTED] dated 2/14/07, completed 510/214 forms submitted as part of this inquiry. [REDACTED] listed as parent/guardian in student record.

¹ CIF office reported that no 510/214 forms on football athletes were forwarded by FHS to its office in the past three years. Of the information submitted by FHS, the only forms in which all necessary information was completed related to [REDACTED] and [REDACTED]. FHS officials reported that they submitted several 510/214 forms to the CIF office.

² According to a FHS student informational record, 298-5718 is the cellular telephone number for "Coach Jeff".

Of note in the records concerning the current athletes:

- i. Two athletes ([REDACTED] and [REDACTED]) are listed in FHS records as living on [REDACTED] [REDACTED]. In the students' informational record, the young men's parents are listed as the parent or guardian and includes no mention of Gwen or Steve Seumaala. FHS files also include a PG&E account form indicating that service is in the name of [REDACTED] at [REDACTED] and a form for [REDACTED] for service at [REDACTED]. Gwen Leota is included in the records for [REDACTED] for the previous year at [REDACTED].

Gwen Seumaala is the court-appointed guardian for another of the four athletes currently competing ([REDACTED]) who live at that address according to the court records and Coach Verner. As a result, the records indicate that three families have service in their names at the address of Steve and Gwen

Seumaala, not including the court document for [REDACTED] listing Gwen Seumaala as the resident at that address.

- ii. Three of the 2007 athletes ([REDACTED], [REDACTED], and [REDACTED]) enrolled on the same day (February 15, 2007), while [REDACTED] enrolled a week later (February 22, 2007).

Principal Luhn indicated that subsequent to sending the completed 510/214 forms to the CIF for [REDACTED], [REDACTED], [REDACTED], and [REDACTED] – forms that he reported included the appropriate signatures of the athletes' former high schools in American Samoa – he contacted Saco. Luhn reported he told Saco that there was a bona fide change of residence, and Saco responded that these forms did not need to be completed if there was a bona fide change of residence. Luhn indicated he never received the signed forms back by Saco and he assumed he did not receive it back because he had been told by Saco that the forms were not necessary since there was a bona fide change of residence.

Luhn reported that he did not have any records of what he submitted to CIF but that fully completed Forms 510/214, including the signature of appropriate officials from high school in American Samoa, were forwarded. The records forwarded by FHS to CIF as part of this inquiry included Forms 510/214 on four athletes ([REDACTED], [REDACTED], [REDACTED], and [REDACTED]), but only two ([REDACTED] and [REDACTED]) had the signatures from a high school in American Samoa – the same high school.

Attachment #4 contains an e-mail exchange between Saco, Luhn, and Martin in mid May 2007 that appears to support that Saco said no forms were necessary if a bona fide residence change occurred.

Attachment #4 also contains an e-mail exchange in August 2007 between Saco and Martin about a FHS athlete. Martin inquired about the eligibility status if an athlete's parents move back to their prior residence and the athlete is living with a caregiver. While it is unknown whether the athlete referred to in the e-mail is from American Samoa, the set of facts is similar to [REDACTED] due to the "caregiver" notation and similar to the information provided by [REDACTED] and [REDACTED] during their recent interviews about their parents departing after a few months. Saco responded that regardless of the caregiver document, hardship papers must be filed and the CIF process utilized. Luhn was not copied on this e-mail, which occurred prior to this season.

Concerning information reported to FHS about possible violations, Luhn reported that he visited in person with Saco about two years ago and Saco informed him of a concern that Saco received from area high

school officials about the eligibility of American Samoan athletes. Luhn said he did not conduct an inquiry because he already had reviewed these situations through the normal process of registering the athletes and when the 510/214 forms were completed.

Luhn also reported that a football coach from American Samoa contacted him in the spring of 2007 and stated that athletes from American Samoa were being recruited by FHS and that a family member of a football coaching staff member at FHS was contacting athletes in American Samoa. He indicated he did not forward this information to Saco.

SECTION IV – OVERVIEW OF INFORMATION REPORTED

A. Information Reported By Those Student-Athletes or Parents Who Did Not Enroll or Who No Longer Are Enrolled At Franklin High School

[REDACTED]

[REDACTED] was enrolled and competed at FHS during the 2004-05 academic year. He was one of the first athletes in recent years to transfer from a high school in American Samoa to FHS. [REDACTED] currently attends Golden Gate Community College.

[REDACTED] is the sister of [REDACTED]. She was interviewed in American Samoa by a CIF representative since her mother was sick. She indicated that [REDACTED] had a friend ([REDACTED]) who was attending FHS during the 2003-04 academic year. [REDACTED] and [REDACTED] were the same age and had attended Leone High School the previous year. [REDACTED] transferred to FHS during [REDACTED] junior year. At the end of his junior year, [REDACTED] was calling [REDACTED] and encouraging him to come to FHS. She reported that [REDACTED] older brother (Jeff) coaches at FHS.

According to [REDACTED], about one week later, [REDACTED] mother telephoned the house to talk with [REDACTED] and his family about [REDACTED] coming to California. [REDACTED] mother, who goes by the name Manu, lives in American Samoa. [REDACTED] thought her last name was Mauga, the same as [REDACTED]

[REDACTED] reported that she previously might have met Eleimanu at a joint program between her church and Eleimanu's church. [REDACTED] was asked whether her family was related to Jeff's family, and she stated that Manu's second cousin is married to their first cousin. She stated they were not blood relatives.

[REDACTED] indicated that during these contacts, Eleimanu asked whether [REDACTED] would want to go to school in California, as Eleimanu knew that [REDACTED] family had relatives in that area. Eleimanu mentioned FHS. [REDACTED] stated that the family talked with Eleimanu "back and forth" on topics such as the school district, whether he would be living within the district, etc. She was asked why Eleimanu wanted her brother to travel to California, and she replied that she assumed it

was because of football. Later in the conversation, she also added that it could have been for academics and football.

██████████ was asked whether there were any promises made, and she stated that there were no promises. They talked about when her brother might attend school. ██████████ indicated that "they" said they were willing to pay for everything, but no one said specifically what would be paid.

██████████ reported that in late May 2004, she and her brother traveled to California. She returned to American Samoa in mid July. ██████████ reported that she paid for her airfare and that "they" paid for half of her brother's ticket. She explained that she made the reservations and then telephoned Jeff Seumaala or his brother (██████████) after making the reservations to let them know what the reservations were. They then paid for half of her brother's ticket. She was asked why the family paid for half, and she stated that she was "wishy-washy" on whether she wanted her brother to attend, so she did not want to be committed to them, so she wanted a ticket for her brother to fly back, if he desired.

██████████ reported that when she and her brother went to FHS, they met the vice principal, as she wanted to know more about the school. The principal asked why her brother was coming, and she replied that he was coming for educational reasons. She told the vice principal they were also looking at the football program. ██████████ reported that while there, she also helped her brother register. She talked with several counselors. She was asked what address she put down on the registration form, and she replied the address of Jeff and ██████████ Seumaala. She was asked why, and she stated because their house was in the school district. She was asked why she did not put down the cousin's address, and she stated she only put down the cousin's telephone number. She was asked if she signed legal guardianship or medical authority to anyone, and she stated that she signed a form that said medical authority would go to her cousin.

██████████ indicated that after she returned to American Samoa and her brother stayed with the cousin (██████████) or with Jeff and ██████████ Seumaala. She indicated that her brother "spent a lot of time" with Jeff and ██████████ Seumaala. She estimated her brother would stay one or two nights with Jeff or ██████████ Seumaala during the week and one or two nights on the weekend. She stated that her brother often spent the night after a football practice during the week with them. ██████████ indicated that she never paid Jeff Seumaala for any lodging and was not aware of her family paying for it.

██████████ noted that she and her mother went to the FHS graduation and she and her mother paid for their own airline tickets. They stayed with their cousin and were in that area for about three weeks. ██████████ did not come home after graduation but stayed for football camps.

Possible Violations Reported In This Overview

Bylaw 510

- a. Contact by Eleimanu with the athlete's mother and sister to encourage transfer
- b. Payment of a one-way airline ticket prior to enrollment
- c. Occasional lodging at residence of Jeff Seumaala and automobile transportation

[REDACTED]

[REDACTED] attended FHS during the 2005-06 academic year. He previously attended Leone High School in American Samoa for three years. He currently is attending San Francisco Community College.

[REDACTED] and [REDACTED] are the parents of [REDACTED] and were interviewed in American Samoa by representatives of the CIF. They reported that Eleimanu Seumaala contacted the family about [REDACTED] attending FHS. Eleimanu lived close to the [REDACTED] residence, which is near Leone High School. They knew of her but previously had never talked with her.

Eleimanu came to the house and told the [REDACTED] that her son coaches at a high school in Stockton. She added that FHS Head Coach Tom Verner had watched tape on [REDACTED] and they were interested in him. Eleimanu told the [REDACTED] that [REDACTED] would have a chance to play football and maybe secure a college scholarship.

Eleimanu told them that "they" would take care of the boys and take care of everything. (Throughout the conversation, the [REDACTED] frequently used the pronoun "they". When asked who "they" were, they responded Jeff Seumaala or Eleimanu). Eleimanu told them that everything would be paid for, including airfare, for [REDACTED] and the [REDACTED] that they would pay for [REDACTED] to return home for Christmas, and they would pay for the [REDACTED] to attend the high school graduation. They agreed to send their son.

The [REDACTED] indicated that their son was one of six students who went to FHS that year from Leone High School. The others were:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

The [REDACTED] reported that after agreeing to their son's attendance at FHS, Eleimanu telephoned them and indicated the date they and [REDACTED] would travel to California. The [REDACTED] indicated that they left on a Sunday to travel to California and got back on a Sunday, which they believed was June 5, 2005. The [REDACTED] had no responsibility in booking the flights, as they believed Eleimanu or Jeff Seumaala booked them. They had electronic tickets that they picked up at the airport. They did not

pay anything for these tickets. The tickets for the [REDACTED] and [REDACTED] were in first class. Leone High School student-athlete [REDACTED] also was on this flight, but [REDACTED] was unaccompanied. ([REDACTED] also was an athlete from Leone High School who was transferring to FHS). Also on the plane were [REDACTED], [REDACTED] mother ([REDACTED]), and [REDACTED]'s grandson. The [REDACTED]s were in coach class. The group flew from Pago Pago to Honolulu to Sacramento on Hawaiian Airlines.

Jeff Seumaala met them at the airport with Jeff's brother (Steve). Jeff transported them to the hotel in Stockton, which they believed was the Best Western. At the hotel, they saw [REDACTED], who was a student at Leone who went to Franklin the previous year. They also saw [REDACTED] mother and his sister, who were attending [REDACTED] high school graduation. The [REDACTED] did not check in the hotel, as Jeff Seumaala gave them a key. They believed it was room 219. They stayed approximately one week and did not pay for the hotel; however, the Lafaeles paid for their own meals.

The [REDACTED] reported that during this initial trip to Stockton, they did not see FHS and they did not meet any other coaches from FHS. Mrs. [REDACTED] was on the plane back with them. Jeff Seumaala drove them around the area, including to two houses. The first was where the boys from Samoa had been staying the previous year and the second is where [REDACTED] would be staying the next year. Jeff Seumaala stayed with the boys at these houses. Mrs. [REDACTED] drew a description of the interior of the home. The [REDACTED] indicated that they understood that Jeff Seumaala needed more room for the Samoans, so they had to move to a bigger house. They put [REDACTED] belongings in this house, although [REDACTED] stayed at the hotel with the [REDACTED] until their departure. It was their understanding that [REDACTED], [REDACTED], and [REDACTED] would be living in this house. Mr. [REDACTED] reported that during his next trip to Stockton to register [REDACTED], he visited the house and staying there were [REDACTED], [REDACTED], [REDACTED], and Jeff Seumaala.

The [REDACTED] reported that in early September, around the time of high school registration, [REDACTED] had to be registered. During their initial conversations with Eleimanu in the spring, she told them that they would have to travel to enroll [REDACTED] at FHS. Eleimanu contacted them around registration time and told them of the necessity to travel to FHS. During this time, Mr. [REDACTED] was in the Tacoma area visiting relatives. The family decided that Mr. [REDACTED] would travel from Tacoma to California to register [REDACTED], as opposed to Mrs. [REDACTED] traveling from Samoa. Mr. [REDACTED] flew from Tacoma to Sacramento. He was met at the airport by Jeff Seumaala. Mr. [REDACTED]

was in Sacramento for approximately one week. Jeff Seumaala handled flight arrangements between Tacoma and Sacramento, including paying for the round-trip ticket between Tacoma and Sacramento. The ██████ paid for the remainder of the portion of Mr. ██████'s trip between American Samoa and Tacoma.

Mr. ██████ reported that when he went to Stockton to register his son at the high school, Jeff Seumaala asked him to provide a signature on what he believed was a high school registration form. Mr. ██████ said that the form already had been completed for him, so all he did was sign it. He was asked if he reviewed the form. He initially said yes, but then later said no, as he signed, but he did not review it.

Mr. ██████ indicated that at the request of Steve Seumaala, he went to the cable company in Stockton with Steve. They were the only individuals that went. He could not remember what he signed at the cable company other than he believed he put service for an address in his name. He could not recall whether he completed any forms. Upon request, he signed a release form from TCG authorizing the CIF to review his records at all cable companies in California.

Mr. ██████ indicated that during this trip, he went to the house where his son was staying and at the house were ██████, ██████, ██████, ██████, Jeff Seumaala, and ██████.

The ██████s never signed anything that provided any person in Stockton with legal guardianship. They also did not sign anything for medical purposes. Jeff Seumaala told them not to worry about it; that if anything would arise, it would be handled.

The ██████ reported that it was uncertain whether the Samoan boys would return to American Samoa for Christmas, as flights were very crowded. Initially, it was believed they would not return because they could not get a flight. Information had circulated that Hawaiian Airlines was adding an additional flight into American Samoa and that the opportunity to make a reservation on that flight would begin early one morning. Mrs. ██████ indicated that she awoke early and called to make a reservation for ██████. She got a confirmation number and called Jeff Seumaala with the number. Jeff Seumaala then paid for the flight, as ██████ went to the Sacramento airport to pick up his ticket at the time of his flight.

The [REDACTED] were asked how they knew that Jeff Seumaala would pay for the ticket, and they said that was part of a conversation with Jeff Seumaala when they asked him if their son would return for Christmas. Mrs. [REDACTED] indicated that Jeff Seumaala's answer, at that time, is that "we would see how everything went". They recalled, at some point, Jeff Seumaala told them that [REDACTED] would come home for Christmas if they could secure the seats. She believed this conversation occurred after the season was completed.

Mrs. [REDACTED] reported that when she began calling Eleimanu about attending her son's high school graduation, Eleimanu was not very nice to her and she was not providing a definitive response. Eleimanu told them that they were not going to have all of the parents come to graduation. Mrs. [REDACTED] began contacting Jeff Seumaala, but he was not returning calls. She finally confronted him on the telephone and asked if they intended to pay for the parents to attend graduation as they had promised. Mrs. [REDACTED] also told Jeff Seumaala that his mother was being rude to them. Jeff Seumaala responded that there was nothing to worry about and that they would pay for the parents to come to graduation. The [REDACTED] said Eleimanu later came to the front of their house and "threw" the information about the flights into the hands of one of their children and told the children to give the information to their parents.

They traveled to Sacramento and on this plane was [REDACTED]'s father. They flew out of San Francisco and the [REDACTED] paid the difference to Jeff Seumaala of flying into Sacramento. They stayed at a hotel for approximately one week. Jeff Seumaala picked them up at the airport in Sacramento. [REDACTED]'s parents were at the graduation. Also present was Eleimanu.

The [REDACTED] recalled that during their initial trip in May to take [REDACTED], they visited a clinic that was providing physicals to [REDACTED] and some of the other Samoans. At the clinic was Coach Verner. This would have been the only time they would have seen or talked with Verner.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with both parents to encourage transfer
- b. Payment of airline transportation for athlete and his parents to take athlete to California prior to enrollment
- c. Payment of airline transportation for Mr. [REDACTED] to register son
- d. Receipt of lodging at Stockton hotel during initial trip to take son
- e. Payment of airline transportation for athlete to travel between California and American Samoa at Christmas

- f. Payment of airline transportation for parents to attend high school graduation
- g. Lodging of athlete at residence of Jeff Seumaala and automobile transportation during academic year

Bylaw 200(d)5

- a. Submission of false information to FHS by Jeff or Steve Seumaala concerning cable company and residency

[REDACTED]

[REDACTED] attended FHS during the 2005-06 academic year. He previously attended Leone High School for three years.

[REDACTED] and [REDACTED] are the parents of [REDACTED]. Mr. [REDACTED] was interviewed at his place of employment. CIF interviewed both parents separately. Mr. [REDACTED] reported that Eleimanu was the name of the lady who contacted him and his wife. Eleimanu came to his NAPA Auto Parts store. He had never met this lady before. He talked to her on one occasion in person and on two occasions on the telephone about his son attending FHS. Eleimanu's son is an assistant coach at FHS.

Mr. [REDACTED] was asked whether Eleimanu offered the family anything. He replied that they offered a place for [REDACTED] to stay if he traveled to California. He was asked how Eleimanu knew of his son, and he assumed that Eleimanu read the papers. He specifically remembered that Eleimanu and her son were connected to FHS. He said neither Jeff Seumaala nor Eleimanu are related to the [REDACTED] family.

Mrs. [REDACTED] was interviewed at her home. She reported that the mother of Coach Jeff Seumaala at FHS contacted her husband via telephone in April 2005 and indicated that they were recruiting local kids to go to California. She had not known previously this individual.

Approximately one week later, Jeff Seumaala's mother came to her husband's office and met her and her husband. The lady provided a full page of material on the school and said that the coach at FHS had heard a lot about [REDACTED] and wanted [REDACTED] to relocate to FHS. The lady said that [REDACTED] had a lot of athletics potential and there was a lot of opportunity in California. At the end of this conversation, she and her husband said "thanks, but no thanks".

She stated that several months went by and then she heard that Jeff Seumaala called several parents of other athletes on the island to recruit them. One of the kids contacted was [REDACTED], who was a good friend of [REDACTED]. [REDACTED] contacted [REDACTED] to encourage him. The parents of [REDACTED] contacted them about a meeting. [REDACTED] reported that she and her husband met the parents of [REDACTED] and [REDACTED] to talk about the opportunity. At the end of the conversation, they still said they did not want to send their son to California.

According to Mrs. [REDACTED], on the next day, Jeff Seumaala telephoned Mrs. [REDACTED] to try to convince her to send her son. After talking with Jeff, they decided to allow [REDACTED] to go to California. She believed this was in mid May 2005.

Mrs. [REDACTED] was asked whether any promises were made to her by Jeff Seumaala or his mother, and she stated that the promise was that [REDACTED] would receive housing accommodations, living expenses, and an education. She was asked whether anything was mentioned about airfare, and she stated that Jeff Seumaala's mother said that a one-way airfare would be paid by the coaches for [REDACTED].

Mrs. [REDACTED] was asked whether Jeff or his mother were related in any way to the [REDACTED] family, and she stated they were not. She also stated that the [REDACTED] family did not have any relatives in the Stockton area.

Mrs. [REDACTED] was asked if she ever contacted any parents to encourage them to allow their son to attend Franklin. She reported that Jeff Seumaala's mother also asked her to visit the family of [REDACTED] another athlete at Leone High School. [REDACTED] said, as a result, she and [REDACTED] parents visited [REDACTED]. She stated that she recently saw [REDACTED] mother, and [REDACTED] mother yelled at her for getting [REDACTED] involved in that situation.

Mrs. [REDACTED] reported that in February 2006, she and her son ([REDACTED]), who currently is entering his senior year at Leone High School, went to California in order to see her son sign a National Letter of Intent with San Jose State University. While there, Jeff Seumaala attempted to convince her to allow [REDACTED] to stay with them and attend Franklin. Jeff Seumaala's mother also talked with them about [REDACTED] attending. She stated that she told them she was not interested in [REDACTED] attending FHS.

Mrs. [REDACTED] reported that after agreeing to send [REDACTED] to California, during her conversation with Jeff Seumaala, she and her son left for California a short time later. She stated that her round-trip airfare between American Samoa and Sacramento was paid by them, as was [REDACTED] one-way airfare. She reported that both tickets were electronic tickets that they picked up at the ticket counter at the airport. Jeff Seumaala's mother told them about the itinerary, and Mrs. [REDACTED] believed that Jeff Seumaala e-mailed the itinerary to them. She reported that [REDACTED] ticket was in first class, while her ticket was in coach. She believed a travel agency in California was used for her tickets.

She was asked if she believed it was L&L Travel, and she stated she believed it was. (Another parent during a previous interview had mentioned that L&L Travel had been used for their tickets).

Besides her and her son, [REDACTED] and his parents also were on the plane. [REDACTED] and his parents were in first class. Since she had her granddaughter with her, she assumed that was the reason that she was not in first class.

Upon arrival in Sacramento, Jeff Seumaala met and took them to a hotel in Stockton. She could not remember the name of this hotel, but she believed it was downtown. She was at the hotel for approximately 10 days. She did not pay for the hotel, although she paid for her own meals. She believed the trip occurred in early June because they attended the Leone graduation and left a day or two later.

Mrs. [REDACTED] stated they did not register [REDACTED] while they were in Stockton during the summer and did not travel back to do so later in the summer. She believed they signed an affidavit that authorized Jeff Seumaala to register [REDACTED] on their behalf.

Mrs. [REDACTED] stated that while she was in California, she saw the new house that [REDACTED] would stay in. Jeff Seumaala stayed with them, as all of the Samoan boys resided there. There were four bedrooms at this house. Mrs. Coulter reported that she did not pay Jeff Seumaala or anyone any money for any lodging. She was asked why, and she stated that they said that he would be in good hands and did not ask for any money for lodging. She stated that she sent her son some spending money.

Mr. [REDACTED] believed that [REDACTED] was staying with Jeff Seumaala. He showed a copy of a letter that was sent to Jeff Seumaala at the [REDACTED] address that he knew [REDACTED] was living with Jeff Seumaala. The letters to Jeff Seumaala were returned as undeliverable. He sent [REDACTED] letters in [REDACTED]'s name at this same address and they were not returned. Mr. [REDACTED] did not pay anything to Jeff Seumaala for lodging for [REDACTED]. Mr. [REDACTED] reported that he was aware that Jeff Seumaala was transporting [REDACTED] to and from school.

Mrs. [REDACTED] reported that her son returned home at Christmas and she paid for his airfare.

Mrs. [REDACTED] reported that the entire family went to the high school graduation, including her, her husband, her daughter, her daughter's five kids, and her younger son ([REDACTED]). They paid for their own airfare and lodging. They spent approximately one month in California, including a trip to Los Angeles. At the conclusion of the trip, the family traveled from Los Angeles back to American Samoa.

Mrs. [REDACTED] indicated that Jeff Seumaala made arrangements for [REDACTED] to fly from Los Angeles to American Samoa after graduation. Jeff Seumaala paid for a one-way ticket for [REDACTED] from Los Angeles to American Samoa. When asked who paid for the return flight for Cameron to fly from American Samoa to Sacramento, Mrs. [REDACTED] initially believed that Jeff Seumaala did. Later in the interview, she believed that the family paid and then stated she was not sure who paid for the return flight. She knew that Jeff Seumaala paid for at least a one-way ticket and believed it was from Los Angeles to American Samoa.

Mr. [REDACTED] reported that he paid for the lodging and airfare for him, his wife, his daughter, and his daughter's kids to travel to Sacramento for high school graduation. They then traveled to Los Angeles and flew out of Los Angeles. He was asked whether he paid for [REDACTED] ticket from Los Angeles to Sacramento, and he stated that he thought he did. He believed that when [REDACTED] returned to California, someone else paid for it. He knew he did not pay for it.

When asked to detail what trips were paid by officials connected with FHS, Mr. [REDACTED] indicated that he could not say for sure what airfare he did not pay. He said that it was "maybe that a few airfares were paid by Franklin officials now and then", but he was not sure which ones.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with both parents to encourage transfer
- b. Contact by Jeff Seumaala with Mrs. [REDACTED] to encourage transfer
- c. Payment of airline transportation for Mrs. [REDACTED] and her son prior to enrollment
- d. Payment of airline transportation for [REDACTED] after high school graduation
- e. Receipt of lodging at Stockton hotel prior to enrollment
- f. Lodging at residence of Jeff Seumaala and automobile transportation for [REDACTED] during the academic year

attended FHS during the 2005-06 academic year. He previously attended Leone High School for three years. His parents were interviewed separately by CIF representatives.

 is mother. She reported that completed his junior year at Leone High School and shortly thereafter, came home talking about how his cousin () was moving to the United States to play football. He said he also would like to go. About this time, a lady called Eleimanu Seumaala, whose maiden name is Tuiasosopo, told Niualama that her sons Jeff and Steve Seumaala coached and lived in Stockton and that they had a program there for Samoan boys. This program included helping study for the SAT, tutoring them on course subjects, and ensuring they received good grades while receiving coaching and training to play football for FHS. She stated that over the next few days, Eleimanu tried to convince her to let go to Stockton.

 said she was at first reluctant, but her husband was more interested and took an active role in the process. Eleimanu told her not to worry about living expenses, including room and board, school supplies, clothing, and food because all of that would be taken care of by her sons and funded by Coach Verner who was "financing everything". Eleimanu told her that her sons worked for Coach Verner and they would take care of everything. This included paying for airfare for and the to travel to Stockton, round trip for graduation, and if did not receive a college scholarship, they would pay for him to fly back to American Samoa. Eleimanu told her that her (Eleimanu's) sons would take care of the plane tickets using a credit card. Niualama only needed to go to the airport and check in. She said that Eleimanu works in the Human Resources Department for the American Samoan Government.

 is the father of and he reported that the lady who works at the Human Resources Department for America Samoa approached his wife about going to California in June 2005. Mr. believed the lady's name was Eleimanu. He and his wife met this lady at the Kentucky Fried Chicken restaurant in American Samoa. The lady explained everything that would be taken care of. He could not remember the lady's last name, but he said the lady is the mother of Jeff Seumaala who works for Coach Verner at FHS. Mr. reported that the lady indicated that they would provide everything, including clothing, school, housing, etc. She also said they would pay for the parents to come to California to register their son and for graduation. Mr.

██████ indicated that he is not related to Eleimanu, Jeff Seumaala, or Eleimanu's husband. He did not know her prior to their discussions.

Mrs. ██████ reported that she, her husband, and ██████ went to Stockton in July 2005 to take her son to Stockton. At that time, the trip for ██████ and her husband were paid for by Franklin representatives. She also went along, but because the trip to Stockton coincided with a work trip in Northern California, her employer paid her way. She stated that they landed in California and stayed with her sister in Torrence while her business meeting was occurring. She, her husband, and her son then drove to Stockton where they stayed approximately one day.

Mr. ██████ reported that ██████ traveled to California to attend FHS and that Eleimanu paid for ██████'s ticket. He or his wife contacted Eleimanu, who arranged a ticket on Hawaiian Airlines. Mr. ██████ believed ██████ left in late June and he (██████) did not pay for the ticket.

Mr. ██████ reported that in July, he and his wife traveled from American Samoa to Los Angeles, as they have relatives in Los Angeles. He and his wife then flew from Los Angeles to Sacramento, were there for approximately one day to register ██████ at FHS, and then flew back to Los Angeles. Mr. ██████ indicated that Eleimanu made arrangements that paid for his airline ticket from American Samoa to Los Angeles, Los Angeles to Sacramento, Sacramento to Los Angeles, and Los Angeles to American Samoa. Eleimanu made arrangements to pay for his wife's ticket from Los Angeles to Sacramento and Sacramento to Los Angeles. Eleimanu did not pay for his wife's ticket between American Samoa and Los Angeles. Mr. ██████ explained this his wife was talking with Jeff Seumaala about these arrangements, and he believed that Eleimanu made the actual arrangements. These tickets were not first class. He indicated there were two different sets of tickets. The initial set was his round-trip ticket between American Samoa and Los Angeles and the second set of tickets were the round-trip tickets between Los Angeles and Sacramento. There were different discussions about the two sets of tickets with Jeff Seumaala or Eleimanu.

They stayed at a hotel and he did not pay for it, as he believed Jeff Seumaala paid for the lodging for one night. The ██████ paid for their own meals.

Mr. ██████ recalled ██████ father being present at registration. He took several of the Samoan boys and ██████ father to lunch. He and his wife went to the school and his wife filled out the registration materials.

Mrs. [REDACTED] reported that during her trip to Stockton to register her son, they met Jeff and Steve Seumaala and Coach Verner. They were taken to the school and taken to the house where [REDACTED] was to live with [REDACTED], [REDACTED], [REDACTED] (she could not remember [REDACTED]'s first name), [REDACTED] (she could not remember [REDACTED]'s last name), and one other boy whose name she could not remember. She noted that her son was not related to the Seumaalas. She signed a medical clearance form so that if her son needed medical attention, the Seumaalas could see that it took place. She also stated that she signed registration documents at the high school but did not fill out any of the information on them other than signing her name. Furthermore, she did not know what information she signed and she was not aware of what the registration forms stated.

Mr. [REDACTED] reported that [REDACTED] stayed with Jeff Seumaala, [REDACTED], and [REDACTED] in a house during the academic year. After approximately six months, [REDACTED] moved to another house. Mr. [REDACTED] said he never paid Jeff Seumaala any money for lodging, and no one asked for any money. Mr. Taifane paid for [REDACTED] clothes. He reported that if [REDACTED] asked for money, he would have provided it. [REDACTED] did not believe that [REDACTED] paid Jeff Suemaala any money for lodging. He was asked why [REDACTED] moved to another house, and Mr. [REDACTED] believed the first house became too crowded. As a result, Jeff Seumaala's brother became involved because they needed another house.

Mrs. [REDACTED] reported that her son's room and board and clothing were taken care of. Eleimanu told her that the coach was a millionaire who wanted to help Samoan kids get better opportunities.

Mr. [REDACTED] reported that at Christmas, during the year that [REDACTED] was at FHS, [REDACTED] received a ticket to fly between California and American Samoa. Mr. [REDACTED] indicated that "they bought the ticket" for [REDACTED]. Mr. [REDACTED] was asked how he knew that "they bought it", and he stated that he knew he did not buy it. He stated he did not talk to anybody about the ticket, as [REDACTED] had talked to someone about the arrangements.

Mr. [REDACTED] indicated that he and his wife became upset with Eleimanu around high school graduation, as they had promised to pay for the parents to go to graduation, but Eleimanu did not want to fulfill that promise. Mr. [REDACTED] stated that as graduation was approaching, he talked with Eleimanu about the airfare. She replied that there were not enough funds so they could not provide these flights. He stated he was upset because she had promised that during their initial conversations. Mr. [REDACTED] indicated that a few days later, he called her again. Her reply was for them to pay for

the flights and they would reimburse the [REDACTED] family. His wife also talked with Jeff Seumaala around this time period. Jeff Seumaala told Mr. [REDACTED]'s wife that they would put money into the family's account in order to reimburse him for this flight. Mr. [REDACTED] explained that his sister-in-law had an account on the mainland, and he believed it would be best if Jeff Seumaala transferred the funds to his sister-in-law's account. He believed his wife gave that account number to Jeff Seumaala. Several weeks later, after the trip, no funds had been transferred, so his wife called Coach Verner. A short while later, approximately \$1,300 was entered into the account. He never talked to Verner directly about the money. Mr. [REDACTED] stated that they were only in the Stockton area for a very short period of time for the graduation. After the graduation ceremony, Verner prepared dinner for the Samoan kids, but they did not attend.

Mrs. [REDACTED] reported that Eleimanu only would pay for one parent to go to the high school graduation. As a result, she had to pay one way. Eleimanu explained their failure to pay both parents' airfare for graduation was because they had to pay for a funeral in the family. However, they asked for her account number so that they could reimburse her the funds, but she believed this was never done.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with both parents to encourage transfer
- b. Contact by Jeff Seumaala with Mrs. [REDACTED] to encourage transfer
- c. Payment of airline transportation for mother and son prior to enrollment to travel to California
- d. Payment of airline transportation for athlete to travel between California and American Samoa at Christmas
- e. Receipt of lodging at a Stockton hotel for mother, father, and athlete prior to enrollment
- f. Lodging at residence of Jeff Seumaala and automobile transportation for [REDACTED] during the academic year
- g. Payment of airline transportation for a parent to attend high school graduation

[REDACTED]

[REDACTED] attended FHS during the 2005-06 academic year. He previously attended Leone High School for three years.

[REDACTED] is the mother of [REDACTED]. She was interviewed by representatives of the CIF in American Samoa. [REDACTED] reported that Eleimanu works in the Human Resources Department for the American Samoan Government and is Jeff Seumaala's mother. [REDACTED] reported that Eleimanu contacted [REDACTED] about [REDACTED] traveling to California and playing football. [REDACTED] stated her first response was why would [REDACTED] leave the island when he can play football "here". Eleimanu responded that [REDACTED] could further his football career. [REDACTED] responded to Eleimanu that she was not interested.

[REDACTED] reported that on the next day, [REDACTED]'s mother telephoned her at work. [REDACTED]'s mother indicated that the team was looking for a free safety, and [REDACTED] is a good safety. [REDACTED] stated that she then talked with her son, and her son stated that he did not want to go. [REDACTED] added that while she knew [REDACTED], she previously had not been acquainted with [REDACTED] mother.

[REDACTED] reported that Eleimanu telephoned her again and then came to her work. A few days later, [REDACTED] mother ([REDACTED]) came to the house and talked with [REDACTED]. Eleimanu again telephoned and [REDACTED] told Eleimanu that it was a possibility. Shortly thereafter, [REDACTED] told Eleimanu that her son would attend. Eleimanu telephoned her on a Monday to indicate that the date had been set for the flight on Thursday.

[REDACTED] said that Eleimanu told her that the kids at FHS are happy and they have a good place to stay. Eleimanu told her that they would pay for her son's airfare, shelter, and housing. Eleimanu also told her that everything is paid for, including airfare to California and at Christmas, if [REDACTED] wanted to come home. She indicated that Eleimanu also told her that she needed her to come to register [REDACTED] at FHS and they would pay for the flight and that she could receive cost of airfare to attend [REDACTED] graduation.

[REDACTED] was interviewed in American Samoa. He recalled talking with [REDACTED] mother and [REDACTED] mother about going to California. [REDACTED] and [REDACTED]

Concerning high school registration, [REDACTED] stated that Jeff Seumaala picked her up on that day and took her to the high school. She stated that she did not think something was right and she felt very uncomfortable. Some issue arose at registration. Jeff Suemaala called Coach Verner, who arrived and resolved the situation. She did not recall completing anything, as she indicated that she really "wasn't paying attention". She recalled waiting for a few minutes while Coach Verner worked out the situation. Once Verner arrived, he did everything while they were seated outside on some chairs. [REDACTED] indicated that she never signed any guardianship.

[REDACTED] said that she visited the home where the athletes were living. She believed the house was very nice. She did not pay anyone for any rent, food, electricity or for the lodging for her son during the academic year.

[REDACTED] reported that while in Stockton, he lived on [REDACTED] Avenue with Jeff Seumaala, Steve Seumaala, [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. At that time, there were four bedrooms and there were two people in each room. Later in the interview, after [REDACTED] indicated that some fellow Samoans ([REDACTED], [REDACTED], and [REDACTED]) arrived at some point during the second semester of the 2005-06 academic year, he indicated that some athletes, including himself, were taken to another house. Jeff stayed at the house on [REDACTED] Avenue, along with [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. [REDACTED] went with Steve Seumaala to a house, along with [REDACTED], [REDACTED], and [REDACTED]. This house was closer to the high school but about 15-20 minutes from the house on [REDACTED] Avenue. He never paid any rent and he never paid for any meals.

Concerning transportation, Jeff Seumaala had a car that was like a van or an Expedition. All of the six athletes and the two coaches could ride in the car. Jeff Seumaala or Steve Seumaala transported them each day to school and after practice. This occurred even after the season was over.

[REDACTED] indicated that they paid for his round-trip ticket to return at Christmas in 2005. Jeff Seumaala told him that they were going to send him home for a couple of weeks. Jeff Seumaala gave him a ticket the day before the flight.

[REDACTED] reported that Eleimanu telephoned [REDACTED] prior to high school graduation and stated that Eleimanu would pay the cost for a one-way ticket for graduation but that [REDACTED] would have to pay for the second portion. [REDACTED] indicated this made her upset and she yelled at Eleimanu. Eleimanu replied that they would pay for round-trip airfare, but she was on her own for lodging at graduation

and they would not pay for [REDACTED] airfare to return to American Samoa following graduation. [REDACTED] told Eleimanu that she wanted her son back, and she did not attend graduation.

[REDACTED] indicated that shortly after graduation, her son returned to American Samoa using the first portion of a round-trip ticket that she did not pay. She stated she told her son that she did not want him to go back. During her interview, she provided CIF representatives information about a ticket at Christmas and in early summer, which she located in her home. Below is the information contained on these materials:

- An itinerary from L&L Travel in Lodi, California, for a ticket for [REDACTED] [REDACTED] to travel from Sacramento to Pago Pago on December 19, 2005, with the return on January 1, 2006, and from Pago Pago to Sacramento.
- A ticket receipt for [REDACTED] [REDACTED] to travel on June 4, 2006, from Sacramento to Pago Pago, and a ticket to return on July 7, 2006, to travel from Pago Pago to Sacramento. This stock control number is 1730038213137. The refund office code is 1732103155113 – this number is located in the upper-right corner of the ticket. (According to [REDACTED], he used the ticket from Sacramento to Pago Pago and this is the return ticket he was to use).
- A passenger receipt for an expense of \$25 on June 4, 2006, for [REDACTED] [REDACTED]. (This is believed to be a cost for luggage).
- A boarding pass for the December 19 flight for [REDACTED] [REDACTED] from Sacramento to Honolulu. The e-ticket number on this ticket is 1731341101380.
- A passenger ticket with a \$25 charge for “carriage of excessive baggage”. The passenger ticket reference number is 1731341101380.

Attachment #5 is a copy of this information.

[REDACTED] indicated that after graduation in the spring of 2006, he was given a round-trip ticket. The purpose was for him to return to American Samoa and then return to California and attend Santa Rosa College in Santa Rosa, California. He did not use the return portion.

[REDACTED] indicated that during her one trip to California, she initially saw Coach Verner at a doctor's clinic. Jeff Seumaala had taken her son to get a check up (later described as a physical) and Jeff Seumaala took her there to meet [REDACTED]. This doctor's office is near Verner's office. She asked Verner about any medical issues, and he stated they would take care of any issues if he was injured,

[REDACTED]

[REDACTED] enrolled in FHS during the second semester of the 2005-06 academic year. He attended Leone High School for the previous three years.

[REDACTED] is the mother of [REDACTED]. She was interviewed by CIF representatives in American Samoa. [REDACTED] indicated that the mother of one of the coaches at FHS came to her house and told her that her son got selected from several of the high schools in American Samoa and would be provided an opportunity to play football in California. [REDACTED] said that she knows the lady as Manu. [REDACTED] indicated that Manu said that they had been watching tape of her son.

[REDACTED] indicated that Manu returned to her house to talk to her about her son coming to California. [REDACTED] did not believe Manu ever talked to [REDACTED]. [REDACTED] did not believe she received any telephone calls from any parents of other athletes who had gone to FHS. [REDACTED] indicated that she is not related in any way to Jeff Seumaala, Steve Seumaala, or Manu and her husband's family is originally from Western Samoa.

[REDACTED] asked Manu how she was to afford this, and Manu stated that [REDACTED] did not have worry about anything, as it all would be paid by the people in the United States. [REDACTED] was asked whether Manu mentioned anything specifically, and she stated that Manu stated that [REDACTED] airfare and lodging would be paid. Manu also told her that [REDACTED]s airfare would be paid to attend high school graduation. In response to a question later in the interview, she indicated that she did not recall any discussion that [REDACTED] would receive an airline ticket at Christmas. [REDACTED] was unclear on when these conversations occurred. Later in the interview, it was determined that her son probably left American Samoa in March 2006, and these conversations occurred a few weeks prior to that.

[REDACTED] indicated she traveled with her son when he went to live in California. She said she flew from Pago Pago to Honolulu and to Sacramento. On this flight were her and her son, and [REDACTED] and [REDACTED] son, [REDACTED]. ([REDACTED] enrolled in FHS also during the second semester of the 2005-06 academic year). [REDACTED] was also on the plane, but neither of [REDACTED] parents were. ([REDACTED] enrolled in FHS during the second semester of the 2005-06 academic year). She stated that Manu gave her the tickets, although she did not remember how.

She believed they spent approximately four to five days in a hotel in Stockton. She did not pay for this lodging, although she paid for the meals for her and her son. Mrs. [REDACTED] also was staying at the same hotel. During this trip, she visited Jeff Seumaala's home, where [REDACTED] would be living. During the four or five days, [REDACTED] and [REDACTED] were still staying with their mothers at the hotel. On one night, she and [REDACTED] cooked for their son's and others at Jeff Seumaala's house.

[REDACTED] reported that one day during her trip to Stockton to take her son to California, she went to FHS to register her son. Jeff Seumaala took her, [REDACTED], [REDACTED], and [REDACTED]. She believed classes were going on. They went into the office and registered. She was asked who completed the forms, and she stated that she believed she completed the forms. She was asked what address she put down and she stated she put down the address that Jeff Seumaala gave her. She did not remember the address.

Jeff Seumaala took [REDACTED] and [REDACTED] to the airport and [REDACTED] traveled to Las Vegas to see [REDACTED] daughter. [REDACTED] returned to American Samoa by herself. [REDACTED] indicated that she did not pay for her return ticket. She did not believe she flew first class on either part of the trip. She provided CIF representatives her passport, which contained a boarding pass for a flight from Honolulu to Pago Pago on March 12, 2006. There was a stamp for this trip in her passport. (Proof of identity but not a passport is required to travel to American Samoa). According to [REDACTED]'s student information sheet at FHS, he registered on March 10, 2006.

[REDACTED] indicated that [REDACTED] initially lived with Jeff Seumaala but then moved with Steve Seumaala (Jeff Seumaala's brother). [REDACTED] indicated that she never paid Steve Seumaala or Jeff Seumaala any money for lodging. They never asked her, and she did not provide any. She did not believe [REDACTED] was paying them.

[REDACTED] was shown a sheet, which appeared to be a student informational sheet from FHS, dated August 24, 2006, for [REDACTED]. The mailing address for [REDACTED] was [REDACTED] Street. [REDACTED] indicated that street did not sound familiar, although she has never mailed [REDACTED] a letter. The parent and guardian names on the form are [REDACTED] / [REDACTED]. She stated that [REDACTED] [REDACTED] is her full name and [REDACTED] is her ex-husband's name. She was asked about the telephone number 209-[REDACTED]-[REDACTED], and she stated that she was not familiar with that number but said that she only called her son

on [REDACTED]'s cellular telephone. [REDACTED] did not recall signing any transfer or guardianship papers for her son.

[REDACTED] indicated that [REDACTED] returned for Christmas and stayed approximately two weeks. She indicated that "they paid for it". She did not know who made the arrangements for the ticket. She indicated that she did not pay for it. She did not remember Manu mentioning a free ticket for her son at Christmas during their initial discussions.

[REDACTED] indicated that during their initial discussions, Manu told her that they would pay for her flights for graduation. (Later in the interview, [REDACTED] indicated that Manu never said anything about going to pay for her ticket for graduation). When the graduation period was approaching, [REDACTED] told her son ([REDACTED]) to ask Steve Seumaala or Jeff Seumaala if they intended to pay for her ticket to attend graduation. [REDACTED] explained that she asked this because she had heard from other parents that their tickets had been paid for graduation. [REDACTED] indicated she never heard back from Steve or Jeff Seumaala. At the same time, she knew that she had nobody to take care of her younger children. She subsequently telephoned [REDACTED] and told him she would not be able to attend graduation.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with the athlete's mother to encourage transfer
- b. Payment of airline transportation for [REDACTED] and his mother to live in California prior to enrollment
- c. Payment of airline transportation for [REDACTED] at Christmas
- d. Receipt of lodging at a Stockton hotel for [REDACTED] and his mother prior to enrollment
- e. Lodging at residence of Jeff and Steve Seumaala and automobile transportation for [REDACTED] during the academic year

██████████

██████████ is the father of ██████████, who enrolled at FHS in February 2007 but returned to American Samoa approximately two weeks later. ██████████ was interviewed by CIF representatives via telephone. Mr. ██████████ reported that Eleimanu Seumaala, who is his cousin, approached him about ██████████ coming to California. He stated that his grandparents are the same grandparents as Eleimanu. He said that he and Eleimanu would "run into each other" at family functions, like funerals, etc.

Mr. ██████████ knew that Eleimanu's son was connected with the high school. ██████████ reported he was told that they saw a tape of their son's football abilities and they were interested in him. When asked about the tape, Mr. ██████████ stated that a tape was made when his son was with his high school football team (from American Samoa) in Las Vegas, and that tape was forwarded to California. Mr. ██████████ indicated there were no promises made to him by Eleimanu and there was no discussion of any payment for airline flights for Christmas or graduation. Mr. ██████████ stated that after the decision was made for ██████████ to return to American Samoa, they called Eleimanu, apologized to her, FHS released him, and ██████████ returned home.

After the decision was made that ██████████ would enroll at FHS, Mr. ██████████ reported that his son and wife traveled from American Samoa to California. He stated that the trip was arranged by Eleimanu in a "fly now and pay later" arrangement. He explained that Eleimanu paid for the flight and that they intended to reimburse her. He indicated that the cost of the tickets was approximately \$2,800, and they had paid about \$900. The \$2,800 was the cost of the two round-trip tickets. They pay directly to Eleimanu. Mr. ██████████ reported that after his wife and son traveled to California and stayed for a few days, his wife returned. Shortly thereafter, his son returned.

Mrs. ██████████ was interviewed by telephone. She reported that during her stay in California, she resided at a hotel, but she could not remember the name. She said she did not pay for the lodging, but she paid for her meals. Eleimanu made the arrangements for the hotel.

Mrs. ██████████ stated that she stayed approximately one week in the Stockton area and that her son stayed approximately one week after she left before he became homesick and left. She indicated that her son was to stay with her husband's brother (or their other son) who was moving to the Stockton area from Alaska. When she was leaving, there was no place for her son to stay. When no place

was available for [REDACTED] to stay, she telephoned the oldest Seumaala brother (either Steve or Jeff), and [REDACTED] stayed with him for approximately one week prior to him traveling back to American Samoa.

Mrs. [REDACTED] stated she registered her son at FHS. Mrs. [REDACTED] reported she did not remember what address she put down for her son when she registered him at FHS. She stated that it was not her intent to reside in California. She was eager to get back, as she has three or four other children. She did not remember who she talked with at registration, including whether she talked with a principal or guidance counselor. She assumed she put down her address in American Samoa, although she was not sure. (According to FHS records, the address for [REDACTED] was [REDACTED] Street, which, according to Jeff Seumaala, is his address.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with the athlete's parents to encourage transfer
- b. Loan of money to pay cost of airline transportation
- c. Receipt of lodging at a Stockton hotel for [REDACTED] and his mother prior to enrollment
- d. Lodging at residence of Jeff or Steve Seumaala and automobile transportation for [REDACTED] for approximately one week

[REDACTED]

[REDACTED] is the mother of [REDACTED], a student-athlete who is entering his senior year at Fagaitua High School. She was interviewed by CIF representatives in American Samoa. Ms. [REDACTED] reported that in January 2007, a woman telephoned her who indicated that her brother was a coach in the United States and that her brother's organization wanted to provide him a scholarship to attend high school. She believed the woman's name was Tuiasosopo, and [REDACTED] believed that she worked for the Samoan Government. (NOTE: Tuiasosopo is Eleimanu's maiden name).

They had one telephone conversation in which this lady described what would occur. [REDACTED] did not expect this call and did not know how this lady received her name. She stated that the lady told [REDACTED] that [REDACTED] had been picked by the organization and wanted her son to attend high school in California. The lady told [REDACTED] that for her son, they would take care of the airfare, lodging, and his education while he was attending the high school. She also told [REDACTED] that for one of the parents, they would pay airfare to fly to California and provide lodging and meals. They would also assist her son in choosing a college.

They wanted him to travel to California in February 2007. The lady also mentioned that [REDACTED] was a good player and also would be coming. She believed the conversation lasted about one hour. She was asked if FHS was mentioned, and she stated she did not know if the specific high school was named. Subsequent to that conversation, she talked with her husband ([REDACTED]) and [REDACTED] and the decision was made that [REDACTED] would not go.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with [REDACTED] mother to encourage transfer

██████████

██████████ is the mother of Leone High School student-athlete ██████████. ██████████ was interviewed by CIF representatives in American Samoa. She reported that early in 2007, her son (██████████) told her about the possibility of a lady coming by or telephoning her to talk about him playing for a high school in the United States. ██████████ said the lady subsequently visited her home. The lady mentioned that she is the mother of a high school coach in the United States. The lady encouraged ██████████ to allow ██████████ to travel to the United States. According to ██████████, the lady mentioned that the family would receive airfare to visit the school and that the schooling would be free. ██████████ asked whether FHS was mentioned, and she stated she thought FHS specifically was mentioned. She could not remember the lady's name. She told the lady she was not interested.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with ██████████ mother to encourage transfer

B. Information Reported By Those Student-Athletes or Parents Who Currently Are Enrolled in FHS

[REDACTED] is the father of [REDACTED] who currently is a senior at FHS. [REDACTED] enrolled at FHS during the second semester of the 2006-07 academic year. Mr. [REDACTED] stated that in January 2007, a lady approached them and asked whether [REDACTED] wanted to further his education in California. Later in the interview, [REDACTED] was asked whether the lady's name was Eleimanu, and he stated that it was.

[REDACTED] was asked why his son was approached, and [REDACTED] replied that he believed that they had heard about his grades and his ability to play sports. [REDACTED] indicated that another athlete, who he could not remember, also left American Samoa to attend FHS around the same time. That athlete returned home because he was homesick after two or three weeks.

[REDACTED] was asked whether he talked with any individuals who lived in the Stockton area prior to [REDACTED] attending FHS, and he stated that he talked with Steve Seumaala, who is Eleimanu's son.

[REDACTED] indicated that Eleimanu is indirectly "a relative" in that Eleimanu's son's wife's cousin is [REDACTED] wife's sister's husband. [REDACTED] could not initially remember Eleimanu's name but when provided, he indicated that was correct. He stated that Eleimanu works part time at a travel agency. He did not know her husband's name. She has two sons, Steve and Jeff Seumaala. He was asked whether he knew Eleimanu before Eleimanu discussed going to California, and he stated that he knew her, but they did not socialize. She formerly worked at a government office.

[REDACTED] was asked to detail what Eleimanu mentioned to him, and [REDACTED] indicated that she asked if [REDACTED] was interested in furthering his education in California. She mentioned that her son had been watching tapes of [REDACTED] and knew [REDACTED] was a good player. [REDACTED] indicated that he and his wife took time to think about it and decided to allow his son to enroll at FHS.

[REDACTED] indicated that [REDACTED] and his wife went to California in late January or February 2007. The purpose of the trip was to see the school, the place where [REDACTED] would be staying, and to enroll [REDACTED] in FHS. They stayed a few days with his wife's cousin in Sacramento. This cousin is the

mother of [REDACTED], a former student-athlete from American Samoa and current FHS student-athlete. [REDACTED]'s mother is [REDACTED]'s sister, so [REDACTED] and [REDACTED] are first cousins. [REDACTED]'s wife traveled to Stockton and stayed at a hotel for one to two days. His wife paid for the hotel.

Concerning the airline tickets, [REDACTED] stated that he paid for the tickets for his son and wife. Later in the interview, when asked whether Eleimanu ever offered to pay the airfare for [REDACTED] to travel, he indicated that Eleimanu offered to pay his airfare when his wife and [REDACTED] went to California in February. [REDACTED] was asked why she would offer to do that, and he stated it was because Eleimanu wanted him to see the school in order that he would feel comfortable with the decision. [REDACTED] explained that Eleimanu offered to provide this ticket after he stated that he could not go because he could not afford another ticket. In response to his statement, she offered the airline ticket. [REDACTED] stated he turned it down, as he knew he could not get away from work. [REDACTED] was asked why Eleimanu did not provide the ticket to his wife, and he stated that Eleimanu wanted him to attend and that is why she offered the ticket.

[REDACTED] stated that he believed he used Mabuhay Travel Services in American Samoa to make the arrangements for these tickets. Smrt subsequently contacted Mabuhay Travel who indicated that this ticket was subcontracted to Eleimanu Seumaala, who also had a travel agency in American Samoa.

According to [REDACTED], during her trip in February, his wife enrolled [REDACTED] at Franklin. [REDACTED] was asked what address his wife put down on the registration form, and he stated that he believed his wife put down Steve Seumaala's address, as that was where [REDACTED] would be staying. They did not sign over any legal guardianship to anyone. He did not recall signing any medical forms.

[REDACTED] indicated that [REDACTED] was staying with Steve Seumaala (and Steve's wife), [REDACTED], and another Samoan. [REDACTED] was asked whether he is paying Steve Seumaala for any lodging, and he stated he is not. He offered, but Steve Seumaala did not take any money. He was asked whether [REDACTED] paid anything, and he stated that he did not know.

[REDACTED] indicated that [REDACTED] does not have a car. In response to a question about how [REDACTED] travels to school, he stated he did not know, because he did not know where the house was in relationship to the high school. [REDACTED]'s wife visited the house when she went to register [REDACTED] in February.

██████████ was asked whether ██████████ would be traveling home for Christmas, and he stated that it was his hope that he would. ██████████ added that ██████████'s brother works for an airline and it is hoped that the brother would be able to get ██████████ a reduced rate. ██████████ did not know the airline where his son worked.

Possible Violations Reported in This Overview

Bylaw 510

- a. Contact by Eleimanu with ██████████'s father to encourage transfer
- b. Contact by Steve Seumaala with ██████████'s father to encourage transfer
- c. Lodging at residence of Steve Seumaala and automobile transportation for ██████████

[REDACTED]

[REDACTED] is a student-athlete at Franklin High School.

[REDACTED] indicated that his parents are [REDACTED] and [REDACTED]. [REDACTED] indicated that he and his parents came to visit Gwen Seumaala, who is his mother's stepsister in January or February of 2007. It was a family vacation that included his mother, father, and two sisters. They came for a family vacation but did not return, as his parents elected to reside in Stockton. He stated that everybody remained for one or two months before his family returned to American Samoa. He stated his dad wanted him to go to school in the United States and have a better opportunity for an education. He did not hear about FHS until he got to Stockton. Upon arrival, his dad wanted him to attend school in Stockton. In response to a question about when he learned of FHS, he responded it was when his "Aunt Gwen" said that FHS was a good school.

He had never heard of Eleimanu and had never talked with her. He did not know if his parents know Eleimanu.

He lives at [REDACTED] Street and has lived there since January or February. He lives there with his Aunt Gwen, who is his guardian; Steve Seumaala; [REDACTED]; and [REDACTED].

Possible Violations Reported in This Overview

Bylaw 214/510

- a. Transfer eligibility legislation

[REDACTED]

[REDACTED] is a student-athlete at FHS.

[REDACTED] indicated that he is one of seven children; he has three brothers and three sisters, and he is the youngest. None of them live at home. He currently lives at [REDACTED] Street.

He indicated that Gwen Seumaala is his mother's sister. He was asked when he first met her, and he stated he never met her in American Samoa but met her earlier this year when he came to Stockton. He had never met Eleimanu.

He stated that his mother became ill with cancer and he, his mother, and his father came to the Stockton area to get treatment in Sacramento and South Dakota. His folks stayed about two months, although they intended to stay longer. They received treatment and then they returned to American Samoa, but he stayed.

Possible Violations Reported in This Overview

Bylaw 214/510

- a. Transfer eligibility legislation

[REDACTED]

[REDACTED] is a student-athlete at FHS.

[REDACTED] indicated that he first came to the Stockton area in January or February 2007. He came here to see his mother who was living in Dixon, California. She still lives there. He had never heard of FHS prior to his trip and no one ever told him about it. He had never talked to Manu Seumaala. He never lived at [REDACTED] Avenue. (That is the address listed on the information received from Stockton High School as the first enrollment and on the PG&E residency on February 13, 2007. The form also indicated he was living with [REDACTED]).

He currently is living at [REDACTED] with Gwen Seumaala, who is his mother's cousin. He first met her when he visited this year.

Possible Violations Reported in This Overview

Bylaw 214/510

- a. Transfer eligibility legislation

C. Information Reported By Representatives of Stockton Unified School District or FHS

Scott Luhn

Scott Luhn is the Principal at FHS. He became the principal approximately two and a half years ago and believed he came during the 2005-06 academic year. He was the assistant principal for approximately three and a half years at Stagg High School. He was asked about his familiarity with the CIF 214 and 510 forms, and he stated he had been working with them for approximately six years.

He could not recall if there were any CIF forms that were completed for the 2005-06 academic year, as that would have been his first year.

Concerning the 214/510 forms for the athletes first competing this current year, he sent a letter to the high schools in American Samoa asking for the completion of the forms. He sent a letter the second time because he did not get a response from his first letter. He eventually got the forms signed from American Samoa and sent them to the CIF. Luhn indicated that although he sent the forms to the CIF, he did not have a copy of the letter that he sent with the forms nor a copy of what was sent to the CIF. He never received anything back from the CIF, although he usually did.

Luhn recalled a conversation with Pete Saco when Saco informed him that the 510/214 forms were not necessary for several of the athletes. Luhn explained that he told Saco that he had a bona fide residence change for several of the Samoan athletes. Saco replied there was not a need for a 510 or 214 form being filed if a bona fide change of residence occurs. Luhn indicated that the type of materials that is requested by the high school includes the parent registering with the student, proof of residence, transfer from the previous school, and immunization records. He was asked whether he told Saco what he had used to determine a bona fide residence for these athletes, and he stated he had not. He believed his conversation with Saco occurred after May 10, 2007, which was the date he signed the CIF 510/214 forms for the four athletes. He was asked why he communicated with Saco about this, and he stated he was not sure. He recalled talking with Saco at least about the general rule. He was asked if he had a specific recollection of sending the forms to the CIF, and although he did not, he believed he sent the forms. He talked to Saco after sending the forms to Saco.

He was asked if he had any concerns about three students from American Samoa transferring at the same time during mid year, and he stated he did not. He was asked several questions about his due diligence, and he indicated he believed he completed due diligence by requesting proof of residency.

Luhn indicated he had several conversations over the years with Saco about American Samoans. He was asked if they ever spoke in person, and he stated that occurred about two years ago in the fall after he had begun when he went to the CIF office. Saco told him that the CIF office had some concerns expressed to it by other members, including receiving comments from a director of athletics at one school and a head football coach at another. The concerns ran to whether the athletes were at FHS legally. He did not contact either of the people that Saco had mentioned. He was asked why, and he stated in that he was proactive initially because he had reviewed the situation when the athletes enrolled.

He was asked if he was ever contacted by anybody from American Samoa. He replied that he was contacted by a coach from a high school in American Samoa and the coach told him that the kids were being recruited. The coach said that a family member of a football coach at FHS was talking to American Samoa athletes. Luhn thought that the coach from American Samoa mentioned the specific name of the assistant coach from FHS, but he currently did not remember it. Luhn indicated he did not conduct an investigation on this information and he did not report this to Saco. He also did not tell Saco he was contacted by an American Samoa coach.

Possible Violations Reported in This Overview

Bylaw 214/510

- a. Transfer eligibility legislation

Jeff Seumaala

Jeff Seumaala is an assistant football coach at FHS. He was born in California but went to Leone High School and graduated in 1997. He attended Utah State, played football, and graduated in 2002. He is not married and coaches the defensive line at FHS. He has a brother, Steve, who is married to Gwendolyn. He has a brother, [REDACTED], who recently moved back to American Samoa after his father passed away. His mother is Lotomanu or Liumanu, who is not currently employed. His mother goes by Manu. She previously worked with the American Samoan government. [REDACTED] is his brother. The Magua name was changed to Seumaala. He owns a Suburban and has owned it for the past three years.

He did not know whether his mother ever encouraged anyone to travel to enroll at FHS. He never received a videotape from his mother about any athletes at FHS. He stated he has requested game film from a TV station in American Samoa. He did this because he is a former high school athlete. He has never watched a game tape with Coach Verner and never told Coach Verner about any players watched on the tape.

He never arranged air travel for any prospects or their families.

He indicated he has not lived with his brother Steve Seumaala for the last five years. He was asked if the following athletes lived with him, and he said they did not: [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. He was asked about [REDACTED], and he indicated that two or three years ago, [REDACTED] stayed with him while [REDACTED] parents were out of town. He explained that [REDACTED] parents were living in Stockton, as he saw [REDACTED] father at several games.

He was asked whether he ever arranged any transportation from the airport for any athletes when they were arriving from American Samoa, and he stated he did not. He stated he would have given friends transportation for high school graduation. He stated that if he was asked for help, he would have given someone a ride. This was not when they came to enroll.

In response to specific questions, he indicated he did not arrange for any athlete or their parents to stay at a hotel in Stockton. This included [REDACTED], [REDACTED], [REDACTED], [REDACTED], or [REDACTED]. He has never heard of L&L Travel.

Possible Violations Reported in This Overview

None

Thomas Verner

Thomas Verner is the head football coach at FHS. He has been the head football coach at FHS for 14 years and is paid to be the head football coach. He has no teaching responsibilities.

Jeff Seumaala has been on his football staff for four to five years. During the 2004-05 academic year, Jeff Seumaala was the offensive line coach. He indicated that Steve Seumaala has never been a coach. He occasionally attends practices. During the fall 2006 season, Steve Seumaala helped with water on the sidelines or on the field. He has been involved in the past in some capacity helping on the field during games. Steve Seumaala performs duct work, primarily for rental properties for Mark Williams, who formerly was a coaching staff member at FHS. Williams was on the staff for the past two or three years but is not on this year's staff.

Verner was asked if he ever talked to Jeff Seumaala's mother, Eleimanu. He stated that he had. He stated he met her approximately 20 years ago in person when Eleimanu's brother was receiving a Master's degree from the University of Pacific. Verner could not remember the brother's last name, but he and the brother were coaching together at St. Mary's High School.

Verner was asked about the number of Samoans who have attended FHS, and Verner responded almost every year, there is a kid from American Samoa who attends FHS and that not all of them play football. He stated that at practice today, there will be 10 American Samoans just watching practice.

He was asked a question about [REDACTED], and Verner indicated that he was not going to respond to any questions about events past two years due to the CIF's statute of limitations. He said he would have the same answer for several of the athletes the same age as [REDACTED].

Verner was asked about [REDACTED]. He replied that he did not know [REDACTED] until [REDACTED] got to FHS. He did not have any conversations with individuals in American Samoa about [REDACTED]. He first learned about [REDACTED] when [REDACTED] was a student at the high school and [REDACTED] showed up in the weight room.

Verner was asked whether anyone asked him to make sure that [REDACTED] was eligible, and he stated that he checked the academic eligibility for every kid who was on his team. He stated it was not his

job to check transfer eligibility, as that is Joe Martin's job. Verner could not recall talking to Martin about [REDACTED]. He was asked whether he asked Martin to check on the eligibility of [REDACTED], and he stated that he was not sure. He was asked whether he asked [REDACTED] about [REDACTED]'s past football experience, and Verner replied that he was sure that he did. He was asked as a general practice, did he try to determine the athlete's previous football experience, and he stated that he usually asked in that he usually asked what positions they played.

He was asked if he ever determined where the athletes were living, and he stated he did not.

He was asked who Gwen Seumaala was, and he stated that is the sister-in-law to Jeff Seumaala and Steve Seumaala's wife. Steve and Gwen Seumaala live at [REDACTED] St. He was asked if any athletes were living there, and he stated that [REDACTED], [REDACTED], and [REDACTED] were living there, as she was the court-appointed guardian for all of them. He was asked several questions about why Gwen Seumaala had court-appointed guardianship, and he generally declined to answer saying that he did not want to talk about the family background of the athletes. He was asked whether [REDACTED], [REDACTED], or [REDACTED] ever lived there, and he stated he did not know. He was asked whether any football players lived with Jeff Seumaala or others lived with Steve Seumaala, and he stated he did not believe so. He stated it was possible on a temporary basis, but they did not stay for any extended period. He stated that the American Samoans have a deep tradition of living "here and there".

He stated that he saw Eleimanu within the last two years when she was in the United States when her husband was getting treatment for a heart disease. He was asked whether he ever spoke to her about contacting players in American Samoa on behalf of FHS, and he stated he did not. He was asked whether he knew if Jeff Seumaala spoke to his mother about contacting athletes, and he stated he did not know.

He indicated he never made any calls to American Samoan high school coaches within the past two years, as he did not know any high school coaches in American Samoa. He stated he never contacted anyone in American Samoa.

He was asked why there were several American Samoan kids who transferred to FHS after their junior year, and he responded that the families save up the money and were able to afford it at that time. It is the dream of many American Samoan families to have their sons come to the United States to play football. He stated there are many Samoans also at the following high schools: Grant,

Elk Grove, Palo Alto, and Carson. He was asked whether he personally paid for any American Samoan parents to travel to the United States, and he stated he did not. He did not arrange any transportation and did not know if Jeff Seumaala did. He was asked whether Jeff or Steve Seumaala paid for any airfare, and he stated he did not know.

He was asked if he ever used L&L Travel, and he stated "no" and he added that he has not used L&L in the last two years. He stated he never used L&L Travel to pay for any workers to travel from American Samoa. He was asked if he ever talked to ██████████'s parents about money to pay for a graduation trip for the parents, and he stated "no".

He was asked whether any former American Samoan student-athletes have an ax to grind with him, and he stated ██████████ may. He stated that ██████████ was "totally hopeless". He was asked if he had any other reasons why other parents or athletes from American Samoa would not be truthful, and he stated he did not know.

Possible Violations Reported in This Overview

None

Joe Martin

Joe Martin is the administrator in charge of athletics for the Stockton Unified School District. He said he has been very familiar with Forms 510 and 214.

He was asked when he first heard of the American Samoans coming to FHS, and he stated it was in 1996, when he was the head coach at Berkley High School, and knew that FHS had several American Samoan players. Since he became the athletics director, he recalled in February 2007 that he had a group of American Samoan players and their parents come to the District office. They had not yet played. He did not know why they came to the District office. There were four different groups of parents for four students. They just dropped in to his office. They asked him how they could get their sons enrolled at FHS. He took them to Student Services and they gave them documents in order to enroll. He stated while this is not unusual, it does not happen every day. He took this group to Student Services, which is always the first stop in enrollment. He did not know what Student Services does.

He was asked whether he took any steps to ascertain whether they would be eligible, and he stated that he did. He assumed he reviewed their residency and academic eligibility and completed the 510 and 214 forms. He indicated that his office sends the forms to the CIF or they come from the high school. He stated they usually would come from the principal, like Scott Luhn at FHS. He believed he saw the forms before they were sent in. He was asked whether he ever sent 510 or 214 forms for any other Samoans, and he stated that he did not. Of these four, he gained the knowledge that he needed to complete the forms when they came to his office. He reviewed the forms at that time. Luhn also reviewed them and then sent them in. Martin looked at them to make sure they were complete. He was asked whether he did any investigation of the four, and he stated he did not, as that was the job of the CIF.

Martin reported that he talked with Claire Poulmele at the American Samoa Department of Education on the telephone, which he believed to be in the fall of 2006. At first, he could not remember if it was before or after the letter, but upon reflection, believed it was before. He believed that the letter was in response to the telephone call. He asked Poulmele if these athletes played football and if they were recruited by FHS. He stated his concern was whether they played football the previous year.

He was asked why he sent the letter to the Department of Education and Poulmele, and he stated that it seemed like the largest body to send it to in American Samoa. He wanted to send it to the governing body. He was asked where he got her name, and he stated he did not remember. He was asked about any relationship he had with Congressman Pombo, and he stated he did not have any relationship. He did not know why she indicated that in her letter.

Martin said he again telephoned the Department of Education after receipt of the letter. He believed that he utilized the same number he had contacted Poulmele in the Department of Education and the telephone was answered by Bob Tuiasosopo. He talked to Tuiasosopo for a few minutes without realizing who it was. At that time, he believed that Tuiasosopo must have taken Poulmele's position. Martin was asked whether Tuiasosopo sent any letters, and he stated he did not know. He was communicating with Tuiasosopo about the 510 and 214 forms. He was asked whether Tuiasosopo has any relationship to FHS, and he stated he did not know. He stated that he talked to Tuiasosopo about four or five times about the forms. He never met him in person. He was not a personal friend of Tuiasosopo. Martin was asked if he knew Eleimanu Suemaala, and he stated he did not know her.

Martin was asked whether he spoke with the head football coach at FHS about Samoans. He stated when he first met Tom Verner in 2006, he told Verner that they would tolerate no violations. Later in 2006, after the issue arose about the three student-athletes, he stated he asked Verner about the three, and Verner asked him to check whether they had played varsity football.

He was asked whether he looked at any of the documents that made the three Samoans eligible in the fall of 2006, and Martin replied that he came to the high school at 2 p.m. the day of the first game and went through every form. The assistant principal at that time had not provided him a list of the eligible players, so that prompted his visit.

Martin stated that he brought Verner in after receiving the letter from the CIF and asked him if there was any undue influence, and Verner stated there was not. He was asked whether he ever received information from anyone else about possible violations, and he stated he never heard anything else. He was asked whether he heard that Jeff Seumaala contacted parents of the Samoan athletes while in Samoa, and he stated he had not.

He was asked whether he ever sat down with Saco to talk about the American Samoan athletes, and he stated not about American Samoa athletes, but they talked about FHS athletes. He was asked

whether there were ever any conversations with Saco about it, and he stated that he tried to be very forthright with Saco. It was possible that he called Saco.

Possible Violations Reported in This Overview

None