

What he owns/

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of a June 26, 2007, interview with [REDACTED], father of [REDACTED] who currently is a junior at Franklin High School. This conversation was held in the writer's room at the Trade Winds Hotel in American Samoa. Present for the interview were [REDACTED]; Scott Donald, legal counsel for the San Joaquin section of CIF; and the writer. This was tape-recorded by the writer. [REDACTED] provided the following information, although not necessarily in this order, as this summary is organized topically, as opposed to chronologically:

[REDACTED] is a vessel agent who is self-employed and his company is entitled The American Pacific Agency, P.O. Box [REDACTED], Pago Pago, American Samoa 96799. His cell telephone number is [REDACTED], and his facsimile number at the agency is [REDACTED].

[REDACTED] has eight children. [REDACTED] is [REDACTED]'s son. He attended Fagaitua High School for two and one-half years and transferred to Franklin High School for the spring semester of 2007. He completed his junior year at Franklin and will be entering his senior year this fall.

### INITIAL CONTACT

[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] explained that the family could not afford college for their son and they were concerned about what would happen.

[REDACTED] indicated that his son attended Fatikua High School and played fullback and linebacker. He had finished his junior season in the fall of 2006. He 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 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 Franklin, 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]'s wife's sister's husband. [REDACTED] could not initially remember Eleimanu's name but when provided, he indicated that was correct. He stated that she 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 she knew him, 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 indicated 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. He was asked whether he talked to any other parents of other athletes, and he indicated that he talked with another parent that he knows well, but he could not remember her name. Later in the interview, when reviewing names of several athletes who went to California, he stated he talked with [REDACTED].

[REDACTED] stated that he and his wife made the decision and informed [REDACTED], who was hesitant. [REDACTED] indicated that a factor in allowing [REDACTED] to go to California was that [REDACTED] would have

several brothers and sisters in the United States. He indicated that Tali is in Phoenix, Bradley is in Las Vegas, Christian is in Long Beach, Regina is in Long Beach, and Lauren is in Seattle.

### TRIP TO CALIFORNIA

██████████ indicated that ██████████ and his mother went to California. The purpose of the trip was to see the school, the place where ██████████ would be staying, and to enroll ██████████ in the high school. They stayed a few days with his wife's cousin in Sacramento. This cousin is the mother of ██████████, who lives there. ██████████ is from Fatikua High School but lived with his grandmother in American Samoa. ██████████ mother is ██████████'s sister, so ██████████ and ██████████ are first cousins. ██████████'s wife traveled to Stockton and stayed at a hotel there for one to two days. His wife paid for the hotel.

Concerning the airline tickets, ██████████ 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 ██████████ to travel, he indicated that Eleimanu offered to pay his airfare when his wife and ██████████ went to California in February. The writer asked why she would offer to do that, and he stated it was because Eleimanu wanted him to see the school and lodging in order that he would feel comfortable with the decision. ██████████ 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. ██████████ stated he turned it down, as he knew he could not get away from work. The writer 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.

██████████ stated Eleimanu used a travel agent for these tickets. He believed it was Mabuhay Travel Services in American Samoa (P.O. Box 5457, with the office telephone number being 684-699-6100). ██████████ explained that Eleimanu also worked at a travel agency, as he asked Eleimanu for prices on some tickets, but ██████████ utilized Mabuhay Travel Services for the California trip. He purchased two tickets and paid by check through Mabuhay Travel. At the conclusion of the interview, the writer asked ██████████ to sign a release form to look at his records at Mabuhay Travel, which he did.

### CHRISTMAS

The writer 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.

### REGISTRATION

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

██████████ was asked if he had to pay any tuition at Franklin, and he stated that he did not. He assumed that Steve Seumaala would have to pay.

### LODGING

██████████ indicated that ██████████ was staying with Steve Seumaala and his wife, ██████████, and another Samoan. ██████████ was asked whether he paid Steve Seumaala for any lodging, and he stated he did not. He offered, but Steve Seumaala did not take any money. He was asked whether ██████████ paid anything, and he stated that he did not know. ██████████ was asked about any spending money he provided to ██████████ and he stated that ██████████ gets spending money from his brothers and sisters. ██████████ added that they also have opened up a bank account in California for ██████████.

██████████ was asked whether he knew Steve Seumaala's brother, Jeff, and he stated he did not know him. He did not believe he had ever talked with Jeff Seumaala.

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

Charles E. Smrt  
June 26, 2007

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of the writer's visit to the Department of Human Resources \_\_\_ with several individuals in the department. It also included two short conversations with individuals from the Department of Education.

Scott Donald, legal counsel for the San Joaquin section of CIF; and the writer initially visited with Malu Mageo, the director of human resources for the American Samoa Government. The writer showed him an August 28, 2006, letter allegedly from Claire Poumele to Joe Martin in the Unified Stockton District. The writer noted that the letter appeared to have been faxed from the human resources department and that the fax number on top appeared to indicate [REDACTED], which the writer believed to be the fax number for the human resources department.

Shortly thereafter, Mageo asked two supervisors in human resources (Esie at [REDACTED], and Makerita Enesi at [REDACTED]) to join the discussion. After a few minutes, Esie, Enesi, Donald, and the writer went to Esie's office.

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 that they were aware of Eleimanu having a football connection in California. 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 talking about \_\_\_\_\_ accommodations.

It was reported that there are two fax machines in human resources and the number ending in 1139 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.

Enesi reported that she taught at Leoni High School and knows many people in that area. On one occasion, Eleimanu asked Enesi if she knew [REDACTED] from the Leoni area. Enesi obtained the name and the telephone number for [REDACTED].

Enesi reported that on one occasion, Eleimanu asked her to obtain the name and telephone number of [REDACTED].

Esie reported that Eleimanu currently was on six-month's leave effective the first of January so she would be returning next week. Esie has not talked with her since this leave. 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. Esie indicated that she would review the timecards to determine whether Eleimanu was at work on that day. The writer indicated that she would telephone Esie in the near future.

Subsequent to the visit to the Department of Human Resources, Donald and the writer visited the Department of Education and asked Sally, Claire Poumele's assistant, several questions. Sally's cell telephone number is [REDACTED]. Donald and the writer previously had talked with Sally a few days before.

Sally indicated that on August 28, 2006, Maletele Luituitele was the director of education and Poumele was the deputy director. Luituitele was the director until early 2007 and shortly thereafter, Poumele became acting director and then director. At the time of the letter, Luituitele would have been the director. The writer asked Sally if she recalled whether a letter was received in the Department of Education on August 28 from the Stockton Unified School District, and she stated she did not receive

such a letter. She stated that if Poumele would have received a letter, she would have known about it. She did not know why Poumele would have been on the August 28 letter.

Sally was asked several questions about the availability of Department of Education letterhead. She thought that all of the stationary was contained in a drawer next to Pele, the office secretary. Pele reported that stationary is contained in the office drawer, but stationary/letterhead is also located at various satellite offices with the Department of Education.

Charles E. Smrt  
June 26, 2007

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of a September 6, 2007, interview with Scott Luhn, Principal at Franklin High School (FHS). This interview was held in the conference room at FHS. It was tape-recorded by the writer and David Lyon. Present for this interview was Scott Donald, David Lyon, Renee Sanchez, Michael Babitzke, and the writer.

#### BACKGROUND

Luhn became the principal approximately two and a half years ago. The previous principal was Ms. Pat Hague. He 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 California 214 and 510 forms, and he stated he has been working with them for approximately six years.

#### INFORMATION SUBMITTED TO CIF

Luhn indicated that David Lloyd put together the chart that was submitted. He attempted to look for information for the athletes from American Samoa for 2005-06 but could not find any.

#### CIF FORMS

Luhn indicated that there had been confusion recently on the 214 and 510 forms. He has always thought that if a student transferred in and played a varsity sport for the previous high school, these forms were completed. 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 ██████████'s 214/510 forms, he did not fill out the information on the form. Similar to the other Samoans who came in the spring of 2007, he sent a letter to the high school 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 it to the CIF. Luhn indicated that he sent the forms to the CIF, but he did not have a copy of any 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 indicated that Saco said that the 214/510 forms were not necessary for several of the athletes. Luhn explained that he told Saco that it was a bona fide residence change for several of the Samoan athletes and based on that, Saco said there was not a need for a 510 or 214 form being filed. 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, and he stated he had not. He believed his conversation with Saco occurred after May 10, which was the date he signed the 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 he stated he did not, although he believed he sent the forms. He talked to Saco after sending the forms.

At the end of the interview, questions were asked by the involved parties in the area. Luhn reiterated that he did not remember if these forms were hand delivered or mailed to the CIF office. He reiterated that he sent all of the forms to the CIF office.

Concerning [REDACTED], he also did not receive a response initially from [REDACTED] high school and sent a second letter. He had a conversation with Saco probably about [REDACTED], but this would have been during the same conversation discussing the other athletes. He was shown a copy of the foreign athlete exchange form, and he stated he now realizes that he did not complete that form.

Concerning [REDACTED] [REDACTED] he completed the 510/214 forms. He believed he got the information from the parents. The address he put down was his understanding of where the parents and [REDACTED] were living.

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

Concerning [REDACTED] [REDACTED], he did not remember meeting with the parents.

#### CLAIRE POULMELE LETTER

He could not remember if he saw it, but he probably did in relationship to the three athletes. He believed that these three athletes were living with their parents.

#### OTHER CONVERSATIONS WITH SACO

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. Luhn 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 the Director of Athletics Tracy and the head football coach at \_\_\_\_\_. The concerns ran to whether the athletes were at FHS legally. He did not contact either the people that Saco had mentioned to him. He was asked why, and he stated in that he was proactive initially because he had checked when the athletes enrolled.

He recalled another conversation with Saco about the new process and 30-day eligibility period. He did not know if this specifically concerned American Samoans.

He was asked if he was ever contacted by anybody from American Samoa, and he indicated that he had. He was contacted by a coach from a high school in American Samoa and the coach felt 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 does not remember it currently. Luhn indicated he did not conduct an investigation on this and he did not report this to Saco. He also did not tell Saco he was contacted by an American Samoa coach.

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of a June 22, 2007, interview with Dr. Claire Poulmele, Director of the Department of Education in the American Samoa Government. This conversation was held at Tafuna High School where a leadership conference was occurring. The interview was arranged through Poulmele's administrative assistant (Sally), and Sally's cell telephone number is 684-██████████. The office number is ██████████. Present for the interview were Poulmele; Elia Savali, program director for secondary schools for the Department of Education; Tumua Matuu, legal counsel for the Department of Education; Scott Donald, legal counsel for the San Joaquin section of CIF and the writer. Savali's wife's cell telephone number is ██████████. Matuu's office number is ██████████-██████████. This was not tape-recorded per Poulmele's request. Poulmele (and occasionally Savali and Matuu) provided the following information, although not necessarily in this order, as this summary is organized topically, as opposed to chronologically:

### BACKGROUND

Poulmele reported that a student transferred from one of the Samoan high school team off island high school and the Samoan high school coach and administrator refused to endorse a form that was required for this transfer because they did not like that the student-athlete was transferring. The coach and administrator had questions about why the athlete was transferring. Poulmele indicated that she asked Savali to ask the coach why he did not wish to endorse the form. Poulmele generally indicated her position that she was in favor of such transfers, as it would help the students. (It is the writer's belief that it would be beneficial to students, including athletes, transferring from Samoan high schools to high schools off island would be beneficial to the students, assuming that it is a better school environment).

Poulmele indicated that on behalf of the Samoan high schools, she would like a copy of the California rules so they can protect their students.

### AUGUST 28, 2006, LETTER

The writer asked Poulmele if she wrote the August 28, 2006, letter, and her initial reaction was that she did not recall writing it. She stated it was doubtful that it was her signature. Later in the interview, she stated that she was fairly certain it was not her signature. She stated that she usually signs all letters as her full name, which is Claire Tuia Poulmele. Savali indicated that was not her signature and Matuu indicated that was not her signature. The writer referenced a comment in the letter to "United States Congressman Richard Pombo", and Poulmele indicated that she did not know what that is.

Approximately 30 minutes into the discussion, Poulmele excused herself, as she had to return to the leadership conference in which she was one of the organizers. Matuu and Savali remained with the writer and Donald. The writer reviewed a list of athletes who allegedly had gone to California. Matuu indicated that ██████████ was her cousin who might currently be working at the Equator Restaurant. She indicated that she would talk to ██████████ about talking with us.

Savali indicated that the parents of ██████████ indicated that ██████████ was in California and staying with an uncle. He did not talk to them directly. He was asked whether he knew Jeff Seumaala, and he stated he did not.

Savali indicated that some Samoan high school athletes have transferred to Hawaiian high schools. He believed that since that was considered permissible, parents of local athletes are more open to allowing their sons to go to California.

Savali indicated that [REDACTED] played for him, although [REDACTED] was not a starter. He believed that [REDACTED] parents had relatives in California.

They were asked about Bob Tuiasosopo. He indicated that Tuiasosopo was an announcer for football games in the Samoa area. He has a brother who is in California who formerly coached at a college in California.

Several questions were asked concerning the AIGA Foundation and Savali indicated that the Foundation does clinics.

Charles E. Smrt  
June 22, 2007

## INTERVIEW SUMMARY

### California Interscholastic Federation

This is a report of May 15, 2007, conversation with [REDACTED], a football student-athlete at San Jose Community College (SJCC). This interview was held in the Multipurpose Room on the SJCC campus. Present for this interview were [REDACTED] and the writer. It was tape-recorded by the writer with [REDACTED] permission.

#### BACKGROUND

[REDACTED] indicated he currently is living in the San Jose area in an apartment with a few other athletes from the SJCC football team, none of which went to Franklin High School. His cell number is [REDACTED]. He attended Franklin High School in Stockton for one year and graduated in June 2006. Tom Verner was his high school coach. He attended Leoni High School in America Samoa for three years. His parents ([REDACTED]) reside in America Samoa, with their address being P.O. Box [REDACTED] and a zip code of 96799. Their home telephone number is [REDACTED]. Living at that address are his brother, sister, parents, and nephew. [REDACTED]'s date of birth is November 3, 1985.

#### STOCKTON RESIDENCY

[REDACTED] reported that while attending Franklin High School, he lived with his uncle (Jeff Seumaaha), who is an assistant football coach at Franklin. He could not remember the number, but it was on [REDACTED] Avenue. He lived there with two cousins - [REDACTED] and [REDACTED]. [REDACTED] and [REDACTED] are in the same grade as [REDACTED], although [REDACTED] and [REDACTED] came to Franklin during the second semester of their junior year. [REDACTED] currently is at San Francisco City College, while [REDACTED] returned to America Samoa.

[REDACTED] was asked why he lived with Seumaaha, and he stated that Seumaaha was his uncle. He was asked to describe his relationship, and he stated that Seumaaha's great grandfather was chief of the tribe of which his grandparents were members. The writer asked whether his mother or father were a brother or sister to Seumaaha, and stated they were not. [REDACTED] indicated that [REDACTED] and [REDACTED] are his cousins because they also are members of the tribe.

#### MOVING TO CALIFORNIA

[REDACTED] indicated that he moved from America Samoa to California on May 29, 2005. He was asked why he made this move, and he stated that his parents determined that he had more opportunities for a future by coming to California. [REDACTED] reported that his mother telephoned Seumaaha, who is her cousin's son. His mother believed that he had more of a future by coming to the United States. He stated that he came to the United States to play football. He was asked why he came at the end of his junior year, and he stated that the intent was for him to come at the beginning of his junior year, but he had "girlfriend problems" and could not move his junior year. He wanted a new lifestyle for himself and his mom supported him in this decision.

He was asked about his conversations with Seumaaha prior to coming to California. He stated that Seumaaha graduated from Leoni High School. Since Seumaaha is about 28 years old, he knew Seumaaha when Seumaaha was still in the area. He stated he would have had conversations with Seumaaha while Seumaaha was living in the United States due to this relationship. [REDACTED] indicated that his in-person or telephonic contact with Verner was when Seumaaha took him to the high school to meet Verner upon his arrival in California.

Concerning his trip to the United States, he and his mom traveled together. He stated his father is a wealthy businessman, as he owns an auto parts company. He and his mother stayed for a few days in a hotel. After these few days, they moved into Seumaaha's house. [REDACTED] was asked why they did not move to Seumaaha's house immediately, and he stated that Seumaaha had his brother's wife's relatives staying with him at that time. His mother stayed approximately six weeks, but during that time, his father and sister also came to California and stayed with them.

[REDACTED] reported that his parents paid for his transportation and lodging for this trip. He stated he did not receive any assistance from anyone else concerning these costs. He was asked whether he had heard of the AIGA Foundation, and he stated that he is aware that it is a group that supports young Polynesians to attend camps. Some NFL players are connected with the Foundation. He went to a camp in Samoa that was founded by AIGA and possibly one in the United States. He did not receive any grants, loans, or any financial assistance from the Foundation to travel to the United States.

### SENIOR YEAR AT FRANKLIN

[REDACTED] reported that he did not pay any rent to his uncle for his stay at that residency. His mother was sending him \$300 per month for incidental expenses. He traveled back to Samoa at Christmas and stayed approximately two to three weeks. His parents paid for that trip. He did not play in any All Star game in either Samoa or Hawaii. He played in an All Star game in Stockton.

He was asked about his legal status, and he believed that Seumaaha was his legal guardian. He recalled his parents signing some papers.

Concerning his recruitment, [REDACTED] reported that he took visits to San Jose State and to Morgan State. He chose San Jose State because it was closer to relatives, which he has relatives in San Francisco and Stockton. He stated that his mother's cousin lives in San Francisco and Seumaaha lived in Stockton. His mother traveled from America Samoa to Stockton for his signing of the NLOI, which was on February 1. He was not a NCAA qualifier, so he did not enroll at San Jose State. San Jose State encouraged him to attend a two-year college, graduate, and come to San Jose State. He believed he eventually will attend San Jose State. He was not aware of any connection between Franklin High School and San Jose State.

[REDACTED]

[REDACTED] was asked why [REDACTED] did not enroll at SJCC, and he replied that [REDACTED] had grandparents who lived in the Stockton area. The writer asked [REDACTED] if [REDACTED] lived with his grandparents while Taifane went to Franklin High School, and he stated that [REDACTED] lived with Stephan (last name unknown) who was a defensive line coach at Franklin High School.

Coulter was asked about [REDACTED] and [REDACTED], two recent graduates of Franklin High School. He replied he did not know where they intended to enroll as he has not kept in communication with them. He replied that he talked to Seumaaha about a week or two ago.

Charles E. Smrt  
May 15, 2007

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of a June 25, 2007, interview with [REDACTED], the father of [REDACTED]. This conversation was held at [REDACTED] business at NAPA Auto Parts. [REDACTED] mailing address is [REDACTED], American Samoa 96799. He home telephone number is 684-[REDACTED] and a facsimile of 684-[REDACTED]. His e-mail is [REDACTED]@yahoo.com. Present for the interview were [REDACTED]; Scott Donald, the legal counsel for the San Joaquin section of the CIF; and the writer. This was tape-recorded by the writer. [REDACTED] provided the following information, although not necessarily in this order, as this summary is organized topically, as opposed to chronologically:

#### INITIAL CONTACT

[REDACTED] reported that that Eleimanu was the name of the lady who contacted them. She came to the NAPA Auto Parts. He had never met this lady before. He talked to her one time in person and on two occasions on the telephone. Her son is an assistant coach at Franklin High School.

[REDACTED] was asked whether the mother 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 she said her son was connected to the high school.

Neither Jeff Seumaala nor Eleimanu are related to their family.

#### TRIP TO CALIFORNIA

[REDACTED] said that [REDACTED] and [REDACTED]'s mother traveled in June and that Eleimanu took care of all the arrangements for [REDACTED]. He flew into Sacramento. [REDACTED] did not possess any e-mails or any other documentation from this trip. They took responsibility for these arrangements. When asked who paid, he stated he was not sure.

[REDACTED] believed that [REDACTED] and [REDACTED]'s wife returned to California and then [REDACTED] went back to California to enroll. He believed that Eleimanu or Jeff Seumaala paid for the trip in August.

#### LODGING

[REDACTED] believed that [REDACTED] was staying with Jeff. He showed the writer a copy of a letter that was sent to Jeff Seumaala at the [REDACTED] Avenue address that he knew [REDACTED] was living with Jeff Seumaala. The letters to Jeff Seumaala were returned as undeliverable. He sent [REDACTED] a letter in [REDACTED]'s name at this same address and they were not returned.

[REDACTED] did not pay anything to Jeff Seumaala for lodging for [REDACTED]. He was sending [REDACTED] \$100 to \$150 each month, and he did not know if [REDACTED] gave that to Jeff Seumaala for the lodging. Jeff Seumaala did not ask him for any money. [REDACTED] asked him to send money.

[REDACTED] reported that he was aware that Jeff Seumaala was transporting [REDACTED] to and from school.

#### TRIPS TO CALIFORNIA BY FAMILY

[REDACTED] stated he took two trips to California. The first was to see some football games in the fall. He recalled seeing [REDACTED] play in Sacramento and San Francisco. On this occasion, he paid for the airfare and lodging for his family. Jeff Seumaala picked them up at the Sacramento Airport.

The second trip was for graduation, and he paid for the lodging and airfare for him, his wife, his daughter, and his daughter's kids to travel to Sacramento. 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 back to California that someone else paid for it. He knew he did not pay for it.

Toward the end of the interview, when asked to detail what trips were paid by officials connected with Franklin, [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.

#### MISCELLANEOUS

[REDACTED] remembered that [REDACTED] came home for Christmas in 2004, but he did not remember who paid for the ticket.

[REDACTED] met Coach Verner on the practice field. He also remembered he went to Verner's home for a barbeque. He believed this was when they were in Stockton for graduation.

When [REDACTED] went with the family for the high school graduation, [REDACTED] worked out with the Franklin football team.

[REDACTED]ter believed that Jeff Seumaala also was a banker or a securities specialist.

Charles E. Smrt  
June 25, 2007

## INTERVIEW SUMMARY

### California Interscholastic Federation

Report of a June 25, 2007, interview with [REDACTED], the mother of [REDACTED]. This conversation was held at [REDACTED] home, and the mailing address is P.O. Box [REDACTED], Leoni, American Samoa 96799. Present for the interview were [REDACTED] and the writer. This was not tape-recorded at [REDACTED]'s request. [REDACTED] provided the following information, although not necessarily in this order, as this summary is organized topically, as opposed to chronologically:

#### BACKGROUND

[REDACTED]'s home telephone number is [REDACTED]. She is married to [REDACTED].

She explained that her son ([REDACTED]) had always done very well in all sports and was a very visible athlete. [REDACTED] attended Franklin High School in California during the 2005-06 academic year.

#### INITIAL CONTACTS

[REDACTED] reported that the mother of Coach Jeff Seumaala at Franklin High School contacted her husband and indicated that they were recruiting local kids to go to California. She believed this occurred in April and was a telephone call to her husband.

Approximately one week later, Jeff Seumaala's mother came to the NAPA Office and met she and her husband. The lady provided a full page of material on the school and said that the coach at Franklin had heard a lot about [REDACTED]. The coach wanted [REDACTED] to relocate to Franklin. The writer asked what she thought relocate meant, and [REDACTED] reported that [REDACTED] would attend his last year of school at Franklin and play football. 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. [REDACTED] reported that the parents of [REDACTED] and [REDACTED] met with them to talk about the opportunity. At the end of the conversation, they still said they did not want to send their son.

On the next day, Jeff Seumaala telephoned [REDACTED] to try to convince them to send their son. After talking with Jeff, they decided to allow [REDACTED] to go to California. She believed this was in mid May.

She 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. The writer 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].

[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 they do not have any relatives in the Stockton area.

#### TRIP TO CALIFORNIA

[REDACTED] reported that after agreeing to send [REDACTED] during the conversation with Jeff, they left a short time later. She stated that her round-trip airfare was paid between American Samoa and Sacramento and [REDACTED] one-way airfare was paid by them. She reported that both were electronic tickets that they picked up at the ticket counter. Jeff Seumaala's mother told them about the itinerary, and she believed

that Jeff e-mailed the itinerary to them. She reported that Cameron's ticket was in first class, while her ticket was in coach. In response to a question, she stated that 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. (At the end of the interview, ██████ signed a release form for the CIF to review her records at L&L Travel).

Besides her and her son, ██████efele and his parents also were on the plane. ██████ and his parents were in first class. She first believed that ██████ and his parents were on the plane, but she later believed that ██████ had left earlier. Since she had her granddaughter with her, she reasoned 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.

██████ stated that the last night before she left, she talked with Coach Verner at his house. She stated this was a big mansion with 20 plus rooms. Cars were sent to pick them up. Present on this occasion were she, her son, ██████, and ██████'s parents. Based upon this house, she believed that Verner is the financial backer of this situation, because she knew that Jeff did not have any money.

██████ was asked when the date of this trip was, and she stated that she believed it was in early June because they attended the Leoni graduation and left a day or two later.

#### LODGING DURING THE ACADEMIC YEAR

██████ stated that while she was there, she saw the new house that ██████ would stay in. Jeff stayed with them, as all of the Samoan boys resided there. There were four bedrooms at this house.

██████ did not pay Jeff 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 lodging money. She stated that she sent her son some spending money.

#### REGISTRATION

██████ stated they did not register ██████ while they were there during the summer and did not travel back. She believed they signed an affidavit that authorized Jeff to register ██████ on their behalf.

#### CHRISTMAS

██████ returned home at Christmas and she paid for his airfare.

#### HIGH SCHOOL GRADUATION

██████ reported that the entire family went to the high school graduation, including her and her husband, her daughter, her daughter's five kids, and her younger son (██████). 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.

██████ indicated that Coach Jeff made arrangements for ██████ to fly from Los Angeles to American Samoa. Coach Jeff paid for a one-way ticket for ██████ from Los Angeles to American Samoa. When asked who paid for the return flight for ██████ to fly from American Samoa to Sacramento, ██████ initially believed that Jeff 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 paid for at least a one-way ticket and believed it was from Los Angeles to American Samoa.

## MISCELLANEOUS

██████ was asked if ██████ took any SAT tests in California, and she stated she did not believe that he did. She knew he took the SAT before he left.

██████ 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 asked her to go visit the family of ██████. ██████ said, as a result, she and ██████'s parents went to ██████. She stated that she recently saw ██████'s mother, and ██████'s mother yelled at her for getting ██████ involved in that situation.

Coulter reported that in February 2006, she and ██████ went to California in order to see her son sign a National Letter of Intent with San Jose State University. Jeff Seumaala called her on a Saturday and asked her to come to Tuesday for the National Letter. Jeff Seumaala told her that she should buy the ticket and they would reimburse her. She stated that she never asked for reimbursement. They stayed at a hotel on Waterloo Street and paid for their own lodging. While there, Jeff Seumaala attempted to talk her into allowing ██████ to stay with them and attend Franklin. She also talked with Jeff Seumaala's mother about ██████ attending. She stated that she told them she was not interested in ██████ attending Franklin.

At the end of the interview, ██████ asked several questions about academics, and the writer explained the NCAA Clearinghouse to her. The writer mentioned that he would forward her some information about the Clearinghouse.

Charles E. Smrt  
June 25, 2007

NOTES FROM INTERVIEW WITH [REDACTED]  
FROM INTERVIEW AT APPROXIMATELY 3:00 P.M.  
AT THE HUMANITIES OFFICE IN PAGO PAGO, SAMOA

I spoke with [REDACTED], the mother of [REDACTED], regarding her family's experience with Franklin High School. She related the following.

[REDACTED] completed his junior year at Leone High School. At the end of the school year, [REDACTED] came home one day talking about how his cousin was going to the United States to play football. He said he would like to go too. About this time, a lady called Liumanu Seeumaula whose maiden name is Tuiasosopo, told [REDACTED] that her sons Jeff and Steve Seeumaula coached and lived in Stockton and that they had a program there for Samoan boys where they would help with their SAT scores, tutor them on course subjects, and make sure they got good grades while at the same time receive coaching and training to play football for Benjamin Franklin High School. She stated that over the next few days Liumanu tried to convince her to let Eric go to Stockton. She was at first reluctant. Her husband was more interested and took an active role in the process. Liumanu 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." Liumanu told her that her sons worked for Coach Verner and they could take care of everything and also would pay for air fare. This included air fare for the child and the parents to go to Stockton, round trip for graduation, and if her son did not receive a college scholarship, they would pay for him to fly back to Samoa. Liumanu said that her sons would take care of the plane tickets and that she did not have to worry about that because her sons would use a credit card. They would just go to the airport and check in.

The first time that [REDACTED] went to Stockton was in July of 2005. At that time, [REDACTED] trip and her husband's were paid for. She went along too but because the trip to Stockton coincided with a work trip in Northern California, her employment paid for her way. She states that she landed in California and stayed with her sister in Torrence while her business meeting went on. Then she and her husband drove to Stockton where they stayed approximately one day. While they were in Stockton, she and her husband paid for their own motel room. While in Stockton, they met Jeff and Steve 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] last name), and one other boy whose name she could not remember at all. She notes that her son was not related to the Seeumaulas. She notes that she did sign a medical clearance form so that if her son needed medical attention the Seeumaulas could see that it took place. She also states that she signed registration documents but did not fill out any of the information in them other than signing her name.

Furthermore, she does not know what information she signed to. In other words, she was not aware of what the registration forms stated. She does not recall signing any other forms.

█ did not start on the football team but did very well in school. She was very disappointed, however, with the way █ was treated by Jeff and Steve, particularly after football ended. Her son scored a 2600 (sic) on the SATs. Yet despite this score he did not get any attention and she believes that it was a lack of effort by Jeff and Steve that led to her son's failure to receive any scholarship attention. Her son did not start on the football team. Furthermore, during the season he injured his knee and was unable to play for a few games. The only treatment he received was from the team's trainers. After the season was over and when █ ultimately returned to the states to attend Delta School where he currently goes to school, he had to have knee surgery. It is her understanding that her son's room, board and clothing were taken care of by Coach Verner. Liumanu told her that the coach was a millionaire and wanted to help Samoan kids to get better opportunities. She believes she sent her son \$600 over the course of his stay there and that this was used for extra clothing and other items. She was never asked to reimburse the Seeumaulas for anything. She told me that Liumanu, whose maiden name is Tuiasosopo, works in the Human Resources Department but she has not run into her since the experience.

At the end, they only would pay for one parent to go to graduation. As a result, she had to pay one way. They explained their failure to pay both parents' air fare for graduation 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. This was never done. She believes she may have tickets which she is looking for. She has agreed to allow us to interview █ when he returns from Hawaii to Stockton. She spoke with her husband briefly during the interview and he will talk to us and his phone number is 733-7476.