

**Report to the Chicago Blackhawks Hockey Team Regarding
the Organization's Response to Allegations of
Sexual Misconduct by a Former Coach**

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I. Executive Summary^a

On May 7, 2021, a hockey player formerly affiliated with the Chicago Blackhawks Hockey Team (the “Blackhawks”) filed a lawsuit against the team. The player, John Doe, alleged that in May 2010, he was sexually assaulted by the then-video coach for the Blackhawks. John Doe further alleged that the Blackhawks were made aware of the alleged assault soon after it occurred and failed to act to address the assault. In late June 2021, Jenner & Block LLP (“Jenner & Block”) was hired by the Blackhawks to conduct an independent investigation. Over the course of four months, we investigated (i) the conduct of the former video coach, Brad Aldrich, in and around May 2010; (ii) the extent to which individuals affiliated with the Blackhawks, including those in senior management, knew about Aldrich’s conduct in May 2010, and when and how those individuals learned about the conduct; and (iii) when and how individuals affiliated with the Blackhawks, including those in senior management, responded to the information they learned about Aldrich’s conduct in May 2010.

Our investigation uncovered the following events. On May 8 or 9, 2010, John Doe had a sexual encounter with Brad Aldrich. The Blackhawks were in the midst of the National Hockey League (“NHL”) playoffs and ultimately won the Stanley Cup for the first time since 1961. John Doe was a twenty-year-old hockey player for the Blackhawks’ minor league affiliate team. He was called up to Chicago during the 2010 playoffs to serve as a “Black Ace,” a prospect player who could be available to play for the Blackhawks if needed. Brad Aldrich was the Blackhawks’ twenty-seven-year-old video coach in his second full year in the job. Aldrich was responsible for cutting video clips of game footage for the other Blackhawks’ coaches.

Today, John Doe and Brad Aldrich have widely divergent recollections of the sexual encounter, but both men agree an encounter occurred. The heart of the difference between the two recollections is not only what occurred during the

^a This report contains descriptions that are graphic in nature and language that at times may be offensive.

Throughout this report, footnotes are denoted with letters and endnotes are denoted with numbers.

encounter, but most critically whether the encounter was consensual. John Doe stated that the encounter was entirely non-consensual. John Doe stated, among other details, that on one occasion, during the second week of May 2010, Aldrich invited him to his apartment, provided him with dinner and drinks, told him he had the power to get John Doe onto the Blackhawks' roster, and turned on pornography. John Doe stated that Aldrich threatened John Doe by telling John Doe he needed to act like he enjoyed the sexual encounter or John Doe would never play in the NHL "or walk" again, forcibly performed oral sex on John Doe, masturbated on John Doe's back, and then threatened John Doe again before John Doe was able to escape Aldrich's apartment.

According to a confidant of John Doe who did not work for the Blackhawks, a little over one week after the sexual encounter, John Doe shared certain details of the encounter with the confidant. The confidant stated to us that John Doe was clear at the time that the encounter was not consensual.

Brad Aldrich stated that the encounter was entirely consensual. Aldrich stated, among other details, that he brought John Doe and a woman from a bar to Aldrich's apartment, played strip poker, and engaged in oral sex with the woman, but not with John Doe. Aldrich further stated that after the woman left Aldrich's apartment, Aldrich and Doe watched pornography, Aldrich received permission to engage in a sexual encounter with John Doe, Aldrich performed oral sex on John Doe, and Aldrich received a "hand job" from John Doe.

The woman present at the beginning of the encounter described by Aldrich was located and interviewed as part of this investigation. The woman recalled being present for and engaging in sexual activity with John Doe and Aldrich in Aldrich's apartment in Chicago, but leaving at a certain point while Aldrich and John Doe remained at Aldrich's apartment. Her version of events contradicts certain of Aldrich's statements, and also contradicts certain of John Doe's statements, who said that he went to Aldrich's apartment building with the woman on a different evening, but the woman left before entering the apartment and no sexual encounter with the woman occurred.

On May 23, 2010, the Blackhawks' Senior Director of Hockey Administration Al MacIsaac was told by a Blackhawks employee that there may have been a sexual encounter involving Aldrich and John Doe. MacIsaac dispatched the Blackhawks' mental skills coach and team counselor Jim Gary to speak to John

Doe to gather details of what may have happened. John Doe recalled that he told Gary the details of the encounter with Aldrich as he reported them to us during our investigation and as described above. Gary recalled a conversation with John Doe on May 23, 2010 during which Gary obtained limited, yet still very troubling information from John Doe that Gary believed to be true: that Aldrich was pressuring John Doe to have sex with him and that Aldrich told John Doe that if John Doe did not comply, Aldrich could harm John Doe's career.

Later on May 23, within an hour after the Blackhawks won the playoff game that secured their place in the Stanley Cup Finals, five members of senior management (then-President John McDonough, MacIsaac, General Manager Stan Bowman, then-Executive Vice President Jay Blunk, and then-Assistant General Manager Kevin Cheveldayoff), along with then-head coach Joel Quenneville, and Gary, met to discuss what had been learned about Aldrich and John Doe. Accounts of the meeting vary significantly, and the participants had limited recollections of the details of the meeting. All of the participants recalled being informed that there was an incident between Aldrich and John Doe involving an unwelcome sexual advance, but, for the most part, the participants reported that they only learned about the incident at a high level—that Aldrich, a coach, tried to “get under the sheets” with John Doe, a player. Gary recalled telling everyone in the meeting what he said John Doe told him—that Aldrich was pressuring John Doe to have sex with him and that Aldrich told John Doe that if John Doe did not submit to Aldrich's advances, he could harm John Doe's career. None of the participants recalled being told about the type of clearly non-consensual sexual conduct that is described by John Doe in his lawsuit or was described during John Doe's interview with us.

Bowman recalled that during the meeting, McDonough and Quenneville made comments about the challenge of getting to the Stanley Cup Finals and a desire to focus on the team and the playoffs. Several years later, MacIsaac, in discussing the situation between Aldrich and John Doe with another Blackhawks employee, stated that McDonough did not want any negative publicity during the Stanley Cup Finals.

While there was a general failure to recall how the meeting ended, Bowman recalled a statement by McDonough, the most senior member of management in the room, that he would handle the situation. Regardless of who was, or was perceived to be, responsible for handling the situation, Aldrich continued to

travel and work with the team, and participate in team activities throughout the playoffs. We found no evidence that any action was taken to address the issue until after the playoffs ended.

A Blackhawks policy at the time provided that all reports of sexual harassment would be “promptly and thoroughly” investigated. Our investigation uncovered no evidence, however, that McDonough or anyone else either contacted Human Resources or initiated an investigation between May 23 and June 14. The Blackhawks won the Stanley Cup on June 9. On June 10, during an evening in which players, coaches, and other employees took the Stanley Cup to various Chicago locations to celebrate the team’s championship, Aldrich made a sexual advance on a Blackhawks intern who was twenty-two years old, physically touching the intern. The intern rebuffed Aldrich’s advance and did not report the encounter to management or Human Resources.

Four days later, on June 14, McDonough informed the Blackhawks’ then-Director of Human Resources that Aldrich had allegedly made a sexual advance on John Doe. According to the Director of Human Resources, McDonough also informed her about the May 23 meeting in his office, during which McDonough said it was decided that the group would not alert Human Resources or do anything about the incident during the playoffs so as not to disturb team chemistry. When interviewed, McDonough stated that he did not recall this conversation with the Director of Human Resources.^b

On June 16, 2010, the Director of Human Resources met with Aldrich and offered him the option to undergo an investigation into what occurred with John Doe or to resign. Aldrich chose to resign and signed a separation agreement during the meeting. No investigation was conducted. Aldrich received a severance and a playoff bonus, and continued to be paid a salary for several months. He was permitted to host the Stanley Cup for a day in his hometown, his name was engraved on the Stanley Cup, he received a

^b Our investigation uncovered no evidence that the Blackhawks’ ownership (including the current Chairman and the current CEO), or the current President of Business Operations and the General Counsel (both of whom joined the organization in 2021), were aware of the events of 2010 at any time before John Doe’s potential civil lawsuit was brought to their attention ahead of its actual filing.

championship ring, and he attended a Stanley Cup banner-raising ceremony at the United Center. He went on to have paid and unpaid positions with USA Hockey, the University of Notre Dame, Miami University in Ohio, and Houghton High School in Houghton, Michigan. While in Houghton, in 2013, Aldrich was arrested and pled guilty to fourth degree criminal sexual conduct involving a minor.

This report is organized into ten sections, beginning with the scope and execution of our investigation, and as follows:

- We describe the structure of, and relevant policies governing, the Blackhawks organization in 2010, followed by background regarding Brad Aldrich and his employment with the Blackhawks.
- For context, we provide a detailed recitation of the 2010 NHL playoffs, when the majority of relevant events occurred; not all events in this report, however, are listed in chronological order.
- We next provide a thorough account of the sexual encounter between Aldrich and John Doe as told to us during our interviews of each individual, and describe certain subsequent events.
- We describe in detail the Blackhawks' knowledge of what occurred between Aldrich and John Doe, including the conversations that occurred between and among coaches, senior management, and John Doe in the days and weeks that followed the encounter.
- We provide a detailed account of the Blackhawks' actions and inactions during and after the 2010 playoffs, Aldrich's separation from the team, and finally certain events in Aldrich's life and John Doe's life after the playoffs.

At the end of this report, we offer our conclusions regarding the events that transpired in 2010.

II. Our Investigation

Our investigation was precipitated by the filing of two complaints against the Blackhawks in the Circuit Court of Cook County, Illinois, Law Division, in May 2021. On May 7, 2021, a lawsuit was filed in the Circuit Court of Cook County,

Illinois by “John Doe,” a former player in the Blackhawks organization, against the Blackhawks.¹ The lawsuit alleged two counts of negligence and one count of violating the Illinois Human Rights Act, 775 ILCS 5/1-101 et seq., involving alleged conduct in May 2010 by Brad Aldrich.² John Doe filed an amended complaint against the Blackhawks on July 22, 2021, providing additional details about Aldrich’s alleged sexual misconduct and the Blackhawks’ alleged negligence, and adding additional counts of willful and wanton misconduct and intentional infliction of emotional distress.³

On May 26, 2021, a lawsuit was filed in the Circuit Court of Cook County by “John Doe (2)” against the Blackhawks.⁴ This lawsuit alleged negligence and willful and wanton conduct related to alleged actions or failure to act by the Blackhawks after Aldrich left his employment with the Blackhawks in June 2010 and before Aldrich was arrested in Michigan in 2013.⁵ Plaintiff “John Doe (2)” is described in his complaint as a former player on the Houghton High School hockey team located in Houghton, Michigan.⁶ “John Doe (2)” filed an amended complaint against the Blackhawks on July 22, 2021, adding new allegations concerning the Blackhawks’ knowledge of sexual misconduct allegations against Aldrich.⁷

A. Independence of Investigation

The Blackhawks directed us to follow the facts wherever they led and permitted us to conduct an investigation independent of interference or influence. We designed and executed the investigation with no limits from the Blackhawks. In our sole discretion, we chose who to interview and what materials to review. We were given prompt access to documents, employees, and information, including contact information for current and former employees and players.

The factual findings set forth in this report are solely advanced by Jenner & Block. The Blackhawks exerted no influence over our reporting of the facts and findings.

Our investigation is not a response by us or by the Blackhawks to John Doe’s and John Doe (2)’s lawsuits. Jenner & Block is not serving as counsel for the Blackhawks in the John Doe or John Doe (2) civil litigation.

Jenner & Block has never previously provided legal representation to the Blackhawks. The Blackhawks paid Jenner & Block’s legal fees incurred during

the investigation, but payment was not contingent on any particular finding or outcome.

B. Investigative Team

The investigative team was led by Partner Reid J. Schar, co-chair of Jenner & Block's Litigation Practice and a former federal prosecutor. The Jenner & Block team that worked on the investigation has significant experience conducting internal and government investigations, including investigations involving allegations of sexual misconduct.

C. Scope of Investigation

We engaged in a broad and thorough investigation. As further described below, we collected a large volume of electronic and hard copy documents and records. We interviewed 139 witnesses, including current and former Blackhawks' personnel, from entry-level paid interns to the most senior executives and coaching staff. Several witnesses were interviewed more than once. We interviewed 21 current and former Blackhawks players and Rockford IceHogs players. We interviewed John Doe, Brad Aldrich, and individual players and personnel who were directly involved in the events described below. We also interviewed several witnesses who never worked for the Blackhawks but whose identities were raised during our investigation.

On August 2, 2021, the Blackhawks announced that a hotline number and email address were available for anyone who believed that they had any relevant information. The hotline was used and the information provided was only accessible to Jenner & Block.

This report is not a record of every single fact, document, or witness statement that we gathered, but instead focuses on key events and information.

1. Document Collection from the Blackhawks

We collected over 100 gigabytes of electronic records from over 145 individuals and 49 boxes of hard copy records. Of particular note, we collected the following records:

- All available documents involving, concerning, relating to, or referencing Brad Aldrich.

- All available documents involving, concerning, relating to, or referencing John Doe.
- All available emails (unlimited by topic) for certain individuals during the time period of May through September 2010.
- All available emails for certain individuals and for certain time periods referencing USA Hockey, Notre Dame, Houghton, and Miami University.
- Blackhawks and Rockford IceHogs Team Rosters.
- Travel records (including road trip itineraries, flight manifests, hotel invoices, rooming assignments, expense reimbursement requests, receipts, and *per diem* disbursements).
- Phone records for Blackhawks-issued cell phones and Blackhawks desk phones.
- Records from Human Resources, including personnel files, investigation files, employment and separation agreements, salary information, performance evaluations, policies, and trainings.
- Payroll records, including salary, paycheck, and bonus records.

Our efforts to collect relevant records were met with several limitations often present in investigations of matters over a decade old. First, while several witnesses described relevant text messages to us, for the most part, those text messages could not be collected because phones were no longer possessed, paper records included only call logs and no text messages, and cellular providers reported to us that they did not preserve text messages from 2010. Second, in 2010, Blackhawks and IceHogs players did not have Blackhawks-issued email addresses and there were therefore no Blackhawks emails for 2010 players. Third, although Blackhawks employees did have Blackhawks-issued email addresses, until recently, it was the Blackhawks' general practice to not retain email data for individuals after their employment with the Blackhawks ended. While we collected emails sent to and received by former President John McDonough and Brad Aldrich from other individuals' email archives, McDonough's and Aldrich's original email archives were not retained

consistent with the Blackhawks' general practice. We collected and reviewed all emails with Aldrich that were retained by other individuals who are either currently employed by the Blackhawks or whose emails were preserved for other reasons. Fourth and finally, Brad Aldrich's 2010 personnel file could not be located after extensive searches.^c We therefore could not review Aldrich's employment application and any notes that were added to Aldrich's 2010 file by Human Resources.

2. Efforts to Collect Records from External Sources

We collected records from several sources external to the Blackhawks, including the entities for which Aldrich worked after he separated from the Blackhawks. For example, we collected records from Miami University in Ohio, which employed Aldrich in 2012. We contacted the University of Notre Dame and requested relevant records; the University of Notre Dame declined our request. We contacted Houghton High School and requested relevant records; the school responded that it did not have any relevant records. We contacted USA Hockey and received information orally. We also contacted the National Hockey League Players' Association (NHLPA) and made requests for information and records. We received one document from the NHLPA and assistance with arranging interviews with certain players.

We asked numerous witnesses about whether they possessed personal emails and texts that could be relevant to our investigation. Several witnesses voluntarily conducted searches for relevant records and provided text messages and emails.

In addition, we contacted the apartment building in Chicago where Aldrich lived in 2010 and requested visitor logs and camera footage. The building's current management informed us that 2010 visitor logs and camera footage no longer exist.

^c We located personnel files for other employees with similar hire and departure dates as Aldrich, but there were other missing, non-pertinent personnel files with similar hire and departure dates as Aldrich. We were unable to determine the reason that any particular personnel file was or was not maintained.

3. Witnesses

We interviewed four categories of individuals:

- Current and former Blackhawks personnel, including individuals within Business Operations (such as Sales, Marketing, Human Resources, Finance, and Payroll personnel), and Hockey Operations (coaches, including Aldrich,^d training and equipment staff, and management).
- Current and former Blackhawks players, including 14 of the 25 members of the 2009-2010 Blackhawks roster at the time of the 2010 playoffs.
- Current and former Rockford IceHogs players, including 5 of the 9 Black Aces in 2010, and including John Doe,^e and two additional IceHogs players.
- Individuals who never worked for the Blackhawks, but who otherwise participated in or observed relevant events, or were confided in by John Doe and others.

We began contacting witnesses on June 28, 2021. We interviewed 139 witnesses over the course of four months either in person, using the Zoom application, or by telephone. Several witnesses were interviewed more than once. Eleven individuals (none of whom were key witnesses) declined, directly or through counsel, to be interviewed. Twenty-six individuals did not respond to our requests for interviews.

4. Anonymity

In this report, we have anonymized the identity of most witnesses, including but not limited to all individuals who affirmatively requested anonymity, as well as many other witnesses. We have not anonymized the names of

^d Aldrich's counsel participated in our interview of Aldrich.

^e John Doe's counsel participated in our interview of John Doe. The Blackhawks' civil litigation counsel was also present.

individuals who provided statements to the media and in doing so, publicly identified themselves as witnesses to certain events. We have also not anonymized the names of senior management and the head coach, who were directly involved in the handling of Aldrich's conduct in 2010. To further protect particular witnesses, we have generalized or omitted certain details regarding particularly sensitive events, such as the location of the event, to shield their identities.

Obtaining the cooperation of witnesses is critical in investigations such as this one and important to uncovering the truth. We are grateful to the many individuals who were willing to candidly speak to us about sensitive subjects. Particularly given the sensitive nature of the events at issue and the professional impact that may arise from cooperating with this investigation, we ask that any reader of the report respect witness anonymity.

5. Witness Memory

Our investigation was affected by the limitations of witnesses' memories. Memory is malleable and subject to alteration over time, and it is not surprising that witnesses would have divergent recollections of the same events.⁸ During the course of our investigation, certain inaccurate information has been publicly disseminated. Many witnesses reported that they were exposed to news and social media posts regarding our investigation and related topics. In our conversations with witnesses, we asked open-ended questions so as not to lead a witness to a particular statement or fact, and we clarified whether a witness remembered a particular fact with certainty and due to first-hand knowledge, or remembered only after the information came to the individual filtered through others or long after the event in question. We also made robust efforts to independently corroborate certain memories with records, such as contemporaneous emails, notes, travel records, and phone records.

There are certain biases that further provide important context for witness recollections. For example, *confirmation bias* is defined as the tendency to search for or interpret information in a way that confirms one's existing beliefs.⁹ *Hindsight bias* is defined as the tendency to perceive past events as being more predictable than they actually were.¹⁰ Investigations occurring long after a disputed matter will be subject to such biases, and this investigation was likely no exception. We also note that the allegations at the

heart of this investigation concern same-sex sexual interactions and allegations of sexual misconduct in the context of professional men's hockey primarily in 2010. Several witnesses explicitly referenced the sensitivity surrounding certain conduct at the time and in that context, and those dynamics may have affected what people said and did then, and now. One would also not expect every recitation of the events to every audience over eleven years to be the same. During witness interviews, we made efforts to explore the basis of a witness's knowledge to test for potential biases and to explore their awareness of their potential biases, including why they provided more or less information in prior statements about certain events.

III. The Blackhawks Organization

This section describes the Blackhawks organization as it existed in 2010 and the organization's then-existing policies regarding sexual harassment, as well as reporting, investigation, and discipline regarding sexual harassment complaints.

In 2010, the Blackhawks organization was organized into two "Front Office" components—Business Operations and Hockey Operations—both reporting to the President of the organization, John McDonough.

A. Business Operations

Business Operations consisted of strategy, communications, corporate partnerships, marketing, ticketing, and other business-related departments. In 2010, Business Operations employed many people who were recent college graduates and in their twenties, including paid interns and other entry-level employees. In 2010, Jay Blunk oversaw Business Operations as a Senior Vice President; he recently departed the organization.

B. Hockey Operations

Today and in 2010, Stan Bowman oversees Hockey Operations as the General Manager (and today as President of Hockey Operations, as well).¹¹ Bowman oversees all day-to-day hockey operations, including drafting and trading players, negotiating contracts, identifying prospect players, and overseeing the hiring of coaches and hockey operations employees.¹² In 2010, Al MacIsaac served as the Senior Director of Hockey Administration and reported directly to McDonough; today he is the Senior Vice President of Hockey

Operations.¹³ In 2010, Kevin Cheveldayoff was the Assistant General Manager; he has since departed the organization.¹⁴

The coaching staff sits within Hockey Operations and, in 2010, consisted of then-head coach Joel Quenneville, assistant coaches, and a mental skills coach, James (“Jim”) Gary. Gary is a licensed clinical counselor and provided performance-related coaching and personal counseling to players who sought his assistance.¹⁵ Gary is now retired.¹⁶

C. Human Resources and Legal

In 2010, Human Resources was overseen by the Director of Human Resources, an individual who recently departed the organization. The Director of Human Resources reported directly to the President. In 2010, the organization did not have an internal Legal Department or General Counsel. Today, the Blackhawks have a General Counsel.

D. John McDonough

In 2010, John McDonough was the President of the Blackhawks and oversaw the entire organization, including Business Operations, Hockey Operations, and Human Resources.¹⁷ He reported to the Blackhawks’ ownership.¹⁸ As we undertook our investigation, a number of witnesses expressed strong views of McDonough’s management style and his control over decision-making within the organization. Witnesses described McDonough as extremely controlling and wanting to be—and being—the final decision-maker on numerous occasions, including for some decisions that were perceived by witnesses as not meriting McDonough’s involvement given McDonough’s role as President of the organization.¹⁹ When interviewed, McDonough described his leadership style as aggressive and direct, but denied that all decisions came to him.²⁰ McDonough stated that he generally let the Hockey Operations employees make the “hockey decisions.”²¹ McDonough was released from the Blackhawks in April 2020.

E. The Players

The players consisted of two groups of individuals. First was a roster of individuals who were professional players in the NHL and under contract with the Blackhawks. Second was a roster of individuals—also professional players—who played for the Rockford IceHogs, which was in 2010 and remains today an American Hockey League (AHL) “minor league” team that

was affiliated with and is now owned by the Blackhawks. During the NHL playoffs, certain members of the IceHogs became “Black Aces”—prospect players who were ready to play in the case of an injury, suspension, or any other reason that a Blackhawks player was unable to play.

F. Relevant Policies

In 2010, the Front Office, the coaches, and the coaching staff were governed by the Blackhawks’ Team Member Handbook.²² At the time, the Handbook had last been updated in November 2005.²³ The Handbook included a harassment policy, which, among other provisions, prohibited harassing behavior and required personnel to report harassing behavior by others.²⁴ Sexual harassment was defined to include unwelcome sexual advances and requests for sexual favors when:

“[s]ubmission to or rejection of the conduct is an explicit or implicit term or condition of employment ...”

or

“[t]he conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creates an intimidating, hostile or offensive working environment.”²⁵

Sexual harassment was also defined to include:

“[r]etaliation against an individual for complaining about sexually harassing behavior.”²⁶

The Handbook provided a procedure for reporting sexual harassment and stated:

“[a]ll reports of sexual harassment will be promptly and thoroughly investigated and appropriate action will be taken. After the incident is investigated, you will be notified of the final decision regarding your complaint.”²⁷

The Handbook further stated that an employee

“found to have sexually harassed another individual will be subject to disciplinary action, which could include immediate termination from the Chicago Blackhawks. The penalty will be

determined on a case-by-case basis, after careful review and consideration of the specific incident(s).”²⁸

Players received and were required to acknowledge a document titled “Team Rules” at the beginning of the 2009-2010 season.²⁹ The “Team Rules” were based on standard rules provided and approved by the NHL and the NHLPA.³⁰ The “Team Rules” for the 2009-2010 season did not address sexual harassment, or reporting, investigation, or discipline for harassment.^f

We asked dozens of the Blackhawks’ current and former personnel, including coaches affiliated with the organization in 2010, about their knowledge of the Blackhawks’ sexual harassment policy and procedures in 2010. Most of these witnesses, including some in senior management, were unaware of the relevant policy or procedures in 2010 related to sexual harassment, though some were required to acknowledge receipt of the Handbook in 2010 or earlier.³¹

IV. Brad Aldrich

In this section, we provide an account of the hiring and employment of Brad Aldrich as the video coach for the Blackhawks from July 2008 through June 2010. The video coach was responsible for breaking down pre-game video, cutting game clips for the coaches to use with the players, running video sessions on a computer while the coaches ran their sessions for the players, and cutting clips of individual players as requested by the players and coaches.³²

During the summer of 2008, the video coach for the Blackhawks transitioned to a scouting role for the team, leaving the position vacant.³³ At the time, Aldrich was the Coordinator of Hockey Operations/Video Coordinator for the University of Notre Dame Hockey Team.³⁴ The General Manager for the Blackhawks at the time, Dale Tallon, received a message from an individual affiliated with the San Jose Sharks, another NHL team, recommending that Tallon look out for Aldrich’s resume.³⁵ Tallon recalled that after receiving the

^f The “Team Rules” covered a variety of topics, including alcohol consumption and use of tobacco products, gambling, attendance at practices and games, dress code, reporting of injuries and illnesses, interacting with the media and fans, game penalties, use of illegal equipment, and discipline and fines.

message from the Sharks, he received Aldrich's resume.³⁶ Other witnesses recalled that Tallon was friends with the General Manager of the Sharks and that Aldrich's father was the Sharks' equipment manager.³⁷ The then-Director of Human Resources recalled that Tallon arranged Aldrich's interview for the video coach position.³⁸

For his part, Aldrich recalled that he received a phone call from Stan Bowman, who was the Assistant General Manager of the Blackhawks at the time.³⁹ Aldrich recalled Bowman describing a video coach position and inviting Aldrich to interview for the position.⁴⁰ When interviewed, Bowman said he did not recall being involved in Aldrich's interview or hiring process.⁴¹ Bowman also said such involvement by him was unlikely, given that Bowman was not involved in the hiring of coaches or assistant coaches at the time.⁴² Bowman said that he did not know how Aldrich became an employee of the Blackhawks.⁴³

Regardless of how Aldrich came to the Blackhawks' attention and who arranged for his interview, Aldrich came to Chicago to interview for the video coach position.⁴⁴ Aldrich recalled being interviewed by Tallon in his office, and meeting Bowman and McDonough, both of whom Aldrich said stopped by Tallon's office.⁴⁵ The Director of Human Resources also recalled interviewing Aldrich.⁴⁶ When interviewed, Aldrich stated that he believed the Blackhawks contacted the University of Notre Dame for a reference, but there were no witnesses in our investigation who recalled contacting the University of Notre Dame.⁴⁷ We requested records regarding Aldrich from the University of Notre Dame; the University of Notre Dame declined our request. Aldrich recalled that he was offered the video coach position on the same day as his interview.⁴⁸

Aldrich was employed as the video coach for the Blackhawks from August 1, 2008, until June 16, 2010.⁴⁹ He reported directly to the head coach, who was initially Denis Savard and later Joel Quenneville.⁵⁰ Aldrich and some players and coaches recalled that players could request their individual video clips from Aldrich.⁵¹ Aldrich gave the requested clips to the coaches, who would in turn show the clips to the players.⁵² During the games, Aldrich worked from the locker room, listening to updates from coaches and cutting videos for the coaches to show the players, sometimes between periods.⁵³

During his employment with the Blackhawks, Aldrich appears to have received three formal performance evaluations, each providing positive feedback. The three evaluations we located were unsigned Microsoft Word documents stored in electronic folders; because we were unable to locate Aldrich's personnel file, we cannot say with certainty that the evaluations we located were the final versions or were in fact ever finalized, though no one to whom we showed the unsigned evaluations suggested they were materially different from final versions. In a January 2009 unsigned performance evaluation, Tallon wrote that Aldrich "has enhanced the job of Video Coach [to] provid[e] more information than previous individuals in that role" and that the other coaches had "all very positive" feedback regarding Aldrich.⁵⁴ Tallon also wrote: "[i]f there was an area where [Aldrich] had some adjusting to do[,] it was in his personality" and Aldrich "has very high confidence in his ability to the point where it borders on arrogance."⁵⁵

In a June 2009 unsigned performance evaluation, Quenneville wrote that "Brad did a great job to accommodate the coaches preparing for meetings and their everyday needs ... I believe going forward Brad can be more efficient by being in a separate working environment [and] not in the middle constantly being disturbed."⁵⁶ In his last performance evaluation, dated June 29, 2010 (after Aldrich had separated from the team), but unsigned by Quenneville and Aldrich, Quenneville wrote: "Aldrich did a great job for the Coaching staff in preparing us for all of our meetings and coordinating several tasks that we forward his way. Brad has several people relying on him at the same moment and has a way of deflecting and accommodating everyone at once ... Congrats on winning the Stanley Cup!"⁵⁷ When interviewed, Quenneville stated that he did not recall whether he wrote the June 29, 2010 evaluation of Aldrich, or if he knew whether Aldrich had been separated at the time, but did not dispute that he may have written the evaluation.⁵⁸ He further stated that the review looked to him like something he would write.⁵⁹ Additional performance evaluations of coaches dated June 29, 2010, also unsigned by Quenneville, were similarly written and contain the same language congratulating the employee on the Stanley Cup win.

Witnesses had varying opinions of Aldrich, although it is unclear how witnesses' current views of Aldrich have been colored by the allegations made since Aldrich departed the Blackhawks in 2010. Several Front Office personnel who knew Aldrich in 2010 described him as friendly,⁶⁰ outgoing,⁶¹

and nice.⁶² Several former players and coaches viewed Aldrich's work performance positively.⁶³ Witnesses noted that Aldrich got along well with the coaches and was "chummy" with many individuals on the Blackhawks' staff.⁶⁴ Several former players explained that they enjoyed speaking to Aldrich because Aldrich informed players in advance if they had a chance to make the game lineup.⁶⁵

Other witnesses had very different views of Aldrich. One former player described Aldrich as intense and "cocky."⁶⁶ Some witnesses described Aldrich as "creepy,"⁶⁷ someone who kept to himself,⁶⁸ peculiar,⁶⁹ standoffish, and arrogant.⁷⁰ Several witnesses recalled Aldrich making inappropriate comments, including jokes with sexual content, bragging or speaking inappropriately about sexual interactions with women, and speaking frequently about how he dated many different women.⁷¹ Some witnesses observed Aldrich "hitting on" female Front Office employees.⁷² One former player—who regularly socialized with Aldrich during the 2009-2010 season—believed at the time that Aldrich spoke about dating many women because he was attempting to mask his sexual orientation.⁷³

On the eve of the 2010 NHL playoffs, Aldrich had served in the video coach position for two seasons.

V. The 2010 National Hockey League Playoffs

Many of the events at issue in our investigation occurred during the 2010 NHL playoffs. On April 4, 2010, the Blackhawks won the Central Division title, and on April 11, 2010, entered the playoffs as the second overall seed in the Western Conference.⁷⁴ The Western Conference Quarterfinals, in which the Blackhawks played the Nashville Predators, started on April 16 and ended on April 26, with the Blackhawks winning the series.⁷⁵ On April 24, 2010, just before the conclusion of the Nashville series, the Blackhawks assigned nine prospect players from the Rockford IceHogs, including John Doe, to serve as Black Aces during the remainder of the 2010 playoffs.⁷⁶ The Blackhawks went on to win the Western Conference Semifinals against the Vancouver Canucks (May 11, 2010), and the Western Conference Finals against the San Jose Sharks (May 23, 2010).⁷⁷ The Blackhawks won the Stanley Cup Finals against the Philadelphia Flyers on June 9, 2010.⁷⁸ Because it is relevant to the sequence, context, and timing of events as further discussed in this report, the schedule of games, locations, and certain off days and flights was as follows:

2010 Playoff Schedule

NASHVILLE SERIES	APRIL 16, 2010: GAME 1 IN CHICAGO
	APRIL 18, 2010: GAME 2 IN CHICAGO
	APRIL 20, 2010: GAME 3 IN NASHVILLE
	APRIL 22, 2010: GAME 4 IN NASHVILLE
	APRIL 24, 2010: GAME 5 IN CHICAGO & BLACK ACES JOIN TEAM
	APRIL 26, 2010: GAME 6 IN NASHVILLE
VANCOUVER SERIES	MAY 1, 2010: GAME 1 IN CHICAGO
	MAY 3, 2010: GAME 2 IN CHICAGO
	MAY 4, 2010: TEAM FLIGHT TO VANCOUVER
	MAY 5, 2010: GAME 3 IN VANCOUVER
	MAY 6, 2010: OFF DAY IN VANCOUVER
	MAY 7, 2010: GAME 4 IN VANCOUVER
	MAY 8, 2010: TEAM FLIGHT TO CHICAGO
	MAY 9, 2010: GAME 5 IN CHICAGO
	MAY 10, 2010: TEAM FLIGHT TO VANCOUVER
	MAY 11, 2010: GAME 6 IN VANCOUVER
	MAY 12, 2010: TEAM FLIGHT TO SAN JOSE
SAN JOSE SERIES	MAY 13-15, 2010: OFF DAYS IN SAN JOSE
	MAY 16, 2010: GAME 1 IN SAN JOSE
	MAY 18, 2010: GAME 2 IN SAN JOSE
	MAY 19, 2010: TEAM FLIGHT TO CHICAGO
	MAY 20, 2010: OFF DAY IN CHICAGO
	MAY 21, 2010: GAME 3 IN CHICAGO
	MAY 22, 2010: OFF DAY IN CHICAGO
	MAY 23, 2010: GAME 4 IN CHICAGO
	MAY 29, 2010: GAME 1 IN CHICAGO
	MAY 31, 2010: GAME 2 IN CHICAGO
PHILADELPHIA SERIES	JUNE 2, 2010: GAME 3 IN PHILADELPHIA
	JUNE 4, 2010: GAME 4 IN PHILADELPHIA
	JUNE 6, 2010: GAME 5 IN CHICAGO
	JUNE 9, 2010: GAME 6 IN PHILADELPHIA

A. The Black Aces

During the playoffs, there were two distinct groups of players affiliated with the Blackhawks: players on the Blackhawks' NHL roster and the Black Aces. The Black Aces were prospect players who were ready to play in the NHL playoffs in the case of an injury, suspension, or any other reason that a Blackhawks player was unable to play during the playoffs.⁷⁹ A Black Ace would play only if the Blackhawks had already depleted available back-up players on the NHL roster, a very unlikely eventuality.⁸⁰ The Black Aces were expected to watch games, practice with the other Black Aces, and travel with the Blackhawks so that they could experience the playoffs on the theory that such experiences might be relevant later in their Blackhawks careers.⁸¹ The Black Aces practiced at a separate rink from the Blackhawks and were typically not coached or trained by the Blackhawks' training and coaching staff.⁸² Members of the Rockford IceHogs' coaching and training staff traveled to Chicago to support the Black Aces.⁸³ The Rockford staff, however, did not travel with the Black Aces to away games.⁸⁴ Several witnesses, including two Black Aces, recalled having a significant amount of down time because their chances of playing were slim and their practice sessions were limited.⁸⁵

B. Aldrich's Interactions with the Black Aces

On several occasions during the 2010 playoffs, Aldrich socialized with one or more of the Black Aces. Two former Black Aces and Aldrich himself recalled Aldrich joining several of the Black Aces when they went to bars and restaurants in Chicago and on the road.⁸⁶ Several witnesses recalled observing Aldrich with the Black Aces.⁸⁷ Some former Black Aces recalled Aldrich hosting several Black Aces at the pool at his apartment building,⁸⁸ hosting Black Aces inside his apartment,⁸⁹ and gathering as a group for massages at the team hotel on the road.⁹⁰ Phone records corroborate that Aldrich and multiple Black Aces were in frequent contact with each other in May and June of 2010.⁹¹

Several Black Aces perceived Aldrich to have access to coaches and information the Black Aces valued. During his interview, John Doe recalled coaches encouraging him and the other Black Aces to request video clips from Aldrich and use Aldrich as a resource.⁹² Another Black Ace and a member of the 2010 Blackhawks team both recalled that Aldrich provided them with advance notice and intelligence on the Blackhawks' lineup for game days.⁹³

One member of the 2010 Blackhawks team recalled that many players relied on Aldrich to tell them what coaches were thinking.⁹⁴ This player further recalled that Aldrich texted the player after games to share what was being discussed in the coaches' room and what Quenneville thought of the player's performance.⁹⁵

One particular Black Ace, who we refer to throughout this report as Black Ace 1, stated during his interview that he and other Black Aces were aware that Aldrich participated in the meetings held by the other Blackhawks coaches.⁹⁶ Black Ace 1 also stated that he and other Black Aces socialized with Aldrich during the 2010 playoffs because they wanted to know how to succeed in the NHL.⁹⁷ Black Ace 1 recalled Aldrich stating that he "could bury us" in the Blackhawks organization and make sure "you could never play" by saying "not nice things about us."⁹⁸ Six additional witnesses told us that, after Aldrich's separation from the Blackhawks, each heard a rumor that Aldrich threatened players' careers.⁹⁹

It was against this backdrop—the Blackhawks' success during the 2010 playoffs and the Black Aces arriving in Chicago and having significant down time during which they socialized with Brad Aldrich—that John Doe had a sexual encounter with Brad Aldrich.

VI. The Sexual Encounter Between John Doe and Brad Aldrich

In the following pages, we describe an encounter between John Doe and Aldrich, first as told to us by John Doe, and then as told to us by Aldrich. It is undisputed that a sexual encounter occurred involving John Doe and Aldrich and that it occurred on May 8 or May 9, 2010.^g The account by Aldrich diverges from the account by John Doe in numerous respects, including whether the encounter was consensual. We also include below an account from a woman who described an evening during which she went to Aldrich's apartment with Aldrich and John Doe. Aldrich and John Doe have differing accounts of their interaction with the woman. We describe accounts from secondary witnesses,

^g Despite efforts to confirm certain facts, the precise date of the sexual encounter remains unclear, although the facts as detailed below strongly suggest the encounter occurred on May 8 or 9, 2010.

including a confidant of John Doe who did not work for the Blackhawks and who spoke to John Doe soon after the encounter with Aldrich. Below we set forth all of the relevant details as reported to us by John Doe, Brad Aldrich, and the other witnesses.

A. John Doe

From May 4 until May 8, 2010, the Blackhawks and the Black Aces were in Vancouver for Games 3 and 4 of the Western Conference Semifinals.¹⁰⁰

VANCOUVER SERIES

MAY 4, 2010: TEAM FLIGHT TO VANCOUVER

MAY 5, 2010: GAME 3 IN VANCOUVER

MAY 6, 2010: OFF DAY IN VANCOUVER

MAY 7, 2010: GAME 4 IN VANCOUVER

MAY 8, 2010: TEAM FLIGHT TO CHICAGO

John Doe recalled that he socialized with Aldrich and other Black Aces while the team was in Vancouver.¹⁰¹ John Doe also recalled Aldrich inviting him to Aldrich's hotel room in Vancouver.¹⁰² John Doe stated that Aldrich suggested they could watch hockey in the hotel room and that it would make John Doe a better player.¹⁰³ John Doe stated that he declined the invitation.¹⁰⁴ Also while in Vancouver, John Doe met with a confidant—who did not work for the Blackhawks—for dinner, which occurred sometime between May 4 and May 7.¹⁰⁵ When interviewed, the confidant recalled that during the meal, John Doe said nothing out of the ordinary or in particular regarding Aldrich, suggesting to the confidant (who soon thereafter learned about the sexual encounter between John Doe and Aldrich) that the encounter had not occurred before the Vancouver dinner.¹⁰⁶

1. May 8 to 9, 2010

On May 8, the Blackhawks traveled back to Chicago and, on May 9, the Blackhawks played Game 5 against Vancouver.¹⁰⁷ John Doe recalled that after Game 5 on May 9, he was with a group at a bar in Chicago.¹⁰⁸ John Doe recalled that Aldrich was present and introduced John Doe to a woman.¹⁰⁹ John Doe

next recalled going to Aldrich's apartment building with Aldrich and the woman. Before they entered Aldrich's apartment, John Doe recalled, the woman left.¹¹⁰ John Doe recalled following the woman to ask why she was leaving.¹¹¹ John Doe recalled that Aldrich appeared to John Doe to be unhappy that John Doe followed the woman instead of entering his apartment.¹¹² During his interview, John Doe did not describe any additional interactions with Aldrich on this evening, and did not describe any evening during which John Doe, Aldrich, and the woman were present and engaged in sexual activity.¹¹³

John Doe recalled that the Blackhawks traveled to Vancouver on May 10 for Game 6, which took place on May 11, and that he and other Black Aces stayed in Chicago.¹¹⁴ Travel records confirm that the team, including Aldrich, traveled on May 10 to Vancouver for Game 6.¹¹⁵ John Doe recalled receiving text messages from Aldrich while Aldrich was in Vancouver.^{h, 116}

John Doe also recalled that Aldrich frequently referenced that around this time, Aldrich was speaking to Quenneville about John Doe, and Quenneville wanted Aldrich to show John Doe videos or talk to John Doe about hockey.¹¹⁷ John Doe recalled that Aldrich made clear that Aldrich had a direct line to Quenneville.¹¹⁸

On May 12, the day after the Blackhawks' Game 6 series-clinching victory against Vancouver, the Blackhawks traveled from Vancouver directly to San Jose for several off days before starting the Western Conference Finals against the San Jose Sharks.¹¹⁹ Travel records and dozens of witness interviews reflect that Aldrich traveled directly from Vancouver to San Jose and did not return to Chicago until May 19.¹²⁰ Thus, records and multiple eyewitnesses place Aldrich in either Vancouver or San Jose for the entire period of May 10 to May

^h As noted in Section II.C., text messages between John Doe and Aldrich could not be collected because John Doe and Aldrich stated that they no longer possess the phones they used in 2010. The cellular provider for Aldrich's Blackhawks-issued cell phone reported to us that it did not preserve text messages from 2010.

19. John Doe traveled from Chicago to San Jose on a commercial flight on May 12 and stayed in San Jose until May 19.¹²¹

VANCOUVER SERIES

MAY 9, 2010: GAME 5 IN CHICAGO

MAY 10, 2010: TEAM FLIGHT TO VANCOUVER

MAY 11, 2010: GAME 6 IN VANCOUVER

SAN JOSE SERIES

MAY 12, 2010: TEAM FLIGHT TO SAN JOSE

MAY 13-15, 2010: OFF DAYS IN SAN JOSE

MAY 16, 2010: GAME 1 IN SAN JOSE

MAY 18, 2010: GAME 2 IN SAN JOSE

MAY 19, 2010: TEAM FLIGHT TO CHICAGO

John Doe stated that while he is “blurry” on the exact date of the sexual encounter involving Aldrich, he believed that the encounter occurred in Chicago at some point after May 9, the evening during which John Doe stated the woman did not enter Aldrich’s apartment.¹²² On this point, it appears John Doe’s recollection was initially inaccurate. As noted above, records and multiple other witnesses place Aldrich outside of Chicago between May 10 and May 19 and John Doe himself away from Chicago between May 12 and May 19. A photograph of the team in San Jose on May 14 appears to include both Aldrich and John Doe. However, in a later communication provided to us on the topic, John Doe indicated he believed the sexual encounter with Aldrich occurred after Games 3 and 4 (May 5 and 7) of the Vancouver series, on an off day in Chicago, and before travel to San Jose.¹²³ Based on John Doe’s later communication, it appears what John Doe describes as the sexual encounter, as further detailed below, occurred on May 8 or May 9.

2. The Encounter

Regardless of the exact date of the sexual encounter, John Doe recalled that the evening of the incident with Aldrich started when John Doe received a text

message from Aldrich inviting John Doe to Aldrich's apartment in Chicago.¹²⁴ John Doe recalled that Aldrich wrote in the text message that Aldrich could provide a home-cooked meal and talk with John Doe about hockey.¹²⁵ As context, John Doe stated during his interview that he believed that Aldrich was being nice to John Doe because John Doe had been staying in a hotel for a long time.¹²⁶

John Doe recalled that when he received the text message, he was hungover from the previous evening's activities.¹²⁷ He recalled that none of the other Black Aces wanted to go to dinner with him at a restaurant, which led John Doe to accept Aldrich's invitation for dinner at Aldrich's apartment.¹²⁸

John Doe recalled entering Aldrich's apartment, where a small TV or computer was showing a horse race. John Doe stated that Aldrich offered and made John Doe a mixed alcoholic drink.¹²⁹ John Doe stated that Aldrich was making dinner and continued to cook and talk about horse races and hockey skills.¹³⁰ John Doe stated that Aldrich told John Doe what he needed to do to be successful as a player.¹³¹ John Doe recalled that Aldrich said Quenneville listened to Aldrich and if Aldrich told Quenneville that John Doe was working hard, Aldrich could get John Doe on the Blackhawks' roster.¹³² John Doe recalled that Aldrich cooked a seafood pasta dish and continued to make small talk.¹³³ John Doe recalled that he was looking forward to the dish because he had not had a home-cooked meal in a long time.¹³⁴

John Doe further recalled that he drank two or three alcoholic drinks during dinner.¹³⁵ After dinner, John Doe stated, he declined another drink and Aldrich suggested watching hockey.¹³⁶ John Doe recalled that he and Aldrich moved to the futon in Aldrich's living room area. John Doe recalled that the futon was reclined about 75 percent, and Aldrich gave John Doe two pillows and used two pillows for himself.¹³⁷ John Doe recalled that Aldrich then reclined the futon completely and told John Doe it would be more comfortable.¹³⁸ John Doe stated that after the hockey program ended or a commercial started, Aldrich took the remote and turned on pornography.¹³⁹ John Doe stated that Aldrich then turned back to the hockey program and said, "whoops, guess you know what I was watching last night."¹⁴⁰ John Doe stated that Aldrich then turned on pornography a second time, and this time left the pornography on the television for about 15 to 20 seconds before flipping back to the hockey program.¹⁴¹ John Doe stated that Aldrich said that there must be something wrong with the remote control.¹⁴² John Doe stated that Aldrich then turned

on pornography a third time and left the pornography playing on the television.¹⁴³ During our interview, John Doe became emotional and choked up as he described the following events.¹⁴⁴

John Doe stated that Aldrich then began to touch himself and asked John Doe if John Doe was going to touch himself.¹⁴⁵ John Doe recalled that he said “no” to Aldrich, and then Aldrich told John Doe to touch himself. John Doe recalled that he told Aldrich that he was uncomfortable.¹⁴⁶ John Doe stated that he then put his hand into his pants for approximately ten seconds.¹⁴⁷ John Doe recalled asking Aldrich, “happy?” John Doe recalled that Aldrich responded that he was not happy and rolled over on the futon towards John Doe, started to rub John Doe’s leg, and tried to start kissing John Doe.¹⁴⁸ John Doe recalled that Aldrich was on John Doe’s right side and that John Doe pushed Aldrich with his left hand as he punched Aldrich on or near Aldrich’s eye with his right hand.¹⁴⁹ John Doe recalled that after he punched Aldrich, Aldrich stood up, grabbed a souvenir Cubs miniature baseball bat that was on either a shelf or window, and told John Doe that John Doe was not going anywhere.¹⁵⁰ John Doe recalled that he was sitting up at this point and froze.¹⁵¹ John Doe recalled that Aldrich said words to the effect of, “If you don’t lay down and act like you enjoy it, I’ll make sure you never play in the NHL or walk again.”¹⁵² John Doe recalled that he scooted himself as far away as he could from Aldrich. John Doe recalled that Aldrich got on top of him, started to forcefully kiss him, and shoved his tongue into John Doe’s mouth.¹⁵³ John Doe recalled that, after approximately thirty seconds, John Doe began to gag and told Aldrich that his tongue was “too fat.”¹⁵⁴ John Doe recalled that in response, Aldrich said words to the effect of, “maybe you’ll like this with my fat tongue” and then began to perform oral sex on John Doe.¹⁵⁵

John Doe recalled that Aldrich continued to perform oral sex on John Doe, stopping only to tell John Doe to act like he was enjoying it.¹⁵⁶ John Doe recalled that Aldrich stopped performing oral sex on John Doe once John Doe ejaculated in Aldrich’s mouth.¹⁵⁷ John Doe recalled that Aldrich then told John Doe that John Doe must have liked it, which Aldrich said meant to Aldrich that John Doe was gay.¹⁵⁸ John Doe recalled that Aldrich then sat up, paused, and told John Doe to roll over onto his stomach.¹⁵⁹ John Doe recalled that he said “no,” and Aldrich again told John Doe to roll over.¹⁶⁰ John Doe recalled that he rolled over and Aldrich got on top of John Doe.¹⁶¹ John Doe recalled that Aldrich then said words to the effect of “don’t worry, I won’t put it in you.”

John Doe recalled that Aldrich “dry humped” John Doe until Aldrich ejaculated on John Doe’s back.¹⁶² John Doe recalled that Aldrich then wiped off John Doe’s back, stating words to the effect of: “You can’t tell anyone about this; it is our little secret; no one can find out or I will make sure you never play in the NHL.”¹⁶³

John Doe next recalled that Aldrich went into the bedroom or bathroom.¹⁶⁴ John Doe stated that he quickly put on his clothes, ran out of the apartment, and ran down the stairs as fast as he could.¹⁶⁵ John Doe stated that he took a taxi back to his hotel and locked himself in his room. John Doe recalled that he was terrified and shaking.¹⁶⁶ John Doe also recalled receiving text messages from Aldrich asking where John Doe went and telling John Doe that John Doe could not tell anyone what happened.¹⁶⁷

John Doe stated that over the course of the next two weeks, he received many text messages from Aldrich.¹⁶⁸ John Doe also recalled that before Games 1 and 2 of the San Jose series, when the Blackhawks and the Black Aces were in San Jose, Aldrich came to one or two of the Black Aces’ practices.¹⁶⁹ John Doe recalled feeling scared and sick when he saw Aldrich and stated that he believed Aldrich had the power to dictate John Doe’s career.¹⁷⁰

B. John Doe’s Confidant

An individual who we will refer to as John Doe’s confidant recalled receiving a phone call from John Doe on May 17, 2010.¹⁷¹ On that date, the Blackhawks and the Black Aces were in San Jose, and it was an off day between Game 1 and Game 2 against the San Jose Sharks.¹⁷² The confidant was certain of the date of the call because he received the call on the day of the confidant’s wedding anniversary (a point we confirmed by receiving from the confidant a photograph of his wedding invitation).¹⁷³ When interviewed, the confidant stated that John Doe could barely speak and was crying throughout the May 17 phone call.¹⁷⁴ The confidant stated that he initially wondered to himself whether John Doe had been in a car accident and asked John Doe to catch his breath.¹⁷⁵ The confidant recalled John Doe stating that he had something difficult to tell him and then describing a sexual encounter involving Aldrich.¹⁷⁶

The confidant recalled John Doe telling him that Aldrich, John Doe, and a handful of teammates were recently out together in Chicago.¹⁷⁷ The confidant recalled John Doe explaining that Aldrich and John Doe separated from the

group with a woman, and the three individuals went to Aldrich's apartment.¹⁷⁸ The confidant recalled John Doe stating that he had sexual relations with the woman while Aldrich watched from a corner where he was masturbating.¹⁷⁹ The woman then left Aldrich's apartment.¹⁸⁰

The confidant further recalled John Doe describing a second interaction with Aldrich during the May 17, 2010 call, although in a second interview the confidant stated that he was uncertain whether it was a separate evening John Doe was describing or a continuation of the events that occurred after the woman left Aldrich's apartment.¹⁸¹ The confidant recalled John Doe saying that he and Aldrich watched hockey highlights together and Aldrich repeatedly flipped the video to pornography before saying "whoops" and flipping the video back to hockey highlights.¹⁸² The confidant recalled John Doe telling him that John Doe had two or three alcoholic drinks and did not feel well.¹⁸³ John Doe told the confidant that he next relaxed on a futon in Aldrich's apartment and fell asleep.¹⁸⁴ John Doe said to the confidant that when he woke up, Aldrich was on top of him and trying to or directly performing oral sex on John Doe.¹⁸⁵ The confidant recalled John Doe saying that he tried to push Aldrich back and Aldrich grabbed a Chicago Cubs souvenir bat or souvenir hockey stick and threatened to hit John Doe with the bat or stick, or did hit him with the bat or stick.¹⁸⁶ The confidant recalled that John Doe said he could not "come to" and explained to the confidant that he felt that he was under the influence to a greater extent than the alcohol he had consumed.¹⁸⁷ The confidant recalled that John Doe said Aldrich continued to perform oral sex on John Doe, masturbated, and ejaculated on John Doe.¹⁸⁸ John Doe told the confidant that he felt threatened by Aldrich, disgusted, and that he wanted to leave.¹⁸⁹ According to the confidant, Aldrich informed John Doe that if he told anyone, he was "done" and would never play an NHL game.¹⁹⁰ When interviewed, the confidant did not recall whether John Doe stayed at Aldrich's apartment after the encounter.¹⁹¹

The confidant further recalled that John Doe stated he did not know why he felt he could not get off the futon in Aldrich's apartment, but he felt that he did not have the physical strength to do so.¹⁹² The confidant recalled asking John Doe to further explain how he could not fight off Aldrich, and reminded John Doe that he "fights for a living."¹⁹³ The confidant recalled that John Doe responded that he was in and out of consciousness and mentioned to the confidant the possibility of having been drugged.¹⁹⁴

The confidant also recalled telling John Doe that John Doe's parents should know about the incident.¹⁹⁵ The confidant recalled John Doe stating that he did not want anyone to know, including his parents.¹⁹⁶ The confidant recalled asking John Doe for permission to speak to the Blackhawks, which John Doe granted.¹⁹⁷ This point is further addressed below.¹⁹⁸

C. Brad Aldrich

Aldrich provided a different version of the encounter with John Doe, including his view that the encounter was consensual.

Aldrich stated that, at some point early in the 2010 playoffs, he confided to John Doe and Black Ace 1 that he was gay.¹⁹⁹ Aldrich recalled that, after this conversation, he felt that Black Ace 1 was supportive of Aldrich but he regretted telling John Doe.²⁰⁰ Aldrich stated that he felt threatened by John Doe and worried that John Doe was going to reveal his sexual orientation to others.²⁰¹ Aldrich further stated that he felt that John Doe asked questions that made him feel uncomfortable.²⁰² Despite stating that he felt concerned that John Doe would reveal his sexual orientation, Aldrich also stated that leading up to the night of the sexual encounter with John Doe, Aldrich experienced what he believed to be flirtatious interactions between him and John Doe.²⁰³ Aldrich stated that none of the interactions before the night of the encounter were physical.²⁰⁴ John Doe did not recall a conversation with Aldrich about Aldrich's sexual orientation; Black Ace 1 recalled the conversation but provided no details regarding who else, if anyone, was present for the conversation.²⁰⁵

On the evening of the encounter, which Aldrich recalled was either May 8 or May 9, 2010, Aldrich said that he and John Doe were socializing and drinking at a bar in Chicago with a woman.²⁰⁶ Aldrich stated that in general, during the 2009-2010 season, he engaged in excessive drinking. Aldrich recalled that late in the evening, he, John Doe, and the woman left the bar and traveled together to Aldrich's apartment.²⁰⁷ Aldrich recalled that he, John Doe, and the woman played strip poker in Aldrich's apartment.²⁰⁸ Aldrich recalled that the game ended with none of the three individuals wearing clothes.²⁰⁹ Aldrich recalled that the three individuals started kissing and engaging in oral sex.²¹⁰ Aldrich recalled that all three individuals participated in the oral sex, although the woman, as further described below, said that Aldrich and John Doe did not perform oral sex on each other in the woman's presence.²¹¹ Aldrich asserted

that in his view, the night was fun and playful.²¹² Aldrich recalled that at some point during this interaction, the woman left Aldrich's apartment after he believed she started to menstruate.²¹³ Aldrich recalled that after the woman left the apartment, John Doe did not put on his clothes. Aldrich stated that John Doe played pornography on his phone.²¹⁴ Aldrich recalled that he and John Doe sat on the futon in Aldrich's apartment and both individuals began to masturbate while the pornography played.²¹⁵ Aldrich recalled that he turned to John Doe and asked John Doe if "it [was] time to take this to the next step."²¹⁶

Aldrich stated that he vividly remembered John Doe's response.²¹⁷ Aldrich stated that John Doe said, "I've always wanted to try it."²¹⁸ Aldrich stated that he performed oral sex on John Doe and John Doe gave Aldrich a "hand job."²¹⁹ Aldrich stated that John Doe stayed the night and slept in Aldrich's apartment.²²⁰ Aldrich stated that in his view, he never had the sense that John Doe wanted to stop the encounter and did not tell Aldrich to stop.²²¹ Aldrich stated that John Doe was not unconscious when the sexual encounter occurred and that there were no drugs involved.²²²

Aldrich stated that he did not recall his interactions the next morning with John Doe or John Doe leaving in the morning.²²³ Aldrich stated that he was not concerned at the time about the player-coach dynamic, nor did he feel that he did anything wrong.²²⁴ Aldrich stated that he never spoke to anyone about the sexual encounter with John Doe.²²⁵ Aldrich also stated that he foresaw a sexual encounter with John Doe because of the flirtatious interactions he said he had with John Doe leading up to the sexual encounter.²²⁶ Aldrich denied sexually assaulting John Doe.²²⁷ Aldrich also denied threatening John Doe, flipping between pornography and sports in the presence of John Doe, and cautioning John Doe against telling anyone about the encounter.²²⁸

D. The Woman

The woman who came to Aldrich's apartment was located and interviewed. She provided an account that corroborated certain aspects of John Doe's and Aldrich's accounts, and differed in certain respects as well.

The woman recalled that she first met Aldrich at a bar in Chicago where he and certain hockey players socialized.²²⁹ The woman stated that she and Aldrich texted occasionally and she initially believed Aldrich to be nice.²³⁰ The woman recalled only one occasion when she and Aldrich socialized with each other outside of the bar.²³¹ The woman recalled that, on this night, she was drinking

with Aldrich and an individual whom she believed to be John Doe at a bar in Chicago.²³² The woman stated that she, Aldrich, and John Doe may have traveled to a second location, but she did not recall with certainty.²³³ The next event the woman recalled was Aldrich asking her: “Why don’t you come back to my condo?”²³⁴

The woman stated that she accepted Aldrich’s invitation.²³⁵ The woman stated that she went to Aldrich’s residence with Aldrich and John Doe and they watched ESPN.²³⁶ The woman recalled that someone, whom she believed to be Aldrich, asked if she wanted to watch pornography, which she declined.²³⁷ The woman stated that she, Aldrich, and John Doe then played strip poker, and John Doe and Aldrich engaged in oral sex with her.²³⁸ The woman stated that she did not believe that Aldrich and John Doe engaged in oral sex with each other, kissed each other, or touched each other’s genitals.²³⁹ The woman stated she did not see either Aldrich or John Doe ejaculate or masturbate.²⁴⁰ The woman recalled that Aldrich wanted to record a video during the interaction and the woman declined.²⁴¹ The woman recalled that John Doe was nice to her during the interaction.²⁴²

The woman stated that at some point during the interaction, Aldrich scratched her and she started to bleed.²⁴³ The woman stated that when Aldrich scratched her, she realized she did not want to be at Aldrich’s residence and decided to leave.²⁴⁴ The woman recalled that Aldrich was aggressive and told her that she should stay the night at his residence and in his bed.²⁴⁵ The woman stated that, after turning down Aldrich’s requests for her to sleep in his bedroom, she waited in the building lobby for 45 minutes for a taxi.²⁴⁶ The woman stated that she did not see John Doe or Aldrich in the lobby while she waited for a taxi.²⁴⁷ The woman described Aldrich as the instigator of events that occurred in her presence that evening.²⁴⁸ When interviewed, the woman stated nothing about John Doe following her after she did not enter Aldrich’s apartment and she made clear she did enter Aldrich’s apartment and had a sexual encounter with Aldrich and John Doe.²⁴⁹

The woman never spoke to John Doe again.²⁵⁰ She recalled seeing Aldrich again in Chicago once and he told her that he had left the Blackhawks.²⁵¹

E. Interactions between John Doe and Aldrich after the Sexual Encounter

John Doe recalled that, after the sexual encounter with Aldrich, while the team was in San Jose from May 12 through May 19, John Doe went out to a bar with a group of ten people, including Aldrich.²⁵² John Doe recalled that Aldrich was constantly texting John Doe and begging John Doe to come to Aldrich's hotel room.²⁵³ John Doe recalled that, on the way back to the team hotel, the group stopped at Subway or Pita Pit.²⁵⁴ John Doe recalled that Aldrich stood behind John Doe in the line and pinched and poked John Doe.²⁵⁵ John Doe also recalled seeing over the shoulder of Black Ace 1 that Black Ace 1 was receiving text messages from Aldrich.²⁵⁶ John Doe recalled that he walked to the front of the line away from Aldrich, ordered and picked up his food, and left the restaurant alone.²⁵⁷ John Doe recalled that after leaving, he received a text message from Aldrich asking John Doe where he went.²⁵⁸ John Doe said that he received texts from Aldrich for one or two hours after leaving the restaurant.²⁵⁹ John Doe stated that he did not respond to the text messages and later told Aldrich he had turned off his phone.²⁶⁰

John Doe also stated in his interview that he later spoke to Black Ace 1 about Aldrich.²⁶¹ John Doe recalled that he told Black Ace 1 that Aldrich tried to touch him.²⁶² John Doe recalled that Black Ace 1 responded that Aldrich was a "creep" and then ended the conversation.²⁶³ When interviewed, Black Ace 1 stated that he did not recall speaking to John Doe about Aldrich in 2010 or at any time.²⁶⁴ Prior to his interview, on July 14, 2021, Black Ace 1 sent an email to our investigative team, in which he wrote, "I was never there to witness any allegations, but I do remember [John Doe] talking to Jim Gary at the time about it."²⁶⁵ John Doe's conversation with Jim Gary is described below in Section VII.B.3.

Aldrich stated that he did not perceive interactions between him and John Doe to be awkward in the days after the sexual encounter. Aldrich stated that he and John Doe continued to socialize at bars.²⁶⁶ Phone records reflect that, between May 10 and May 30, Aldrich called or attempted to call John Doe ten times, and John Doe called or attempted to call Aldrich three times.²⁶⁷ The phone records indicate that none of these phone calls were longer than three

minutes, and several calls were only one minute in duration²⁶⁸—which could indicate no connection was made or a voicemail was left.ⁱ

F. John Doe’s Later Recitations of the Encounter with Aldrich

John Doe, the confidant, Aldrich, and the woman are the only individuals who described to us in any detail their understanding of the encounter based on a recollection at or close to the time of the encounter. There were a few witnesses, however, that described conversations with John Doe some months or years later in which John Doe or others in John Doe’s presence discussed John Doe’s interactions with Aldrich. We provide those details here. We will describe the Blackhawks’ knowledge of what occurred between Aldrich and John Doe in Section VII, below.

A member of the 2010-2011 Blackhawks team recalled that in September 2010, the night before the start of the Blackhawks’ training camp for the following season, the player overheard John Doe tell a story to other players about John Doe, Black Ace 1, and a woman participating in a “threesome,” and Aldrich trying to join.²⁶⁹ The player further recalled overhearing John Doe or Black Ace 1 say that Aldrich tried to touch the genitals of one of the players involved in the “threesome.”²⁷⁰ The player stated that John Doe and Black Ace 1 told the story in a joking manner and that it did not seem like a serious issue to the player.²⁷¹

A former player for the Rockford IceHogs recalled speaking to John Doe during the IceHogs’ season-ending party in the spring of 2011.²⁷² The IceHogs player recalled that John Doe pulled him aside and told him about an incident that occurred between John Doe and the Blackhawks’ video coach during the 2010 playoffs.²⁷³ The IceHogs player recalled thinking that others knew about the incident because John Doe did not appear to be discreet during the conversation.²⁷⁴ The IceHogs player recalled that John Doe told him that, when he was a Black Ace during the 2010 playoffs, he was drinking and hanging out with the Blackhawks’ video coach.²⁷⁵ The IceHogs player further recalled that John Doe said that John Doe and the video coach were watching

ⁱ For this information, we relied on call logs for Aldrich’s Blackhawks-issued cell phone; call logs associated with Aldrich’s personal phone and text messages were not available.

pornography and the coach performed oral sex on John Doe.²⁷⁶ The IceHogs player recalled that John Doe then said John Doe pushed the video coach off of him.²⁷⁷

A former roommate of John Doe stated in his interview that in 2011 or 2012, John Doe told the roommate that there was a sexual incident involving someone from the Blackhawks.²⁷⁸ The roommate recalled that John Doe seemed uncomfortable during the conversation and did not want to share all of the details about the incident, so the roommate did not ask many questions.²⁷⁹

G. Aldrich's Interactions with Black Ace 1

John Doe's May 7, 2021 Complaint alleged that prior to the alleged sexual assault on John Doe, the Blackhawks were made aware that Aldrich had sexually assaulted a teammate of John Doe (a point denied by all witnesses who were in senior management).²⁸⁰ Many witnesses told us they knew or believed that the teammate was Black Ace 1.²⁸¹ When interviewed, Black Ace 1 reported several specific interactions with Aldrich during the 2010 playoffs. He denied that he had any direct sexual encounters with Aldrich.²⁸² Aldrich also denied any direct sexual encounters involving Black Ace 1.²⁸³

Black Ace 1 recalled that at some point early in the 2010 playoffs, Aldrich came out to Black Ace 1 as gay.²⁸⁴ After this conversation, Black Ace 1 recalled receiving a text message in which Aldrich said he could give a better "blow job" than any woman could.²⁸⁵ When the team was in San Jose (May 12 to 19), Aldrich invited Black Ace 1 to Aldrich's hotel room where a female masseuse gave Black Ace 1 a massage and a "hand job" in the bathroom while Aldrich sat on the bed in the bedroom.²⁸⁶ On May 21 or May 23, 2010, Black Ace 1 recalled receiving a text message from Aldrich that included a photograph of a penis.²⁸⁷ Black Ace 1 recalled that Aldrich followed up with a second text message in which Aldrich said the photograph was intended for a different person.²⁸⁸ During his interview, Black Ace 1 said that he thought he was the only person Aldrich was "doing this to" during the 2010 playoffs.²⁸⁹ Aldrich stated when interviewed that he did not recall sending these text messages to Black Ace 1 during the 2010 playoffs, but also noted that he did not recall with certainty that this did not happen.²⁹⁰

Black Ace 1 stated that a Front Office employee was standing next to him when he received the text with the explicit photograph.²⁹¹ The Front Office

employee was close with Black Ace 1 at the time.²⁹² We refer to her throughout this report as Employee A.²⁹³ Black Ace 1 recalled that Employee A pushed him to tell someone about the text from Aldrich, believing that the text was inappropriate and especially so coming from a coach to a player.²⁹⁴

When interviewed, Employee A confirmed that she spoke to Black Ace 1 about a picture of a penis that Aldrich texted to Black Ace 1, and then a follow-up text from Aldrich expressing that the text was intended for a different person.²⁹⁵ Employee A recalled speaking with Black Ace 1 about the explicit text message in the Front Office after Black Ace 1 came upstairs from skating.²⁹⁶ Employee A confirmed that she told Black Ace 1 that he should tell someone.²⁹⁷ Employee A also stated that she told a male Hockey Operations employee about the texts Black Ace 1 received from Aldrich,²⁹⁸ that conversation is described in detail below in Section VII.B.1. Employee A recalled hearing from Black Ace 1 at a later time that Black Ace 1 did not want to be around Aldrich, that Aldrich continued to call Black Ace 1, and that Black Ace 1 told Aldrich to stop contacting him.²⁹⁹

Black Ace 1 vehemently denied to us in writing and during his interview that he had any direct sexual encounters with Aldrich.³⁰⁰ On April 18, 2011, an individual who we will refer to as a professional acquaintance of Black Ace 1 wrote an email to the Executive Director of the NHLPA, Donald Fehr.³⁰¹ The acquaintance wrote:

“I know you have spoken with [John Doe’s confidant] regarding an incident with [John Doe] and a Chicago staff member during the Stanley Cup Playoffs last year. [Black Ace 1] was involved as well and I got him in touch with [a therapist affiliated with the NHLPA] approximately 2 weeks ago; however, I did want to have a follow up with yourself.”³⁰²

When interviewed, Black Ace 1’s acquaintance stated that he did not recall sending this email or Black Ace 1 telling him that an incident involving Aldrich had occurred.³⁰³ The acquaintance also stated that he did not recall speaking to Fehr about an incident involving Black Ace 1 and Aldrich.³⁰⁴ The acquaintance speculated that, based on this email and in his view, an incident involving Black Ace 1 and Aldrich must have occurred; however, he was not certain that it did.³⁰⁵ The acquaintance also stated that Black Ace 1 recently

(in 2021) sent him an email vehemently denying any sexual interaction with Aldrich occurred in 2010.³⁰⁶

The communication made by John Doe's confidant to the NHLPA is described further in Section IX.B below.

In 2010, rumors of an incident between Black Ace 1 and Aldrich started and followed Black Ace 1 for years. Black Ace 1 recalled being asked by a couple of players about whether Aldrich gave Black Ace 1 a "blow job."³⁰⁷ Black Ace 1 recalled laughing off the question and saying "no."³⁰⁸ A former coach for the Rockford IceHogs wrote in a 2011 evaluation of Black Ace 1, "I think what happened last spring with Brad Aldrich weighed on [Black Ace 1] this year big time."³⁰⁹ When interviewed, the former coach stated that he never spoke to Black Ace 1 about Aldrich and based the note in the evaluation on rumors he heard at the time.³¹⁰ Black Ace 1 also recalled an incident in approximately 2014 when he was chased around the ice by a former Blackhawks player who called Black Ace 1 a "f****t" and asked if Black Ace 1 "liked that blow job or what?"³¹¹

Based on the available evidence, it is difficult to discern precisely what occurred between Aldrich and Black Ace 1; both individuals denied in interviews that anything occurred other than the explicit text messages Black Ace 1 recalled receiving from Aldrich during the 2010 playoffs. Clearly, other individuals, including Black Ace 1's coach and later a professional acquaintance who wrote an email to the NHLPA, believed something occurred and expressed concern. We include this information about Black Ace 1 because it is clear, at a minimum, that Aldrich, a coach, sent Black Ace 1, a minor league player, text messages of a sexual nature during the 2010 playoffs around the same time as the encounter between John Doe and Aldrich.

Next we turn to describing what the Blackhawks knew about the encounter between John Doe and Aldrich, when they knew it, and what they did upon learning the information.

VII. The Blackhawks' Knowledge of What Occurred

In this section, we describe the extent to which Blackhawks coaches, staff, and other non-player personnel, including senior management, were informed of a sexual encounter involving Aldrich and John Doe during the 2010 playoffs.

This section begins with John Doe sharing information with a Blackhawks skating coach. We then describe events in Chicago from May 21 through 23, including conversations that occurred between John Doe, Black Ace 1, Jim Gary, and a key meeting among senior management and the Blackhawks' Head Coach, Joel Quenneville, within an hour of the Blackhawks winning the Western Conference Finals.

A. San Jose (May 12 to 19)

The Blackhawks arrived in San Jose on May 12 from Vancouver and left San Jose on May 19.³¹² John Doe, Black Ace 1, and other Black Aces took a commercial flight from Chicago to San Jose on May 12.³¹³ The Black Aces, including John Doe, departed San Jose with the team on May 19.³¹⁴

SAN JOSE SERIES

MAY 12, 2010: TEAM FLIGHT TO SAN JOSE

MAY 13-15, 2010: OFF DAYS IN SAN JOSE

MAY 16, 2010: GAME 1 IN SAN JOSE

MAY 18, 2010: GAME 2 IN SAN JOSE

MAY 19, 2010: TEAM FLIGHT TO CHICAGO

John Doe recalled that, while in San Jose, the first person he spoke to about the encounter with Aldrich was Paul Vincent, then a Blackhawks skating coach.³¹⁵ John Doe's confidant recalled that John Doe told him that Vincent observed John Doe seeming distraught and having "nothing in him" while skating or working out, and John Doe and Vincent then spoke about Aldrich.³¹⁶ John Doe recalled that Vincent said he had heard "something through the grapevine" and asked John Doe a direct question about Aldrich.³¹⁷ John Doe recalled telling Vincent that he could "confirm that."³¹⁸ John Doe further recalled that Vincent then asked John Doe what happened and John Doe responded, "I don't know."³¹⁹ John Doe said that Vincent told John Doe that this was all Vincent needed, that he would handle it, and he would take the issue to the "proper people."³²⁰ Vincent's description of this conversation and related events are described further in Section VII.D below.

B. Chicago (May 19 to 23)

The Blackhawks traveled to Chicago on May 19, practiced on May 20, played Game 3 at home against San Jose on May 21, and played Game 4 at home against San Jose on May 23.³²¹ The San Jose series ended on May 23 with a Blackhawks victory.³²²

SAN JOSE SERIES

MAY 21, 2010: GAME 3 IN CHICAGO

MAY 22, 2010: OFF DAY IN CHICAGO

MAY 23, 2010: GAME 4 IN CHICAGO

As described in more detail below, there is a wide variety of witness accounts about the events of May 21 to 23. There is consistency in the accounts, however, that Al MacIsaac (Senior Director of Hockey Administration) heard something had occurred involving Aldrich and John Doe, dispatched Jim Gary to speak to John Doe about what had happened, and thereafter a meeting occurred with senior management. The meeting occurred in John McDonough's office within an hour of the Blackhawks winning the Western Conference Finals. Although there are varying accounts of what was said during the May 23 meeting, almost all of the participants in the meeting recall learning about an incident involving Aldrich and John Doe. After the meeting, no one contacted Human Resources, the information was not explored further through a formal investigation or otherwise, and Aldrich continued to serve as a video coach, travel with the team, and be present for team activities until his separation from the organization on June 16. The details of these events follow.

1. Conversations with Employee A

The first series of conversations regarding Aldrich that occurred in Chicago after the team's return from San Jose involved Employee A.³²³ In addition to speaking to Black Ace 1 about explicit text messages he received from Aldrich, when interviewed, Employee A recalled learning from Black Ace 1 that something sexual and physical had happened between John Doe and Aldrich.³²⁴ Employee A recalled that Black Ace 1 told Employee A that John

Doe was extremely upset.³²⁵ During her interview, Employee A stated that she spoke to John Doe about the incident and recalled thinking at the time that he was being evasive and seemed embarrassed to share the details of what occurred.³²⁶ In interviews, neither John Doe nor Black Ace 1 said they remember having a conversation with Employee A about a sexual encounter between John Doe and Aldrich.³²⁷

Aldrich recalled that after the sexual encounter with John Doe, and while he was still employed with the Blackhawks, he heard a rumor that Employee A found out that Aldrich and John Doe had a sexual interaction and further heard that Employee A was upset by this information.³²⁸

2. Conversations with Al MacIsaac

In an interview, Employee A stated that upon hearing from Black Ace 1 and John Doe about Aldrich, and before the 2010 season ended, Employee A told a male Hockey Operations employee that a physical incident had occurred between Aldrich and John Doe, that Black Ace 1 had received a graphic photograph in a text message from Aldrich, and that Aldrich was harassing Black Ace 1.³²⁹ Although Employee A declined when interviewed to share the name of the individual with whom Employee A spoke, she also stated that it was possible the individual was Al MacIsaac. It became clear through the course of our investigation that MacIsaac was at least one individual Employee A spoke to regarding Aldrich.³³⁰

When interviewed, MacIsaac recalled that on the morning of May 23, he was sitting in his office at the United Center.³³¹ This was the morning of Game 4 of the San Jose series, a game that began at 2 p.m. Central Standard Time.³³² MacIsaac recalled that Employee A came to his office and told him about Aldrich.³³³ MacIsaac stated in his interview that he remembered the conversation as if it happened yesterday.³³⁴ MacIsaac recalled that Employee A told him that people were at a bar across the street, people went back to the hotel, and at the hotel, Aldrich tried to “get under the sheets with” John Doe.³³⁵ MacIsaac stated that he did not know where Employee A learned the information Employee A shared with MacIsaac, or why Employee A told him.³³⁶ MacIsaac stated that, in his view, Employee A was not asking MacIsaac to take action.³³⁷ MacIsaac was unclear as to whether Employee A referenced Black Ace 1 during the conversation.³³⁸

MacIsaac stated that he recalled feeling shocked because he had previously seen Aldrich “hit on” his female assistant and the story about Aldrich and John Doe therefore did not make sense to him.³³⁹ MacIsaac stated that he recalled thinking that it was inappropriate for a player and coach to be socializing.³⁴⁰ MacIsaac further stated that he recalled thinking that the issue with Aldrich needed to be addressed.³⁴¹ He stated that he reached out to Jim Gary and asked Gary to find out what happened between John Doe and Aldrich.^{j, 342}

Gary recalled during his interview that MacIsaac approached him on the afternoon of May 23 and asked to speak to him privately.³⁴³ Gary recalled that he and MacIsaac went into the hallway outside the executive game suite at the United Center, where MacIsaac told Gary that a staff member, whom MacIsaac did not identify, indicated that John Doe and Black Ace 1 were receiving invitations for sex from Aldrich.³⁴⁴ Gary recalled that MacIsaac asked Gary to “check it out” and speak to the two players.³⁴⁵

3. John Doe’s and Black Ace 1’s Conversations with Jim Gary

John Doe recalled that in the middle of a period during Game 3 or Game 4 of the San Jose series (May 21 or 23), he received a phone call or text message from Jim Gary.³⁴⁶ John Doe stated that Gary asked John Doe to meet Gary

^j Phone records reflect a series of phone calls that occurred the previous day. On May 22, at 3:27 p.m., Jim Gary called John Doe and spoke to him by telephone for 26 minutes. Within minutes of this call ending, Gary spoke to MacIsaac for 5 minutes and Gary then spoke to McDonough for 13 minutes. Gary regularly spoke to Blackhawks players between game days and McDonough, MacIsaac, and Gary were in frequent contact with each other about a variety of topics. None of the witnesses who participated in these phone calls—including Gary and John Doe—recalled the subject of the calls or whether the calls were regarding Aldrich. We note the calls in this report because of the length of the call between Gary and John Doe (26 minutes), and because of the proximity of that call to the calls between Gary, McDonough, and MacIsaac. All other evidence points to MacIsaac, Gary, and others first learning about the incident involving Aldrich on May 23, not May 22 when this sequence of phone calls occurred. For completeness, however, we note the calls here.

outside of the locker room.³⁴⁷ John Doe stated that he went to the locker room and saw Gary, who told John Doe to come with him because they needed to talk.³⁴⁸ John Doe recalled that Gary showed John Doe through the locker room, up a ramp, past bleachers, through the gym, through another door, and through a short hallway before the two reached a storage closet, which was where John Doe and Gary spoke.³⁴⁹ John Doe recalled that the closet stored materials for game promotions.³⁵⁰ Gary recalled a somewhat similar series of events—he went downstairs after speaking to MacIsaac and saw John Doe in the hallway.^{k,351} Gary asked John Doe if the two of them could speak and John Doe agreed.³⁵² Gary recalled that the rooms in which he typically met with players were occupied, so he and John Doe spoke in a supply closet.³⁵³ Gary recalled the closet had supplies, bottles, cans, and mops in it, and that it was a room just off of the hallway.³⁵⁴

John Doe recalled that Gary told John Doe that “we heard some serious things” and then asked if John Doe knew if Black Aces had contact with Aldrich or if John Doe knew if anything had occurred with Aldrich.³⁵⁵ John Doe recalled responding that he did not know about others, but something happened to him.³⁵⁶ John Doe stated that he then told Gary the entire story of the sexual encounter with Aldrich.³⁵⁷ John Doe recalled that Gary told John Doe that “everything was going to be okay,” that John Doe was going to be “okay,” and that Gary had to leave for a meeting.^{l,358} John Doe recalled that the conversation lasted 20 to 30 minutes.³⁵⁹

^k John Doe, through his attorney, provided permission to ask Gary (a counselor) questions about the substance of Gary’s conversations with John Doe in 2010 regarding Aldrich. John Doe’s attorney and the Blackhawks’ civil litigation counsel were present for our interviews of Gary.

^l John Doe’s confidant recalled speaking to John Doe soon after John Doe’s conversation with Gary. The confidant recalled that John Doe recounted Gary saying that John Doe would not “speak a word of this,” that John Doe should “absolutely drop this,” and that John Doe had some fault for the encounter with Aldrich occurring. In this regard, John Doe’s recollection about his conversation with Gary is different from what the confidant stated John Doe told him shortly after the conversation with Gary occurred.

In his interview, Gary recalled telling John Doe that he heard from MacIsaac about a staff member informing MacIsaac that John Doe received an invitation for sex from Aldrich.³⁶⁰ Gary recalled that John Doe became very nervous.³⁶¹ Gary recalled that John Doe told Gary he was going to come to Gary about this issue, but had not done so yet.³⁶² Gary stated John Doe then told Gary that Aldrich was pressuring John Doe to have sex with him and that Aldrich told John Doe that if John Doe did not give in, Aldrich could hurt John Doe's career.³⁶³ Gary recalled sensing that Aldrich's statement about his career concerned John Doe.³⁶⁴ Gary further recalled John Doe stating that he responded to Aldrich that he was not into "that stuff."³⁶⁵ Gary stated that he asked John Doe what John Doe had experienced, and John Doe responded that Aldrich kept pressuring him, but that John Doe did not have a direct physical encounter with Aldrich because he was not "into it."³⁶⁶ Gary recalled that he believed what John Doe told him, both about Aldrich's efforts to pressure John Doe into sex and Aldrich's threats to harm John Doe's career.³⁶⁷

Gary then recalled telling John Doe that this was serious and inappropriate and that John Doe needed to tell management or Human Resources, explaining to John Doe that "this had to come out" and that "this can't continue."³⁶⁸ In Gary's view, John Doe seemed very nervous and was shuffling around.³⁶⁹ Gary said that John Doe was resistant to tell management and asked if Gary would tell management first.³⁷⁰ Gary recalled that John Doe said he would speak to John McDonough after Gary told management.³⁷¹ Gary next recalled that John Doe stated he did not want to be around Aldrich.³⁷² In Gary's memory, the conversation lasted eight to ten minutes.³⁷³

After the conversation with John Doe ended, Gary said he left the supply closet and approached Black Ace 1, who was standing in the hallway.³⁷⁴ Gary recalled that Black Ace 1 was not receptive to speaking to Gary about Aldrich and that the two spoke for three or four minutes in the hallway.³⁷⁵ Gary stated that he asked Black Ace 1 if Aldrich had pressured him to have sex.³⁷⁶ Gary recalled Black Ace 1 stating that he did not know anything about it, laughing, and saying that it was "not his thing" before walking away.³⁷⁷ When interviewed, Black Ace 1 said he met Gary outside the arena during a home playoff game and mentioned receiving a text from Aldrich containing a photograph of a penis.³⁷⁸

John Doe recalled that, after his conversation with Gary, he returned to the press box to watch the remainder of the game.³⁷⁹ After the game, John Doe

went downstairs and waited outside the locker room to make sure he was not needed and to receive his schedule for the next day.³⁸⁰ John Doe recalled receiving multiple texts from Aldrich asking John Doe if John Doe told anyone about what had occurred between them.³⁸¹ John Doe further recalled that Aldrich told John Doe that there was a “huge meeting” in the coaches’ office and that the coaches kicked Aldrich out of the meeting.³⁸² No witnesses identified a coaches’ meeting occurring after a San Jose playoff game in which Aldrich was kicked out of the meeting.

4. The Executive Game Suite

Gary recalled that he returned to the executive game suite and told MacIsaac that the issue needed to be looked into and that it was a potentially serious problem.³⁸³ Gary recalled that MacIsaac said he would get back to Gary and about fifteen to twenty minutes later, while the game was still being played, MacIsaac came back to Gary and told Gary that they would meet in John McDonough’s office after the game.³⁸⁴

When interviewed, MacIsaac recalled being in the executive game suite during Game 4 (May 23) with Stan Bowman, John McDonough, then-assistant general manager Kevin Cheveldayoff, and then-senior vice president Jay Blunk.³⁸⁵ MacIsaac recalled that during the game, Jim Gary entered the suite, and then MacIsaac, Gary, and Bowman spoke in the hallway outside the suite.³⁸⁶ MacIsaac stated that Gary told Bowman and MacIsaac that there was “something to it” (with regards to the information Employee A told MacIsaac).³⁸⁷

When interviewed, Bowman recalled that after Game 4 ended—which was at approximately 4:46 p.m. Central Standard Time—MacIsaac approached him in the executive game suite.³⁸⁸ Bowman recalled MacIsaac stating that there was a problem with Aldrich and John Doe, and they needed to speak with McDonough.³⁸⁹ Bowman said he may have spoken to Gary as well, but he did not specifically recall doing so.³⁹⁰ Bowman said he recalled feeling surprised by what MacIsaac told him because the Blackhawks had just won and Bowman usually went directly to the locker room after games to speak with the coaches.³⁹¹

5. John McDonough's Office

After Game 4 ended, a meeting occurred in John McDonough's office in the Front Office space at the United Center. Jim Gary, Stan Bowman, Al MacIsaac, John McDonough, Kevin Cheveldayoff, and Jay Blunk were present. The participants recalled the meeting lasting for between ten and twenty-five minutes.³⁹² After the meeting started, Bowman recalled McDonough saying that Quenneville should participate because the incident involved Aldrich, a coach.³⁹³ Quenneville was subsequently called to the Front Office to join the meeting.³⁹⁴ When interviewed, Quenneville stated that being called into a meeting in McDonough's office was unusual since the game had just ended.³⁹⁵

As noted earlier, there are multiple and sometimes different recollections of what occurred during the meeting in McDonough's office. As this is a critical meeting in the course of the events that occurred, and to be fair to all involved, we describe below what each participant in the meeting recalled.

a. Jim Gary

Gary recalled during his interview that he told the assembled group in McDonough's office what John Doe told him: that Aldrich was pressuring John Doe for sex, that John Doe told Aldrich he was not "into that," and that Aldrich threatened John Doe by saying if John Doe did not comply, Aldrich could hurt John Doe's career.³⁹⁶ Gary recalled that he also expressed that John Doe was uncomfortable around Aldrich due to the situation.³⁹⁷ Gary recalled the participants seemed to be stunned.³⁹⁸ He recalled that the participants started to discuss what to do next, including someone mentioning the possibility of an investigation into the matter.³⁹⁹ Gary stated during his interview that he believed he heard someone ask if they should involve the Director of Human Resources.⁴⁰⁰ Gary recalled that he told the group that it was important for them to speak to John Doe and McDonough stated he would speak to John Doe.⁴⁰¹ Gary further recalled asking if the group needed him, the group saying no, and Gary leaving the meeting before it ended.⁴⁰² Gary stated that when he left the room, he told the group to let him know what happened so that he could inform John Doe of the outcome.⁴⁰³ Gary recalled that someone said they would get back to him.⁴⁰⁴

i. Gary's Description of the May 23 Meeting to the Director of Human Resources in 2021

In a January 2021 conversation with the Director of Human Resources and another individual, Gary provided additional details about the meeting in McDonough's office that went beyond the details he recalled during our interview. In particular, according to the Director of Human Resources, Gary said that during the meeting, Quenneville appeared angry and was concerned about upsetting team chemistry. Also according to the Director of Human Resources, Gary recalled that "they" decided to hold off talking to Aldrich about the situation until the season was over.⁴⁰⁵

b. Stan Bowman

Bowman recalled that, during the May 23, 2010 meeting, either MacIsaac or Gary stated that there was an incident between John Doe and Aldrich in which Aldrich had tried to "climb into bed" with John Doe one night at Aldrich's apartment.⁴⁰⁶ Bowman recalled that Gary said he had spoken to John Doe earlier that day and that John Doe did not want to talk about it.⁴⁰⁷ Bowman told us that, as described to him, the situation did not strike him as immediately alarming at the time as the allegation did not involve a sexual assault as having occurred.⁴⁰⁸

Bowman recalled that, after learning of the incident, Quenneville shook his head and said that it was hard for the team to get to where they were, and they could not deal with this issue now.⁴⁰⁹ Bowman further recalled that McDonough referenced his previous employment with the Chicago Cubs.⁴¹⁰ Bowman recalled McDonough saying that the Blackhawks might never make it this far in the playoffs again, and that they needed to think about when to handle the issue.⁴¹¹ (The Blackhawks had not played in the Stanley Cup Finals in 18 years.) Bowman did not recall anyone explicitly referencing the notion that the issue should be tabled until after the playoffs.⁴¹² Rather, Bowman recalled discussion about the need to find out more about what happened.⁴¹³ Bowman further recalled that he asked McDonough what McDonough wanted to do and McDonough responded that Bowman should leave it to McDonough.⁴¹⁴ Bowman stated that when the meeting ended, Bowman believed the issue was in McDonough's hands and everyone else should focus on the upcoming Stanley Cup Finals.⁴¹⁵

c. Al MacIsaac

In his interview, MacIsaac recalled that Gary told the group that Aldrich had tried to “get under the sheets” with John Doe.⁴¹⁶ MacIsaac stated that he believed at the time that something inappropriate had happened between a player and a coach, but he did not think a crime had occurred, and he believed that the issue would be taken care of when the season ended.⁴¹⁷ MacIsaac remembered little else about the meeting, including how it ended and what was to occur following the meeting related to the incident.⁴¹⁸

i. MacIsaac’s Description of the May 23 Meeting to a Blackhawks Employee Several Years Later

A Blackhawks employee we interviewed recalled speaking to MacIsaac about Aldrich several years after the 2010 meeting in McDonough’s office.⁴¹⁹ The employee recalled that MacIsaac recounted how he learned during the 2010 playoffs that John Doe and Black Ace 1 were with a woman when Aldrich tried to, in MacIsaac’s words, “force” himself onto, and perform oral sex on, one of the players, but the player shoved Aldrich away.⁴²⁰ The employee further recalled that MacIsaac told him that McDonough did not want any negative publicity during the Stanley Cup Finals, which was why the Blackhawks waited until after the playoffs to separate Aldrich from the organization.⁴²¹ When asked about these statements, MacIsaac stated that he had no recollection of speaking with the employee about Aldrich—not several years after the May 23 meeting or ever.⁴²²

d. John McDonough

McDonough recalled that Jim Gary told the group that he was “aware of an incident” and John Doe “was embarrassed about the incident.”⁴²³ McDonough also stated during his interview that he believed Gary explained during the May 23 meeting what occurred, but he could only recall that Gary mentioned Aldrich’s name and how the situation was embarrassing for John Doe.⁴²⁴

In his initial interview, McDonough denied that there was a discussion during the meeting about who was going to address the issue or about tabling the issue until after the playoffs.⁴²⁵ McDonough recalled that Quenneville appeared to be agitated.⁴²⁶ McDonough otherwise had virtually no

recollection of the discussion after the issue had been raised.⁴²⁷ During a second interview, McDonough stated that Gary told the assembled group that Gary was going to address the issue with John Doe again following the meeting.⁴²⁸ The next event McDonough recalled was that the meeting ended and everyone dispersed.⁴²⁹ McDonough stated that this was the first and last time he recalled discussing this issue.⁴³⁰

i. McDonough's Description of the May 23 Meeting to the Director of Human Resources on June 14, 2010

According to the then-Director of Human Resources, three weeks later, on June 14, McDonough called the Director into his office and told her that he learned of an incident a few weeks earlier involving Aldrich.⁴³¹ The Director of Human Resources recalled that McDonough told her that the incident involved drinking and Aldrich "hitting on" or making a sexual advance on John Doe at an off-site apartment.⁴³² The Director of Human Resources also recalled McDonough describing the meeting in his office on May 23 after Game 4 ended with MacIsaac, Bowman, Gary, and Quenneville.⁴³³ The Director of Human Resources recalled that McDonough told her that, during the meeting, the group decided not to alert Human Resources or outside legal counsel and to not do anything about the incident during the playoffs so as not to "disturb team chemistry."⁴³⁴ The Director of Human Resources further recalled McDonough saying that the group decided to keep the alleged incident among themselves for the duration of the playoffs and that they would address the issue as soon as possible after the season.⁴³⁵

The Director of Human Resources also recalled McDonough referencing the fact that John Doe was physically larger than Aldrich.⁴³⁶ When interviewed, McDonough made the same comment, adding that it was hard for him to imagine that a non-consensual sexual encounter occurred between John Doe, who McDonough believed to be 6'3" and 230 lb. in 2010, and Aldrich, who McDonough believed to be 5'6" and 130 lb. in 2010.⁴³⁷

When interviewed, McDonough stated that he did not recall speaking with the Director of Human Resources about Aldrich on June 14 or at any time.⁴³⁸

e. Joel Quenneville

During his interview, Quenneville generally recalled a meeting in McDonough's office after Game 4 of the San Jose series with members of the Blackhawks' senior management.⁴³⁹ Other participants in the meeting recalled that Quenneville was not present for the first portion of the meeting and was called upstairs to the Front Office to join the meeting after it had started.⁴⁴⁰ Quenneville recalled others in the meeting stating that "an event happened without saying what happened" and that "something may have happened."⁴⁴¹ When interviewed, Quenneville stated that he believed that the issue being discussed involved a coach doing something improper and that the group was meeting to decide whether to "make it public."⁴⁴² Quenneville also stated that he did not believe that John Doe's name was referenced and, after multiple interviews, Quenneville was unclear whether Aldrich's name was referenced.⁴⁴³

Quenneville also said when interviewed that he did not recall anyone saying it was hard for the team to get where they were in the playoffs, but recalled that his focus was on winning and this meeting was unexpected.⁴⁴⁴ He said that there was no resolution of the situation at the meeting.⁴⁴⁵

Otherwise, Quenneville recalled nothing else regarding the meeting or the events more broadly.

f. Kevin Cheveldayoff

Kevin Cheveldayoff, then the Assistant General Manager, recalled that there was a meeting in McDonough's office before a home game during the Philadelphia series (the Stanley Cup Finals), and not the San Jose series.⁴⁴⁶ Regardless of when Cheveldayoff believed the meeting occurred, Cheveldayoff recalled being in a meeting in McDonough's office regarding Aldrich with others in senior management, including McDonough, Bowman, MacIsaac, and Quenneville.⁴⁴⁷ He recalled the group was told that there were allegations that Aldrich was socializing with players outside the arena, Aldrich sent inappropriate texts to players, and Aldrich made unwanted advances on players.⁴⁴⁸ Cheveldayoff recalled that John Doe and Black Ace 1 were specifically referenced during the meeting.⁴⁴⁹ Cheveldayoff also recalled that he felt shocked at the time because it was not common for coaches and players to socialize, and he believed at the time that the allegations were serious.⁴⁵⁰

He further recalled someone stating that the allegations needed to be investigated and that someone would make sure the two players and Aldrich would be kept separate.⁴⁵¹ Cheveldayoff recalled no other substantive details from the meeting.

g. Jay Blunk

Jay Blunk, then a Senior Vice President and present for the meeting in McDonough's office, recalled someone saying that Aldrich may have propositioned a player, who Blunk believed was identified during the meeting as John Doe.⁴⁵² Blunk recalled that someone said they were going to look into the issue and substantiate it.⁴⁵³ Blunk recalled no other substantive details from the meeting.

6. Jim Gary's Phone Calls with Stan Bowman and Joel Quenneville

During the late evening of May 23, several hours after Game 4 and the meeting in McDonough's office, Gary recalled speaking to Bowman by telephone about the Aldrich situation.⁴⁵⁴ Phone records reflect a 19-minute phone call between Bowman and Gary on May 23 starting at 9:06 p.m.⁴⁵⁵ Gary recalled that he spoke to Bowman to confirm that the Blackhawks were going to pursue an investigation.⁴⁵⁶ When interviewed, Gary said that he knew John Doe was hurting and he wanted to confirm the Blackhawks were following through in a timely fashion.⁴⁵⁷ Gary recalled Bowman stating that the group in the meeting discussed the issue and that they "will pursue this," including by questioning Aldrich, and they would bring it to "an ending."⁴⁵⁸ Gary recalled feeling reassured by Bowman during the phone call.⁴⁵⁹ Bowman did not recall this phone call, but did not deny that it could have happened and could have involved a discussion regarding Aldrich.⁴⁶⁰

The following day, phone records reflect that Gary called Quenneville at 12:49 p.m. and the call lasted for 10 minutes.⁴⁶¹ Quenneville did not recall this phone call or what they discussed, and speculated that the conversation could have been about a different topic, such as a family member who had spoken with Gary as a counselor on a prior occasion.⁴⁶² Quenneville also stated that he and Gary typically met once annually. Available phone records reflect no other phone calls between Gary and Quenneville in 2010.⁴⁶³

7. Contacts with the Blackhawks' Management by John Doe's Confidant

John Doe's confidant stated that he called Stan Bowman or Al MacIsaac, or possibly both individuals, regarding Aldrich.⁴⁶⁴ The confidant was uncertain as to when the contacts were made, and stated that the contacts could have been in May or June 2010, as late as early 2011, or at both times.⁴⁶⁵ We were unable to corroborate the confidant's contacts with Bowman or MacIsaac with phone records, although not all relevant phone records exist today. The confidant recalled that he told Bowman or MacIsaac that there was an incident with Aldrich, it was of a "disgusting sexual variety," and John Doe was a "mess."⁴⁶⁶ The confidant stated that Bowman or MacIsaac told him that they would look into the information the confidant shared and "handle it."⁴⁶⁷ Bowman and MacIsaac stated in interviews that they did not recall speaking to the confidant about Aldrich at any time, although Bowman stated that it is possible he spoke to the confidant about Aldrich and has no memory of it.⁴⁶⁸

C. Blackhawks 2009-2010 Players

Two former Blackhawks players claimed in their interviews and publicly in 2021 that, during the 2010 playoffs, "everyone" knew about Aldrich engaging in inappropriate conduct with players.⁴⁶⁹ In particular, Brent Sopel claimed in his interview and publicly that "everyone" was talking about how Aldrich wanted to "touch penises" during the 2010 playoffs and that "everyone" knew.^{m, 470} Nick Boynton stated in his interview and publicly that during the 2010 playoffs, numerous Blackhawks players asked him what happened regarding Aldrich.⁴⁷¹ We pressed Sopel and Boynton for details regarding which conversations, and with whom, led them to believe that "everyone" knew about Aldrich engaging in inappropriate conduct with players.⁴⁷² Neither Boynton nor Sopel could provide many details.⁴⁷³ Interviews of players from the 2010 Blackhawks' roster contradicted the claims that "everyone" knew—of the 14 players on the 2010 roster whom we interviewed, 6 players told us they had no knowledge of inappropriate conduct by Aldrich

^m Former Blackhawks players Brent Sopel and Nick Boynton publicly identified themselves in 2021 and made public statements about their knowledge of certain events.

in 2010, and 6 players told us they only learned about inappropriate conduct through rumors after Aldrich separated from the Blackhawks in June 2010.⁴⁷⁴ Two players—Sopel and Boynton—stated that they heard about inappropriate conduct by Aldrich before he separated from the team.⁴⁷⁵

D. Paul Vincent

As noted in Section VII.A. above, John Doe recalled that he provided some information about Aldrich to Paul Vincent, the skating coach, while the team was in San Jose between May 12 and 19.⁴⁷⁶ When interviewed, Vincent stated that while the details are “cloudy,” he recalled hearing about an issue involving two players and Aldrich.⁴⁷⁷ Vincent recalled hearing about the issue from a 2010 Blackhawks player, Nick Boynton, while the team was in San Jose.⁴⁷⁸ Boynton recalled speaking to Vincent about how he heard that Aldrich asked two players if Aldrich could “jerk them off” and that the encounter involved drugs and alcohol.⁴⁷⁹ Boynton stated that when he and another player spoke to Vincent, Vincent said he would take care of it.⁴⁸⁰ The other player did not recall a conversation with Boynton about Aldrich, and stated that he did not speak to Vincent about Aldrich.⁴⁸¹ A third 2010 Blackhawks player, Brent Sopel, stated when interviewed that Vincent approached him sometime while the team was in San Jose, and told him about Aldrich wanting to touch two players’ genitals.⁴⁸²

Vincent said he approached the two players who had been identified to him, whom he declined to identify to us during our investigation. It appears that Vincent was referring to John Doe and Black Ace 1.⁴⁸³ Vincent stated that the two players told Vincent that they were recently at Aldrich’s apartment on the same or different occasions and Aldrich tried and wanted to touch the genitals of one or both players, but the two players resisted.⁴⁸⁴ Vincent stated that he told the two players that the information they provided was all he needed to know and that he did not need to hear more.⁴⁸⁵ Vincent stated that he told the two players that he would alert the appropriate people who could handle the situation.⁴⁸⁶ When interviewed, Black Ace 1 categorically denied ever having a sexual encounter with Aldrich or speaking to Vincent about Aldrich at any time.⁴⁸⁷

Vincent said that after he spoke to the two players, he approached Jim Gary and Brian Higgins—a United Center security person—while the team was in San Jose.⁴⁸⁸ Vincent said that he shared with Gary and Higgins what the two

players told him regarding Aldrich, and stated to us that he was particularly confident he had spoken to Higgins.⁴⁸⁹ Vincent further stated that he was asked to join a meeting with McDonough, Bowman, MacIsaac, and Gary in a meeting room at the team hotel in San Jose.⁴⁹⁰ He stated that he told the group what the two players told him regarding Aldrich.⁴⁹¹ Vincent stated that MacIsaac said they were handling the situation, and that Vincent told the group that they should call the Chicago Police Department and have the police quietly investigate.⁴⁹² Vincent said that MacIsaac told Vincent not to worry about the situation and that he could leave the meeting.⁴⁹³

Vincent said that after he left the meeting, he told two assistant coaches about the situation before heading to dinner.⁴⁹⁴ One of the assistant coaches told us that Vincent did not raise issues with him regarding Aldrich or a meeting with management in San Jose, and stated that he would have recalled such a conversation had it occurred.⁴⁹⁵ The second assistant coach, John Torchetti, did not respond to our requests to be interviewed. Torchetti informed a reporter in 2021 that, during the 2010 playoffs, Vincent told him about two players confiding in Vincent regarding Aldrich, and that Vincent alerted management.⁴⁹⁶ Boynton and Sopel told us that Vincent reported to them in 2010 that he had informed management of the situation involving Aldrich.⁴⁹⁷

Vincent's account is directly contradicted by witnesses and records from May 2010. Brian Higgins—by all accounts and as proven by contemporaneous records—was not in San Jose in May 2010 and stated that he never had a conversation with Vincent about Aldrich or John Doe.⁴⁹⁸ All of the individuals who Vincent stated he met with at the team hotel in San Jose stated unequivocally that they did not meet with Vincent about Aldrich when the team was in San Jose or at any time thereafter.⁴⁹⁹ And, as noted above, one of the assistant coaches Vincent stated he told of the incident and meeting with management denied Vincent spoke to him about either event. Based on our investigation, we could not conclude that Vincent took the information that John Doe provided to Vincent in San Jose and shared it with management.

The next section describes in detail the action, and inaction, by the Blackhawks regarding Aldrich in the days and weeks that followed the May 23, 2010 meeting.

VIII. The Blackhawks' Response During the 2010 Playoffs and Later

In this section, we describe the events that followed the May 23 meeting. We note that for three weeks (May 23 to June 14), it appears that no action was taken by senior management of the Blackhawks to learn more, to notify Human Resources, to communicate with John Doe about the incident, to separate Aldrich from the players, or to address the information Gary received on May 23. On June 14, five days after the Blackhawks won the Stanley Cup, according to the Director of Human Resources, John McDonough informed her about the situation.⁵⁰⁰ After the conversation with McDonough, according to the Director of Human Resources, she spoke to Gary and MacIsaac, and then met with Aldrich.⁵⁰¹ During the meeting with Aldrich, the Director of Human Resources and the Blackhawks' outside counsel gave Aldrich the option to undergo an investigation or resign, and Aldrich chose to resign.⁵⁰² No further investigation was conducted.

A. The Stanley Cup Finals

From May 23, 2010 until June 14, 2010, Aldrich continued to serve as the Blackhawks' video coach, traveled with the team to Philadelphia for games in the Stanley Cup Finals, and otherwise participated in team activities. The Black Aces, including John Doe, continued to practice and watch playoff games, and traveled to Philadelphia for Game 6, the last game of the Stanley Cup Finals. We found no evidence that steps were taken to learn more about the incident involving Aldrich or to discuss the issue with John Doe or with Aldrich. We found no evidence that there were discussions about whether it was appropriate, based on the information known at the time, to limit Aldrich's contacts with Black Aces, Blackhawks players, or Blackhawks personnel. We found no evidence that the Blackhawks' Human Resources Department was contacted about the incident, that an investigation was initiated, or that any other steps were taken to pursue the information known at the time.⁵⁰³

McDonough stated when interviewed that, after everyone dispersed from the May 23 meeting in his office, he did not recall discussing the issue involving Aldrich ever again.⁵⁰⁴ Bowman recalled MacIsaac informing him on May 24 that Employee A was the individual who brought information about Aldrich to MacIsaac in the first instance.⁵⁰⁵ Bowman recalled no other conversations about Aldrich and John Doe during the playoffs.⁵⁰⁶ MacIsaac stated when

interviewed that he did not recall having any additional conversations about Aldrich after May 23.⁵⁰⁷

Gary recalled speaking to John Doe again on May 24 or May 25.⁵⁰⁸ Gary recalled telling John Doe about the May 23 meeting in McDonough's office, that the Blackhawks would be investigating, and that Gary would let John Doe know the outcome.⁵⁰⁹ Gary also recalled telling John Doe that the Director of Human Resources would likely call John Doe about the investigation.⁵¹⁰ Gary explained when interviewed that he wanted to give John Doe some sense of relief that the Blackhawks were working on the issue.⁵¹¹ Gary recalled that, during this conversation, John Doe told him that he thought Aldrich knew something "was up" because Aldrich was no longer looking at John Doe or speaking to John Doe.⁵¹² Gary recalled that John Doe reiterated that he did not want to be around Aldrich.⁵¹³

Gary also recalled that several days after he first attempted to speak to Black Ace 1 on May 23, he had a second conversation with Black Ace 1.⁵¹⁴ Gary recalled the conversation again taking place in the hallway of the United Center.⁵¹⁵ Gary stated that he again asked Black Ace 1 if he had information regarding Aldrich pressuring him or others sexually, and Black Ace 1 said "no" and walked away.⁵¹⁶ Gary recalled that this was the last time he attempted to directly discuss this issue with Black Ace 1.⁵¹⁷

The Blackhawks played against the Philadelphia Flyers in the Stanley Cup Finals between May 29 and June 9.⁵¹⁸ On June 9, 2010, the Blackhawks won the Stanley Cup.⁵¹⁹

B. After the Stanley Cup Finals

Several witnesses recalled that Aldrich, who had not yet been investigated or separated from the Blackhawks, celebrated with the team in the days following the Stanley Cup win, including on June 10 when the team traveled around Chicago with the Stanley Cup.⁵²⁰ Photographs corroborate that Aldrich participated in celebrations when the team won the Stanley Cup and in the days that followed (*see Appendix*). John Doe recalled that, after the team won the Stanley Cup, he saw Aldrich on the ice and in the locker room celebrating with the team.⁵²¹ John Doe stated that seeing Aldrich in these two places indicated to him that nothing had been done to separate Aldrich from the players after John Doe told Gary what occurred between Aldrich and him.⁵²²

1. Aldrich Touches A Blackhawks Employee

One Front Office paid intern, a male employee who was twenty-two years old at the time, recalled when interviewed that Aldrich texted him to meet Aldrich and the Blackhawks team for celebrations in downtown Chicago on the evening of June 10.⁵²³ The employee recalled that he met Aldrich at the Haymarket bar on Randolph Street at 8 or 9 p.m.⁵²⁴ After about an hour, the employee recalled traveling with Aldrich and two Blackhawks players in a car to Stanley's, a bar in the Lincoln Park neighborhood of Chicago, staying for an hour, and then traveling to a third bar in the Wrigleyville neighborhood of Chicago.⁵²⁵ The employee recalled that, at around 1 a.m., he shared a taxi with Aldrich and a third person.⁵²⁶ The taxi dropped the third person off first, and then went to Aldrich's apartment building to drop off Aldrich.⁵²⁷

The employee recalled that when he and Aldrich arrived at Aldrich's apartment building, Aldrich asked if the employee wanted to go upstairs to Aldrich's apartment for a drink.⁵²⁸ The employee recalled saying "no."⁵²⁹ The employee recalled Aldrich asking the employee a second time if the employee wanted to go upstairs to Aldrich's apartment for a drink, which the employee again declined.⁵³⁰ Then, the employee recalled that Aldrich put his hand on the employee's "crotch" at the same time that he asked, in a suggestive manner, if the employee wanted to go upstairs.⁵³¹ The employee stated that Aldrich did not mention anything about a drink during this third statement, and it was clear to the employee that the request was sexual in nature.⁵³² The employee recalled responding "What the fuck?! No."⁵³³ The employee recalled that Aldrich then threw money down for the taxi and went into his apartment building.⁵³⁴ The employee continued to his residence in the taxi.⁵³⁵ Four other entry-level Front Office employees recalled the employee telling them directly in 2010 that Aldrich propositioned this employee while the two were in a taxi.⁵³⁶ Five other Front Office employees recalled hearing about the incident from others in 2010.⁵³⁷ We uncovered no evidence that any of these nine employees reported the incident to Human Resources.

When interviewed, the employee recalled texting Aldrich when he woke up the next morning and questioning Aldrich's actions in the taxi.⁵³⁸ The employee recalled that Aldrich apologized and said he was drunk, that "no one knows, please don't tell," and that "people like me kill themselves where I'm from."⁵³⁹ The employee understood that Aldrich was coming out to him as

gay.⁵⁴⁰ The employee recalled that he felt bad for Aldrich.⁵⁴¹ The employee recalled that his response to Aldrich was that he would not tell anyone.⁵⁴²

The employee stated when interviewed that he did not feel the need to report the incident to the Blackhawks, where he was still employed at the time, and in fact did not report the incident to Human Resources or anyone in senior management.⁵⁴³ The employee further explained that Aldrich apologized and the employee “chalked it up to a drunken mistake.”⁵⁴⁴ The employee also recalled that he did not want to say anything about Aldrich’s proposition to anyone, including to Blackhawks management, because the employee knew that Aldrich’s father worked for the San Jose Sharks.⁵⁴⁵ The employee wanted to ensure that Aldrich would serve as a reference for him for future employment in the hockey industry and did not want to risk Aldrich or Aldrich’s father being an issue for a future job.⁵⁴⁶

The employee further stated when interviewed that, after the incident, he told a fellow entry-level Front Office employee what happened in the taxi with Aldrich and how Aldrich had “come on to” him.⁵⁴⁷ The employee stated that his relationship with Aldrich was awkward for some time after the incident, but that they continued to frequent bars along with other Front Office employees.⁵⁴⁸ In the early fall of 2010, at Aldrich’s invitation, the employee along with one other employee traveled to Houghton, Michigan to participate in Aldrich hosting the Stanley Cup in Aldrich’s hometown.⁵⁴⁹

Aldrich stated that, while he remembered traveling with the Stanley Cup around Chicago on June 10, 2010, and while he did not deny that an interaction with this employee occurred, he did not recall taking a taxi home with a Front Office intern, propositioning or grabbing an employee in a sexual manner while in the taxi, or having a conversation with an employee about his sexual orientation.⁵⁵⁰

On June 11, a parade was held in Chicago in honor of the Blackhawks’ Stanley Cup win.⁵⁵¹ John Doe recalled seeing Aldrich at the parade.⁵⁵²

2. Actions by Human Resources

On Monday, June 14, 2010, the Director of Human Resources was in her office for her first full day since the Blackhawks won the Stanley Cup five days earlier.⁵⁵³ According to the Director of Human Resources, McDonough called her into his office and informed her for the first time of an issue involving

Aldrich that he stated he had learned about a few weeks earlier.⁵⁵⁴ This conversation is described in detail above, in Section VII.B.5. At the end of the meeting, the Director of Human Resources recalled, McDonough told her to speak to Gary and MacIsaac.⁵⁵⁵

The Director of Human Resources next recalled contacting Gary.⁵⁵⁶ The Director of Human Resources stated that Gary served as her conduit for information and she never spoke directly to John Doe.⁵⁵⁷ Phone records reflect at least one call between the Director of Human Resources and Gary on June 14, 2010.⁵⁵⁸ The Director of Human Resources did not recall what Gary told her about the allegations other than unwanted sexual advances were made by Aldrich.⁵⁵⁹ The Director of Human Resources stated that she believed that Gary told her that Black Ace 1 was reluctant to talk about Aldrich.⁵⁶⁰ The Director of Human Resources also stated that she believed Gary told John Doe during the week of June 14 that the Blackhawks were addressing the issue with Aldrich.⁵⁶¹

The Director of Human Resources also recalled that she spoke to MacIsaac on June 14, when he told her that Employee A told MacIsaac about an issue regarding Aldrich.⁵⁶² The Director of Human Resources recalled MacIsaac explaining to her that Employee A came to his office prior to a home playoff game and told MacIsaac that he should speak with two Black Aces.⁵⁶³ The Director of Human Resources recalled MacIsaac stating that he had enlisted Gary to talk to the Black Aces because of Gary's relationship with the players.⁵⁶⁴ The Director of Human Resources further recalled MacIsaac telling her that Gary spoke to the players, including John Doe.⁵⁶⁵ The Director of Human Resources recalled learning from Gary and MacIsaac that after Gary spoke with the two players, he reported what he had learned to Bowman and MacIsaac in the executive game suite at the United Center.⁵⁶⁶ The Director of Human Resources recalled learning that, after Game 4 on May 23, Bowman, MacIsaac, and Gary brought the issue to McDonough.⁵⁶⁷ When interviewed, MacIsaac stated that he did not recall speaking with the Director of Human Resources about Aldrich in June 2010.⁵⁶⁸

On June 15, the Director of Human Resources called Aldrich.⁵⁶⁹ Aldrich recalled that he was in Houghton, Michigan at the time, and the Director of Human Resources said that she needed to meet with him immediately.⁵⁷⁰

3. Aldrich's Separation from the Blackhawks Organization

On the morning of June 16, 2010, Aldrich met with the Director of Human Resources⁵⁷¹ and the Blackhawks' outside counsel, whom the Director of Human Resources had informed about the situation.ⁿ The Director of Human Resources told Aldrich that there was an allegation against him by a player regarding an unwanted sexual advance.⁵⁷² The Director of Human Resources recalled that either she or the outside counsel stated that they wanted to know Aldrich's side of the story.⁵⁷³ The Director of Human Resources could not recall if John Doe's name was referenced nor did she recall any other details of what was said to Aldrich about the allegations.⁵⁷⁴ The outside counsel recalled that Aldrich was told there was an allegation that Aldrich was hitting on John Doe.⁵⁷⁵

The Director of Human Resources recalled that, upon hearing about the allegation against him, Aldrich immediately shut down, became emotional, and cried.⁵⁷⁶ The Director of Human Resources stated that Aldrich did not admit or deny the allegation; the outside counsel stated that Aldrich denied the allegation.⁵⁷⁷ The Director of Human Resources recalled telling Aldrich that he had two options, which in her view were that Aldrich could take a leave of absence while the Blackhawks conducted a formal investigation of the allegation, or Aldrich could resign.⁵⁷⁸ The outside counsel recalled telling Aldrich that the Blackhawks would need to conduct a full investigation, and if the allegation was proven accurate, Aldrich would likely be discharged.⁵⁷⁹ The Director of Human Resources next recalled that Aldrich responded that he did not want an investigation and that he asked to resign.⁵⁸⁰

Aldrich recalled that the conversation with the Director of Human Resources and the outside counsel was very short.⁵⁸¹ He recalled the Director of Human Resources explaining that there was an allegation of an inappropriate relationship or conduct with a player.⁵⁸² Aldrich stated that he immediately knew that the allegation had to do with John Doe, as John Doe was the only

ⁿ The Blackhawks did not have an internal legal function at the time. The Blackhawks' outside counsel at the time was asked to be involved in certain issues, including the separation of employees. The outside counsel who was involved in Aldrich's separation searched for but did not locate records relevant to Aldrich or specifically to Aldrich's separation.

player with whom Aldrich had a sexual encounter.⁵⁸³ Aldrich recalled that the Director of Human Resources stated that Aldrich could take a leave of absence while the Blackhawks investigated the allegation or Aldrich could sign a separation agreement and leave the Blackhawks.⁵⁸⁴ Aldrich stated that he believed his sexual orientation would be revealed if he chose the investigation and so he chose to sign the agreement and leave the Blackhawks.⁵⁸⁵

The Director of Human Resources recalled sitting with Aldrich while the outside counsel left the room to prepare the separation agreement.⁵⁸⁶ The Director of Human Resources recalled that, while she sat with Aldrich, he was emotional and sad.⁵⁸⁷ Aldrich recalled that the separation agreement was already on the table when he arrived for the meeting and the outside counsel walked through the agreement with him.⁵⁸⁸ The agreement included a provision stating that Aldrich agreed not to contact or otherwise communicate with any of the Blackhawks' managers, coaches, or players, including managers, coaches, and players employed by the Blackhawks' American Hockey League affiliate, "regarding any of the facts and matters relating in any manner to the reasons for the separation of employment."⁵⁸⁹

Aldrich recalled asking how long the Blackhawks would continue to pay him.⁵⁹⁰ Aldrich was paid through August 31, 2010; received \$20,622, less taxes and withholding, in severance; and received a \$15,000 playoff bonus.⁵⁹¹ The Director of Human Resources and Aldrich both recalled that, during the meeting, Aldrich requested to partake in the tradition of hosting the Stanley Cup for a day.⁵⁹² The Director of Human Resources recalled granting the request during the meeting.⁵⁹³

The Director of Human Resources stated when interviewed that she could not recall informing McDonough or MacIsaac about Aldrich's departure, but assumed she informed each of them and believed she personally informed Quenneville.⁵⁹⁴ When interviewed, McDonough stated that he was not aware of when or why Aldrich left the Blackhawks, and stated that he assumed it was a coaching decision.⁵⁹⁵ MacIsaac stated when interviewed that he was not involved in the decision regarding Aldrich's separation and did not know whether Aldrich was terminated or left on his own accord.⁵⁹⁶ Quenneville stated that he was not involved in discussions about Aldrich's separation and he did not know the circumstances of Aldrich's separation.⁵⁹⁷

Gary recalled that the Director of Human Resources told him that Aldrich was no longer with the Blackhawks and that he could inform John Doe that Aldrich was not allowed to see or communicate with any player or staff member.⁵⁹⁸ Gary recalled that when he called John Doe and told him the news about Aldrich, John Doe seemed relieved and stated that he did not want to ever see Aldrich again.⁵⁹⁹ John Doe also recalled a conversation with Gary about Aldrich's separation.⁶⁰⁰ John Doe recalled that Gary said during the conversation that he believed John Doe.⁶⁰¹ John Doe recalled Gary saying that John Doe would never see Aldrich again, and that Aldrich would never contact John Doe again.⁶⁰² John Doe further recalled that Gary said that the Blackhawks had given Aldrich the option to quit or the Blackhawks would conduct an investigation and Aldrich chose to quit.⁶⁰³

The next section describes events that occurred after Aldrich's separation from the Blackhawks.

IX. Events that Occurred After Aldrich's Separation from the Blackhawks

A. Brad Aldrich

Soon after Aldrich's separation, witnesses recalled seeing Aldrich during a cleanout day in the locker room and hearing him tell players that he was leaving the Blackhawks.⁶⁰⁴ One employee overheard Aldrich saying that he was leaving because he was having a hard time with all of the travel.⁶⁰⁵ A former player recalled Aldrich telling him in the hallway of the United Center on cleanout day that he was leaving the Blackhawks to go home and to be closer to family, and that he did not like to travel.⁶⁰⁶ On another occasion, a former employee recalled Aldrich saying that he was leaving the Blackhawks because he did not like to travel and the NHL "grind" was too hard on him.⁶⁰⁷

Despite his separation, Aldrich continued to participate in activities related to the Blackhawks' Stanley Cup win. He attended a Stanley Cup party at the home of a Blackhawks trainer in Illinois, where he socialized with Blackhawks trainers.⁶⁰⁸ In September 2010, Aldrich's name was engraved on the Stanley Cup along with the other coaches and players' names.⁶⁰⁹ As noted above, the Director of Human Resources agreed to allow Aldrich to host the Stanley Cup for one day in his hometown of Houghton, Michigan.⁶¹⁰ Two Blackhawks

employees, who said they were unaware of John Doe's allegation regarding Aldrich at the time they prepared the schedule of days for hosting the Cup, worked with the Hockey Hall of Fame on the schedule.⁶¹¹ On September 14, 2010, Aldrich brought the Stanley Cup to his hometown of Houghton, Michigan.⁶¹² Aldrich recalled that he received the Cup on a Monday night and took the Cup to a local bar in Houghton.⁶¹³ Aldrich stated that, the next morning, he took the Cup to the local high school, around town, to dinner at his family's home, and finally to a party at the local ice rink.⁶¹⁴ Aldrich recalled that two Blackhawks employees traveled to Houghton, including the employee who recalled the taxi incident on June 10.⁶¹⁵ The two employees accompanied Aldrich around Houghton with the Stanley Cup.⁶¹⁶ A few weeks later, on October 9, 2010, Aldrich attended a ceremony at the United Center, during which the Stanley Cup banner was raised in the arena.⁶¹⁷ On that day, Aldrich recalled that he went to MacIsaac's office and MacIsaac handed Aldrich his Stanley Cup ring.⁶¹⁸

In the months and years that followed, rumors about an incident or incidents involving Aldrich and one or more players were prevalent in the Front Office and among the players.⁶¹⁹ We are not including every rumor that was reported to us regarding Aldrich in this report. Certain rumors not only lacked corroboration, but also lacked any plausibility. There were, however, some rumors that were consistent with actual events. Blackhawks and IceHogs players recalled hearing rumors about an incident involving Aldrich and John Doe, or more generally an incident involving Aldrich and a player or players. Specifically, several witnesses, including Front Office personnel and players, recalled hearing rumors that Aldrich sent inappropriate text messages, was involved in a "threesome" with a player, invited a player to come to his hotel room, asked players to give him a "hand job," and attempted to receive or perform oral sex on a player.⁶²⁰

After leaving his employment with the Blackhawks, Aldrich went on to work and volunteer at USA Hockey, the University of Notre Dame, Miami University of Ohio, and Houghton High School.⁶²¹ None of the witnesses we interviewed recalled anyone at the Blackhawks providing a written or verbal reference for Aldrich to his future employers. When interviewed, Aldrich stated that he did not list any Blackhawks employees as references on job applications, nor did he ask anyone from the Blackhawks to vouch for him or make any calls on his behalf.⁶²² USA Hockey reported to us that they identified no records reflecting

a reference provided for Aldrich by the Blackhawks.⁶²³ We gathered records from Miami University regarding Aldrich's employment and found no evidence of references, whether written or oral, provided by the Blackhawks. Miami University published an investigative report on September 24, 2021, which stated that Aldrich did not provide references on his resume when he applied to Miami, that the then-head coach of Miami University's hockey team received Aldrich's name from the coach's collegiate hockey connections, and that the head coach and others spoke to the University of Notre Dame about Aldrich and received favorable information.⁶²⁴ The Miami investigative report does not describe any references provided by the Blackhawks.⁶²⁵ The University of Notre Dame declined to share information or records with us, other than to confirm Aldrich's dates of employment at the university.

Houghton High School reported to us that they identified no records reflecting a reference provided for Aldrich by the Blackhawks.⁶²⁶ The head hockey coach at Houghton High School told us that Aldrich did not formally apply for volunteer hockey coaching positions in 2010 and 2012.⁶²⁷ The head coach explained that Aldrich's uncle, who was the assistant coach in 2010, had told the head coach that Aldrich was not working and asked if the team could help Aldrich.⁶²⁸ In 2012, the team re-hired Aldrich as a volunteer based on his work as a volunteer in 2010.⁶²⁹ The head coach said that he did not contact the Blackhawks about Aldrich at any time.⁶³⁰

In March 2012, Aldrich visited the United Center for a Blackhawks game.⁶³¹ After the game, he went downstairs to the talent hallway (which included a door to the locker room) and was told by security to leave.⁶³² Aldrich recalled that the Director of Human Resources subsequently called him and told him that he could not visit the talent hallway again.⁶³³ The Director of Human Resources also recalled this event, as well as sending an email in which she told MacIsaac that Aldrich attempted to contact players and obtain access to the talent hallway, and that "both [were] unacceptable."⁶³⁴

In September 2013, the Director of Human Resources was contacted by the Houghton, Michigan Police Department.⁶³⁵ A detective stated that the police were investigating Aldrich because Aldrich was suspected in a criminal sexual assault.⁶³⁶ The Director of Human Resources recalled the detective telling her that the police heard that there were "hang ups" with males affiliated with the Blackhawks.⁶³⁷ The Director of Human Resources recalled telling the Houghton detective that Aldrich had resigned, but that she could not provide

more details over the phone.⁶³⁸ The Director of Human Resources further recalled that she told the detective that, if served with a subpoena, she would cooperate.⁶³⁹ The Director of Human Resources stated that she did not recall hearing from the detective again.⁶⁴⁰

In October 2013, Aldrich was arrested and charged in Houghton, Michigan with third and fourth degree criminal sexual conduct involving a minor.⁶⁴¹ In December 2013, Aldrich pled guilty to fourth degree criminal sexual conduct involving a minor.⁶⁴² In 2014, Aldrich was sentenced to serve nine months in jail and five years of probation.⁶⁴³

B. John Doe

After the 2010 Stanley Cup win, John Doe continued to be under contract with the Blackhawks and played for the Rockford IceHogs. During the summer of 2010 and the 2010-2011 pre-season and regular season, John Doe had several additional conversations with Jim Gary and recalled being subjected to rumors and derogatory comments.⁶⁴⁴ When interviewed, Gary recalled that at the September 2010 Blackhawks training camp, he told John Doe that he could help find John Doe a therapist unaffiliated with the Blackhawks.⁶⁴⁵ Gary recalled that John Doe did not seem interested in Gary's suggestion.^{o, 646} John Doe recalled that during the training camp, multiple players called John Doe derogatory words and asked if John Doe missed "his boyfriend Brad."⁶⁴⁷ None

^o John Doe provided us with several 2009 and 2010 emails from Gary to John Doe and other Blackhawks players, including, for example, Gary's requests to John Doe to schedule meetings. Certain of the emails from Gary to John Doe included pictures of naked women, crude jokes of an explicit sexual nature, and at least one email which had homophobic undertones. According to Gary, he sometimes used what he regarded as juvenile sexual humor as part of an effort to engage with the young male players in order to encourage them to receive mental skills coaching and counseling from him. Gary stated that he believed that using this type of humor would be effective in forming a connection with John Doe.

of the players interviewed during our investigation admitted to making or hearing about these or similar statements.

Gary recalled a counseling session with John Doe at Gary's private office during the 2010-2011 season.⁶⁴⁸ Gary recalled that John Doe did not seem interested in speaking about Aldrich.⁶⁴⁹ Gary recalled that he told John Doe to contact the Director of Human Resources if Aldrich tried to contact him.⁶⁵⁰

John Doe also recalled counseling sessions with Gary at Gary's private office, but had a different memory of the tone and content of the sessions.⁶⁵¹ John Doe recalled that the sessions were mandated by the Blackhawks and that he spoke to Gary about his girlfriend and hockey.⁶⁵² During the last session, John Doe recalled that Gary said John Doe was partially at fault for what happened between John Doe and Aldrich.⁶⁵³ John Doe recalled Gary saying that he put himself in the situation and John Doe knew he should not have gone to Aldrich's apartment.⁶⁵⁴ John Doe recalled telling Gary that Gary was protecting the Blackhawks and Aldrich.⁶⁵⁵ John Doe recalled that Gary was upset by this comment, asked John Doe how he could think that, and told John Doe that he had been doing his job for years.⁶⁵⁶

When John Doe learned that Aldrich was working with USA Hockey in late 2010, he called his confidant.^{p, 657} When interviewed, the confidant recalled that John Doe was upset that Aldrich appeared to have a position with USA Hockey.⁶⁵⁸ The confidant recalled John Doe stating that whether he was at fault or not for what had occurred to him, John Doe did not want Aldrich "doing this" to other people, in particular "kids," and asked the confidant to help.⁶⁵⁹ The confidant recalled contacting Bowman, MacIsaac, or both, for a second time in late 2010 or early 2011 regarding Aldrich's work with USA Hockey.⁶⁶⁰

The confidant also recalled contacting Donald Fehr, who had recently been named as Executive Director of the NHLPA.⁶⁶¹ The confidant recalled telling Fehr that he was apologetic that they were speaking for the first time under unfortunate circumstances.⁶⁶² The confidant recalled telling Fehr that he was calling about an individual who was not a member of the NHLPA but who

^p Aldrich was working with the staff of one of the USA Hockey-affiliated teams playing in the International Ice Hockey Foundation World Junior Championship, which ran from December 26, 2010 through January 5, 2011.

experienced an incident with a coach who was now working with USA Hockey.⁶⁶³ The confidant recalled that Fehr responded that he knew people at USA Hockey, that the NHLPA would look into the situation, and that the NHLPA could offer support.⁶⁶⁴ The confidant recalled that Fehr suggested that the individual could speak to an NHLPA-affiliated therapist even though the individual was not an NHLPA member.⁶⁶⁵ When interviewed, Fehr stated that he did not recall a conversation with John Doe's confidant, although he did not deny that such a conversation occurred.⁶⁶⁶

The confidant further recalled that John Doe met with the NHLPA-affiliated therapist.⁶⁶⁷ John Doe confirmed during his interview that his confidant contacted the NHLPA in the fall of 2010 and put him in touch with the NHLPA-affiliated therapist.⁶⁶⁸ We contacted the NHLPA-affiliated therapist, who confirmed that he met or spoke with John Doe at least once, but stated that he did not have any records related to John Doe or any recollection of the meeting.⁶⁶⁹

The confidant also recalled when interviewed that he spoke to the professional acquaintance of Black Ace 1.⁶⁷⁰ John Doe's confidant recalled telling Black Ace 1's acquaintance in vague terms about John Doe and Aldrich.⁶⁷¹ When interviewed, Black Ace 1's acquaintance also recalled having a conversation with John Doe's confidant, but he did not remember what John Doe's confidant said to him.⁶⁷² Black Ace 1's acquaintance further recalled knowing about a text message from Aldrich suggesting that if John Doe or Black Ace 1 did not spend more time with Aldrich, Aldrich would negatively impact the player's career.⁶⁷³ Black Ace 1's acquaintance was not certain whether the text message was sent to John Doe or Black Ace 1.⁶⁷⁴

As described in Section VI.G., Black Ace 1's acquaintance contacted the NHL Players' Association in April 2011.⁶⁷⁵ In an email from Black Ace 1's acquaintance to the Executive Director of the NHLPA, Donald Fehr, the acquaintance wrote, "I know you have spoken with [John Doe's confidant] regarding an incident with [John Doe] and a Chicago staff member during the Stanley Cup Playoffs last year."⁶⁷⁶ Fehr stated during an interview that he did not recall a conversation with either John Doe's confidant or Black Ace 1's acquaintance, although he did not deny that such conversations occurred.⁶⁷⁷ Regardless, this email corroborates that John Doe's confidant contacted Fehr regarding Aldrich and John Doe. Black Ace 1's acquaintance also told us that Black Ace 1 spoke with the same NHLPA-affiliated therapist with whom John

Doe spoke.⁶⁷⁸ The therapist, however, did not recall speaking with or have any records related to Black Ace 1.⁶⁷⁹

X. Conclusion

In May 2010, a sexual encounter involving John Doe and Brad Aldrich occurred at Aldrich's apartment in Chicago. John Doe stated that the encounter was not consensual and was a sexual assault. Brad Aldrich stated that the encounter was consensual. In the days and weeks that followed, John Doe shared information about the encounter with his confidant; the Blackhawks' skating coach (Paul Vincent); and the Blackhawks' mental skills coach (Jim Gary), who was dispatched by Al MacIsaac to speak to John Doe. Gary took information he recalled receiving from John Doe to the senior leaders of the Blackhawks organization.

There are multiple accounts of what occurred during the meeting of those senior leaders at the United Center on May 23, 2010. Gary stated that he shared with the senior leaders that Aldrich was pressuring John Doe for sex and threatening to harm John Doe's career if John Doe did not comply. Others recall Gary's comments as less stark—that Aldrich had tried to “get under the sheets” with John Doe. At a minimum, the senior leaders, including then-President John McDonough, were informed of alleged sexual harassment of a player by a coach, including efforts by the coach to engage in unwelcome sexual activity with that player. Several witnesses recalled or later told others about a discussion that ensued during the meeting regarding whether the time was right to address the allegations against Aldrich in light of the need to protect team chemistry and avoid bad publicity during the ongoing playoffs.

What is clear is that, after being informed of Aldrich's alleged sexual harassment and misconduct with a player, no action was taken for three weeks. One witness recalled that the decision on how to proceed was left in McDonough's hands and another witness recalled McDonough saying he would speak to John Doe. McDonough did nothing to address the allegations until June 14, when he reported the information to the Director of Human Resources. While there was a lack of recollection as to whether anyone else present in the meeting besides McDonough needed to or would take any additional steps, nothing was done by the other senior leaders to address the situation.

As a result, the Blackhawks' own sexual harassment policy—which required investigation of all reports of sexual harassment to be conducted “promptly and thoroughly”—was violated. The failure to promptly and thoroughly investigate the matter and the decision to take no action from May 23 to June 14 had consequences. During that period, Aldrich continued to work with and travel with the team. Aldrich engaged in an unwanted sexual advance on a Blackhawks intern—physically grabbing the intern in a sexual manner. And Aldrich continued to participate in team activities and celebrations, in the presence of John Doe.

Even after the allegations were finally reported to the Director of Human Resources, still no investigation occurred, and Aldrich was permitted to resign his position and to continue participating in Stanley Cup victory events.

Appendix

Photo Credits: Chicago Blackhawks

June 9, 2010: Brad Aldrich with the Stanley Cup



June 9, 2010

From left: Paul Vincent; John Torchetti; Stephane Waite; Joel Quenneville;
Mike Haviland; Brad Aldrich.



June 11, 2010: Stanley Cup Parade in Chicago

From left: Al MacIsaac; John McDonough; Brad Aldrich; Paul Vincent.



June 13, 2010: The Stanley Cup at Wrigley Field in Chicago; Aldrich identified with green circle.



Endnotes

¹ Complaint, *John Doe v. Chicago Blackhawks Hockey Team, Inc.*, No. 2021 L 004728 (Cook Cnty. Cir. Ct. May 7, 2021) (“Doe (1) Complaint”).

² Doe (1) Complaint, Count I, ¶¶ 1-12; Count II, ¶¶ 1-15; Count III, ¶¶ 1-9.

³ First Amended Complaint, *John Doe v. Chicago Blackhawks Hockey Team, Inc.*, No. 2021 L 004728 (Cook Cnty. Cir. Ct. July 22, 2021), Allegations Common to All Counts, ¶¶ 4-12; Count I (Negligent Hiring and Retention); Count II (Negligent Supervision); Count III (Willful and Wanton Conduct); Count IV (Strict Liability - Illinois Human Rights Act); Count V (Intentional Infliction of Emotional Distress) (“Doe (1) First Amended Complaint”).

⁴ Complaint, *John Doe (2) v. Chicago Blackhawks Hockey Team, Inc.*, No. 2021 L 005435 (Cook Cnty. Cir. Ct., May 26, 2021) (“Doe (2) Complaint”).

⁵ Doe (2) Complaint, Count I, ¶¶ 1-11; Count II, ¶¶ 1-11.

⁶ Doe (2) Complaint, Counts I-II, ¶ 1.

⁷ First Amended Complaint, *John Doe (2) v. Chicago Blackhawks Hockey Team, Inc.*, No. 2021 L 005435 (Cook Cnty. Cir. Ct. July 22, 2021), Count I (Negligence); Count II (Willful and Wanton Conduct).

⁸ C.A. Morgan III, Steven Southwick, George Steffian, Gary Hazlett, and Elizabeth Loftus, *Misinformation can influence memory for recently experienced, highly stressful events*, INTERNATIONAL JOURNAL OF LAW AND PSYCHIATRY, Jan.–Feb. 2013, at 2.

⁹ Raymond S. Nickerson, *Confirmation Bias: A Ubiquitous Phenomenon in Many Guises*, 2 REVIEW OF GENERAL PSYCHOLOGY, no. 2, 1998, at 175.

¹⁰ Neal J. Roese and Kathleen D. Vohs, *Hindsight Bias*, 7 PERSPECTIVES ON PSYCHOLOGICAL SCIENCE, no. 5, 2012, at 411.

¹¹ Jenner & Block Interview of S. Bowman on August 12, 2021.

¹² Jenner & Block Interview of S. Bowman on August 12, 2021.

¹³ Jenner & Block Interview of A. MacIsaac on August 10, 2021.

¹⁴ Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.

¹⁵ Jenner & Block Interview of J. Gary on September 9, 2021.

¹⁶ Jenner & Block Interview of J. Gary on September 9, 2021.

¹⁷ Jenner & Block Interview of J. McDonough on August 10, 2021.

¹⁸ Jenner & Block Interview of J. McDonough on August 10, 2021.

¹⁹ Jenner & Block Interview of Witness on September 2, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 19, 2021; Jenner & Block Interview of K. Cheveldayoff on August 5, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 19, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 26, 2021; Jenner & Block Interview of J. Quenneville on July 20, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on August 3, 2021; Jenner & Block Interview of Witness on August 9, 2021; Jenner & Block Interview of Witness on September 22, 2021.

²⁰ Jenner & Block Interview of J. McDonough on August 10, 2021.

²¹ Jenner & Block Interview of J. McDonough on August 10, 2021.

²² *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 5(b)(i)-(iii); Jenner & Block Interview of Director of Human Resources on July 1, 2021.

²³ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 5(b)(i)-(iii).

²⁴ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 6(y).

²⁵ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 6(y).

²⁶ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 6(y).

²⁷ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 6(y).

²⁸ *Chicago Blackhawks Hockey Team, Team Member Handbook*, November 2005, ¶ 6(y).

²⁹ Chicago Blackhawks Hockey Team Rules, 2009-2010; October 1, 2021 Email from Witness to Jenner & Block.

³⁰ Chicago Blackhawks Hockey Team Rules, 2009-2010; October 1, 2021 Email from Witness to Jenner & Block.

³¹ *See, e.g.*, Jenner & Block Interview of Witness on September 19, 2021; Jenner & Block Interview of J. McDonough on August 10, 2021; Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on August 10, 2021; Jenner & Block Interview of Witness on August 18, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on August 6, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on August 9, 2021; Jenner & Block Interview of Witness on August 10, 2021; Jenner & Block Interview of Witness on August 25, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 15, 2021; Jenner & Block Interview of Witness on July 19, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 26, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 16, 2021.

³² Blackhawks 2008 Video Coach Job Description; Jenner & Block Interview of B. Aldrich on August 21, 2021.

³³ Jenner & Block Interview of Witness on July 13, 2021.

³⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021; Resume of B. Aldrich.

³⁵ Jenner & Block Interview of D. Tallon on August 24, 2021.

³⁶ Jenner & Block Interview of D. Tallon on August 24, 2021.

³⁷ Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of P. Vincent on August 7, 2021.

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- ³⁸ Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- ³⁹ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴¹ Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of S. Bowman on September 24, 2021.
- ⁴² Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of S. Bowman on September 24, 2021.
- ⁴³ Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of S. Bowman on September 24, 2021.
- ⁴⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴⁵ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴⁶ Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- ⁴⁷ Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of J. McDonough on August 10, 2021; Jenner & Block Interview of J. Blunk on July 26, 2021. *See also* Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁴⁹ July 25, 2008 Employment Agreement of B. Aldrich; June 16, 2010 Separation Agreement of B. Aldrich.
- ⁵⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁵¹ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Witness on July 21, 2021.
- ⁵² Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 30, 2021.
- ⁵³ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁵⁴ January 2, 2009 Performance Evaluation of B. Aldrich.
- ⁵⁵ January 2, 2009 Performance Evaluation of B. Aldrich.

⁵⁶ June 3, 2009 Performance Evaluation of B. Aldrich

⁵⁷ June 29, 2010 Performance Evaluation of B. Aldrich.

⁵⁸ Jenner & Block Interview of J. Quenneville on September 27, 2021.

⁵⁹ Jenner & Block Interview of J. Quenneville on September 27, 2021.

⁶⁰ Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 19, 2021; Jenner & Block Interview of Witness on July 19, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 26, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on August 3, 2021; Jenner & Block Interview of Witness on August 9, 2021; Jenner & Block Interview of Witness on August 10, 2021; Jenner & Block Interview of Witness on August 12, 2021; Jenner & Block Interview of Witness on August 11, 2021; Jenner & Block Interview of Witness on July 23, 2021.

⁶¹ Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 26, 2021.

⁶² Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on August 12, 2021; Jenner & Block Interview of Witness on August 26, 2021; Jenner & Block Interview of Witness on July 6, 2021.

⁶³ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of J. Quenneville on September 27, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of Witness on July 6, 2021.

⁶⁴ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 9, 2021.

⁶⁵ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 16, 2021.

⁶⁶ Jenner & Block Interview of Witness on July 29, 2021.

⁶⁷ Jenner & Block Interview of Witness on July 15, 2021; Jenner & Block Interview of Witness on July 22, 2021.

⁶⁸ Jenner & Block Interview of Witness on August 9, 2021.

⁶⁹ Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 13, 2021.

⁷⁰ Jenner & Block Interview of Witness on July 13, 2021.

⁷¹ Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 28, 2021.

⁷² Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of A. MacIsaac on August 10, 2021.

⁷³ Jenner & Block Interview of Witness on July 6, 2021.

⁷⁴ Chris Kuc, *Blackhawks beat Flyers to win Stanley Cup*, CHICAGO TRIBUNE (April 4, 2010), <https://www.chicagotribune.com/sports/blackhawks/ct-xpm-2010-04-04-chi-100404-chicago-blackhawkss-flames-story.html>.

⁷⁵ *2009-10 Blackhawks Schedule and Results*, Hockey Reference, https://www.hockey-reference.com/teams/CHI/2010_games.html (last visited Oct. 10, 2021) (“2010 Blackhawks Schedule”).

⁷⁶ *Blackhawks Recall Eight From Rockford*, Chicago Blackhawks (April 28, 2010), <https://www.nhl.com/blackhawks/news/blackhawks-recall-eight-from-rockford/c-527341>; 2010 Black Aces Per Diem In Chicago.

⁷⁷ *Habs force Caps showdown, Bruins and Chicago win*, REUTERS (April 26, 2010), <https://www.reuters.com/article/us-nhl-playoffs-monday/habs-force-caps-showdown-bruins-and-chicago-win-idUSTRE63Q0HO20100427>; Ammad Omar, *Blackhawks Win; On To Conference Finals*, WBEZ CHICAGO (May 11, 2010), <https://www.wbez.org/stories/blackhawks-win-on-to-conference-finals/b419a693-14a6-46f7-8120-fe60938402c3>; *Blackhawks finish off Sharks, advance to Stanley Cup*, N.Y. POST (May 23, 2010),

<https://nypost.com/2010/05/23/blackhawks-finish-off-sharks-advance-to-stanley-cup/>.

⁷⁸ Chris Kuc, *Blackhawks beat Flyers to win Stanley Cup*, CHICAGO TRIBUNE (June 9, 2010), <https://www.chicagotribune.com/sports/blackhawks/ct-spt-0610-blackhawks-flyers-chicago20100609-story.html>.

⁷⁹ Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2010; Jenner & Block Interview of J. Quenneville on July 20, 2021.

⁸⁰ Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of J. Quenneville on July 20, 2021.

⁸¹ Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of J. Quenneville on July 20, 2021; Jenner & Block Interview of Witness on July 23, 2021.

⁸² Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on August 3, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 23, 2021.

⁸³ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 23, 2021.

⁸⁴ 2010 Playoffs - Round 2 - Vancouver Manifest; 2010 Playoffs - Round 3 - San Jose Manifest; Rockford Staff - Black Aces Coverage.

⁸⁵ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Witness on September 14, 2021; Jenner & Block Interview of Witness on August 16, 2021.

⁸⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁸⁷ Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on September 10, 2021.

⁸⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 29, 2021.

⁸⁹ Jenner & Block Interview of Witness on July 14, 2021.

⁹⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.

⁹¹ Chicago Blackhawks Verizon Phone Records (May-June 2010).

⁹² Jenner & Block Interview of John Doe on September 20, 2021.

⁹³ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 6, 2021.

⁹⁴ Jenner & Block Interview of Witness on July 16, 2021.

⁹⁵ Jenner & Block Interview of Witness on July 16, 2021.

⁹⁶ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

⁹⁷ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

⁹⁸ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

⁹⁹ Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of Witness on August 12, 2021; Jenner & Block Interview of Witness on August 19, 2021; Jenner & Block Interview of Witness on August 20, 2021; Jenner & Block Interview of Witness on August 30, 2021.

¹⁰⁰ 2010 Blackhawks Schedule.

¹⁰¹ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰² Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰³ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰⁴ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰⁵ Jenner & Block Interview of Witness on August 16, 2021.

¹⁰⁶ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰⁷ 2010 Blackhawks Schedule.

¹⁰⁸ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁰⁹ Jenner & Block Interview of John Doe on September 20, 2021.

¹¹⁰ Jenner & Block Interview of John Doe on September 20, 2021.

¹¹¹ Jenner & Block Interview of John Doe on September 20, 2021.

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- ¹¹² Jenner & Block Interview of John Doe on September 20, 2021.
- ¹¹³ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹¹⁴ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹¹⁵ Blackhawks 2010 Playoffs Travel Records.
- ¹¹⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ¹¹⁷ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹¹⁸ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹¹⁹ Blackhawks 2010 Playoffs Travel Records.
- ¹²⁰ Blackhawks 2010 Playoffs Travel Records; *see, e.g.*, Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 14, 2021.
- ¹²¹ Jenner & Block Interview of John Doe on September 20, 2021; Email from Witness to John Doe, et al., FW: e-tkts issued for 7 players to San Jose (May 11, 2010).
- ¹²² Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²³ October 5, 2021 Email from John Doe.
- ¹²⁴ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²⁵ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²⁶ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²⁷ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²⁸ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹²⁹ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³⁰ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³¹ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³² Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³³ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³⁴ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³⁵ Jenner & Block Interview of John Doe on September 20, 2021.
- ¹³⁶ Jenner & Block Interview of John Doe on September 20, 2021.

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- 137 Jenner & Block Interview of John Doe on September 20, 2021.
- 138 Jenner & Block Interview of John Doe on September 20, 2021.
- 139 Jenner & Block Interview of John Doe on September 20, 2021.
- 140 Jenner & Block Interview of John Doe on September 20, 2021.
- 141 Jenner & Block Interview of John Doe on September 20, 2021.
- 142 Jenner & Block Interview of John Doe on September 20, 2021.
- 143 Jenner & Block Interview of John Doe on September 20, 2021.
- 144 Jenner & Block Interview of John Doe on September 20, 2021.
- 145 Jenner & Block Interview of John Doe on September 20, 2021.
- 146 Jenner & Block Interview of John Doe on September 20, 2021.
- 147 Jenner & Block Interview of John Doe on September 20, 2021.
- 148 Jenner & Block Interview of John Doe on September 20, 2021.
- 149 Jenner & Block Interview of John Doe on September 20, 2021.
- 150 Jenner & Block Interview of John Doe on September 20, 2021.
- 151 Jenner & Block Interview of John Doe on September 20, 2021.
- 152 Jenner & Block Interview of John Doe on September 20, 2021.
- 153 Jenner & Block Interview of John Doe on September 20, 2021.
- 154 Jenner & Block Interview of John Doe on September 20, 2021.
- 155 Jenner & Block Interview of John Doe on September 20, 2021.
- 156 Jenner & Block Interview of John Doe on September 20, 2021.
- 157 Jenner & Block Interview of John Doe on September 20, 2021.
- 158 Jenner & Block Interview of John Doe on September 20, 2021.
- 159 Jenner & Block Interview of John Doe on September 20, 2021.
- 160 Jenner & Block Interview of John Doe on September 20, 2021.
- 161 Jenner & Block Interview of John Doe on September 20, 2021.
- 162 Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶³ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁴ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁵ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁶ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁷ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁸ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁶⁹ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁷⁰ Jenner & Block Interview of John Doe on September 20, 2021.

¹⁷¹ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷² 2010 Blackhawks Schedule.

¹⁷³ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷⁴ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷⁵ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷⁶ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on August 11, 2021.

¹⁷⁷ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷⁸ Jenner & Block Interview of Witness on August 16, 2021.

¹⁷⁹ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸⁰ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸¹ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on August 11, 2021.

¹⁸² Jenner & Block Interview of Witness on August 16, 2021.

¹⁸³ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸⁴ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸⁵ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸⁶ Jenner & Block Interview of Witness on August 16, 2021.

¹⁸⁷ Jenner & Block Interview of Witness on August 16, 2021.

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- ¹⁸⁸ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁸⁹ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹⁰ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹¹ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹² Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹³ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹⁴ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹⁵ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹⁶ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on August 11, 2021.
- ¹⁹⁷ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on August 11, 2021.
- ¹⁹⁸ Jenner & Block Interview of Witness on August 16, 2021.
- ¹⁹⁹ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰⁰ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰¹ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰² Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²⁰³ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²⁰⁵ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²⁰⁷ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²⁰⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.

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- ²⁰⁹ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹¹ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on August 26, 2021.
- ²¹² Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹³ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁵ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁷ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²¹⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²¹⁹ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²¹ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²² Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²³ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁵ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁷ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- ²²⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ²²⁹ Jenner & Block Interview of Witness on August 26, 2021.
- ²³⁰ Jenner & Block Interview of Witness on August 26, 2021.
- ²³¹ Jenner & Block Interview of Witness on August 26, 2021.
- ²³² Jenner & Block Interview of Witness on August 26, 2021.

²³³ Jenner & Block Interview of Witness on August 26, 2021.

²³⁴ Jenner & Block Interview of Witness on August 26, 2021.

²³⁵ Jenner & Block Interview of Witness on August 26, 2021.

²³⁶ Jenner & Block Interview of Witness on August 26, 2021.

²³⁷ Jenner & Block Interview of Witness on August 26, 2021.

²³⁸ Jenner & Block Interview of Witness on August 26, 2021.

²³⁹ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁰ Jenner & Block Interview of Witness on August 26, 2021.

²⁴¹ Jenner & Block Interview of Witness on August 26, 2021.

²⁴² Jenner & Block Interview of Witness on August 26, 2021.

²⁴³ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁴ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁵ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁶ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁷ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁸ Jenner & Block Interview of Witness on August 26, 2021.

²⁴⁹ Jenner & Block Interview of Witness on August 26, 2021.

²⁵⁰ Jenner & Block Interview of Witness on August 26, 2021.

²⁵¹ Jenner & Block Interview of Witness on August 26, 2021.

²⁵² Jenner & Block Interview of John Doe on September 20, 2021.

²⁵³ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁴ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁵ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁶ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁷ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁸ Jenner & Block Interview of John Doe on September 20, 2021.

²⁵⁹ Jenner & Block Interview of John Doe on September 20, 2021.

²⁶⁰ Jenner & Block Interview of John Doe on September 20, 2021.

²⁶¹ Jenner & Block Interview of John Doe on September 20, 2021.

²⁶² Jenner & Block Interview of John Doe on September 20, 2021.

²⁶³ Jenner & Block Interview of John Doe on September 20, 2021.

²⁶⁴ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁶⁵ July 14, 2021 Email from Black Ace 1 to Jenner & Block.

²⁶⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021.

²⁶⁷ Chicago Blackhawks Verizon Records (May 2010).

²⁶⁸ Chicago Blackhawks Verizon Records (May 2010).

²⁶⁹ Jenner & Block Interview of Witness on July 16, 2021.

²⁷⁰ Jenner & Block Interview of Witness on July 16, 2021.

²⁷¹ Jenner & Block Interview of Witness on July 16, 2021.

²⁷² Jenner & Block Interview of Witness on July 13, 2021.

²⁷³ Jenner & Block Interview of Witness on July 13, 2021.

²⁷⁴ Jenner & Block Interview of Witness on July 13, 2021.

²⁷⁵ Jenner & Block Interview of Witness on July 13, 2021.

²⁷⁶ Jenner & Block Interview of Witness on July 13, 2021.

²⁷⁷ Jenner & Block Interview of Witness on July 13, 2021.

²⁷⁸ Jenner & Block Interview of Witness on August 19, 2021.

²⁷⁹ Jenner & Block Interview of Witness on August 19, 2021.

²⁸⁰ *See generally* Doe (1) First Amended Complaint.

²⁸¹ Jenner & Block Interview of B. Sopel on August 12, 2021; Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on August 19, 2021; Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on August 12, 2021; Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of Witness on July 20, 2021;

Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 2, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on September 10, 2021.

²⁸² Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸³ Jenner & Block Interview of B. Aldrich on August 21, 2021.

²⁸⁴ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸⁵ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸⁶ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸⁷ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸⁸ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁸⁹ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁹⁰ Jenner & Block Interview of B. Aldrich on August 21, 2021.

²⁹¹ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁹² Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁹³ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁹⁴ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

²⁹⁵ Jenner & Block Interview of Witness on July 8, 2021.

²⁹⁶ Jenner & Block Interview of Witness on July 8, 2021.

²⁹⁷ Jenner & Block Interview of Witness on July 8, 2021.

²⁹⁸ Jenner & Block Interview of Witness on July 8, 2021.

²⁹⁹ Jenner & Block Interview of Witness on July 8, 2021.

³⁰⁰ Jenner & Block Interview of Black Ace 1 on August 24, 2021.

³⁰¹ Jenner & Block Interview of Witness on September 30, 2021.

³⁰² Email from Witness to D. Fehr re: Discussion (April 18, 2011); Jenner & Block Interview of Witness on September 30, 2021.

³⁰³ Jenner & Block Interview of Witness on September 30, 2021.

³⁰⁴ Jenner & Block Interview of Witness on September 30, 2021.

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- 305 Jenner & Block Interview of Witness on September 30, 2021.
- 306 Jenner & Block Interview of Witness on September 30, 2021.
- 307 Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- 308 Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- 309 Player Evaluations 2010-2011 Season.
- 310 Jenner & Block Interview of Witness on August 12, 2021.
- 311 Jenner & Block Interview of Black Ace 1 on August 24, 2021.
- 312 Blackhawks 2010 Playoffs Travel Records.
- 313 Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on August 19, 2021; Email from Witness to John Doe, et al. FW: e-tkts issued for 7 players to San Jose (May 11, 2010).
- 314 Blackhawks 2010 Playoffs Travel Records.
- 315 Jenner & Block Interview of John Doe on September 20, 2021.
- 316 Jenner & Block Interview of Witness on August 16, 2021.
- 317 Jenner & Block Interview of John Doe on September 20, 2021.
- 318 Jenner & Block Interview of John Doe on September 20, 2021.
- 319 Jenner & Block Interview of John Doe on September 20, 2021.
- 320 Jenner & Block Interview of John Doe on September 20, 2021.
- 321 2010 Blackhawks Schedule.
- 322 2010 Blackhawks Schedule.
- 323 Jenner & Block Interview of Witness on July 8, 2021.
- 324 Jenner & Block Interview of Witness on July 8, 2021.
- 325 Jenner & Block Interview of Witness on July 8, 2021.
- 326 Jenner & Block Interview of Witness on July 8, 2021.
- 327 Jenner & Block Interview of Black Ace 1 on August 24, 2021; Jenner & Block Interview of John Doe on September 20, 2021.
- 328 Jenner & Block Interview of B. Aldrich on August 21, 2021.

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- 329 Jenner & Block Interview of Witness on July 8, 2021.
- 330 Jenner & Block Interview of Witness on July 8, 2021.
- 331 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 332 2010 Blackhawks Schedule.
- 333 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 334 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 335 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 336 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 337 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 338 Jenner & Block Interview of A. MacIsaac on September 24, 2021.
- 339 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 340 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 341 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 342 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 343 Jenner & Block Interview of J. Gary on September 9, 2021.
- 344 Jenner & Block Interview of J. Gary on September 9, 2021.
- 345 Jenner & Block Interview of J. Gary on September 9, 2021.
- 346 Jenner & Block Interview of John Doe on September 20, 2021.
- 347 Jenner & Block Interview of John Doe on September 20, 2021.
- 348 Jenner & Block Interview of John Doe on September 20, 2021.
- 349 Jenner & Block Interview of John Doe on September 20, 2021.
- 350 Jenner & Block Interview of John Doe on September 20, 2021.
- 351 Jenner & Block Interview of J. Gary on September 9, 2021.
- 352 Jenner & Block Interview of J. Gary on September 9, 2021.
- 353 Jenner & Block Interview of J. Gary on September 9, 2021.
- 354 Jenner & Block Interview of J. Gary on September 9, 2021.

355 Jenner & Block Interview of John Doe on September 20, 2021.
356 Jenner & Block Interview of John Doe on September 20, 2021.
357 Jenner & Block Interview of John Doe on September 20, 2021.
358 Jenner & Block Interview of John Doe on September 20, 2021.
359 Jenner & Block Interview of John Doe on September 20, 2021.
360 Jenner & Block Interview of J. Gary on September 9, 2021.
361 Jenner & Block Interview of J. Gary on September 9, 2021.
362 Jenner & Block Interview of J. Gary on September 9, 2021.
363 Jenner & Block Interview of J. Gary on September 9, 2021.
364 Jenner & Block Interview of J. Gary on September 9, 2021.
365 Jenner & Block Interview of J. Gary on September 9, 2021.
366 Jenner & Block Interview of J. Gary on September 9, 2021.
367 Jenner & Block Interview of J. Gary on September 9, 2021.
368 Jenner & Block Interview of J. Gary on September 9, 2021.
369 Jenner & Block Interview of J. Gary on September 9, 2021.
370 Jenner & Block Interview of J. Gary on September 9, 2021.
371 Jenner & Block Interview of J. Gary on September 9, 2021.
372 Jenner & Block Interview of J. Gary on September 9, 2021.
373 Jenner & Block Interview of J. Gary on September 9, 2021.
374 Jenner & Block Interview of J. Gary on September 9, 2021.
375 Jenner & Block Interview of J. Gary on September 9, 2021.
376 Jenner & Block Interview of J. Gary on September 9, 2021.
377 Jenner & Block Interview of J. Gary on September 9, 2021.
378 Jenner & Block Interview of Black Ace 1 on August 24, 2021.
379 Jenner & Block Interview of John Doe on September 20, 2021.
380 Jenner & Block Interview of John Doe on September 20, 2021.

381 Jenner & Block Interview of John Doe on September 20, 2021.

382 Jenner & Block Interview of John Doe on September 20, 2021.

383 Jenner & Block Interview of J. Gary on September 9, 2021.

384 Jenner & Block Interview of J. Gary on September 9, 2021.

385 Jenner & Block Interview of A. MacIsaac on August 10, 2021.

386 Jenner & Block Interview of A. MacIsaac on August 10, 2021.

387 Jenner & Block Interview of A. MacIsaac on August 10, 2021.

388 Jenner & Block Interview of S. Bowman on August 12, 2021.

389 Jenner & Block Interview of S. Bowman on August 12, 2021.

390 Jenner & Block Interview of S. Bowman on August 12, 2021.

391 Jenner & Block Interview of S. Bowman on August 12, 2021.

392 Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of K. Cheveldayoff on August 5, 2021; Jenner & Block Interview of J. McDonough on August 10, 2021.

393 Jenner & Block Interview of S. Bowman on August 12, 2021.

394 Jenner & Block Interview of S. Bowman on August 12, 2021.

395 Jenner & Block Interview of J. Quenneville on July 20, 2021.

396 Jenner & Block Interview of J. Gary on September 9, 2021.

397 Jenner & Block Interview of J. Gary on September 9, 2021.

398 Jenner & Block Interview of J. Gary on September 9, 2021.

399 Jenner & Block Interview of J. Gary on September 9, 2021.

400 Jenner & Block Interview of J. Gary on September 9, 2021.

401 Jenner & Block Interview of J. Gary on September 9, 2021.

402 Jenner & Block Interview of J. Gary on September 9, 2021.

403 Jenner & Block Interview of J. Gary on September 9, 2021.

404 Jenner & Block Interview of J. Gary on September 9, 2021.

405 Jenner & Block Interview of Director of Human Resources on October 11, 2021.

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- 406 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 407 Jenner & Block Interview of S. Bowman on September 24, 2021.
- 408 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 409 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 410 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 411 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 412 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 413 Jenner & Block Interview of S. Bowman on September 24, 2021.
- 414 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 415 Jenner & Block Interview of S. Bowman on August 12, 2021.
- 416 Jenner & Block Interview of A. MacIsaac on September 24, 2021.
- 417 Jenner & Block Interview of A. MacIsaac on September 24, 2021.
- 418 Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of A. MacIsaac on September 24, 2021.
- 419 Jenner & Block Interview of Witness on August 3, 2021.
- 420 Jenner & Block Interview of Witness on August 3, 2021.
- 421 Jenner & Block Interview of Witness on August 3, 2021.
- 422 Jenner & Block Interview of A. MacIsaac on August 10, 2021.
- 423 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 424 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 425 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 426 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 427 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 428 Jenner & Block Interview of J. McDonough on October 1, 2021.
- 429 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 430 Jenner & Block Interview of J. McDonough on October 1, 2021.

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- 431 Jenner & Block Interview of Director of Human Resources on July 1, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 432 Jenner & Block Interview of Director of Human Resources on July 1, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 433 Jenner & Block Interview of Director of Human Resources on July 1, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 434 Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 435 Jenner & Block Interview of Director of Human Resources on July 1, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 436 Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- 437 Jenner & Block Interview of J. McDonough on August 10, 2021.
- 438 Jenner & Block Interview of J. McDonough on August 10, 2021; Jenner & Block Interview of J. McDonough on October 1, 2021.
- 439 Jenner & Block Interview of J. Quenneville on July 20, 2021.
- 440 Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of J. McDonough on October 1, 2021; Jenner & Block Interview of J. Gary on September 9, 2021; Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- 441 Jenner & Block Interview of J. Quenneville on July 20, 2021.
- 442 Jenner & Block Interview of J. Quenneville on September 27, 2021.
- 443 Jenner & Block Interview of J. Quenneville on September 27, 2021; Jenner & Block Interview of J. Quenneville on July 20, 2021.
- 444 Jenner & Block Interview of J. Quenneville on September 27, 2021.
- 445 Jenner & Block Interview of J. Quenneville on July 20, 2021.
- 446 Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- 447 Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- 448 Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- 449 Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- 450 Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.

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- ⁴⁵¹ Jenner & Block Interview of K. Cheveldayoff on August 5, 2021.
- ⁴⁵² Jenner & Block Interview of J. Blunk on July 26, 2021.
- ⁴⁵³ Jenner & Block Interview of J. Blunk on July 26, 2021.
- ⁴⁵⁴ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁴⁵⁵ Blackhawks 2010 Phone Records (May 2010).
- ⁴⁵⁶ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁴⁵⁷ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁴⁵⁸ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁴⁵⁹ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁴⁶⁰ Jenner & Block Interview of S. Bowman on September 24, 2021.
- ⁴⁶¹ Blackhawks 2010 Phone Records (May 2010).
- ⁴⁶² Jenner & Block Interview of J. Quenneville on September 27, 2021.
- ⁴⁶³ Jenner & Block Interview of J. Quenneville on September 27, 2021.
- ⁴⁶⁴ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁴⁶⁵ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁴⁶⁶ Jenner & Block Interview of Witness on August 16, 2021. *See generally*, Jenner & Block Interview of Witness on August 11, 2021.
- ⁴⁶⁷ Jenner & Block Interview of Witness on August 16, 2021.
- ⁴⁶⁸ Jenner & Block Interview of S. Bowman on September 24, 2021; Jenner & Block Interview of A. MacIsaac on September 24, 2021.
- ⁴⁶⁹ Jenner & Block Interview of N. Boynton on July 16, 2021; Jenner & Block Interview of B. Sopel on August 12, 2021; Ben Pope, *2010 Blackhawks players widely knew of Bradley Aldrich's alleged sexual assault: report*, CHICAGO SUN TIMES (June 25, 2021), <https://chicago.suntimes.com/blackhawks/2021/6/25/22550405/blackhawks-sexual-assault-bradley-aldrich-2010-players-knew-lawsuit>; Phil Thompson, *Former Chicago Blackhawks players and staffers allege management likely knew about 2010 sexual assault allegations against video coach*, CHICAGO TRIBUNE (June 27, 2021), <https://www.chicagotribune.com/sports/blackhawks/ct-chicago-blackhawks-sexual-assault-lawsuits-20210627-polnbrijlbnhxr7ecellmhnvim-story.html>; Rick

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⁴⁷² Jenner & Block Interview of N. Boynton on July 16, 2021; Jenner & Block Interview of B. Sopel on August 12, 2021.

⁴⁷³ Jenner & Block Interview of N. Boynton on July 16, 2021; Jenner & Block Interview of B. Sopel on August 12, 2021.

⁴⁷⁴ Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 6, 2021; Jenner & Block Interview of Witness on August 3, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on August 31, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on September 28, 2021; Jenner & Block Interview of Witness on August 31, 2021; Jenner & Block Interview of Witness on July 16, 2021.

⁴⁷⁵ Jenner & Block Interview of N. Boynton on July 16, 2021; Jenner & Block Interview of B. Sopel on August 12, 2021.

⁴⁷⁶ Jenner & Block Interview of John Doe on September 20, 2021.

⁴⁷⁷ Jenner & Block Interview of P. Vincent on August 7, 2021.

⁴⁷⁸ Jenner & Block Interview of P. Vincent on August 7, 2021.

⁴⁷⁹ Jenner & Block Interview of N. Boynton on July 16, 2021.

⁴⁸⁰ Jenner & Block Interview of N. Boynton on July 16, 2021.

⁴⁸¹ Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on August 2, 2021.

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- ⁴⁸² Jenner & Block Interview of B. Sopel on August 12, 2021.
- ⁴⁸³ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁸⁴ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁸⁵ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁸⁶ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁸⁷ Jenner & Block Interview of Black Ace 1 on August 24, 2010.
- ⁴⁸⁸ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁸⁹ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹⁰ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹¹ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹² Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹³ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹⁴ Jenner & Block Interview of P. Vincent on August 7, 2021.
- ⁴⁹⁵ Jenner & Block Interview of Witness on August 10, 2021.
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- ⁴⁹⁸ Jenner & Block Interview of Witness on July 12, 2021; Blackhawks 2010 Playoffs Travel Records; Phil Thompson and Christy Gutowski, *He helped the Chicago Blackhawks win the Stanley Cup. But now 2 lawsuits are bringing scrutiny to a former coach's behavior around young players*, CHICAGO TRIBUNE (September 9, 2021), <https://www.chicagotribune.com/sports/blackhawks/ct-blackhawks-video-coach-brad-aldrich-history-20210909-o2otulx7uncrlfzlzkrfpe3vy-story.html>.
- ⁴⁹⁹ Jenner & Block Interview of J. McDonough on August 10, 2021; Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of S. Bowman on August 12, 2021.
- ⁵⁰⁰ Jenner & Block Interview of Director of Human Resources on July 1, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.
- ⁵⁰¹ Jenner & Block Interview of Director of Human Resources on August 20, 2021.

⁵⁰² Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁵⁰³ *See* Jenner & Block Interview of J. McDonough on August 10, 2021; Jenner & Block interview of J. Blunk on July 26, 2021; Jenner & Block Interview of S. Bowman on August 12, 2021; Jenner & Block Interview of A. MacIsaac on August 10, 2021; Jenner & Block Interview of Director of Human Resources on August 20, 2021.

⁵⁰⁴ Jenner & Block Interview of J. McDonough on August 10, 2021.

⁵⁰⁵ Jenner & Block Interview of S. Bowman on August 12, 2021.

⁵⁰⁶ Jenner & Block Interview of S. Bowman on August 12, 2021.

⁵⁰⁷ Jenner & Block Interview of A. MacIsaac on August 10, 2021.

⁵⁰⁸ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵⁰⁹ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁰ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹¹ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹² Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹³ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁴ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁵ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁶ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁷ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵¹⁸ 2010 Blackhawks Schedule.

⁵¹⁹ 2010 Blackhawks Schedule.

⁵²⁰ Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview B. Aldrich on August 21, 2021.

⁵²¹ Jenner & Block Interview of John Doe on September 20, 2021.

⁵²² Jenner & Block Interview of John Doe on September 20, 2021.

⁵²³ Jenner & Block Interview of Witness on July 28, 2021.

⁵²⁴ Jenner & Block Interview of Witness on July 28, 2021.

525 Jenner & Block Interview of Witness on July 28, 2021.

526 Jenner & Block Interview of Witness on July 28, 2021.

527 Jenner & Block Interview of Witness on July 28, 2021.

528 Jenner & Block Interview of Witness on July 28, 2021.

529 Jenner & Block Interview of Witness on July 28, 2021.

530 Jenner & Block Interview of Witness on July 28, 2021.

531 Jenner & Block Interview of Witness on July 28, 2021.

532 Jenner & Block Interview of Witness on July 28, 2021.

533 Jenner & Block Interview of Witness on July 28, 2021.

534 Jenner & Block Interview of Witness on July 28, 2021.

535 Jenner & Block Interview of Witness on July 28, 2021.

536 *See* Jenner & Block Interview of Witness on July 15, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 14, 2021.

537 Jenner & Block Interview of Witness on July 22, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 26, 2021; Jenner & Block Interview of Witness on August 31, 2021.

538 Jenner & Block Interview of Witness on July 28, 2021.

539 Jenner & Block Interview of Witness on July 28, 2021.

540 Jenner & Block Interview of Witness on July 28, 2021.

541 Jenner & Block Interview of Witness on July 28, 2021.

542 Jenner & Block Interview of Witness on July 28, 2021.

543 Jenner & Block Interview of Witness on July 28, 2021.

544 Jenner & Block Interview of Witness on July 28, 2021.

545 Jenner & Block Interview of Witness on July 28, 2021.

546 Jenner & Block Interview of Witness on July 28, 2021.

547 Jenner & Block Interview of Witness on July 28, 2021. This former employee did not respond to our request for an interview.

548 Jenner & Block Interview of Witness on July 28, 2021.

549 Jenner & Block Interview of Witness on July 28, 2021.

550 Jenner & Block Interview of B. Aldrich on August 21, 2021.

551 Jenner & Block Interview of B. Aldrich on August 21, 2021.

552 Jenner & Block Interview of John Doe on September 20, 2021.

553 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

554 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

555 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

556 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

557 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

558 Chicago Blackhawks Verizon Records (June 2010).

559 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

560 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

561 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

562 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

563 Jenner & Block Interview of Director of Human Resources on July 1, 2021.

564 Jenner & Block Interview of Director of Human Resources on July 1, 2021.

565 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

566 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

567 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

568 Jenner & Block Interview of A. MacIsaac on August 10, 2021.

569 Chicago Blackhawks Verizon Records (June 2010).

570 Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of B. Aldrich on August 21, 2021.

571 Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of B. Aldrich on August 21, 2021.

572 Jenner & Block Interview of Director of Human Resources on July 1, 2021.

573 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

574 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

575 Jenner & Block Interview of Outside Counsel on July 2, 2021.

576 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

577 Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of Outside Counsel on July 2, 2021.

578 Jenner & Block Interview of Director of Human Resources on July 1, 2021.

579 Jenner & Block Interview of Outside Counsel on July 2, 2021.

580 Jenner & Block Interview of Director of Human Resources on July 1, 2021.

581 Jenner & Block Interview of B. Aldrich on August 21, 2021.

582 Jenner & Block Interview of B. Aldrich on August 21, 2021.

583 Jenner & Block Interview of B. Aldrich on August 21, 2021.

584 Jenner & Block Interview of B. Aldrich on August 21, 2021.

585 Jenner & Block Interview of B. Aldrich on August 21, 2021.

586 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

587 Jenner & Block Interview of Director of Human Resources on August 20, 2021.

588 Jenner & Block Interview of B. Aldrich on August 21, 2021.

589 June 16, 2010 Separation Agreement of B. Aldrich.

590 Jenner & Block Interview of B. Aldrich on August 21, 2021.

591 Jenner & Block Interview of B. Aldrich on August 21, 2021; June 16, 2010 Separation Agreement of B. Aldrich; Hockey Ops Playoff Bonuses 2010; Jenner & Block Interview of Director of Human Resources on August 20, 2021; July 25, 2008 Employment Agreement of B. Aldrich; Jenner & Block Interview of Witness on September 2, 2021; July 15, 2010 Chicago Blackhawks Payroll Records, Week 28.

592 Jenner & Block Interview of Director of Human Resources on August 20, 2021; Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁵⁹³ Jenner & Block Interview of Director of Human Resources on August 20, 2021.

⁵⁹⁴ Jenner & Block Interview of Director of Human Resources on August 20, 2021.

⁵⁹⁵ Jenner & Block Interview of J. McDonough on August 10, 2021.

⁵⁹⁶ Jenner & Block Interview of A. MacIsaac on August 10, 2021.

⁵⁹⁷ Jenner & Block Interview of J. Quenneville on July 20, 2021.

⁵⁹⁸ Jenner & Block Interview of J. Gary on September 9, 2021.

⁵⁹⁹ Jenner & Block Interview of J. Gary on September 9, 2021.

⁶⁰⁰ Jenner & Block Interview of John Doe on September 20, 2021.

⁶⁰¹ Jenner & Block Interview of John Doe on September 20, 2021.

⁶⁰² Jenner & Block Interview of John Doe on September 20, 2021.

⁶⁰³ Jenner & Block Interview of John Doe on September 20, 2021.

⁶⁰⁴ Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 30, 2021.

⁶⁰⁵ Jenner & Block Interview of Witness on July 20, 2021.

⁶⁰⁶ Jenner & Block Interview of Witness on July 30, 2021.

⁶⁰⁷ Jenner & Block Interview of Witness on July 28, 2021.

⁶⁰⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶⁰⁹ Jenner & Block Interview of John Doe on September 20, 2021.

⁶¹⁰ Jenner & Block Interview of Director of Human Resources on August 20, 2021.

⁶¹¹ Email from Hockey Hall of Fame to Witnesses re: Cup Schedule (August 18, 2010).

⁶¹² 2010 Blackhawks Cup Day Schedule; Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶¹³ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶¹⁴ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶¹⁵ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on July 14, 2021.

⁶¹⁶ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on July 28, 2021; Jenner & Block Interview of Witness on July 14, 2021.

⁶¹⁷ Jenner & Block Interview of B. Aldrich on August 21, 2021; Jenner & Block Interview of Witness on August 19, 2021.

⁶¹⁸ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶¹⁹ Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on August 19, 2021; Jenner & Block Interview of Witness on August 12, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on July 2, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on July 13, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 12, 2021; Jenner & Block Interview of Witness on July 14, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 23, 2021; Jenner & Block Interview of Witness on August 10, 2021; Jenner & Block Interview of Witness on August 11, 2021; Jenner & Block Interview of Witness on July 15, 2021; Jenner & Block Interview of Witness on July 21, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on August 3, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of Witness on August 30, 2021; Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on September 28, 2021.

⁶²⁰ *See, e.g.*, Jenner & Block Interview of Witness on July 8, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 30, 2021; Jenner & Block Interview of Witness on August 2, 2021; Jenner & Block Interview of Witness on July 20, 2021; Jenner & Block Interview of Witness on August 10, 2021; Jenner & Block Interview of Witness on July 16, 2021; Jenner & Block Interview of Witness on July 9, 2021; Jenner & Block Interview of N. Boynton on July 16, 2021.

⁶²¹ Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶²² Jenner & Block Interview of B. Aldrich on August 21, 2021.

⁶²³ Jenner & Block Interview of Witness on September 21, 2021.

⁶²⁴ Barnes & Thornburg LLP, *Report of Investigation Regarding Former Employee Bradley Aldrich* (September 23, 2021).

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- ⁶²⁵ Barnes & Thornburg LLP, *Report of Investigation Regarding Former Employee Bradley Aldrich* (September 23, 2021).
- ⁶²⁶ Jenner & Block Interview of Witness on September 27, 2021.
- ⁶²⁷ Jenner & Block Interview of Witness on September 27, 2021.
- ⁶²⁸ Jenner & Block Interview of Witness on September 27, 2021.
- ⁶²⁹ Jenner & Block Interview of Witness on September 27, 2021.
- ⁶³⁰ Jenner & Block Interview of Witness on September 27, 2021.
- ⁶³¹ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁶³² Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁶³³ Jenner & Block Interview of B. Aldrich on August 21, 2021.
- ⁶³⁴ Jenner & Block Interview of Director of Human Resources on July 1, 2021; Email from the Director of Human Resources to MacIsaac re: Aldrich (March 26, 2012).
- ⁶³⁵ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
- ⁶³⁶ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
- ⁶³⁷ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
- ⁶³⁸ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
- ⁶³⁹ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
- ⁶⁴⁰ Jenner & Block Interview of Director of Human Resources on July 1, 2021.
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- ⁶⁴⁴ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁴⁵ Jenner & Block Interview of J. Gary on September 9, 2021.

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- ⁶⁴⁶ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁶⁴⁷ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁴⁸ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁶⁴⁹ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁶⁵⁰ Jenner & Block Interview of J. Gary on September 9, 2021.
- ⁶⁵¹ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵² Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵³ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵⁴ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵⁵ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵⁶ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁵⁷ Jenner & Block Interview of John Doe on September 20, 2021; Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁵⁸ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁵⁹ Jenner & Block Interview of Witness on August 16, 2021.
- ⁶⁶⁰ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁶¹ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁶² Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁶³ Jenner & Block Interview of Witness on August 16, 2021.
- ⁶⁶⁴ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁶⁵ Jenner & Block Interview of Witness on August 16, 2021; Jenner & Block Interview of Witness on September 23, 2021.
- ⁶⁶⁶ Jenner & Block Interview of D. Fehr on October 7, 2021.

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- ⁶⁶⁷ Jenner & Block Interview of Witness on August 16, 2021.
- ⁶⁶⁸ Jenner & Block Interview of John Doe on September 20, 2021.
- ⁶⁶⁹ Jenner & Block Call with Therapist on October 4, 2021.
- ⁶⁷⁰ Jenner & Block Interview of Witness on August 16, 2021.
- ⁶⁷¹ Jenner & Block Interview of Witness on August 16, 2021.
- ⁶⁷² Jenner & Block Interview of Witness on September 14, 2021; Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷³ Jenner & Block Interview of Witness on September 14, 2021; Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷⁴ Jenner & Block Interview of Witness on September 14, 2021; Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷⁵ Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷⁶ Email from Witness to D. Fehr re: Discussion (April 18, 2011); Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷⁷ Jenner & Block Interview of D. Fehr on October 7, 2021.
- ⁶⁷⁸ Jenner & Block Interview of Witness on September 30, 2021.
- ⁶⁷⁹ Jenner & Block Call with Therapist on October 4, 2021.