

UNITED STATES OLYMPIC COMMITTEE

BERNARD ROBINSON	)	
	)	
Complainant, and	)	
	)	
BRUCE C.K.W. HARRIS, BARBARA	)	
WAKEFIELD, VALERIE LONG, ANNE G.	)	
CHASE, LEON PRESTON AND	)	
JEANNETTE WOODARD	)	
	)	
Complainants	)	ORDER
v.	)	
	)	
USA TAEKWONDO	)	
	)	
Respondent.	)	November 8, 2011

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1. On November 7, 2011, Bernard Robinson filed a Motion to compel USA Taekwondo (“USAT”) to produce certain documents relating to USAT’s alleged manipulation of certain membership records relating to USAT’s election to its Board of Directors, which was originally scheduled for the end of 2010.<sup>1</sup> These documents had been requested by Robinson in his Document Request dated September 2, 2011.<sup>2</sup>

2. Specifically, Robinson requested (in requests numbered 38 and 39) that USAT produce the following:

38. Any/all/each records (to include the original format, scanned pdf, emailed format and/or printed document) constituting, referring and/or reflecting the manipulation (or attempted manipulation) of membership dates and/or data for members of Herbert Perez’s Taekwondo Club in connection with his efforts to qualify as a candidate for USAT Board of Director position.

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<sup>1</sup> The election was never conducted and is an issue pertinent to the Section 10 Complaints filed by Complainants.

<sup>2</sup> A second Document Request was made on September 12, 2011. Also, Robinson reserves his right to make further and additional Motions to compel the production of documents not produced by USAT in response to both his September 2 and September 12 Requests.

39. Any/all/each record of communication of information regarding/concerning Request No. 38 by any USAT past or present employee and past/present Board member.

3. On September 21, 2011, USAT responded to Robinson's September 2 Document Request. Specifically, regarding requests 38 and 39, USAT replied follows:

[38.] USAT lacks sufficient information with respect to this request in order for it to respond or object.

[39.] See response to [38.] above.

4. In Robinson's November 7 Motion he provided additional information, as set forth below, regarding the documents he was seeking:

[A] certain email (and associated string of associated emails) dated on or about December 2, 1010, concerning the fraudulent and wrongful manipulation of membership records for the membership years 2008 and 2009, done at the written request of former USAT CEO David Askinas at the behest of Herbert Perez, so as to make it appear that Mr. Perez qualified as a candidate for the "small club" director position on the USAT Board of Directors.

5. Additionally, Robinson states in his November 7 Motion that:

Upon information and belief, in addition to the December 2, 2010[,] string of emails, this wrongful manipulation of membership record at the request of Mr. Perez is further evidenced in emails to Mr. Padilla [USAT President] and Ms. Mankamyer [USAT Board member] dated in August 2011, which should also be ordered to be produced.

6. Robinson requests that these records be ordered produced so that they will be available for the mediation scheduled for November 11 and 12, 2011, on the issue of USAT's Board election.<sup>3</sup>


7. After consideration of Robinson's November 7 Motion, the Hearing Panel orders that USAT produce the documents requested in requests 38 and 39, including those

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<sup>3</sup> This mediation was ordered by the Hearing Panel in its Decision and Order dated September 16, 2011.

documents referred to in Robinson's Motion, which supplements his requests 38 and 39. Such documents shall be produced by 5:00 p.m. MST November 9, 2011, so that they are available prior to the November 11 mediation. USAT shall also provide copies of the requested documents to the Hearing Panel.

Dated this 8th day of November, 2011.

  
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Susanne Lyons, Chair

Sarah Konrad, Panel Member  
Glenn Merry, Panel Member