

Gray Investigative Group  
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## **Investigative Report**

**10/9/2022**

**To: Courtney Schmidt, USA Curling**  
**From Scott Gray**  
**Re: Jeff Plush Investigation**

### **Introduction & Background:**

In November 2021, Gray Investigative Group was engaged by USA Curling (USAC) to investigate Jeff Plush's (Plush) involvement in matters related to the 2015 complaint lodged by Meleana Shim (Shlm), a NWSL athlete playing for the Portland Thorns (Thorns) franchise, alleging misconduct on the part of Paul Riley, her head coach. Please note that in an effort to avoid confusion, in this report I am referring to Shim's email to Plush and others as a "complaint", and the content of the information compiled through the Thorns investigation as the Thorns Report, or report.

Although I was able to obtain Plush's narrative of events as best he could recall, I struggled to find anyone else with contemporaneous knowledge of the handling of the Shim complaint to corroborate Plush's recollections, who was willing to agree to be interviewed.

I attempted to contact Dan Flynn, USSF CEO in 2015, Lisa Levine, NWSL General Counsel in 2015, and two NWSL staff persons, Patrick Donnelly and Jackie Vanaman. Ultimately my efforts to reach these people only resulted in a phone call from Russ Sauer, an attorney representing one of the USSF officials named above. Sauer informed me that although his client was willing to discuss the matter in more

detail but was confidentially bound to USSF and would their permission to speak. Sauer suggested that permission could be granted by Peter Zern, an attorney acting as outside counsel for USSF. Sauer did however say that at this time his client was willing to state (in regard to the Shim complaint) that **“Jeff did absolutely nothing wrong in how it was handled”**.

I sent Peter Zern an email on 11/11/2021 asking for permission to interview the USSF official. Zern replied the same day saying that he would follow up with the investigative team to see how best to proceed, and he or one of his team would get back to me. After not getting a response, on 12/01/2021 I sent Zern a second email asking for an update on where we were. The same day I received a response from one of his associates named Amanda Kramer. Kramer apologized for their delay in responding, but stated they were still working through issues and would get back to me when the situation changed but cautioned that it likely would not be before the end of the year.

Given the hesitance of people to cooperate, and the clear delay in hearing back from USSF’s outside Counsel, it was agreed with USAC that I would pause additional efforts on the case and possibly re-engage after the Yates’ Investigation concluded.

Respectfully Submitted, Scott Gray, Gray Investigative Group