

U.S. Center for SafeSport Audit Report

December 19, 2025



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I. EXECUTIVE SUMMARY

In November 2024, the U.S. Center for SafeSport (“the Center” or “SafeSport”) terminated the employment of one of its internal investigators, Jason Krasley (“Krasley”), following Krasley’s arrest for alleged criminal conduct prior to his employment with the Center. The Center engaged Aleta Law to perform an external audit of investigations conducted by Krasley during his employment with the Center to determine whether Krasley followed the Center’s Response and Resolution Standard Operating Procedures (“SOPs”) and/or engaged in any conduct that may have impacted the outcome of those investigations.

Aleta Law completed an exhaustive audit of 114 SafeSport investigations conducted in whole or in part by Krasley. Ultimately, auditors determined that, except in limited circumstances, Krasley’s conduct adhered to the Center’s SOPs and did not impact investigation outcomes. However, auditors found sufficient evidence to justify the re-opening of three matters for investigation by a separate external firm. Aleta Law further recommended, based on its findings, that the Center implement a number of changes to its policies and procedures and/or emphasize its existing practices to address concerns identified during the audit.

The following report summarizes the audit process, findings, and recommendations made by Aleta Law.

II. INTRODUCTION

The U.S. Center for SafeSport employed now-former internal investigator Jason Krasley between 2021 and 2024. On November 15, 2024, Krasley was arrested for the alleged theft of money seized during a 2019 drug bust when Krasley worked as a police officer in Allentown, Pennsylvania. The same day, upon learning of his arrest, the Center terminated Krasley's employment.

In January 2025 and March 2025, Krasley was further charged with multiple felonies and misdemeanors for alleged sexual misconduct. The reported charges included rape, sexual assault, and involuntary sexual servitude pertaining to alleged incidents occurring in his capacity as a police officer between 2011 and 2018, prior to his employment with the Center.¹

The Center engaged Aleta Law to conduct a comprehensive, neutral, and trauma-informed audit of all investigations conducted and resolved by Krasley during his employment as a SafeSport investigator.

III. SCOPE OF ENGAGEMENT

Beginning on February 5, 2025, the Center conducted outreach to all parties to completed SafeSport investigations conducted by Krasley to inform them of the criminal charges against Krasley and invited anyone who wished to share their experiences with Krasley to contact Aleta Law. Aleta Law's mandate was to review and evaluate any reports received regarding Krasley's conduct during SafeSport investigations.

Aleta Law's scope of engagement entailed: (1) conducting a thorough audit of SafeSport cases investigated and completed by Krasley; (2) determining whether Krasley engaged in conduct outside the scope of the Center's SOPs, and if so, whether impacted investigations should be re-opened; and (3) identifying recommended SafeSport investigative process changes based on the audit findings. Cases identified for re-opening were referred to a separate external firm for further investigation.

IV. ALETA LAW'S ROLE

Aleta Law was engaged as a neutral, external auditor in this process. Auditors received full cooperation and unfettered access from the Center to review materials that they deemed relevant to the audit and to interview individuals who may have pertinent information. Aleta Law conducted an objective and professional review of information gathered to determine, as accurately as possible, whether Krasley followed the Center's SOPs during the investigation process and if not, whether Krasley's conduct substantially impacted the

¹ Krasley has denied the allegations against him. Several charges, including the theft and certain sexual misconduct allegations, have been withdrawn or dismissed. Krasley is currently awaiting trial on the remaining charges.

outcome of those investigations. The findings and recommendations in this report are based on the auditors' independent and objective assessment of the information received and reviewed during the course of the audit.

V. ENGAGEMENT OF THE ASSIST

In addition to its own supportive resources for involved parties, the Center initiated an ongoing partnership with The Athlete Survivors' Assist ("The Assist")², an athlete-focused, trauma-informed team of confidential advocates, to support individuals who interacted with Krasley during his employment with the Center and/or were impacted by the news of his alleged offenses.

VI. METHODOLOGY AND INFORMATION GATHERED

As noted above, the Center contacted parties whose cases had been conducted by Krasley, inviting anyone who had concerns related to their interactions with Krasley to contact Aleta Law. Aleta Law responded to every outreach received and offered those who contacted the auditors an opportunity to participate in an interview. Aleta Law interviewed those individuals who reached out to provide information about their experiences. Aleta Law also reviewed every case assigned to Krasley to independently evaluate whether Krasley acted in accordance with the Center's SOPs and professional expectations.

Aleta Law conducted interviews with 12 individuals who reached out to share their experiences with Krasley in his role as an investigator for the Center. The interviewees included individuals who participated in the Center's process as Claimants, Respondents, witnesses, and advisors.³ Aleta Law has not included the names of parties or other involved individuals in this report and has taken steps in the summary of information to maintain their anonymity and privacy. To the extent that individuals who did not previously provide information during the audit wish to do so now, that avenue remains open to them after the issuance of this report by contacting the Center directly for evaluation as to whether the external audit process should be re-opened as to their individual cases.

In total, Aleta Law reviewed 114 investigations that were investigated in whole or in part by Krasley during his employment with the Center.⁴ The Center provided Aleta Law with full access to all 114 investigation files, which included, but was not limited to: incident reports; electronic communications between Krasley and parties/witnesses; interview

² The Assist previously operated under the name The Army of Survivors.

³ Some individuals who initially reached out to the Center and/or Aleta Law were ultimately not responsive or declined to participate in an interview as part of Aleta Law's audit.

⁴ Aleta Law also reviewed investigations that had been reassigned to other investigators at the Center after Krasley's termination to determine whether Krasley's conduct prior to their reassignment constituted improper conduct outside the scope of the Center's SOPs. Information regarding those reassigned matters is included in this report to the extent that Aleta Law's audit found Krasley's conduct during those investigations to be improper.

transcripts/recordings; interview summaries; investigation notes and activity logs; documentary evidence; Investigation Reports; Administrative Closure/Hold memos; and Notices of Decision. As part of the audit, Aleta Law also reviewed the Center's Standard Operating Procedures, including procedures related to the investigation process, interview recording, and informal resolution. In addition, some interviewees provided Aleta Law with electronic communications they exchanged with Krasley during their investigations.

Aleta Law carefully reviewed each investigation conducted by Krasley and considered the following criteria when determining whether the Center should re-open those investigations:

- Failure to follow the Center's SOPs in a way that may have substantially impacted the outcome of a case;
- Concerns related to the investigation outcome, such as the improper use of informal resolution or administrative closures or unreasonable sanctions;
- Other considerations regarding professionalism and sound judgment, including, but not limited to bias, conflict of interest, power imbalance, or coercion; and
- A lack of trauma-informed communications with parties and witnesses, with particular emphasis on minor athletes.

Aleta Law used the preponderance of the evidence standard when considering the above criteria, meaning was it "more likely than not," based on a thorough audit of each case, that the information reviewed and considered met the criteria for re-opening the investigation.⁵

VII. AUDIT FINDINGS

The findings and recommendations in this report are the culmination of Aleta Law's extensive audit process.⁶ The findings in this report are organized into the following sections: VI.A. Communications with Parties and Witnesses; VI.B. Neutrality and Thoroughness of Investigations; VI.C. Interview Procedures; and VI.D. Informal Resolution.

As noted above, Aleta Law reviewed 114 investigations conducted in whole or in part by Krasley between 2021 and 2024 and interviewed 12 individuals associated with those investigations. In doing so, auditors identified concerns related to Krasley's professionalism and boundary-setting in communications with parties and witnesses, neutrality and thoroughness of investigations, and adherence to the Center's interview procedures. In addition, auditors identified concerns regarding the Center's implementation of informal resolution.

⁵ Matters for which the Center had not rendered an outcome prior to the completion of the audit process were evaluated based on Krasley's adherence to the Center's SOPs while he was assigned to investigate.

⁶ This report is a summary and does not purport to capture every reported concern related to Krasley's conduct as a SafeSport investigator or exhaustively detail the voluminous information reviewed by the auditors throughout the audit process.

Aleta Law recommended that three investigations conducted by Krasley be re-opened for further investigation by an external firm. Aleta Law also recommended that the Center conduct outreach to parties in two investigations to provide clarifying information. Finally, Aleta Law made a number of recommendations regarding the Center's investigation process.

A. Communications with Parties and Witnesses

Aleta Law received and reviewed information regarding Krasley's professionalism and boundary-setting in his communications with parties and witnesses to SafeSport investigations. After careful review, auditors determined that Krasley's communications with parties, though not impacting investigation outcomes, were at times unprofessional and outside the scope of accepted best practices. While concerns were raised about Krasley expressing bias in his communications with parties, there was insufficient evidence to find that any such communications resulted in actual biased conduct by Krasley during his investigations.

1. Potential Biased Communications

Multiple individuals who interacted with Krasley during the investigation process provided information indicating that Krasley may have expressed bias for Claimants in his communications with participants. This included Krasley's communications via text messaging, phone calls, and recorded interviews, as described in detail below. One Claimant described Krasley as "a guy that will make himself your best friend," while another Claimant recalled Krasley stating that he would be "biased" for her because he has a daughter and a background with similar cases as a police officer.

Krasley's communications demonstrated that he expressed a similar level of support for both Claimants and Respondents during the investigative process. In one witness interview, Krasley described himself as "an advocate for both sides" in his role as an investigator. Similarly, in a Respondent interview, Krasley stated that he was "working for" the Respondent as much as "anyone else."

While some of Krasley's communications with participants raised concerns about his appearance of neutrality, based on the totality of the available evidence, the auditors did not find that Krasley actively demonstrated bias for either Claimants or Respondents during his investigations. As further detailed in Section VI.B of this report, the audits of Krasley's cases found that he generally engaged in thorough investigations and pursued all available evidence, including both inculpatory and exculpatory evidence.

2. Phone Calls

Multiple parties reported to Aleta Law that they spoke with Krasley on the phone at length over the course of the investigation process, which included phone conversations during non-business hours and about matters unrelated to their investigations. For example, two

Claimants reported that Krasley asked them questions about their spouse and marital status. Parties also reported that during phone calls Krasley talked about his life and his experience in law enforcement, with one party reporting that Krasley described similar cases he had investigated in the past.

Based on Aleta Law's review of the available evidence pertaining to Krasley's phone calls with participants, auditors found that Krasley made himself available to communicate with parties during non-business hours. For example, after a Claimant reached out to Krasley to speak with him about an upcoming arbitration hearing, Krasley replied in a text message that he was busy but might be able to talk "later tonight." Electronic communications demonstrate that this Claimant frequently initiated contact with Krasley to request phone calls, rather than Krasley proactively calling the Claimant. Ultimately, the evidence reviewed by the auditors was insufficient to establish that Krasley proactively contacted parties for lengthy, after-hours phone calls. However, the audit revealed instances in which Krasley failed to establish appropriate professional boundaries with parties in his role as a neutral investigator by communicating with parties outside of business hours, in an overly familiar manner, and about topics unrelated to their cases. Nonetheless, there was insufficient evidence to find that Krasley's phone calls with parties constituted improper conduct that impacted the outcome of investigations he conducted.

3. Electronic Communications

Auditors confirmed that Krasley often used text messaging as a means of communicating with individuals involved in his investigations.⁷ The vast majority of those communications centered around requests for and scheduling investigative interviews. Records show that in some cases parties expressed to Krasley a preference for communicating via text messages and/or were only responsive to text message communication. The audit found that this was the case for a Claimant who reported that Krasley sent numerous and frequent text messages during the investigation. As such, there was insufficient evidence to find that Krasley's use of text message communications constituted improper conduct that impacted the outcome of investigations he conducted.

Though Aleta Law did not find that the substance or nature of Krasley's text message communications with parties affected investigation outcomes, the audit revealed that Krasley's electronic communications (*i.e.*, texts and emails) with parties at times exceeded appropriate professional boundaries in his role as a neutral investigator. For example, when providing a case update to one Claimant via text message, Krasley inquired about the status

⁷ Based on the information reviewed, Krasley used his Center issued work phone to communicate with parties and witnesses. There was no evidence to establish that Krasley communicated with parties or witnesses via a personal cell phone or other non-Center issued device.

of an injury the Claimant had recently suffered.⁸ In another case, Krasley's emails with the Claimant demonstrate that he used unprofessional language and shorthand such as "damn" and "LOL."

Krasley's communications with participants in the Center's process should have been limited to approved usage as outlined in the Center's SOPs, which provide that staff should attempt to communicate with parties and witnesses primarily through formal channels, such as emails and telephone calls, and should limit text messages to brief, non-substantive exchanges. Krasley's text messages checking in with parties about their investigations and other unrelated matters when other means of communication were available was inconsistent with the Center's SOPs. Based on the communications reviewed, Krasley utilized text messaging with parties rather than proper channels of communication and, in doing so, failed to set appropriate communicative boundaries. In addition, Krasley's use of informal language in electronic communications was incompatible with the Center's standard practices. Nonetheless, as previously noted, there was insufficient evidence to find that Krasley's text messages with parties impacted the outcome of investigations he conducted.

4. Communication during Investigative Interviews

Auditors received and reviewed information regarding Krasley's communication with parties and witnesses during recorded investigative interviews. Multiple individuals who reached out to Aleta Law expressed that Krasley utilized an informal interview style that felt "overly familiar." For example, one Claimant recalled that Krasley laughed and/or smirked during the interview while they discussed Claimant's trauma,⁹ while another Claimant felt that Krasley's communication during the interview came off as "creepy."

Aleta Law carefully reviewed every interview conducted by Krasley during his employment with the Center. In total, Aleta Law reviewed 104 recorded interviews of parties and witnesses. Based on its review, auditors determined that Krasley routinely followed the Center's SOPs regarding interview conduct, including providing interviewees with an explanation of the Center's investigative process, obtaining consent to record the interviews, and confirming each party's right to have an advisor present during the interviews. In some cases, Krasley detailed such information during introductory phone calls with interviewees and, thus, did not do so again during their formal interviews.

Auditors confirmed that Krasley often exercised an informal interview style as described by multiple parties, such as the use of colloquial language or slang rather than more professional terminology. However, Aleta Law found that Krasley nonetheless employed

⁸ In the investigation's case notes, Krasley wrote that the Claimant sought "help and direction" from him.

⁹ Auditors noted that at times, both Krasley and interviewees laughed during tense or awkward moments of interviews. Auditors did not find these reactions to be intentional or unprofessional.

trauma-informed techniques and asked appropriate questions during interviews. Krasley used grounding techniques and provided warnings before asking particularly difficult or triggering questions. When necessary, Krasley provided parties who became emotional or overwhelmed with the opportunity to temporarily pause or postpone their interviews. Documents reviewed by auditors demonstrated that multiple parents/advisors of minor parties described Krasley as “professional” and acknowledged his “kindness and compassion.” Documents provided by the Center demonstrate that during his employment, Krasley attended multiple trainings regarding trauma-informed interviewing and interviewing minor parties and witnesses.

B. Neutrality and Thoroughness of Investigations

The Center’s SOPs provide that investigators must conduct fair, thorough, and neutral investigations. Aleta Law considered concerns raised by participants regarding the thoroughness of Krasley’s investigations and that he pressured parties to participate in investigations or “drop” their allegations against Respondents. To that end, auditors received and reviewed information regarding Krasley’s attempts to obtain relevant evidence and contact potential parties and witnesses during investigations, as well as whether Krasley attempted to influence the participants or outcomes of investigations.

1. Pursuit of Evidence and Parties/Witnesses

During the audit process, Aleta Law determined that two of Krasley’s investigations lacked adequate thoroughness prior to their resolution and recommended that those cases be re-opened and investigated by an external firm. In the first case, the Center administratively closed an allegation of misconduct, determining that there were no applicable policies with which to find the Respondent responsible. However, based on its review of the investigation file, Aleta Law found that the information obtained by Krasley prior to the administrative closure was insufficient to make such a determination. In the second case, Krasley recommended that the Center administratively close the investigation based on his understanding that the Claimant was unwilling to participate, as noted in Krasley’s summary of an unrecorded phone call with Claimant. Upon its review of the case, Aleta Law independently confirmed this Claimant’s willingness to participate in the investigation, despite Krasley’s contrary determination. Based upon Aleta Law’s recommendations, the Center re-opened and assigned both cases to an external firm.

Notwithstanding the two cases detailed above, materials reviewed by Aleta Law demonstrated that Krasley’s investigations were consistently thorough. Based on a careful review of his investigative activity, Krasley regularly attempted to obtain and consider relevant evidence and reached out to potential witnesses to ascertain their availability to participate in interviews. For example, investigation files and activity logs demonstrate that, when relevant, Krasley requested and either attempted to or did obtain police reports, surveillance footage, medical records, and other documentary evidence from proper

sources. In some instances, Krasley appropriately determined that certain evidence or witnesses would be duplicative or irrelevant to the findings. In one such case, the alleged misconduct was sufficiently corroborated by documentary evidence obtained during the investigation, and as such, outreach to additional witnesses would not have impacted the outcome, despite the Claimant's parent/advisor reporting that Krasley failed to reach out to all relevant witnesses.

2. Pressure regarding Participation

Multiple Claimants and/or their advisors reported that Krasley pressured them to decide whether to continue participating in the investigation process, while one Claimant reported feeling pressure from Krasley to "drop" some of the allegations against the Respondent. Based on a careful review of all investigation files, Aleta Law did not find sufficient evidence to confirm that Krasley pressured any Claimants to participate in investigations or "drop" their allegations. Electronic communications demonstrated that Krasley provided Claimants and/or their advisors with options regarding participation, which included placing investigations on administrative holds (*i.e.*, temporarily withdrawing participation). In the case of one Claimant who reported feeling pressure from Krasley to participate in an investigative interview, investigation documents revealed that the Claimant expressed an intent to participate and Krasley appropriately followed up to schedule the interview. Throughout their communications, Krasley reminded this Claimant on multiple occasions that there was no obligation to participate.

Furthermore, while Claimants have the right to withdraw their participation at any time, the Center maintains discretion to independently close investigations based on a number of factors, such as unsupported allegations or lack of applicable policy, diminishing the likelihood that Krasley would have pressured parties not to participate when other rationale for closure existed. In the case of the Claimant who reported feeling pressure to "drop" allegations, investigation documents revealed that this Claimant acknowledged having not been pressured but rather "not given a say" in the decision to administratively close the matter. Aleta Law ultimately recommended and the Center re-opened this matter for further investigation based on other factors as detailed in this report.

C. Interview Procedures

Aleta Law received and reviewed information regarding Krasley's adherence to SafeSport's interview procedures. Auditors considered the following potential procedural issues regarding Krasley's interviews with parties and witnesses: Providing parties with incorrect information about interview procedures that may have influenced their participation in investigations; interviewing minor parties without their parents and/or advisors present against the wishes of those parents; and conducting unrecorded phone interviews of parties and witnesses in lieu of formal recorded investigative interviews.

1. Information regarding Interview Procedures

Multiple individuals interviewed by Aleta Law reported that Krasley informed them that Respondents would have an opportunity to view Claimants' interview transcripts and/or recordings prior to participating in their own interviews. Based on a careful review of all 104 recorded interviews, auditors determined that Krasley consistently made clear to interviewees and their advisors that parties would not have access to interview materials until the end of the investigation process. However, in one case, the parents of a Minor Claimant withdrew participation after expressing to Krasley their understanding that the Minor Respondents would be able to view their child's interview transcript prior to their own recorded interviews. After reviewing the investigation file, auditors determined that Krasley did not sufficiently correct this misunderstanding. Therefore, Aleta Law recommended that the Center conduct outreach to the parents of this Minor Claimant to explain the Center's process for disclosing interview transcripts and ascertain whether they would like the case to be re-opened.

2. Interviews of Minors

As noted above, Aleta Law reviewed all interviews conducted as part of Krasley's investigations. This included 32 interviews of minor parties ranging from 12 to 17 years old. Three parents of Minor Claimants reported that they were not allowed to participate in the interviews of their children.

The Center's SOPs provide that interviews of minors will be conducted by Investigators trained on best practices in conducting interviews with children, which may be a member of the Center's Specialized Interview Team ("SIT"), depending on the circumstances of each case. The Center typically conducts interviews without the presence of a parent in order to elicit the most accurate information directly from the minor, though parents are provided the opportunity to participate per the Center's SOPs.

After careful review, auditors determined that there was insufficient evidence to find that the parents of the above-mentioned Minor Claimants objected to or expressed discomfort with the interview format during the investigation process. In each such case, the Minor Claimant was not interviewed by Krasley directly but rather by a SIT team member with advanced training and experience in interviewing minors and individuals with unique needs. On seven occasions, Krasley interviewed a minor party between the ages of 14 and 17 years old without the presence of a parent or advisor. In each of those cases, Krasley obtained parental consent to conduct the interview with the minor party without a parent or advisor present before doing so. The remaining 22 interviews of minor parties were all conducted by Krasley or a SIT team member in the presence of a parent and/or advisor.¹⁰

¹⁰ Krasley conducted each interview remotely via videoconference. Krasley did not attend any in-person interviews of minors that were conducted by SIT team members.

As detailed above with regard to Krasley's interview communications, Krasley engaged in appropriate, trauma-informed conduct during interviews, including those involving minor parties, for which he received and participated in relevant training throughout his employment with the Center. Based on Aleta Law's review of the 32 interviews of minors, each interview was conducted in accordance with the Center's SOPs regarding minor party/witness interviews.

3. Phone Interviews

A careful review of Krasley's investigation files revealed that Krasley often conducted introductory phone calls and/or unrecorded, informal interviews with parties and witnesses telephonically. The majority of these phone calls were conducted for the purpose of explaining the investigative process, gathering preliminary information from parties and witnesses, and ascertaining their willingness to participate further. Krasley summarized the phone calls with written narratives documented in the investigation files, and in some cases, Krasley relied on those narratives as evidence in Investigation Reports. However, in virtually all investigations that resulted in a formal resolution (*i.e.*, not an administrative closure or informal resolution), all responsive and willing parties participated in formal recorded interviews. In cases where parties were not interviewed, the Respondents admitted to the alleged misconduct and/or Krasley obtained documentary evidence to corroborate the misconduct without the need for formal interviews. As noted above with regard to the thoroughness of Krasley's investigations, Aleta Law recommended and the Center re-opened one case that had been administratively closed based on Krasley's misunderstanding that the Claimant did not wish to participate.

D. Informal Resolution

Aleta Law received and reviewed information regarding the informal resolution of Krasley's investigations and examined the Center's adherence to its SOPs when it resolved such investigations informally. Eighteen investigations conducted by Krasley were resolved via the Center's informal resolution process.

Based on the Center's SOPs, an investigation may be resolved via informal resolution when the Respondent accepts responsibility for the alleged misconduct, irrespective of the Claimant's desire to pursue a formal resolution. Multiple Claimants and/or their advisors expressed their concern that the Center's policies left them out of the informal resolution process.

In almost all cases, the Center and Krasley pursued and resolved cases via informal resolution agreements in accordance with the SOPs in place at the time. In one case that was resolved informally, the Respondent admitted to some, but not all, of the alleged misconduct. Aleta Law recommended that the Center re-open the case as to the unresolved alleged misconduct, which the Center did.

Although the Center's use of informal resolution agreements in Krasley's investigations was generally compliant with the Center's procedures, Aleta Law has made recommendations to the Center regarding its informal resolution processes, which are outlined below in Section VII.C of this report.

VIII. CONCLUSION AND RECOMMENDATIONS

During the audit process, Aleta Law recommended that the Center re-open three cases for further investigation by an external firm. Aleta Law further recommended that the Center conduct outreach to parties/advisors involved in two cases to clarify issues and ascertain their willingness to participate in re-opened investigations. Finally, the Center independently re-opened two investigations based on new information it obtained outside the scope of the audit.¹¹

In addition to recommendations related to individual investigations conducted by Krasley, Aleta Law was charged with evaluating all information gathered during the audit process and making recommendations to the Center to improve its policies and procedures and strengthen its commitment to protecting athletes from abuse. Though Krasley's conduct generally adhered to the Center's SOPs and did not substantially impact investigation outcomes, based on information gathered and evaluated during its audit, Aleta Law identified and offered recommendations to address concerns detailed in Section VI of this report.

Aleta Law's recommendations¹², which are described in detail in Sections VIII.A through VIII.D, are as follows:

- All staff should communicate with parties and witnesses through Center-issued devices only.
- Introductory outreach to parties and witnesses should be conducted via email rather than telephonically, whenever possible.
- Investigators should copy and upload all text message communications with parties and witnesses to the Center's case management system.
- Investigators should answer substantive, process-related questions in writing or during recorded interviews only. In the event such information is discussed via other means, such as an unrecorded introductory phone call, the Investigator should follow up with

¹¹ The Center re-opened one case previously placed on an Administrative Hold following its own routine internal review of investigations. The other case, which had been closed due to the Respondent's criminal disposition, was re-opened upon Respondent's request following the resolution of that disposition. Auditors did not identify any concerns related to Krasley's conduct that warranted the re-opening of these two cases independent of the Center's determinations.

¹² Some recommendations may reflect existing Center policies and procedures. To that extent, auditors recommend that the Center places greater emphasis on staff adherence to those policies and procedures, as discussed in Sections VIII.A-D.

the party or witness in writing to summarize the information discussed and upload the communication to the Center's case management system.

- Investigators should avoid the use of unrecorded phone calls as a means of conducting substantive interviews of parties and witnesses.
- Investigators should begin each interview with a scripted, detailed explanation of the investigation process.
- Investigators should attempt to obtain prior written consent to record interviews and begin recording immediately upon commencement of an interview. The Center should establish criteria for written summaries of interviews in the event a party or witness does not consent to the recording of the interview. Such written summaries should generally be completed within seven (7) business days of the interview.
- The Center should seek to utilize SIT team members for interviews of minors where appropriate and may interview minors without parents present in accordance with the Center's standard practices. However, the Center should also communicate to parents of minor parties and witnesses that a parent or advisor may attend interviews of their children, so long as the parent or advisor is not excluded due to their own participation as a party or witness. A parent/advisor who is excluded may identify another adult to participate in the interview of the minor party or witness. The Center should obtain parental consent to interview a minor without a parent/advisor or other designated adult present in the interview.
- The Center should provide Claimants with notice when informal resolution is to be offered to a Respondent and a summary of the rationale for doing so.
- Moving forward, the Center should conduct routine investigation audits to assess compliance with the Center's policies and procedures.
- The Center should require ongoing, mandatory trainings for all Investigators, including specific training related to trauma-informed interviewing.
- The Center should establish a reporting line for individuals directly involved in the investigative process to report concerns related to Center staff or processes during an investigation.

A. Policies regarding Party/Witness Communication

As noted above, the Center's SOPs provide that Investigators should attempt to limit the use of text message communications with parties and witnesses. Aleta Law recognizes that text messaging is a common and accepted method of communication in daily life for many individuals. However, Aleta Law recommends that the Center place greater emphasis on the avoidance of text message communications by Investigators, unless circumstances require such communication. In order to avoid excessive use of text message communications, which can trend toward informal and/or unprofessional communications with parties and witnesses, Aleta Law recommends that the Center requires Investigators to copy and upload all text messages with parties and witnesses to its case management system for

accountability and transparency. This should include screenshots of the text messages, to the extent possible, rather than a written summary of the text exchange.

In addition, Aleta Law recommends that the Center advises Investigators to answer substantive process-related questions in writing or during recorded interviews only. If such questions are discussed through other means, such as an introductory phone call, the Investigator should follow up with the party or witness in writing to summarize the information discussed and upload the communication to the Center's case management system. Further, Aleta Law recommends that introductory outreach with parties and witnesses should be conducted via email, whenever possible, in which staff may offer to answer questions in writing, rather than telephonically. In this way, all communications with parties and witnesses are documented and maintained for future reference. Finally, and as is current practice, staff must only communicate with parties and witnesses through Center-issued devices regardless of the method of communication.

B. Interview Procedures

The Center's SOPs provide that Investigators may determine the appropriate format for investigative interviews, which could include in-person interviews, video conferences, or phone calls. Recognizing the importance of accountability and transparency, as noted above, Aleta Law recommends that Investigators avoid the use of unrecorded phone calls as a means of conducting substantive interviews of parties and witnesses. While certain situations may dictate the need to rely on phone calls with parties and witnesses, Investigators should make every effort to formally interview individuals who may have relevant information either in-person or via a recorded video call. Further, each interview should begin with a scripted, detailed explanation of the investigative process.

The Center's SOPs further provide that Investigators should limit unrecorded communication with parties and witnesses before and after interviews to brief introductions and pleasantries. However, given the potential for unrecorded exchanges to lead to misunderstandings, staff should attempt to obtain prior written consent to record the interview and begin recording immediately upon the commencement of the interview. If a party or witness does not consent to the recording, the Investigator should, in accordance with the Center's SOPs, take detailed notes and produce a written summary of the interview to be uploaded to the Center's case management system. Aleta Law recommends that the Center establish written criteria for the content included in interview summaries, such as the following: Date, time, and location of the interview; full names of all individuals present; a summary of all process information discussed with the parties or witnesses; detailed information provided by the parties or witnesses; and answers provided by Investigators to any questions or concerns raised by the parties or witnesses. In the interests of reliability and accuracy, such interview summaries should generally be completed within seven business days of the interview.

With regard to interviews of minor parties and witnesses, the Center should seek to utilize SIT team members for such interviews whenever possible. If a SIT team member is not available for the interview of a minor, the Center should obtain parental consent to conduct the interview without one. Aleta Law further recommends that, in all cases, the Center clearly communicates that parents and/or advisors are allowed to attend any interview of a minor party or witness, so long as the parent/advisor is not otherwise excluded due to their own participation as a party or witness. In the event that a parent/advisor of a minor interviewee is excluded, they may identify another adult to attend the interview of the minor in their place. In all other cases, the Center should obtain parental consent to conduct the interview without the participation of a parent/advisor or other designated adult attendee.

C. Informal Resolution

As explained in Section VI above, the Center's SOPs provide that the Center may resolve an investigation via informal resolution when the Respondent accepts responsibility for the alleged misconduct and based on several factors, the Center determines informal resolution is appropriate. Under the Center's SOPs, when a matter has reached the investigation phase of the resolution process, the Center is not required to notify Claimants about its decision to seek an informal resolution.

Aleta Law recommends the Center update its SOPs to require that Claimants be notified and provided a written rationale of its decision to pursue an informal resolution of a matter prior to finalizing an agreement with a Respondent who is under investigation.

D. Additional Oversight Procedures

Finally, Aleta Law recommends, based on the findings of its audit, that the Center strengthens its oversight of Investigators and the investigation process generally. This includes (1) routine investigation audits to assess compliance with the Center's policies and procedures, (2) ongoing, mandatory investigations training for all investigators, including specific training related to trauma-informed interview techniques and best practices, and (3) establishing a reporting line for individuals directly involved in the investigative process to report concerns regarding Center staff and/or processes during an investigation. Investigation audits will be conducted on a forward-looking basis pertaining to future investigations and may be performed internally or by independent, external auditors.