

August 5, 2026

**VIA EMAIL [Stacy.rodriquez@dallas.gov;
Andrew.spaniol@dallas.gov; Ryan.crocker@dallas.gov]
CMRRR #9414 7266 9904 2253 9659 40**

**REGULAR US MAIL
& HAND DELIVERY**

Stacy Jordan Rodriguez
Assistant City Attorney
Andrew G. Spaniol
Assistant City Attorney
Ryan Crocker
Assistant City Attorney

CITY OF DALLAS – ATTORNEYS’ OFFICE
1500 Marilla Street
7DN Dallas City Hall
Dallas, TX 75201

**RE: Cause No. DC-25-18261, *White Rock Boathouse, Inc. v. City of Dallas*,
in the 44th Judicial District Court, Dallas County, Texas (“Lawsuit”)**

NOTICE OF CITY DEFAULT AND DEMAND FOR RETRACTION

Dear Counsel:

This letter is in response to Mr. Jenkins’ Notice of Breach letter dated July 8, 2026 (the “Notice”) pertaining to White Rock Boathouse, Inc.’s (“WRB”) 2025 Code of Conduct. WRB rejects the Notice in its entirety. WRB is not in breach of the Development Agreement, and the Notice is without factual or contractual basis.

WRB’s Code of Conduct has been submitted and accepted by the City on multiple occasions

The City’s claim that WRB’s Code of Conduct was never approved is refuted by the City’s own course of conduct. In spring 2022, Sue Ellen Chambers, President of WRB, submitted the 2022 Code of Conduct to Maria Hasbany, the Park Board Representative for District 9, for transmission to the City. A copy of Ms. Chambers’ February 28, 2022 email correspondence to Ms. Hasbany is attached hereto as **Exhibit A**.

The 2022 Code of Conduct submitted to the City through Ms. Hasbany provided: “*I will not engage in any activity that would constitute a conflict of interest between my participation at the club and my participation in other clubs or organization, and am not now, and, unless otherwise approved by the Head Coach, will not during the course of my participation, be employed by, or volunteer as a coach or mentor for other junior, middle-school, or adult rowing programs.*” The City did not object to this language or any aspect of the Code of Conduct.



Further, two days later, on March 2, 2026, the City fully executed the 2022 Supplement to the Development Agreement. The record demonstrates that the City reviewed and found no issue with the Code of Conduct before fully executing that Supplement.

Most significantly, in 2023, Brett Wolke (then Superintendent of Park and Recreation) directly addressed the Code of Conduct after complaints were raised through Council Member Paula Blackmon about WRB's membership decisions – stemming from nearly the same conflict of interest language now at issue.

In August 2023, Mr. Wolke reviewed the Code of Conduct in 2023 and WRB's detailed explanation of the Code of Conduct. The 2023 Code of Conduct provided to and reviewed by Mr. Wolke stated: *"Anyone employed by or volunteering as a coach or mentor for another junior, middle school or adult rowing or fitness program in the Dallas area will not be accepted as a participant in our programs or club membership due to the conflict of interest it poses for both clubs."*

In his August 29, 2023 email to WRB, Mr. Wolke approved the 2023 Code of Conduct, responding that the City "does not want to get involved in the day-to-day operations of our operators" and stating that he hoped "this puts it to rest." A copy of Mr. Wolke's email correspondence dated August 29, 2023, along with the related email string, is attached hereto as **Exhibit B**.

Significantly, in a follow up email Mr. Wolke sent to Council Member Blackmon on August 29, 2023, regarding the Code of Conduct matter Mr. Wolke confirmed that WRB was in full contractual compliance. Mr. Wolke wrote, ***"White Rock Boathouse, Inc (WRBI) is contractually compliant with regards to their contract with the City. The incident below was based on their business decision per their Code of Conduct. We continuously monitor our Partner Agreements for compliance and work toward correction to resolve. At this time, WRBI is fully compliant."*** A copy of Mr. Wolke's email and the related string is attached at **Exhibit C**. Parks, and the City, were satisfied, found WRB to be in contractual compliance, and, the matter, as Mr. Wolke put it, was indeed put to rest.

From 2023 until the issuance of the Notice—a period of more than three years—WRB received no further requests, objections, or communications from the City regarding the Code of Conduct. The provision the City now cites to, however, has already been approved by the City. Mr. Wolke's emails in Exhibit B and Exhibit C establish that in 2023 Parks clearly acknowledged and accepted WRB's Code of Conduct.

The provision in the 2025 Code of Conduct that the City has incorrectly cited as problematic under the Development Agreement is nearly identical to the provisions found in the Code of Conduct submitted to and approved by the City in 2022 and 2023.

The 2025 Code of Conduct states: *"Anyone employed by or volunteering as a coach or mentor for another junior, middle school, or adult rowing program in the Dallas area will not be accepted as a participant in our programs or club membership due to the conflict of interest it poses for the clubs."* The origins of the provision at issue go back even further to an earlier 2021



version of the Code of Code conduct, which can also be found in Exhibit B. Thus, the City has had no objection to WRB's Code of Conduct, accordingly, for over 4 and approaching 5 years.

Notably, in June 2025, Maria Hasbany, District 9 Park Board Representative at the time, confirmed in writing that Parks had no issues with WRB's performance under its Agreements with the City, necessarily including with respect to WRB's published 2025 Code of Conduct. Ms. Hasbany's June 2025 email correspondence is attached at **Exhibit D**.

Having received the Code of Conduct on multiple occasions without objection, having continued to perform under the Development Agreement, and expressly declined to involve itself in WRB's day-to-day operations, including with respect to the administration of WRB's Code of Conduct, the City cannot now, more than three years later, reverse course and claim the Code of Conduct was never approved.

The conflict-of-interest clause does not violate Section 1.4

The Notice further alleges that the Code of Conduct's conflict-of-interest provision restricting coaches and mentors from competing rowing programs from WRB membership violates the public access requirements of Section 1.4 of the Development Agreement. This claim is without merit. A conflict-of-interest policy is not a public-access restriction, including merely because it may limit eligibility related to matters of internal organizational affiliation. Such internal organizational affiliation requirements are not uncommon for boathouse operations and rowing programs like WRB's, where athletic recruiting integrity and protection is critical to operations.

Regardless, WRB provides access to its facilities for thousands of Dallas residents every year, including high school students, university rowers (SMU, Jesuit, Ursuline), adaptive rowers, adult rowers, and members of the general public through its rowing programs and events at the Filter Building on a non-discriminatory basis through its programs and events at the Filter Building. The provision at issue in the Code of Conduct is a conflict-of-interest measure that does not generally restrict public access to the Premises by either the more than 1.3 million residents of the City of Dallas or the 8 million residents of the Dallas-Fort Worth Metroplex.

To put this in context, out of the millions of residents of City of Dallas and Dallas-Fort Worth Metroplex, the Code of Conduct provision at issue effects only a handful of individuals -- individuals that already have access to their own competing rowing club and are employed or volunteer in a position of authority at that club. The conflict-of-interest provision serves a legitimate organizational purpose and does not violate Section 1.4. The claim that WRB has restricted public access to the Premises is disingenuous, wrongful and a breach of the Development Agreement by the City.

Reservation of rights and demand for retraction

The City has already attempted to deny WRB's contractual renewal rights, which necessitated WRB filing the Lawsuit to protect its contract rights. Now the City is manufacturing alleged defaults in an apparent effort to undermine WRB's position in the Lawsuit and as a pretext



to an improper termination of the Development Agreement, which WRB has duly renewed and extended through March 5, 2036. This is nothing more than the City grasping at straws in an effort to create a default where none exists. This pattern, including the prior dispute over corporate meeting minutes and other pretextual demands, including the City's purported "cease and desist" related to WRB planned security perimeter fencing at the Premises (which was in compliance with the Agreement), and including the City's wrongful refusal to acknowledge WRB's contract renewals, constitutes a course of conduct designed to harass and further interfere with WRB's contractual rights in violation of the Development Agreement, including Section 8.2, which prohibits the City's unreasonable interference with WRB's peaceful enjoyment of the Premises.

WRB rejects the Notice of Breach in its entirety and demands that the City *immediately* withdraw the Notice. WRB expressly reserves all of its rights, remedies, and defenses under the Development Agreement, at law, and in equity, including the right to seek appropriate relief in the Lawsuit relating to the improper Notice. Should the City proceed with any attempt to declare WRB in default or to terminate the Development (or the Use) Agreement based on the meritless Notice or any other unfounded allegations of breach of default against WRB, WRB intends to vigorously defend its rights and pursue all available remedies at law or in equity.

WRB remains willing to engage in good-faith dialogue regarding any legitimate concerns with the Conduct of Conduct. The City's conduct, however, reflects neither good faith nor any legitimate contractual purpose.

We look forward to your prompt response.

Very truly yours,

Karen L. Hart

Encls.

cc:

Kartik Singapura, Esq. (Firm)
Naomie Kweyu, Esq. (Firm)

City of Dallas - Parks & Recreation Department
Attn: John Jenkins, Director
1500 Marilla Street, 6th Floor
Dallas, Texas 75201

(via email [john.jenkins@dallas.gov]; CMRRR #9414 7266 9904 2253 9659 57,
REGULAR US MAIL AND HAND DELIVERY)(w/Encls.)



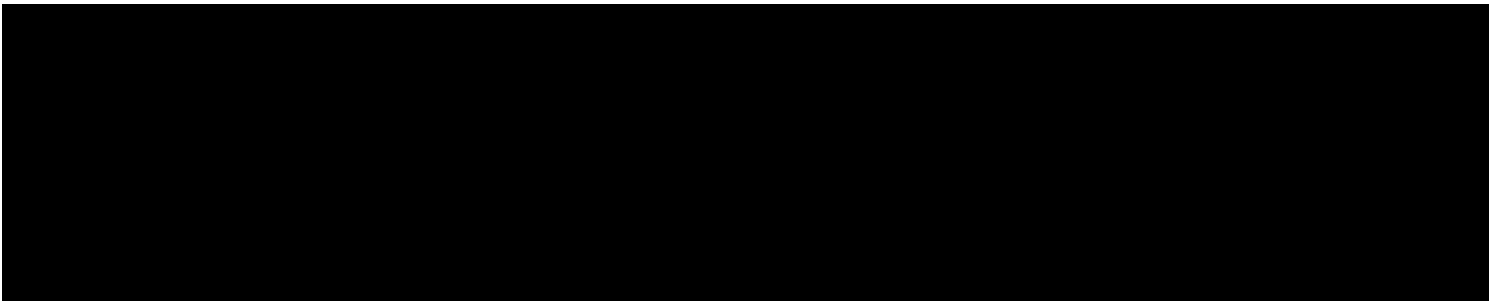
City of Dallas
City Attorney's Office
Attn: Christin Lanners
1500 Marilla 7ES
Dallas, TX 75201
(via CMRRR #9414 7266 9904 2253 9659 64,
REGULAR US MAIL AND HAND DELIVERY) (w/Encls.)

Rachael Berry, Assistant Director - Park and Recreation (via email [rachael.berry@dallas.gov])
(w/Encls.)

Maryann Hernandez, Park and Recreation (via email [maryann.hernandez@dallas.gov])
(w/Encls.)

Olusola Adebajo, Superintendent - Park and Recreation (via email
[olusola.adebajo@dallaspolicy.gov]) (w/Encls.)

Ryan O'Connor, Senior Deputy Director (via email [ryan.oconnor@dallas.gov]) (w/Encls.)



----- Forwarded message -----

From: **Sue Chambers** <chambers.sue22@gmail.com>

Date: Mon, Feb 28, 2022 at 2:06 PM

Subject: Please read when you can

To: Maria Hasbany <maria.hasbany@dallascityhall.com>



Here is the updated version.

White Rock Boathouse Code of Conduct 2022

We all share the love of the sport of rowing, and we want all participants of White Rock to enjoy an environment conducive to their, and other participants' enjoyment of this wonderful sport. Respect is the cornerstone of this code of conduct and applies to all adult participants of White Rock Rowing (hereinafter referred to as "WR participants"). WR participants should treat each other, the equipment, and facilities with respect and should display good sportsmanship while at White Rock Lake or at off-site events/regattas both on/off water. WR Participants should always be responsible, safe and mindful of the well-being of other participants and the public.

To create an environment in which the organizations mission can be achieved, all adult participants and employees must adhere to standards of conduct that support our core values.

The WRR Code of Conduct for all adult participants include the following principles:

- I will support the mission of WRR which prioritizes our youth rowing programs while providing opportunities for adult rowers to participate in the sport
- I will adhere to the published White Rock Rowing and Paddling Safety Guidelines
- I will put safety first, will use common sense to keep myself and others safe and will follow all club safety rules, whether in the White Rock Rowing and Paddling Safety Guidelines or as instructed by a Program Director, Head Coach, supervisor, coach, officer, or director of WRR
- I will be courteous and treat race officials, other WR participants, coaches, opponents, youth and adult athletes, and volunteers with respect
- I will promote the spirit of cooperation and will foster a safe and non-threatening environment at White Rock Boathouse
- I will improve our surrounding community and WRR by volunteering a minimum of 5 hours a year to clean and maintain the boathouse and the equipment or otherwise as needed
- Unless otherwise approved by the Head Coach, I will affiliate with WRR, and wear WRR colors at all competitions, including but not limited to, regatta and ergattas
- I will pay dues and fees, and complete all documents and waivers in a timely manner
- I will immediately inform WRR if I am being investigated for, or have been convicted of, a felony or a crime of moral turpitude
- I will not engage in any activity that would constitute a conflict of interest between my participation at the club and my participation in other clubs or organization, and am not now, and, unless otherwise approved by the Head Coach, will not during the course of my participation, be employed by, or volunteer as a coach or mentor for other junior, middle-school, or adult rowing programs.

Acts of conduct which, in the opinion of the Board, that are injurious or detrimental to the good order, welfare, best interests, or character of WRR, or at variance with the requirements of WRR's policies will not be tolerated. Any person associated with WRB may be suspended or removed from, or denied admission to the club, board, or committee for cause, upon decision by a majority vote of the Board of Directors. Any dues paid will not be refunded. Although it is not possible to list every type of prohibited conduct, examples of such misconduct include, but are not limited to the following:

- Failure to conduct oneself in accordance with, or in violation of, the above principals
- Willful violation of published WRB standard policies, rules, regulations, and guidelines
- Repeated unsportsmanlike behavior
- Verbal or physical abuse of a fellow participant, employee, or guest, including but not limited to discourteous and/or disrespectful treatment of coaches and staff; physical or verbal abuse of a

member, employee, or guest of other boat clubs, including but not limited to discourteous and/or disrespectful treatment of other boaters, coaches, race officials and staff

- Harassment, including sexual harassment, or discrimination based on any characteristic protected by law
- The use of illicit drugs or alcohol at any time.
- Willful disregard of club property/equipment, personal property or equipment, or any property or equipment of WRB tenants stored within or outside of WRB property
- Behaving in a reckless manner, taking unnecessary risks, or acting in such a way that may place anyone at risk of injury or place property at risk of damage, e.g., drunk, and disorderly conduct
- Engaging in or encouraging conduct that is detrimental to the good order, welfare, best interests or character of WRB or anyone associated with WRB, such as deliberate, unfounded, malicious, or libelous remarks, or any deliberate actions to intentionally bring WRB or the sport of rowing or paddling into disrepute
- Any deliberate actions that may impair the successful operations of WRB programs
- Use of WRB facilities or docks for any purpose deemed hazardous in the sole discretion of the WRB organization
- Theft or dishonesty
- Unauthorized use and distribution of personal addresses, email addresses and phone numbers of anyone associated with WRB, including but not limited to, intentional recruitment to competitor programs, or the intentional distribution of misinformation of any kind, without express permission of the President or Board of Directors of the club
- Unauthorized use of WRB branding, trademarks, copyright, and other property (information, reports, etc.), whether financial gain is realized or not
- Destroying, defacing, or damaging City of Dallas, Texas property maintained by WRB
- Criminal conduct, mischief, or unauthorized use in or on City of Dallas, Texas property maintained by WRB
- Disregarding any directive from the WRR Head Coach, Program Director, a supervisor, or a coach
- Having committed any felony or crime of moral turpitude

Reporting Procedure:

Staff Authority:

The WRR Board grants our Head Coach, Program Director and his or her staff the authority to enforce the Code of Conduct and all rules and regulations of the organization. We give the staff the responsibility to call attention to, and correct, individual or group behavior that is not consistent with our Code of Conduct. All staff members are entrusted with enforcing the rules, policies, and procedures and they have permission to discipline a participant whose behavior is inconsistent with these guidelines.

Grievance and Disciplinary Reporting Procedure: All complaints must be reported to the Head Coach or Program Director in writing. If a coach, other than the Head Coach, receives a report, they must immediately forward it to the Head Coach, or Program Director. The Head Coach or Program Director will notify the Chairman of the Board of any complaints. Reports should include the name(s) of the complainant(s), name(s) of the individual(s) allegedly involved in the misconduct, and the type(s) of alleged misconduct. If the Head Coach, or Program Director is unable to resolve the issue in question, or if the issue is regarding the Head Coach, or Program Director the grievance may be sent directly to the Chair of the Board of who, if unable to resolve the issue in question, may bring the matter to the full board. The board of directors will make a final determination of a dispute or grievance **Only** if satisfactory results have not been achieved from the process outlined above.

As a matter of procedure, the Chair of the Board, an officer or board member, the Program Director, or Head Coach has the authority to communicate to the individual(s) involved their concern regarding the actions that are under inquiry.

Confidentiality. To the extent necessary to investigate a grievance, non-public confidential information may be disclosed to potential witnesses or otherwise. Persons receiving such confidential information will be informed of the confidential nature of such information and will be informed that breaching the confidentiality of the information will subject them to disciplinary action.

Retaliation Is Prohibited. Your concerns, complaints, and/or suggestions are taken seriously by WRB and you will not suffer any type of adverse actions if you pursue a problem, complaint, or suggestion using this procedure. The initiation of an allegation will not subject the individual reporting the incident or witnesses to retaliation. An allegation of retaliation shall be considered as a separate incident subject to investigation and disciplinary action.

From: Wulke, Brett <brett.wulke@dallas.gov>
Sent: Tuesday, August 29, 2023 1:52 PM
To: chambers.sue22
Cc: Jonathan Thalheimer
Subject: RE: White Rock Rowing Membership

EXHIBIT

B

Thank you, Sue Ellen. Completely agree that we do not want to continue involving ourselves in these business decisions. I know you are aware though, we want and need a good relationship with City Council so it is in our best interest to provide information when it is requested. I hope this response puts this item to rest and holds any potential future items at bay. I do thank you for the detailed response and wish you all continued success in your program.

Thanks,



Brett Wulke, Superintendent
City of Dallas | dallasparks.org
Dallas Park and Recreation Department
5620 Parkdale
Dallas, Texas 75227
O: 214.670.4236
brett.wulke@dallas.gov



 **Dallas Park & Recreation**
Bringing Communities Together

****OPEN RECORDS NOTICE:** This email and responses may be subject to the Texas Open Records Act and may be disclosed to the public upon request. Please respond accordingly.**

From: Sue Chambers
Sent: Tuesday, August 29, 2023 11:39 AM
To: Wulke, Brett
Cc: Jonathan Thalheimer
Subject: Re: White Rock Rowing Membership

External Email!

Hi Brett,

Cathy Ranspot and Dawn Grimes signed the Code of Conduct (COC), knowing that members were required to affiliate with WRR at races and that coaching for other competitors' rowing programs is not permitted. When it came to our attention that Cathy and Dawn were violating our COC, they were contacted by Kevin Jones, our Program Director. They

were warned they were violating our Code of Conduct and could easily correct the violation by rowing composite. A composite boat is a crew composed of competitors from different organizations that are allowed to represent various clubs in a boat at a race. It is widely practiced nationwide in masters racing and is certainly accepted at WRR. Though they were repeatedly warned of the violation and told of the easy composite fix, they chose to ignore our requests for compliance and further disrespect our rules at the Boathouse.

In addition, Cathy was coaching masters for another program, which is a second violation of our Code of Conduct. She can coach wherever she wants, but it is not the "norm" to coach for one club and join your competitor's club, nor is it acceptable to join a club, use its facility and equipment, and then race for another club. The foundation of successful rowing programs is loyalty and commitment to your club and the community it fosters. Her assertion that master's rowing is just like a Pickleball League is grossly misleading. The magnitude of building boathouses, investing millions of dollars in facilities, equipment, maintenance, repairs, planning complicated travel seasons, and managing a high-level coaching staff is different than playing for a pickup Pickleball League.

We did not reinvent the wheel when implementing our COC, nor did we make up a "Cathy Ranspot" rule! We used examples of COCs from some of the most successful longstanding boathouses in the country that manage multiple programs that include middle school, high school, parents, adults, adaptive, and, in our case, tenant programs, which is not common in boathouses. We used their years of experience to help us set boundaries to build successful programs at WRR around a community that believes in and supports us. It is not in our club's best interest to allow adults who were given multiple opportunities to abide by the Boathouse rules to continue to flaunt rules easily adhered to by all other Boathouse participants. As volunteers, we do not have the time or the capacity to monitor our adult members' behavior and constantly look over our shoulders.

There will always be a few people who won't like our rules or, frankly, won't like us. We have 400+ participants at the Boathouse, including their families, who are thrilled to be part of the Boathouse and are grateful that we have done all the work to provide them with an excellent rowing facility. We have made tremendous strides, and if two unhappy adults are taking up an inordinate amount of time from our volunteer mission because they don't like the rules or the Boathouse management, they can choose (and have, in fact, chosen in the past) to row at any one of the other Dallas area clubs.

We appreciate the pressure you are under to respond to any issue brought to you concerning the detailed day-to-day operations at the Boathouse, but we understand that, as long as we are operating in compliance with our contract, the Park's department does not want to, and will not, be involved in the minutia of running a complex rowing organization. The above two individuals have been complaining about WRR for five years, and they have taken up too much time for both us and the Park's department. Unfortunately, by allowing disgruntled individuals to appeal to the city whenever they are unhappy with our management, time is taken away from our volunteer mission of providing rowing opportunities to Dallas area youth.

I hope this helps end the ongoing cycle of responding to complaints from a few who have other choices of places to row and who have willingly shown their support for other rowing clubs in the past.

Warm regards,

Sue Ellen Chambers

On Mon, Aug 28, 2023 at 3:53 PM Sue Chambers <chambers.sue22@gmail.com> wrote:

Sorry, I will send you the information tonight or tomorrow morning. I have been swamped with getting our programs up and running for the fall season.

Sue Ellen Chambers

On Fri, Aug 25, 2023 at 2:44 PM Wulke, Brett <brett.wulke@dallas.gov> wrote:

Good afternoon –

Checking in on this. I'll need to provide Council Member Blackmon a response/info. If you could please provide some info by end of Monday, that would be much appreciated.

Thanks!



Brett Wulke, Superintendent

City of Dallas | dallasparks.org

Dallas Park and Recreation Department

5620 Parkdale

Dallas, Texas 75227

O: 214.670.4236

brett.wulke@dallas.gov



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From: Wolke, Brett
Sent: Tuesday, August 22, 2023 12:00 PM
To: Sue Ellen Chambers - White Rock Rowing (chambers.sue22@gmail.com) <chambers.sue22@gmail.com>
Cc: Thalheimer Jonathan <jthalheimer@mcslaw.com>
Subject: FW: White Rock Rowing Membership

Good afternoon –

I hope all is well. Please see below. Can you please provide me some information and response on this?

Thanks,



Brett Wolke, Superintendent

City of Dallas | dallasparks.org
Dallas Park and Recreation Department

5620 Parkdale

Dallas, Texas 75227

O: 214.670.4236

brett.wulke@dallas.gov



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From: Blackmon, Paula <paula.blackmon@dallas.gov>
Sent: Tuesday, August 22, 2023 11:18 AM
To: Wulke, Brett <brett.wulke@dallas.gov>
Cc: Tankersley, Consuelo <consuelo.tankersley@dallas.gov>; Hasbany, Maria <maria.hasbany@dallas.gov>; Jenkins, John <john.jenkins@dallas.gov>
Subject: FW: White Rock Rowing Membership

Hello Brett...paula blackmon here...can you look into this pls?

Paula C. Blackmon

Councilwoman, District 9

City of Dallas

From: Cathy Ranspot <catranspot@yahoo.com>
Sent: Thursday, August 17, 2023 4:18 PM
To: Blackmon, Paula <paula.blackmon@dallas.gov>
Subject: White Rock Rowing Membership

External Email!

Hi Paula,

I am attaching the Codes of Conduct in one PDF. It includes the city approved 2021. Then there is the one they modified with the "Cathy Ranspot Clause" in 2022, and the 2023 Code of Conduct that was further modified. I highlighted the the rules that pertain to me, but if you look at the 2022 and 2023 Codes of Conduct, WRB made substantial changes in their language and rules.

To review the timeline -

In October 2021, I participated in the Pumpkinhead Regatta in Austin. I rowed affiliated with DUC in the mixed inclusion adaptive race (I steered the boat with my partner who is a Paralyzed Veteran). I also affiliated with DRC in a quad (they were short a person and I filled in). What is notable, the regatta itself had no problem with me affiliating with two clubs. Again, this is masters rowing--it's just like a Pickleball League. We do it for fun and fitness.

I did not renew my membership in 2022 (as I told you earlier, I have had knee surgery, shoulder surgery and a hysterectomy in the past two years). I attempted to rejoin in 2023. I was denied membership. The reason for my denial, he (Kevin Jones) cited my past violation in 2021 and that I was still coaching and volunteering. For the record, I am no longer coaching for any club, but I think it is absolutely absurd that someone is policing how I volunteer my time.

Other item to note, in 2021, there were two males and two females (myself and Dawn Grimes), who I know were members of White Rock Rowing and they affiliated with other clubs and competed. The males were able to continue their membership in 2022. Dawn Grimes and I have not been allowed to rejoin.

Please let me know if you need any further information. Thank you for your time today, I really appreciate it.

Cathy Ranspot

CAUTION: This email originated from outside of the organization. Please, do not click links or open attachments unless you recognize the sender and know the content is safe.

CAUTION: This email originated from outside of the organization. Please, do not click links or open attachments unless you recognize the sender and know the content is safe.

2023

White Rock Boathouse, Inc. Code of Conduct

White Rock Boathouse, Inc. (WRB) includes the White Rock Boathouse, the Historic Boathouse at T & P Hill, and The Filter Building. Everyone associated with WRB shall maintain a high standard of conduct, including responsible behavior and consideration for the safety and well-being of the public and all affiliations of WRB. We shall treat each other, our equipment and facilities with respect, and we shall display good sportsmanship both on/off water, whether at White Rock Lake or while representing the club at off-site events/regattas.

The following is understood:

- I will adhere to the published White Rock Rowing and Paddling Guidelines
- I will promote the spirit and culture of rowing, paddling, and the reputation of WRB
- I will show respect and consideration to others, fostering a safe, non-threatening environment
- I will place my safety and that of my teammates first
- I will improve our surrounding community and club by contributing my efforts, experience, and/or skills by volunteering at WRB supported events
- I will affiliate with White Rock at all competitions, including but not limited to, regattas and ergattas; all exceptions must be approved by the Head Coach
- Anyone employed by or volunteering as a coach or mentor for another junior, middle school, or adult rowing or fitness program in the Dallas area will not be accepted as a participant in our programs or club membership due to the conflict of interest it poses for both clubs
- WRB reserves the right to deny participation in any of our programs or club membership to anyone who has previously broken the Code of Conduct

Any person associated with WRB may be suspended from, removed from, or denied admission or access to the boathouse and premises, club, board or committee for cause, upon decision by a three-fourths majority vote of the Board of Directors. Any dues paid will not be refunded. "Cause" shall include, but is not limited to:

- Willful violation of published WRB standard policies, rules, regulations and guidelines
- Repeated unsportsmanlike behavior
- Harassment or discrimination based on any characteristic protected by law
- The use of illicit drugs or alcohol before or during rowing
- Willful disregard of club property/equipment, personal property or equipment, or any property or equipment of WRB tenants stored within or outside of WRB property
- Behaving in a reckless manner, taking unnecessary risks, or acting in such a way that may place anyone at risk of injury or place property at risk of damage, e.g. drunk and disorderly conduct
- Engaging or encouraging conduct that is detrimental to WRB or anyone associated with WRB
- Engaging or encouraging conduct that would bring WRB or the sport of rowing or paddling into disrepute
- Unfounded malicious or libelous remarks, or any actions that may impair the good reputation of WRB or anyone associated with it
- Any actions that may impair the successful operations of WRB programs
- Use of WRB facilities or docks for any purpose deemed hazardous in the sole discretion of the WRB organization
- Theft or dishonesty of any kind
- Unauthorized use and distribution of personal addresses, email addresses and phone numbers of anyone associated with WRB, including but not limited to, intentional distribution of misinformation of any kind
- Unauthorized use of WRB branding, trademarks, copyright, and other property (information, reports, etc), whether financial gain is realized or not
- Destroying, defacing, or damaging City of Dallas, Texas property maintained by WRB
- Criminal conduct, mischief or unauthorized use in or on City of Dallas, Texas property maintained by WRB
- Disregarding these directives or any directive from the Head Coach, Assistant Coaches, or Program Director

This Code of Conduct may be amended from time to time by a majority vote of the Board of Directors.

Reporting Procedure

Any and all complaints must be immediately reported to Head Coach, or Program Director in writing. If a coach or supervisor receives a report they must immediately forward it to the Head Coach, or Program Director. Reports should include the name(s) of the complainant(s), name(s) of the individual(s) allegedly involved in the misconduct, and the type(s) of alleged misconduct. Reports or incidents warranting confidentiality will be handled appropriately, and information will be disclosed to others only on a need-to-know basis. The investigation will be completed and a determination regarding the alleged incident(s) will be made and communicated to the complainant(s) and to the person(s) accused.

Your concerns, complaints, and/or suggestions are taken seriously by WRB and you will not suffer any type of adverse actions if you pursue a problem, complaint, or suggestion using this procedure.

2022?

White Rock Boathouse Code of Conduct

We all share the love of the sport of rowing, and we want all participants of White Rock to enjoy an environment conducive to their, and other participants' enjoyment of this wonderful sport. Respect is the cornerstone of this code of conduct and applies to all adult participants of White Rock Rowing (hereinafter referred to as "WR participants"). WR participants should treat each other, the equipment, and facilities with respect and should display good sportsmanship while at White Rock Lake or at off-site events/regattas both on/off water. WR Participants should always be responsible, safe and mindful of the well-being of other participants and the public.

To create an environment in which the organizations mission can be achieved, all adult participants and employees must adhere to standards of conduct that support our core values.

The WRR Code of Conduct for all adult participants include the following principles:

- • I will support the mission of WRR which prioritizes our youth rowing programs while providing opportunities for adult rowers to participate in the sport
- I will adhere to the published White Rock Rowing and Paddling Safety Guidelines
- I will put safety first, will use common sense to keep myself and others safe and will follow all club safety rules, whether in the White Rock Rowing and Paddling Safety Guidelines or as instructed by a Program Director, Head Coach, supervisor, coach, officer, or director of WRR
- I will be courteous and treat race officials, other WR participants, coaches, opponents, youth and adult athletes, and volunteers with respect
- I will promote the spirit of cooperation and will foster a safe and non-threatening environment at White Rock Boathouse
- I will improve our surrounding community and WRR by volunteering a minimum of 5 hours a year to clean and maintain the boathouse and the equipment or otherwise as needed
- • Unless otherwise approved by the Program Director or Head Coach, I will affiliate with WRR, and wear WRR colors at all competitions, including but not limited to, regatta and ergattas
- I will pay dues and fees, and complete all documents and waivers in a timely manner
- I will immediately inform WRR if I am being investigated for, or have been convicted of, a felony or a crime of moral turpitude
- • Due to the conflict of interest, I will not during my participation, be employed by, or volunteer as a coach or mentor for other junior, middle-school, or adult rowing programs, unless otherwise approved by the Program Director or Head Coach

Acts of conduct which, in the opinion of the Board, that are injurious or detrimental to the good order, welfare, best interests, or character of WRR, or at variance with the requirements of WRR's policies will not be tolerated. Any person associated with WRR may be suspended or removed from, or denied admission to the club, board, or committee for cause, upon decision by a majority vote of the Board of Directors. Any dues paid will not be refunded. Although it is not possible to list every type of prohibited conduct, examples of such misconduct include, but are not limited to the following:

- Failure to conduct oneself in accordance with, or in violation of, the above principals
- Willful violation of published WRB standard policies, rules, regulations, and guidelines
- Repeated unsportsmanlike behavior
- Verbal or physical abuse of a fellow participant, employee, or guest, including but not limited to discourteous and/or disrespectful treatment of coaches and staff; physical or verbal abuse of a member, employee, or guest of other boat clubs, including but not limited to discourteous and/or disrespectful treatment of other boaters, coaches, race officials and staff

- Harassment, including sexual harassment, or discrimination based on any characteristic protected by law
- The use of illicit drugs or alcohol at any time
- Willful disregard of club property/equipment, personal property or equipment, or any property or equipment of WRB tenants stored within or outside of WRB property
- Behaving in a reckless manner, taking unnecessary risks, or acting in such a way that may place anyone at risk of injury or place property at risk of damage, e.g., drunk, and disorderly conduct
- Engaging in or encouraging conduct that is detrimental to the good order, welfare, best interests or character of WRB or anyone associated with WRB, such as deliberate, unfounded, malicious, or libelous remarks, or any deliberate actions to intentionally bring WRB or the sport of rowing or paddling into disrepute
- Any deliberate actions that may impair the successful operations of WRB programs
- Use of WRB facilities or docks for any purpose deemed hazardous in the sole discretion of the WRB organization
- Theft or dishonesty
- Competing for another club at scrimmages, regattas or ergattas unless otherwise approved by either the Program Director or Head Coach
- Unauthorized use and distribution of personal addresses, email addresses and phone numbers of anyone associated with WRB, including but not limited to, intentional recruitment to competitor programs, or the intentional distribution of misinformation of any kind, without express permission of the President or Board of Directors of the club
- Unauthorized use of WRB branding, trademarks, copyright, and other property (information, reports, etc.), whether financial gain is realized or not
- Destroying, defacing, or damaging City of Dallas, Texas property maintained by WRB
- Criminal conduct, mischief, or unauthorized use in or on City of Dallas, Texas property maintained by WRB
- Disregarding any directive from the WRR Head Coach, Program Director, a supervisor, or a coach
- Having committed any felony or crime of moral turpitude

Reporting Procedure:

Staff Authority:

The WRR Board grants our Head Coach, Program Director and his or her staff the authority to enforce the Code of Conduct and all rules and regulations of the organization. We give the staff the responsibility to call attention to, and correct, individual or group behavior that is not consistent with our Code of Conduct. All staff members are entrusted with enforcing the rules, policies, and procedures and they have permission to discipline a participant whose behavior is inconsistent with these guidelines.

Grievance and Disciplinary Reporting Procedure: All complaints must be reported to the Head Coach or Program Director in writing. If a coach, other than the Head Coach, receives a report, they must immediately forward it to the Head Coach, or Program Director. The Head Coach or Program Director will notify the Chairman of the Board of any complaints. Reports should include the name(s) of the complainant(s), name(s) of the individual(s) allegedly involved in the misconduct, and the type(s) of alleged misconduct. If the Head Coach, or Program Director is unable to resolve the issue in question, or if the issue is regarding the Head Coach, or Program Director the grievance may be sent directly to the Chair of the Board of who, if unable to resolve the issue in question, may bring the matter to the full board. The board of directors will make a final determination of a dispute or grievance **Only** if satisfactory results have not been achieved from the process outlined above. **Confidentiality.** To the extent necessary to investigate a grievance, non-public confidential information may be disclosed to potential witnesses or

otherwise. Persons receiving such confidential information will be informed of the confidential nature of such information and will be informed that breaching the confidentiality of the information will subject them to disciplinary action.

Retaliation Is Prohibited. Your concerns, complaints, and/or suggestions are taken seriously by WRB and you will not suffer any type of adverse actions if you pursue a problem, complaint, or suggestion using this procedure. The initiation of an allegation will not subject the individual reporting the incident or witnesses to retaliation. An allegation of retaliation shall be considered as a separate incident subject to investigation and disciplinary action.

2021

CITY OF DALLAS
WHITE ROCK BOATHOUSE FACILITIES CODE OF CONDUCT

Prohibited behaviors under the Texas Penal Code:

- Recklessly damaging or destroying City materials or property, or the personal property of building customers or staff. (Texas Penal Code § 28.04)
- Gambling in any form on City property. (Texas Penal Code § 47.02)
- Making offensive gestures, cursing or using obscene, abusive, profane or threatening language. (Texas Penal Code § 42.01)
- Displaying or distributing obscene material. (Texas Penal Code § 43.22 and § 43.24)
- Engaging in acts of sexual misconduct, including, but not limited to, indecent exposure, sexual contact and sexual intercourse. (Texas Penal Code § 21.07 and 21.08)
- Stalking other users, patrons, or staff including looking into an area, such as a restroom, that is designed to provide privacy to a person using the area. (Texas Penal Code § 42.01 and § 42.072); (Dallas City Code § 31-36)
- Exhibiting signs of being under the influence of alcohol or controlled substances. (Texas Penal Code § 49.02)
- Displaying firearms or other deadly weapons on City property in a manner calculated to alarm. Exemptions from this prohibition are recognized for Law Enforcement Officers and individuals licensed to carry handguns in accordance with state law. (Texas Penal Code § 42.01)
- Engaging in physical altercations including assaults and fighting. (Texas Penal Code § 22.01)

Prohibited behaviors under the Dallas City Code

- Entering or remaining in a City building before or after posted hours of operation without the express permission of the Department Director or Director's designee. (Dallas City Code § 31-37)
- Smoking or using tobacco products in City buildings. (Dallas City Code § 41-2)
- Entering into staff work areas not open to the public. (Dallas City Code § 31-14)
- Littering. (Dallas City Code § 7A-3)
- Consuming or possessing alcoholic beverages on City property or while in a public park. (Dallas City Code § 6-6.1 and § 32-11.3)

The following behaviors are prohibited if in the clear judgment of WRB or city staff, on a case-by-case basis, they disrupt the environment for other users of the facilities:

- Using the facilities for other than their intended purpose, including: loitering, sleeping, changing clothes, bathing (except for washing hands or face), shampooing, shaving, washing clothes or utensils, preparing meals or food, or personal grooming unless it is considered appropriate for an approved activity.
- Eating, drinking, or bringing food or beverages in open containers into a City building is prohibited, except in cases where an event has been previously approved.
- Bare feet and bathing suits or clothing that does not cover both upper and lower torso is prohibited in public areas unless it is considered for an approved activity.
- Introducing any animals, insects or other living organisms into City buildings without expressed permission of the City staff, with the exception of service animals, such as seeing-eye dogs or other guide-trained animals.
- Using wheeled recreational devices such as skateboards, roller skates, roller blades, bicycles, and scooters in or on City property, except in designated areas.
- Entering, or attempting to enter, City buildings possessing such defects of bodily hygiene as impairs a clean and sanitary environment, as it is intended for enjoyment of the building. This includes individuals whose neglect of bodily hygiene gives offense and therefore constitutes a nuisance to others and staff.
- Entering into or remaining in City buildings while emitting odors (including bodily odors or perfumes), which interfere with the use of services by other users or the work of staff.
- Entering into City buildings with large framed backpacks, bedrolls, blanket rolls, or more than three grocery-sized paper or plastic bags or parcels. Personal belongings including purses or cell phones must not impede access to doors, services or materials. Customers must keep belongings with them at all times. The City or WRB is not responsible for unattended personal belongings.
- No soliciting or proselytizing on City property, except as authorized. No panhandling at any time.
- Neglecting to provide proper supervision of children.
- Using areas for any activities, other than their intended purpose.
- Physically blocking aisles, exits, or entrances, including sitting or lying down in them.
- Moving, altering, or rearranging furniture or equipment; altering the configuration or settings of electronic equipment without the authorization of staff; or otherwise using furniture or equipment for other than its intended purpose.
- Use of parking lot before or after hours of operation or for performing non-emergency automotive repairs or maintenance at any time.
- Engaging in any other activity that disturbs normal activities and/or the environment for other users and WRB and City staff.

CITY OF DALLAS
WHITE ROCK BOATHOUSE FACILITIES CODE OF CONDUCT

All program participants shall be responsible to adhere to the following prior to use of the facility and/or facility equipment:

- Adhere to the published White Rock Rowing and Paddling Guidelines
- Affiliate with White Rock Rowing at all competitions, including but not limited to, regatta and ergattas; all exceptions must be approved by the Head Coach or Executive Director
- Avoidance of any recruitment activities on the WRB Facilities, including but not limited to the use, publication, and/or ; dissemination of participants information for marketing and recruitment purposes beyond WRB Facilities programs is strictly prohibited
- Unauthorized use of WRB and City of Dallas branding, trademarks, copyright, and other property (information, reports, etc.), whether financial gain is realized or not
- Unauthorized use and distribution of personal addresses, email addresses and phone numbers of anyone associated with WRB Facilities programs, including but not limited to, intentional distribution of misinformation of any kind
- Conduct that jeopardizes WRB's certifications from USRowing or other governing bodies for the sport of rowing

In addition to all of the above, all coaches, board, staff, individuals with instructional duties, and volunteers, shall be responsible to adhere to the following prior to use of the facility and/or facility equipment:

- Background check; for the safety and security of all participants, anyone who has been convicted of a felony may be disqualified from participating at the boathouse in the capacity of a coach, board, staff, instructional duties, and volunteer
- Avoidance of any recruitment activities on the WRB Facilities, including but not limited to the use, publication, and/or; dissemination of participants information for marketing and recruitment purposes beyond WRB Facilities programs is strictly prohibited
- Unauthorized use of WRB and City of Dallas branding, trademarks, copyright, and other property (information, reports, etc.), whether financial gain is realized or not
- Unauthorized use and distribution of personal addresses, email addresses and phone numbers of anyone associated with WRB Facilities program, including but not limited to, intentional distribution of misinformation of any kind

Reporting Procedure

Any and all complaints must be immediately reported to an officer of the Board of Directors of WRB, coach or Executive Director in writing. If a coach or officer of the Board of Directors of WRB receives a report, they must immediately forward it to the Head Coach, Executive Director, or WRB facility staff. Reports should include the name(s) of the complainant(s), name(s) of the individual(s) allegedly involved in the misconduct, and the type(s) of alleged misconduct. Reports or incidents warranting confidentiality will be handled appropriately, and information will be disclosed to others only on a need-to-know basis. WRB shall forward all reports to the City of Dallas Park and Recreation Department and coordinate an investigation to be completed and a determination regarding the alleged incident(s) will be made and communicated to the complainant(s) and to the person(s) accused.

Your concerns, complaints, and/or suggestions are taken seriously by WRB and the City of Dallas Park and Recreation Department and you will not suffer any type of adverse actions if you pursue a problem, complaint, or suggestion using this procedure.

EXHIBIT

C

From: Wulke, Brett <brett.wulke@dallas.gov>
Sent: Tuesday, August 29, 2023 3:07 PM
To: Blackmon, Paula <paula.blackmon@dallas.gov>
Cc: Tankersley, Consuelo <consuelo.tankersley@dallas.gov>; Hasbany, Maria <maria.hasbany@dallas.gov>; Jenkins, John <john.jenkins@dallas.gov>
Subject: RE: White Rock Rowing Membership

White Rock Boathouse, Inc (WRBI) is contractually compliant with regards to their contract with the City. The incident below was based on their business decision per their Code of Conduct. We continuously monitor our Partner Agreements for compliance and work toward correction to resolve. At this time, WRBI is fully compliant.



Brett Wulke, Superintendent
City of Dallas | dallasparks.org
Dallas Park and Recreation Department
5620 Parkdale
Dallas, Texas 75227
O: 214.670.4236
brett.wulke@dallas.gov



 **Dallas Park & Recreation**
Bringing Communities Together

****OPEN RECORDS NOTICE:** This email and responses may be subject to the Texas Open Records Act and may be disclosed to the public upon request. Please respond accordingly.**

From: Blackmon, Paula <paula.blackmon@dallas.gov>
Sent: Tuesday, August 29, 2023 1:55 PM
To: Wulke, Brett <brett.wulke@dallas.gov>
Cc: Tankersley, Consuelo <consuelo.tankersley@dallas.gov>; Hasbany, Maria <maria.hasbany@dallas.gov>; Jenkins, John <john.jenkins@dallas.gov>
Subject: RE: White Rock Rowing Membership

Thanks for sending this...so all we are doing is taking this response without looking into it further? Just trying to understand how the city is conducting its compliance of our contractors/partners...p

Paula C. Blackmon

Councilwoman, District 9
City of Dallas

From: Wulke, Brett <brett.wulke@dallas.gov>
Sent: Tuesday, August 29, 2023 1:46 PM
To: Blackmon, Paula <paula.blackmon@dallas.gov>
Cc: Tankersley, Consuelo <consuelo.tankersley@dallas.gov>; Hasbany, Maria <maria.hasbany@dallas.gov>; Jenkins, John <john.jenkins@dallas.gov>
Subject: RE: White Rock Rowing Membership

Good afternoon –

Please see response from White Rock Boathouse, Inc below in blue. If you have further questions, please let me know.

Hi Brett,

Cathy Ranspot and Dawn Grimes signed the Code of Conduct (COC), knowing that members were required to affiliate with WRR at races and that coaching for other competitors' rowing programs is not permitted. When it came to our attention that Cathy and Dawn were violating our COC, they were contacted by Kevin Jones, our Program Director. They were warned they were violating our Code of Conduct and could easily correct the violation by rowing composite. A composite boat is a crew composed of competitors from different organizations that are allowed to represent various clubs in a boat at a race. It is widely practiced nationwide in masters racing and is certainly accepted at WRR. Though they were repeatedly warned of the violation and told of the easy composite fix, they chose to ignore our requests for compliance and further disrespect our rules at the Boathouse.

In addition, Cathy was coaching masters for another program, which is a second violation of our Code of Conduct. She can coach wherever she wants, but it is not the "norm" to coach for one club and join your competitor's club, nor is it acceptable to join a club, use its facility and equipment, and then race for another club. The foundation of successful rowing programs is loyalty and commitment to your club and the community it fosters. Her assertion that master's rowing is just like a Pickleball League is grossly misleading. The magnitude of building boathouses, investing millions of dollars in facilities, equipment, maintenance, repairs, planning complicated travel seasons, and managing a high-level coaching staff is different than playing for a pickup Pickleball League.

We did not reinvent the wheel when implementing our COC, nor did we make up a "Cathy Ranspot" rule! We used examples of COCs from some of the most successful longstanding boathouses in the country that manage multiple programs that include middle school, high school, parents, adults, adaptive, and, in our case, tenant programs, which is not common in boathouses. We used their years of experience to help us set boundaries to build successful programs at WRR around a community that believes in and supports us. It is not in our club's best interest to allow adults who were given multiple opportunities to abide by the Boathouse rules to continue to flaunt rules easily adhered to by all other Boathouse participants. As volunteers, we do not have the time or the capacity to monitor our adult members' behavior and constantly look over our shoulders.

There will always be a few people who won't like our rules or, frankly, won't like us. We have 400+ participants at the Boathouse, including their families, who are thrilled to be part of the Boathouse and are grateful that we have done all the work to provide them with an excellent rowing facility. We have made tremendous strides, and if two unhappy adults are taking up an inordinate amount of time from our volunteer mission because they don't like the rules or the Boathouse management, they can choose (and have, in fact, chosen in the past) to row at any one of the other Dallas area clubs.

We appreciate the pressure you are under to respond to any issue brought to you concerning the detailed day-to-day operations at the Boathouse, but we understand that, as long as we are operating in compliance with our contract, the Park's department does not want to, and will not, be involved in the minutia of running a complex rowing organization.

The above two individuals have been complaining about WRR for five years, and they have taken up too much time for both us and the Park's department. Unfortunately, by allowing disgruntled individuals to appeal to the city whenever they are unhappy with our management, time is taken away from our volunteer mission of providing rowing opportunities to Dallas area youth.

I hope this helps end the ongoing cycle of responding to complaints from a few who have other choices of places to row and who have willingly shown their support for other rowing clubs in the past.

Warm regards,

Sue Ellen Chambers



Brett Wolke, Superintendent
City of Dallas | dallasparks.org
Dallas Park and Recreation Department
5620 Parkdale
Dallas, Texas 75227
O: 214.670.4236
brett.wulke@dallas.gov



Dallas Park & Recreation
Bringing Communities Together

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From: Blackmon, Paula <paula.blackmon@dallas.gov>
Sent: Tuesday, August 22, 2023 11:18 AM
To: Wolke, Brett <brett.wulke@dallas.gov>
Cc: Tankersley, Consuelo <consuelo.tankersley@dallas.gov>; Hasbany, Maria <maria.hasbany@dallas.gov>; Jenkins, John <john.jenkins@dallas.gov>
Subject: FW: White Rock Rowing Membership

Hello Brett...paula blackmon here...can you look into this pls?

Paula C. Blackmon

Councilwoman, District 9
City of Dallas

From: Cathy Ranspot <catranspot@yahoo.com>
Sent: Thursday, August 17, 2023 4:18 PM
To: Blackmon, Paula <paula.blackmon@dallas.gov>
Subject: White Rock Rowing Membership

External Email!

Hi Paula,

I am attaching the Codes of Conduct in one PDF. It includes the city approved 2021. Then there is the one they modified with the "Cathy Ranspot Clause" in 2022, and the 2023 Code of Conduct that was further modified. I highlighted the the rules that pertain to me, but if you look at the 2022 and 2023 Codes of Conduct, WRB made substantial changes in their language and rules.

To review the timeline -

In October 2021, I participated in the Pumpkinhead Regatta in Austin. I rowed affiliated with DUC in the mixed inclusion adaptive race (I steered the boat with my partner who is a Paralyzed Veteran). I also affiliated with DRC in a quad (they were short a person and I filled in). What is notable, the regatta itself had no problem with me affiliating with two clubs. Again, this is masters rowing--it's just like a Pickleball League. We do it for fun and fitness.

I did not renew my membership in 2022 (as I told you earlier, I have had knee surgery, shoulder surgery and a hysterectomy in the past two years). I attempted to rejoin in 2023. I was denied membership. The reason for my denial, he (Kevin Jones) cited my past violation in 2021 and that I was still coaching and volunteering. For the record, I am no longer coaching for any club, but I think it is absolutely absurd that someone is policing how I volunteer my time.

Other item to note, in 2021, there were two males and two females (myself and Dawn Grimes), who I know were members of White Rock Rowing and they affiliated with other clubs and competed. The males were able to continue their membership in 2022. Dawn Grimes and I have not been allowed to rejoin.

Please let me know if you need any further information. Thank you for your time today, I really appreciate it.

Cathy Ranspot

CAUTION: This email originated from outside of the organization. Please, do not click links or open attachments unless you recognize the sender and know the content is safe.

EXHIBIT

D

From: [Sue Chambers](#)
To: [Jonathan Thalheimer](#)
Subject: Fwd: Sailing and Rowing Contracts at WRL
Date: Tuesday, June 17, 2025 5:54:03 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sue Ellen Chambers

Begin forwarded message:

From: "Hasbany, Maria" <maria.hasbany@dallas.gov>
Date: June 17, 2025 at 9:43:41 AM CDT
To: "Hunt, Robert" <roberth@mail.smu.edu>, 157833 <157833@gmail.com>, Sue Ellen Chambers <chambers.sue22@gmail.com>
Cc: Jeanne Tunks <jeanne.tunks@gmail.com>
Subject: Sailing and Rowing Contracts at WRL

Hello Sue Ellen, Robert and Forest,

I have spoken to each of you recently about the requests for information coming from the Park Department Contract Compliance Department and why this information is being requested. As I stated, the Park Department has no issues with any of your contracts and these requests are being driven by Councilwoman Blackmon's office. She has been working with Al See's guidance to research each of your contracts and performance. It is not clear to me or anyone on staff what her intentions are with regard to these requests.

I would encourage you to speak with Brett Wulke or Director Jenkins directly if you have questions and/or seek legal guidance.

Maria Hasbany
Park Board Representative District 9
214-232-2123

From: [Special Delivery](#)
To: [Mary Smith](#)
Subject: Delivery Update - CITY OF DALLAS-PARKS & REC - Reference: 11334.00006
Date: Thursday, August 6, 2026 8:54:42 AM

This Message has originated outside your organization.

MARY SMITH,

An important update below!



Special Delivery Order Update:

Order Number: 2180131

Delivered At: 08/06/26 at 8:52 AM

Your Delivery Order to CITY OF DALLAS-PARKS & REC has been completed.

Received By: M PEREZ at 8:52 AM on 08/06/26

For more details, please [login](#), [email](#) or call 214-866-3200

PICK-UP FROM:

BELL NUNNALLY
2323 ROSS AVE, STE 1900
DALLAS, TX 75201

DELIVER TO:

CITY OF DALLAS-PARKS & REC
1500 MARILLA ST, 6TH FL.
DALLAS, TX 75201

ADDITIONAL INFORMATION:

Order Placed: 08/06/26 at 8:04 AM

Type: CAR - 1.5 HOUR - ONE WAY

Comment: DELIVER 3 ENVELOPES TO 3 OFFICES AT CITY HALL RUSH

Special Delivery (214) 866-3200

app.specialdelivery.com

From: [Special Delivery](#)
To: [Mary Smith](#)
Subject: Delivery Update - CITY OF DALLAS-ATTORNEYS OFF. - Reference: 11334.00006
Date: Thursday, August 6, 2026 8:58:07 AM

This Message has originated outside your organization.

MARY SMITH,

An important update below!



Special Delivery Order Update:

Order Number: 2180134

Delivered At: 08/06/26 at 8:55 AM

Your Delivery Order to CITY OF DALLAS-ATTORNEYS OFF. has been completed.

Received By: S DELEON LOPEZ at 8:55 AM on 08/06/26

For more details, please [login](#), [email](#) or call 214-866-3200

PICK-UP FROM:

CITY OF DALLAS-PARKS & REC
1500 MARILLA ST, 6TH FL.
DALLAS, TX 75201

DELIVER TO:

CITY OF DALLAS-ATTORNEYS OFF.
1500 MARILLA ST, 7DN
DALLAS, TX 75201

ADDITIONAL INFORMATION:

Order Placed: 08/06/26 at 9:20 AM

Type: CAR - 1.5 HOUR - ONE WAY

Comment: DELIVER 3 ENVELOPES TO 3 OFFICES AT CITY HALL RUSHRUSH

Special Delivery (214) 866-3200

app.specialdelivery.com

From: [Special Delivery](#)
To: [Mary Smith](#)
Subject: Delivery Update - CITY ATTORNEYS OFFICE - Reference: 11334.00006
Date: Thursday, August 6, 2026 8:58:07 AM

This Message has originated outside your organization.

MARY SMITH,

An important update below!



Special Delivery Order Update:

Order Number: 2180135

Delivered At: 08/06/26 at 8:56 AM

Your Delivery Order to CITY ATTORNEYS OFFICE has been completed.

Received By: S DELEON LOPEZ at 8:56 AM on 08/06/26

For more details, please [login](#), [email](#) or call 214-866-3200

PICK-UP FROM:

CITY OF DALLAS-ATTORNEYS OFF.
1500 MARILLA ST, 7DN
DALLAS, TX 75201

DELIVER TO:

CITY ATTORNEYS OFFICE
1500 MARILLA ST, 7ES
DALLAS, TX 75201

ADDITIONAL INFORMATION:

Order Placed: 08/06/26 at 8:04 AM

Type: CAR - 1.5 HOUR - ONE WAY

Comment: DELIVER 3 ENVELOPES TO 3 OFFICES AT CITY HALL RUSHLast
LegRUSH

Special Delivery (214) 866-3200

app.specialdelivery.com

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Return Receipt (Electronic) \$

Certified Mail Restricted Delivery \$

Postage \$

Total Postage and Fees \$

Postmark
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Sent to:

John Jenkins, Director
City of Dallas - Parks & Recreation
1500 Marilla Street, 6th Floor
Dallas, TX 75201

Reference Information

KLH/MS

11334-00006

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Certified Mail Fee \$

Return Receipt (Hardcopy) \$

Return Receipt (Electronic) \$

Certified Mail Restricted Delivery \$

Postage \$ 3.14

Total Postage and Fees \$ 13.34

Postmark
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Sent to:

Stacy Rodriguez
Andrew G. Spaniol
Ryan Crocker
City of Dallas - Attorneys' Office
1500 Marilla St; 7DN Dallas City Hall
Dallas, TX 75201

Reference Information

KLH/MS

11334-00006

WALZ

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USPS® ARTICLE NUMBER

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Certified Mail Fee \$

Return Receipt (Hardcopy) \$

Return Receipt (Electronic) \$

Certified Mail Restricted Delivery \$

Postage \$ 3.14

Total Postage and Fees \$ 13.34

**Postmark
Here**

Sent to:

Christin Lanners

City of Dallas - Attorneys Office
1500 Marilla Street, 7ES
Dallas, TX 75201

Reference Information

KLH/MS

11334-00006

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