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April 15, 2022

Tamarah Pfeiffer, Interim President,
Haskell Indian Nations University
tamarah.pfeiffer@bie.edu

Tonia Salvini, Vice President,
Haskell Indian Nations University
tonia.salvini@bie.edu

Tony Dearman, Director,
Bureau of Indian Affairs
tony.dearman@bie.edu

RE: My Client: Clay Mayes, Haskell Indian
Nations University Cross Country Coach

Please be advised that I have been retained by Clay Mayes, Cross County
Coach for Haskell Indian Nations University.

As you know, on November 4, 2021, Mr. Mayes was advised by Tonia L. Salvini
that a complaint had been filed against him. (Attached Memorandum). The
communication stated that: 1) An investigation would proceed by "an independent,
trained investigator/s through BIE/HR office"; 2) Mr. Mayes was directed to have no
contact with members of the Haskell Cross Country Team; 3) Statement that the notice
was "confidential"; and 4) Warning to Mr. Mayes not to take any form of retaliation or
retribution, and threatening "discipline and possible removal" if he does so.

As of this date, my client has not been informed of any investigation, of any kind,
regarding this matter. Mr. Mayes has not been contacted by anyone at the BIE/HR
office regarding an investigation.

Mr. Mayes has repeatedly requested specific information regarding the complaint
and allegations to Ms. Salvini, Judith Gipp, and others; no information, whatsoever, has
been provided to my client regarding these allegations and complaint.

Mr. Mayes denies any wrongdoing or misconduct as Cross Country Coach at
Haskell Indian Nations University. It is impossible to specifically respond to the alleged
complaint without the presentation of the complaint itself.

Accordingly, on behalf of Clay Mayes, I demand the following:

1. All false and improper communications, allegations, and statements regarding Clay Mayes must cease and terminate immediately.

2. Copies of all communications and allegations (including names and verbal communications) from the alleged students or any other persons be produced to my office within ten (10) days from the date of this letter, (April 25, 2022).

3. Copies of all communications regarding Clay Mayes exchanged between Judith Gipp, Albert Gipp, Tonia Salvini, Tamarah Pfeiffer, all Haskell Employees, and past Haskell employees be produced to my office within ten (10) days, (April 25, 2022).

4. Copies of all communications exchanged between Haskell students or other persons regarding the alleged complaint against Clay Mayes produced to my office within ten (10) days, (April 25, 2022)

5. Immediate payment to my client for all funds due pursuant to his contract; Mr. Mayes has not received any payment since February 19, 2022.

6. Immediate withdrawal of the no contact directive set forth in the November 4, 2021 Memorandum.

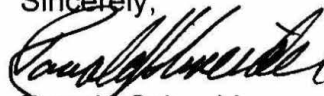
7. An Administrative hearing be promptly scheduled, subject to mutual agreement, and production of all relevant documents.

8. Mr. Mayes' contract must be renewed before the end of April. Failure to do so will be regarded as a violation of his rights, and as an act of retaliation.

Mr. Mayes' contract has been breached by Haskell Indian Nations University. In addition, my client has been slandered and defamed by false statements by Haskell Indian Nations University, individual employees, and other persons. Mr. Mayes has incurred substantial personal and financial damages as a direct result of such violations of law. Appropriate compensation will be sought on behalf of my client.

All future communications should be directed to me at the address and email identified above. You are specifically directed NOT to have any direct or indirect communication with my client.

Sincerely,



Ronald Schneider

cc: Clay Mayes
Enclosure



HASKELL INDIAN NATIONS UNIVERSITY

Accredited by Higher Learning Commission

Vice-President of University Services
University Services
155 Indian Avenue
Lawrence, Kansas 66046-4800
www.haskell.edu

Memorandum

To: Clay Mayes, Athletic Program, Cross-Country Coach

From: Tonia L. Salvini, Vice-President of University Services/Acting President *TS*

Date: November 4, 2021

RE: Notification /No-Contact Order

Please be informed of the following:

1. A complaint has been filed against you. An investigation is the next step in response to the complaint. The investigation process will be guided and monitored through the Vice-President of University Services with consultation from the Bureau of Indian Education/Human Resources (BIE/HR) – Employee/Labor Relations. The investigation will be conducted by an independent, trained investigator/s through the BIE/HR office.
2. You are hereby to have no contact with any eligible or ineligible members of the Haskell Cross Country Team. This includes text messages, social media, third party contacts or other forms of direct and/or indirect contact. The Acting Athletic Director, G. Tanner can only receive coaching guidance from you – and all communication should be limited to only that, and not this issue.
3. This is confidential. Please do not violate the privacy of this notice or other information surrounding this notice.
4. Please know any form of retaliation or retribution is prohibited. Such actions could be subject to discipline and possible removal.

Please sign this document as evidence that you have read and received this information.

U m

Name/Signature

11-4-2021

Date

cc: Bureau of Indian Education/Human Resources
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