

Urbandale Soccer Club Policy with Regard to the Formation of Select Teams

The Urbandale Soccer Club is a member of the Greater Des Moines Junior Soccer League and required to comply at all times with the letter and spirit of Greater Des Moines' rules and regulations regarding the formation of Recreational Soccer Teams.

The Urbandale Soccer Club is a member in good standing of the Iowa Soccer Association and is governed by the Association's new competition levels 1, 2 and 3. The Iowa Soccer Association's rules regarding competition levels explicitly state, "Member Organizations and playing leagues may establish their own criteria for player selection and team assignment provided there is no conflict with Iowa Soccer Association Constitution, Bylaws, Rules and Policies."

The Urbandale Soccer Club has entered into an equal partnership with the Johnston Soccer Club to provide playing opportunities through the Johnston Urbandale Soccer Club for those members seeking a higher level of competition than provided under Iowa Soccer Association competition level 3 and the Greater Des Moines Junior Soccer League's definition of "Recreational Teams".

While the fees for participation in JUSC are higher than those for participation in Urbandale Soccer Club's recreational programs, these fees are reflective of higher costs of league registration, tournaments and coaching; JUSC provides financial assistance so that players with sufficient skill and desire may participate without regard to their financial resources.

Therefore, in accordance with the rules and regulations of both the Greater Des Moines Junior Soccer League and the Iowa Soccer Association, the Urbandale Soccer Club will not register any teams not meeting the definition of "Recreational Teams" as contained in the Greater Des Moines Junior Soccer League Rules and Regulations. Players seeking a higher level of competition are encouraged to learn about the JUSC program.

If a team meets Greater Des Moines' definition of "Recreational Team", it may, at its option, choose to participate in either level 3 or level 2 competitions within the Greater Des Moines Junior Soccer League. The Club will not withhold the release of any player wishing to leave the Club in order to seek non-recreational playing opportunities with other organizations.



IOWA Soccer Association

3850 Merle Hay Rd, Suite 524

Des Moines, IA 50310

(515) 252-6363 voice

(515) 252-7676 fax

www.iowasoccer.org

October 11, 2010

Dear Mark:

In regard to your request that the State Association reconsider its position on the creation and affiliation of another club in the Greater Des Moines area, I offer the following reasons for not considering an application with Iowa Soccer.

1. There are nearly 40 clubs in the Greater Des Moines (GDM) area. Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices.
2. The State Association has worked to help clubs combine efforts in trying to keep the player pool stable and thereby create more stability in the existing clubs.
3. Approving a club in an area that is already served by several other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases.
4. Although I have not canvassed the GDM clubs (a practice I do with any submitted application in the effected geographic area), I believe I can safely say with some certainty that the current clubs in the area are not in favor of having another club established in Greater Des Moines feeling existing clubs provide adequate coverage for the area.
5. Dispersing players already registered with existing clubs and the State Association does not foster the growth of the sport either locally or statewide.

I appreciate your time and commitment to the sport of soccer. I wish you the best moving forward and continued success in your soccer-related work.

Respectfully,

Harold Kahler
Executive Director



The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer.

3850 Merle Hay Road • Suite 524 • Des Moines, IA • 50310

www.iowasoccer.org

515.252.6363 local • 800.386.4692 free • 515.252.7676 fax

June 21, 2010

Mark Carlson

Des Moines, IA 50315

Dear Mark:

I want to thank you and Jon for visiting with me about the Performance Soccer Academy's application for affiliation. As discussed, while excited about the prospects to gain more activity from the Hispanic, Asian and Bosnian communities, I've expressed the following concerns with the application and establishment of a club in the south part of Des Moines:

1. There are nearly 40 clubs in the Greater Des Moines (GDM) area and at least 10 have select divisions. Players wanting the opportunity to play at any level including the select level in the GDM area have ample opportunity and a variety of choices.
2. The State Association has worked to help clubs combine efforts in the select arena, thereby, keeping the talent pool stable and creating better select teams. By adding another select club in the area, the talent pool will be dispersed further.
3. Approving a club in an area that is already served by 3 other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases. It also has similar implications for clubs in the Greater Des Moines area other than those discussed.
4. The current clubs south of Des Moines – Carlisle, Soccer South, Norwalk – are not in favor of having another club established in that territory feeling that 3 clubs provides adequate coverage for the area.

This being said, I encourage you to visit with the 3 clubs to educate them about your intentions and plans. In my communication with them it appeared that they were not necessarily privy to what Performance Soccer is trying to accomplish or the benefits that you feel Performance Soccer would bring to the area and the development of soccer in Iowa. There may be potential for cooperative arrangements and sharing of programs.

I've enclosed your \$50.00 check for your convenience.

Again, I appreciate your time and commitment to the sport of soccer and the youth of Iowa. I wish you both the best moving forward and continued success in your soccer-related work.

Respectfully,

Harold Kahler
Executive Director

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Mr. Kahler,

October 12, 2010

I appreciate your quick response. Unfortunately, your comments and position indicate the Iowa Soccer Association (ISA) does not have enough information to adequately understand the numerous concerns in Urbandale, our home community.

We share the following examples as why we strongly disagree with the Iowa Soccer Association's position.

(1) Community members in Urbandale and other local suburbs have no choice but to participate in soccer clubs which have higher registration costs, due to the subsidization of paid professional coaches. Your review of Level III (fka "Recreational") registration costs of local clubs will show that clubs without paid coaches are largely less expensive than those clubs that have paid staff. We are wishing to provide a soccer club in Urbandale without a paid staff, similar to other youth organizations in our community (e.g., Urbandale Little League, Urbandale Girls Recreation Association, J-Hawk Sports Association), so that we may introduce more children to the sport of soccer in these difficult economic times.

(2) You stated in your correspondence dated October 11, 2010, that: "Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices." We disagree with this assertion. For instance, the Urbandale Soccer Club (USC) recently adopted a policy only allowing Level I and II teams to register through the Johnston/Urbandale Soccer Club (JUSC). In order to do so, families are required to pay \$1000 or more per year for registration and other costs. This is at least \$700 per year more than it would cost to have a Level II team with a volunteer coach. Due to USC's policy restricting Level I and II teams from registering through USC, if a group of Urbandale families wanted to register a Level II team with a volunteer coach, it would have to register in a club outside of the community, forcing the team to hold practices on actual soccer fields, as well as home games, outside of Urbandale. Many families do not have the time or resources to travel outside of Urbandale every time a child has practice or a game. This is not a fair or viable alternative for Urbandale families.

(3) USC gives priority to the use of the city owned soccer complex to teams that are associated with paid professional coaches. We believe this practice is inequitable and our proposed club would treat all teams the same at any given age group.

(4) Your correspondence makes the assumption that the current club structure in Greater Des Moines (GDM) has maximized the number of youth playing soccer. Due to the elimination of paid coaches, as referenced above, we are extremely confident that we will not only draw from existing clubs, but bring many new children into the sport. Some families will continue to have their children play in clubs with paid professional coaches, and we fully respect that choice. However, other families should equally have an option for their children to play in a club within their community free of the costs associated with paid coaches.

(5) We believe your comment about some local soccer clubs not wanting new clubs introduced is completely accurate. Unfortunately, the reason it is accurate is because the introduction of new clubs has the potential to disrupt the financial business model of those clubs already in existence, not because it would adversely impact the experience of youth

soccer players in the GDM area. For example, of course the USC would not want a new club introduced in Urbandale which has lower registration costs at all ages and allows families to register Level I or II teams if they wish to do so, without the cost of paid coaches. We have spoken with representatives of a couple of other GDMJSL clubs, which do not have paid coaches, and they were surprised by ISA's position on restricting new clubs.

Our goal, is to provide families in Urbandale with a fun, educational and low-cost soccer experience. We believe by utilizing volunteer coaches we will accomplish that goal, however Urbandale families will still be able to have their children play on teams with paid coaches if they so choose, through JUSC or other similar clubs. Again, families should not be required to pay \$700 extra for their children to play on Level I or Level II teams, nor should they be forced to travel outside of Urbandale to play in a club that allows volunteer coached Level I or Level II teams. Additionally, families with children on Level III teams in Urbandale should not have to pay higher registration costs to subsidize pro coaching salaries.

We have only touched on a small number of the issues in this correspondence. Now that you have more information, we would ask that you reconsider your position and respond to us by Friday, October 15. If you feel that you need additional time to respond, please let us know.

Sincerely,

Mark [REDACTED]
Dave [REDACTED]
Eric [REDACTED]
Tom [REDACTED]
Matt [REDACTED]
Doug [REDACTED]

Subject: Formal Complaint Regarding Actions of the Iowa Soccer Association (ISA)

Mr. Kahler,

December 2, 2010

Upon your recommendation, I am filing this complaint with your office. I would appreciate you copying the board of directors, or other parties who may normally be involved in the complaint process.

As a bit of background, I began playing soccer in the Urbandale Soccer Club in 1980, and continued playing rather actively for approximately twenty (20) years. I started coaching youth soccer when my oldest daughter, who is now in 8th grade, began playing in 2002. I have also served twice on the Urbandale Soccer Club's (USC) board of directors. First, in 2003, prior to deploying with the Iowa National Guard in support of Operation Iraqi Freedom, and again from the spring of 2009 through the summer of 2010.

Due to inappropriate actions on the part of the USC, I, along with a group of other parents/volunteers (Mark [REDACTED], Dave [REDACTED], Doug [REDACTED], Tom [REDACTED], and Eric [REDACTED]), decided that it was best to start a new, inexpensive, all-volunteer soccer club in the City of Urbandale. Some of USC's inappropriate actions have included: extending the JUSC agreement with the Johnston Soccer Club for ten (10) years without gathering input from USC members or notifying them of said extension; overpaying coaches with club funds without tracking hours worked; overcharging recreational soccer players to participate on USC teams, to subsidize coaching salaries; selectively allowing use of city soccer fields, based on whether a child is playing on a team with a paid coach; accumulating over \$300,000 in reserves while maintaining the above-referenced high fees; and, adopting a restrictive Levels of Play policy, which requires families desiring Level 2 or higher play for their children to either pay the high costs for JUSC or leave the club.

It states boldly on ISA's website: "The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer." Furthermore, ISA's purpose, as stated in its constitution, is to: ". . . promote the sport of soccer through the establishment and development of soccer programs." Unfortunately, based on some of ISA's actions over the last six months, it is my position that ISA is not carrying out its mission, but rather working to protect those clubs/soccer coaching businesses, such as USC, which are overpaying coaches and overcharging members, thus leading to a drop in youth soccer participation.

To support this claim, I provide the following information:

- In email correspondence dated June 9, 2010, Ian Bradley, ISA's director of coaching outlined ISA's "concerted effort to grow Level 2". (attached hereto as "Exhibit A-1")

- Ian's June 9th email included a document titled: "Iowa Soccer Association Levels of Play". (attached hereto as "Exhibit A-2") I was encouraged by Ian's emphasis on promoting Level 2 teams, and ISA's apparent recognition that many children quit playing soccer because of the lack of Level 2 opportunities. Ian further noted that most players quit at the U11-U13 age group, which coincides with the beginning level of select soccer in many clubs throughout Iowa.

- Based partially upon encouragement from Ian's June 9th guidance, parents in Urbandale decided to register two Level 2 girls teams through the USC. Brian [REDACTED] and I coached the U14 team, and Dave [REDACTED], Doug [REDACTED], and I coached the U12 team. USC had no policies in place at that time restricting the registration of such teams, and we did not violate any ISA rules in forming the teams.

- Sometime after our filing of registrations for the above two teams with USC, John "Shedzy" Sheridan, the director of coaching for the USC, contacted Ian Bradley to raise concerns about our Level 2 teams.

- Shortly after being contacting by Shedzy, in email correspondence dated July 1, 2010, Ian Bradley gave new guidance on ISA's Levels of Play initiative. (attached hereto as "Exhibit A-3") ISA put out this new guidance, after receiving complaints from USC and from Waukee's club (I presume VSA), as Ian shared this with me on the telephone. The new guidance included the following excerpt:

ISA's position is that *independent Level 2 teams should not be formed in clubs that already offer Level 1, 2 and 3 programs. If coaches are allowed to form Level 2 teams independently of the club and basically "cherry pick" players from the recreational and select programs*, then the integrity of the club is compromised and Level 3 and Level 1 programs can be negatively affected, potentially reducing opportunities and participation. (emphasis added)

I mentioned to Ian, in our cordial telephone conversation on the late afternoon of July 1, that I was disturbed that ISA would so quickly change its position without getting both sides of the story, by first contacting the Level 2, volunteer coaches involved. I further took interest in ISA's use of the reference to "cherry pick[ing]" players, as this is the exact same language that John "Shedzy" Sheridan used at board meetings discussing this issue, and is the same language that JUSC coaches used in falsely accusing our teams of doing such, as shared by a parent who still has a child playing for JUSC. At the end of the new guidance, Ian, ironically, but rightfully, noted: "One purpose of adding Level 2 was to create more opportunities for players looking for a higher level of play *or for players who may play multiple sports and do not want to commit to the rigors and cost of participating in Level 1 and 2 professionally coached programs.*" (emphasis added) This was precisely the reason that most of the girls on our teams wanted to play on an Urbandale Level 2 team. (see email correspondence to Harold Kahler, attached hereto as "Exhibit A-4") As you will see, this is an extremely active group of girls, who do not have time to fully commit to JUSC, or wish to dedicate money in that direction.

- I further would like to bring to your attention not only my defense of our proper formation of the teams, but the illegal recruiting that JUSC regularly performs. See my email to Ian Bradley, dated July 6, 2010 (attached hereto as "Exhibit A-5")

- Using Ian Bradley's revised guidance as partial justification, the USC then adopted a new policy in August, 2010, which would require players to participate in JUSC for Level 2, sign-up for Level 3, or leave the soccer club, and pursue Level 2 with other clubs. (see correspondence from Cam Torstenson and USC Policy with Regard to the Formation of Select Teams, attached hereto as "Exhibits A-5 & A-6")

Again, the above revisions to ISA's guidance were made after only communicating with the USC and without ISA getting both sides of the story. ISA was willing to accept as the truth, allegations that paid professional coaches made about volunteer coaches "cherry picking" without investigating such a matter, and with full knowledge that paid select coaches regularly "cherry pick" players off of Level 3 teams. It is my assertion that the above provides evidence of the bias ISA shows toward paid professional coaches and the clubs which employ them. ISA provided the necessary cover for USC to adopt a restrictive select soccer policy and, unfortunately, spread false accusations about volunteer coaches "cherry picking".

As further evidence of ISA's efforts to protect the large soccer clubs/coaching businesses in the Des Moines Area, I would ask you to review the following documentation:

- Email correspondence from parent/volunteer, Mark [REDACTED], to Harold Kahler (attached hereto as "Exhibit B-1").

- ISA Executive Director, Harold Kahler's, correspondence to Mark [REDACTED], giving ISA's rationale for not considering an application for our soccer club's affiliation with ISA (attached hereto as "Exhibit B-2"). I am particularly troubled by the following two excerpts from the ISA correspondence:

3. Approving a club in an area that is already served by several other clubs *may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases.* (emphasis added)

...

5. Dispersing players already registered with existing clubs and the State Association *does not foster the growth of the sport either locally or statewide.* (emphasis added)

I would have thought that ISA's focus would be on spreading the sport of soccer, and that it would look forward to developing as many low cost, volunteer-led clubs as possible, rather than worrying about "erosion of . . . existing clubs . . . revenue bases." As of last spring, due to overcharging members of our community, USC had over \$330,000 in the bank, and JUSC, along with JSC and USC approved increases to the coaching budget, to the extent of up to \$317,000 for six paid coaches, who work no where near 40 hours per week throughout the year. I do not think ISA needs to worry about USC's revenue base.

I am further troubled by two inferences I draw from ISA's correspondence:

- (1) That the player pool in central Iowa is at its maximum, and affiliating a new club in Urbandale will only lead to a decline in soccer players.
- (2) That parents in our community are unable to decide for themselves what is best for their children, and we would have some power to get them to join our clubs.

On the first point, as a former member of the USC board of directors, I can confidently share that USC's membership has seen drastic declines during the last 10 years. I am surprised that ISA is not able to identify that the decline may be due to the rise of pay for play soccer in our community and the higher costs for even Level 3 players, to subsidize the paid coaches.

On the second point, parents are going to still sign their children up for what is best for their individual situation, whether it be USC, JUSC, or our proposed club. It is as if ISA and USC need to protect parents from themselves. It is my contention that USC and other clubs with large pay for play structures are afraid of competition from volunteer coaches who have enough knowledge of the game to provide a viable, low cost option for youth in our communities. By taking the hard-line approach ISA is taking against the potential affiliation of additional clubs in the Des Moines area, it is my opinion that ISA is protecting the clubs already in existence, rather than acting in furtherance of its mission.

- I have attached additional correspondence, to include a letter sent by six parents/volunteers to further show the logical and reasonable request we made to affiliate a new club, and to show the hasty nature of ISA's decision.

In response to this complaint, I would also ask that ISA clarify the following:

- 1) Who made the decision to not allow additional affiliated clubs in the Des Moines area, and under what authority in ISA's governing documents?
- 2) Why is this restriction not on ISA's website?
- 3) Why has ISA not publicized the restriction of further members in the Des Moines area to ISA's members?
- 4) What analysis was done in the community of Urbandale to determine that an additional club would not best serve our community?

Thank you for considering this complaint.

Sincerely,



Matt Carver

From: "Ian Bradley" <~~ibradley@iowasoccer.org~~>
Subject: Levels Of Play
Date: June 9, 2010 1:43:23 PM CDT
To: ~~ibradley@iowasoccer.org~~
1 Attachment, 79.0 KB

Directors of Coaching, Club Coaches,

Just a quick reminder that when you register teams with ISA this fall, all teams will need to be designated Level 1, Level 2 or Level 3. ISA has made a concerted effort to grow Level 2 with the introduction of the Director's Cup and Toyota Cup Level 2 events and we hope that clubs will start to offer more Level 2 events at their tournaments starting in the fall.

I have attached Levels of Play descriptions. If you have any questions, do not hesitate to contact me at 515-252-6363 ext 102 or by e-mail at ibradley@iowasoccer.org.

Ian Bradley
ISA State Director of Coaching



Levels of Pla...doc (79.0 KB)

Exhibit A-1.



Iowa Soccer Association
Levels of Play

Beginning in the fall of 2010, Iowa Soccer Association U11 through U19 teams will be self-designated as "Level 1", "Level 2" or "Level 3". All U10 and below teams will be classified Level 3. These categories will replace the terms "premier", "classic" and "recreational", respectively, and corresponding team formation rules will better support the needs of our members across the state.

Through the implementation of levels of play, and with supporting rules and events, the aim is to have the levels better reflect the challenges our soccer communities and players face, and to get away from the use of terms like "recreational" that have associated stigmas in the older age groups.

While there exists a "classic" designation of teams in our state, the reality is most non-select teams, regardless of age group, register as recreational. By better supporting and promoting a level of play that is currently under-served, Level 2 opportunities will encourage players to play instead of quit. In addition, the rules guiding Level 2 and Level 3 will open more opportunities for Level 3 teams that seek a higher level of competition. Level 3 teams will have the option to compete in Level 2 events, increasing opportunities for that level of play as well.

In many clubs throughout the state, select tryouts begin at U11. Often, less physically developed players do not make the team and the only other option within their club is to play on a recreational team. This can result in players becoming frustrated with the level of play, facing the stigma of playing recreational because they didn't make a team, and ultimately, quitting the sport. Retention rates at U11-U13 support that most players who quit do so at these age groups. Level 2 will give those players a place to play.

To help further Level 2 opportunities, there will need to be an emphasis on offering Level 2 opportunities at tournaments. Iowa Soccer will encourage tournament directors to offer a Level 2 option, and will itself offer this level of competition. Currently, Classic/Level 2 teams already have the option to enter the Iowa Director's Cup and the Toyota Indoor Championships. By working together to promote additional playing opportunities, our soccer communities will benefit by increased participation and retention.

Level 3 is intended to provide the opportunity for all players to participate in and enjoy the game of soccer without regard for ability or soccer skills. Level 3 teams may participate in Level 3, Level 2 or Level 1 in-state tournaments. These stipulations do not apply to out-of-state tournaments.

Level 3 Team Formation Rules

- The team formation process will be random in nature.
- Criteria for player assignment will include NO consideration for the ability of the player or the relative strength of the team.
- All forms of recruiting, invitations and tryouts are specifically prohibited. Coaches will have no direct input to or involvement with the assignment of players to their teams.
- If a Member Organization permits teams to remain together from season to season, the player has the option to stay on the team.
- New teams and returning teams that need players are formed by one of the following methods:
 - a. Players are assigned (rostered) to a team by age groups on a territorial basis (neighborhood, schools, precincts, zip codes, etc.)
 - b. Players are assigned (rostered) to a team by a random draw from one (1) player pool on a territorial basis as stated in (a) above.
- Players' names shall not be identified to the coach until the player is placed on the team. Only the head coach may request their child be rostered to the team that he/she is coaching.

Level 2 is intended to provide players a higher level of competition than Level 3. Level 2 teams may participate in Level 2 or Level 1 in-state tournaments but not in Level 3 events. These stipulations do not apply to out-of-state tournaments.

Level 2 Team Formation Rules

Member Organizations and playing leagues may establish their own criteria for player selection and team assignment provided there is no conflict with Iowa Soccer Association Constitution, Bylaws, Rules and Policies.

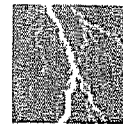
Level 1

Level 1 soccer is intended to provide players with a higher level of competition than Level 2. Level 1 teams may participate only in Level 1 in-state tournaments. These stipulations do not apply to out-of-state tournaments.

Level 1 Team Formation Rules

Member Organizations and playing leagues may establish their own criteria for player selection and team assignment provided there is no conflict with Iowa Soccer Association Constitution, Bylaws, Rules, and Policies.

From: MATT RENEE CARVER [REDACTED]
Subject: FW: Iowa Soccer Association - Level 2 Clarification Letter
Date: July 6, 2010 11:57:07 AM CDT
To: Matt Carver [REDACTED]



[REDACTED] Urbandale, IA 50322 515-334-9061

From: ibradley@iowasoccer.org
To: ibradley@iowasoccer.org
Subject: Iowa Soccer Association - Level 2 Clarification Letter
Date: Thu, 1 Jul 2010 16:12:53 -0500

To Whom It May Concern:

There have been concerns expressed about the new Iowa Soccer Levels of Play initiative and specifically coaches taking it upon themselves to form Level 2 teams without their registering clubs' support.

ISA's position is that independent Level 2 teams should not be formed in clubs that already offer Level 1, 2, and 3 programs. If coaches are allowed to form Level 2 teams independently of the club and basically "cherry pick" players from the recreational and select programs, then the integrity of the club is compromised and Level 3 and Level 1 programs can be negatively affected, potentially reducing opportunities and participation.

In clubs that have multiple teams in an age group or already offer Level 1, 2 and 3 options, all Level 1 and 2 teams should be created through a club-wide tryout or selection process and the opportunity to play on those teams should be offered to all age appropriate players in the club.

Clubs that form teams using Level 3 team formation guidelines (no tryouts or team selection) can choose to play Level 2 or Level 3, although there is no benefit for a team using Level 3 team formation guidelines registering as Level 2.

One purpose of adding Level 2 was to create more opportunities for players looking for a higher level of play or for players who may play multiple sports and do not want to commit to the rigors and cost of participating in Level 1 or 2 professionally coached programs. Consequently, I believe clubs should assess whether those types of teams can be accommodated within their current structure without affecting the integrity of the current Level 1, 2, 3 system.

There may be a place for Level 2 teams in clubs that offer Level 1,2 and 3 programs, that are parent coached and consequently do not pay the professional coaching fees or receive the opportunities that playing under a professional staff creates. However, those teams cannot be allowed to run independently of the Level 1,2,3 program already supported by the club and must be open to all age appropriate club members.

If you have any questions, do not hesitate to contact me at 515-252-6363 ext 102 or by e-mail at ibradley@iowaosccer.org.

Ian Bradley
ISA State Director of Coaching

Exhibit A-3

1 Attachment, 3.3 MB

Below I have copied a picture and caption that were printed in our local section of the Des Moines Register a few weeks ago. I thought it made sense for you to actually see the young ladies who the Urbandale Soccer Club would be denying the opportunity to play Level 2 soccer, due to its new policy, and who the Iowa Soccer Association is denying the opportunity to play in a new, low cost, volunteer club. I have also included a list of all of the various activities in which these young ladies are able to participate, due to the flexibility of our team (moving practice times around), as well as due to the low cost of our team. I am confident these girls are symbolic of many other young people in our community who would like to enjoy a low cost and supportive soccer environment, and who also would like to enjoy the enrichment of many different activities.

I would also note that all of these girls are very good students, and that I have never heard even one of them use profanity or say a selfish thing at practice or in a game. I would think that the Urbandale Soccer Club and Iowa Soccer Association would want to promote and encourage such exemplary young people, rather than limit their opportunities. As your monthly newsletter is titled: "Let the Kids Play!"

Matt Carver

All of Urbandale except Co [redacted] M [redacted] is from Johnston.

Erin - Soccer, Cross Country, Track, Band, Show Choir

Exhibit A-4

ERROR: limitcheck

COMMAND: image

Jessi Carver - Soccer, Volleyball, Show Choir, Track, Softball

S[REDACTED] - Soccer, Basketball

M[REDACTED] - Soccer, Basketball, Track, Volleyball, Show Choir

C[REDACTED] - Soccer, Basketball, Volleyball, Track, Softball

S[REDACTED] - Soccer, Basketball, Track, Volleyball

Ja[REDACTED] - Soccer, Basketball, Track

Ha[REDACTED] - Soccer, Show Choir, Track

Je[REDACTED] - Soccer, Basketball, Track, Volleyball, Softball, Show Choir

[REDACTED]

From: Matt Carver <[REDACTED]>
Subject: Fwd: Iowa Soccer Association - Level 2 Clarification Letter

Date: July 6, 2010 1:30:53 PM CDT

To: Ian Bradley <[REDACTED]>

Cc: "Kahler Jr." <[REDACTED]>, DAVID <[REDACTED]>, Matt Carver <[REDACTED]>

1 Attachment, 41.2 KB

Ian,

I appreciate you speaking with me on the telephone on Thursday evening. To further elaborate on the comments that I made to you about not "cherry picking," I wanted to share the below email. Our younger Level 2 team is comprised of U12 girls. USC still has another U12 Level 3 team at that age. We did not approach the girls on that team, and, to my knowledge, none of the girls on that team are playing on our Level 2 team. Likewise, there is a Level 3 U14 girls team for my older Level 2 team, and we did not approach players on that team about playing. In fact, someone shared my name with a mother, whose family is moving to Urbandale, because they heard that the family has an 8th grade girl who plays soccer. This girl's older sister is going on to play college soccer in Illinois next year. Also, her second oldest sister just ran in the Illinois state track meet. Needless to say, this young lady is probably a very good athlete. I explained JUSC to the mother, but she said that they did not want to spend the money. I also told her about our Level 2 team and the other Level 3 team. However, when she mentioned that her daughter was going to DM Christian in the fall, I thought it was important to mention that the daughter of the Level 3 team's coach goes to DM Christian. I also mentioned that the Level 3 coach was a good coach. The mom said that that sounded like a great way for her daughter to make friends with some girls from her new school, and I agreed completely. Does this appear at all like cherry picking?

Meanwhile, let me share a real cherry picking story. I coached a young lady for 6 years, who was actively recruited by JUSC coaches and parents for 3 years. Finally, last year, she and 2 other girls from our U12 team went out for JUSC. Due to these losses, my oldest daughter's team did not have enough players to have a 11 v 11 U13 team. As such, before I knew all of the rules, I contacted the parents of three girls (none of whom had played soccer IN YEARS) about playing on our team, just so we could have a squad. They all decided to play on our team. The Urbandale Soccer Club rewarded our team by finding that we had violated team formation rules and requested that our U13 team be placed in the top U14 division (where we lost all of our games last fall, short of tying one). Furthermore, they made this placement without telling me that they had done so, so I did not learn about the placement until picking up my coaching packet in AUGUST. NO DUE PROCESS WHATSOEVER.

Back to this year. We fully intended for my younger daughter to play on a Level 3 team, or I was going to instruct her individually. A group of U12 JUSC parents then contacted me about coaching, because their daughters were all active in multiple activities, they did not want to pay all of the money, and they weren't particularly pleased with JUSC. I went out of my way to tell them that I did not want to be seen as the one organizing this U12 team. I believe that there are 5 former JUSC players who decided to play on our U12 Level 2 team, and 2 former JUSC players who are playing on our U14 Level 2 team. Again, at both age groups, all of these families initiated contact with me. I DID NOT CHERRY PICK ANY OF THEM.

Let me be very clear that I know that what this is all really about is \$\$\$\$. No one can tell me differently, because the facts and truth are on our side.

If it was about more kids playing soccer and having a good experience, then why are we not getting a pat on the back as VOLUNTEER coaches. We have far more girls playing U14 and U12 girls soccer in Urbandale, than U13, for instance. I would say that it is close to 2 to 1. I am including JUSC girls in this count. Heck, I even turned down another JUSC player for our U14 team.

The business that is youth soccer in the United States is turning into absolute lunacy. Did either of you hear Juergen Klinsmann's comments the day after the US-Ghana game? We are the only country in the world where parents pay all of this money for youth soccer. I know this as well, because I had the opportunity to play on a German team, while I was stationed there in the Army for 3 years. Yesterday, I checked the cost for their youth teams. For one year it was 60 euros. 60 EUROS! (about \$75) This included A level teams through U19.

I agree with your previous communication on Level 2. The money barrier needs to break down. Why shouldn't Iowa lead the way?

Until there are significant changes, I will continue to be active on this topic for decades to come, God willing. I would rather work with ISA in fixing this problem than against you. Youth soccer should not be a pay for play business. As long as it continues to be run as a pay for play business, I WILL BE FIGHTING ON THE OTHER SIDE. You may contact me at any time.

Thanks,

Matt Carver
[REDACTED]
[REDACTED]

Exhibit A-5

From: "DAVID [REDACTED]"
Subject: Re: [REDACTED]
Date: June 21, 2010 12:36:57 PM CDT
To: [REDACTED], "Matt Carver" <[REDACTED]>

Thanks for your understanding if someone asked about it, you sought us out.

If you would like, you can give me your paperwork and I can turn in with some of the other girls as well. Just let me know.

Thanks,

Dave
Sent from my Verizon Wireless BlackBerry

-----Original Message-----
From: [REDACTED]
Date: Mon, 21 Jun 2010 17:32:05
To: <smetz4@[REDACTED]>
Subject: Re: [REDACTED]

I totally understand! Thanks so much. We'll look forward to getting together soon.

-----Original Message-----
From: DAVID [REDACTED]
To: [REDACTED]
Cc: Matt Carver
Cc: Matt Carver
Subject: Re: [REDACTED]
Sent: Jun 21, 2010 12:28 PM

[REDACTED]

Matt and I are happy to have [REDACTED] be a part of the team, we just don't want to be view as raiding other teams players for the sake of putting together the Level 2 team.

Please fill out the paperwork and request the Level 2 team coached by Dave Smetzer and Matt Carver.

Thanks,

Dave

Ps, we will probably try to have a team meeting in the next week or so.

Sent from my Verizon Wireless BlackBerry

-----Original Message-----
From: [REDACTED]
Date: Mon, 21 Jun 2010 16:20:21
To: <smetz4@[REDACTED]>
Subject: [REDACTED]

Hello, I'm [REDACTED] ([REDACTED]'s mom). I've been in touch with [REDACTED], [REDACTED]'s mom, about what they were doing with [REDACTED] for this fall season because we were interested in making a move. Funny thing is that I just received an email from [REDACTED]'s mom, [REDACTED] asking if we'd be interested in moving [REDACTED] to your team. I'm so excited to have her back with these girls and would love to have her on your team if your up for it. We'll register her tomorrow. Thanks so much.

[REDACTED]

Sent from my Verizon Wireless BlackBerry

Sent from my Verizon Wireless BlackBerry

Begin forwarded message:

Urbandale Soccer Club Policy with Regard to the Formation of Select Teams

The Urbandale Soccer Club is a member of the Greater Des Moines Junior Soccer League and required to comply at all times with the letter and spirit of Greater Des Moines' rules and regulations regarding the formation of Recreational Soccer Teams.

The Urbandale Soccer Club is a member in good standing of the Iowa Soccer Association and is governed by the Association's new competition levels 1, 2 and 3. The Iowa Soccer Association's rules regarding competition levels explicitly state, "Member Organizations and playing leagues may establish their own criteria for player selection and team assignment provided there is no conflict with Iowa Soccer Association Constitution, Bylaws, Rules and Policies."

The Urbandale Soccer Club has entered into an equal partnership with the Johnston Soccer Club to provide playing opportunities through the Johnston Urbandale Soccer Club for those members seeking a higher level of competition than provided under Iowa Soccer Association competition level 3 and the Greater Des Moines Junior Soccer League's definition of "Recreational Teams".

While the fees for participation in JUSC are higher than those for participation in Urbandale Soccer Club's recreational programs, these fees are reflective of higher costs of league registration, tournaments and coaching; JUSC provides financial assistance so that players with sufficient skill and desire may participate without regard to their financial resources.

Therefore, in accordance with the rules and regulations of both the Greater Des Moines Junior Soccer League and the Iowa Soccer Association, the Urbandale Soccer Club will not register any teams not meeting the definition of "Recreational Teams" as contained in the Greater Des Moines Junior Soccer League Rules and Regulations. Players seeking a higher level of competition are encouraged to learn about the JUSC program.

If a team meets Greater Des Moines' definition of "Recreational Team", it may, at its option, choose to participate in either level 3 or level 2 competitions within the Greater Des Moines Junior Soccer League. The Club will not withhold the release of any player wishing to leave the Club in order to seek non-recreational playing opportunities with other organizations.

Exhibit A-6

From: MATT RENEE CARVER [REDACTED]
Subject: FW: ISA reconsider
Date: October 11, 2010 11:50:38 AM CDT
To: Matt Carver <[REDACTED]>
1 Attachment, 151 KB



[REDACTED]
From: [REDACTED]
To: [REDACTED]
Subject: FW: ISA reconsider
Date: Mon, 11 Oct 2010 11:43:14 -0500

From: Harold Kahler [mailto:[REDACTED]]
Sent: Monday, October 11, 2010 9:49 AM
To: 'Mark [REDACTED]'
Subject: RE: ISA reconsider

Mark

Thanks for your patience with the delay in my response. The State Association's position has not changed but I have attached a formal response for your convenience.
Harold

From: Mark Kahler [mailto:[REDACTED]]
Sent: Thursday, October 07, 2010 3:37 PM
To: hkahler@[REDACTED]
Subject: ISA reconsider
Importance: High

Mr. Kahler,

You spoke to me a few weeks ago regarding the fact that ISA won't allow anymore clubs join the Greater DM Junior Soccer league. I had left a message with Nancy, and you returned my call. I went and reviewed the bylaws, etc on the ISA site, and can't find that it is restricted. So I was wondering if I put together a packet for a new club (bylaws, file with Secretary of State, etc) if your board would reconsider- or not. If not, I really do not want to put the work into it if there is no chance. Yet if there is, I would like to go ahead and put together for a possible start in the spring.

Thanks again for your time,

Mark [REDACTED]

Exhibit B-1



IOWA Soccer Association

3850 Merle Hay Rd, Suite 524

Des Moines, IA 50310

(515) 252-6363 voice

(515) 252-7676 fax

www.iowasoccer.org

October 11, 2010

Dear Mark:

In regard to your request that the State Association reconsider its position on the creation and affiliation of another club in the Greater Des Moines area, I offer the following reasons for not considering an application with Iowa Soccer.

1. There are nearly 40 clubs in the Greater Des Moines (GDM) area. Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices.
2. The State Association has worked to help clubs combine efforts in trying to keep the player pool stable and thereby create more stability in the existing clubs.
3. Approving a club in an area that is already served by several other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases.
4. Although I have not canvassed the GDM clubs (a practice I do with any submitted application in the effected geographic area), I believe I can safely say with some certainty that the current clubs in the area are not in favor of having another club established in Greater Des Moines feeling existing clubs provide adequate coverage for the area.
5. Dispersing players already registered with existing clubs and the State Association does not foster the growth of the sport either locally or statewide.

I appreciate your time and commitment to the sport of soccer. I wish you the best moving forward and continued success in your soccer-related work.

Respectfully,

Harold Kahler
Executive Director

Exhibit B-2

From: Mark [REDACTED]
Subject: FW: RE: ISA reconsider
Date: October 13, 2010 7:47:07 AM CDT
To: "Matt Carver" <[REDACTED]>, "Matt Carver" <[REDACTED]>
2 Attachments, 86.6 KB

-----Original Message-----

From: Harold Kahler [mailto:hkahler@[REDACTED]]
Sent: Wednesday, October 13, 2010 7:44 AM
To: 'Mark [REDACTED]'
Subject: FW: RE: ISA reconsider

Mark

Thank you for the follow up. I read the supporting documentation with interest but my position has not changed. I will not approve a competing organization in a community where there is an existing club or in an area - GDM metro - that offers a variety of alternatives.

Thanks

Harold

-----Original Message-----

From: Harold Kahler [mailto:hkahler@[REDACTED]]
Sent: Wednesday, October 13, 2010 7:09 AM
To: hkahler@[REDACTED]
Subject: Fwd: RE: ISA reconsider

----- Original Message -----

Subject: RE: ISA reconsider
Date: Tue, 12 Oct 2010 17:23:32 -0500
From: Mark [REDACTED]
To: "Harold Kahler" <[REDACTED]>

Mr. Kahler,

As mentioned in an email from me earlier today, this is a response with input from others.
thanks

Mark

From: Harold Kahler [mailto:hkahler@[REDACTED]]
Sent: Monday, October 11, 2010 9:49 AM
To: 'Mark [REDACTED]'
Subject: RE: ISA reconsider

Mark

Thanks for your patience with the delay in my response. The State Association's position has not changed but I have attached a formal response for your convenience.

Harold

Exhibit B-3

From: Mark [REDACTED]
Sent: Thursday, October 07, 2010 3:37 PM
To: hkahler@isa- [REDACTED]
Subject: ISA reconsider
Importance: High

Mr. Kahler,

You spoke to me a few weeks ago regarding the fact that ISA won't allow anymore clubs join the Greater DM Junior Soccer league. I had left a message with Nancy, and you returned my call. I went and reviewed the bylaws, etc on the ISA site, and can't find that it is restricted. So I was wondering if I put together a packet for a new club (bylaws, file with Secretary of State, etc) if your board would reconsider-or not. If not, I really do not want to put the work into it if there is no chance. Yet if there is, I would like to go ahead and put together for a possible start in the spring.

Thanks again for your time,

Mark [REDACTED]



[HTML Message.htm \(4.6 KB\)](#) [ISA Kahler L...pdf \(81.9 KB\)](#)

Mr. Kahler,

October 12, 2010

I appreciate your quick response. Unfortunately, your comments and position indicate the Iowa Soccer Association (ISA) does not have enough information to adequately understand the numerous concerns in Urbandale, our home community.

We share the following examples as why we strongly disagree with the Iowa Soccer Association's position.

(1) Community members in Urbandale and other local suburbs have no choice but to participate in soccer clubs which have higher registration costs, due to the subsidization of paid professional coaches. Your review of Level III (fka "Recreational") registration costs of local clubs will show that clubs without paid coaches are largely less expensive than those clubs that have paid staff. We are wishing to provide a soccer club in Urbandale without a paid staff, similar to other youth organizations in our community (e.g., Urbandale Little League, Urbandale Girls Recreation Association, J-Hawk Sports Association), so that we may introduce more children to the sport of soccer in these difficult economic times.

(2) You stated in your correspondence dated October 11, 2010, that: "Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices." We disagree with this assertion. For instance, the Urbandale Soccer Club (USC) recently adopted a policy only allowing Level I and II teams to register through the Johnston/Urbandale Soccer Club (JUSC). In order to do so, families are required to pay \$1000 or more per year for registration and other costs. This is at least \$700 per year more than it would cost to have a Level II team with a volunteer coach. Due to USC's policy restricting Level I and II teams from registering through USC, if a group of Urbandale families wanted to register a Level II team with a volunteer coach, it would have to register in a club outside of the community, forcing the team to hold both practices (on actual soccer fields) and home games outside of Urbandale. Many families do not have the time or resources to travel outside of Urbandale every time a child has practice or a game. This is not a fair or viable alternative for Urbandale families.

(3) USC gives priority to the use of the city owned soccer complex to teams that are associated with paid professional coaches. We believe this practice is inequitable and our proposed club would treat all teams the same at any given age group.

(4) Your correspondence makes the assumption that the current club structure in Greater Des Moines (GDM) has maximized the number of youth playing soccer. Due to the elimination of paid coaches, as referenced above, we are extremely confident that we will not only draw from existing clubs, but bring many new children into the sport. Some families will continue to have their children play in clubs with paid professional coaches, and we fully respect that choice. However, other families should equally have an option for their children to play in a club within their community free of the costs associated with paid coaches.

(5) We believe your comment about some local soccer clubs not wanting new clubs introduced is completely accurate. Unfortunately, the reason it is accurate is because the introduction of new clubs has the potential to disrupt the financial business model of those clubs already in existence, not because it would adversely impact the experience of youth

Exhibit B-4

soccer players in the GDM area. For example, of course the USC would not want a new club introduced in Urbandale which has lower registration costs at all ages and allows families to register Level I or II teams if they wish to do so, without the cost of paid coaches. We have spoken with representatives of a couple of other GDMJSL clubs, which do not have paid coaches, and they were surprised by ISA's position on restricting new clubs.

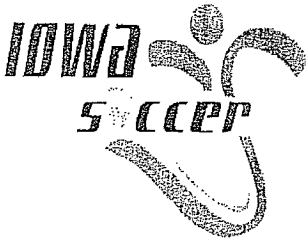
Our goal, is to provide families in Urbandale with a fun, educational and low-cost soccer experience. We believe by utilizing volunteer coaches we will accomplish that goal, however Urbandale families will still be able to have their children play on teams with paid coaches if they so choose, through JUSC or other similar clubs. Again, families should not be required to pay \$700 extra for their children to play on Level I or Level II teams, nor should they be forced to travel outside of Urbandale to play in a club that allows volunteer coached Level I or Level II teams. Additionally, families with children on Level III teams in Urbandale should not have to pay higher registration costs to subsidize pro coaching salaries.

We have only touched on a small number of the issues in this correspondence. Now that you have more information, we would ask that you reconsider your position and respond to us by Friday, October 15. If you feel that you need additional time to respond, please let us know.

Sincerely,

Mark
Dave
Eric
Tom
Matt
Doug





The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer.

Matt Carver

██████████
Urbandale, IA 50322

Mr. Carver:

In accordance with the Iowa Soccer Association Hearings and Appeals Policy (enclosed) which governs the disposition of complaints, I have reviewed your complaint and now set forth the findings and decision.

The complaint: The State Association is acting in a manner contrary to its mission and purpose based on the following:

1. Collusion with large soccer clubs/coaching businesses
2. Protecting clubs from competition
3. Showing non support for new organizations

The mission: To foster, promote and perpetuate the sport of soccer.

The purpose: to further and promote the sport of soccer through organization, training, and education; to aid, administer, assist and teach the sport of soccer for pleasure, recreational and other nonprofitable purposes to and for citizens of the State of Iowa; to organize soccer teams to compete and participate in soccer; and to promote the sport of soccer through the establishment and development of soccer programs.

Collusion with large soccer clubs/coaching businesses. The allegation of collusion is based on (1) the application of Level 2 rules and (2) denial of an application for affiliation.

First, regarding Level 2 rules, the State Association has the right to create rules and policies for its members and also has the right to clarify those rules and policies. Coach Bradley was contacted by the coaches at the Urbandale Soccer Club and Vision Soccer Academy about a potential loophole in the then recently publicized Levels of Play. Coach Bradley immediately recognized the problem and the unintended consequences of the rules, and published a clarification regarding Level 2 teams. While the potential loophole was discovered by two of the Greater Des Moines clubs, the subsequent clarification, as are the rules, was not designed exclusively for the Urbandale Soccer Club, the Vision Soccer Academy, or "large soccer clubs/coaching businesses" but was designed and applicable to all Iowa Soccer affiliates. The clarification was immediately posted on the Association website for broader distribution.

Second, Coach Bradley's direction in his clarification is consistent with Iowa Soccer philosophy regarding Level 2 opportunities. His expressed concerns about independent teams "cherry picking" can be a potential outcome if teams are allowed to function outside the rules and policies of the club.



F



Third, Coach Bradley's clarification is in agreement with Section 1 of the ISA Rules (enclosed). In fact the State Association does not recognize "independent teams" within affiliates. Affiliates are responsible for their players and teams. Player selection and team assignment which includes level designations, are the responsibility of the affiliate. Further, each affiliate is responsible for their players and teams and the affiliate can set policy for teams and players as long as the rules/policies do not violate any state or national rule/policy (ISA Rules Section 2.B).

Fourth, Coach Bradley's clarification was in response to an issue brought to the state office by an affiliate. Affiliates, our members, often seek the advice and counsel of the State Association as well as requesting clarification and explanation of rules and policies. If appropriate, action is taken to clarify or correct any inconsistencies or mistakes as was the case here.

As for the State Association denying approval of a new affiliate, ISA Bylaw Article I, Section F. 2 & 3 (enclosed) govern applications for affiliation. Authority is delegated by the Board of Directors to the Executive Director to review and approve/deny applications. However, there has been no formal application submitted and therefore, no formal ruling. Mr. Havran's inquiries regarding affiliation were considered an informal, fact finding process as I noted in previous emails to Mr. Carver. My advice to Mr. Havran was based on the information he provided and on my knowledge of the ISA Affiliation Approval Guidelines. When applications are submitted, the Executive Director's due diligence and decision on formal approval/denial of affiliation is based on these guidelines. The guidelines are enclosed for your convenience.

Protecting Clubs from Competition. This allegation is based on the Level 2 playing issue as addressed above and the presumed denial of an affiliation application. As previously stated, no application has been submitted and therefore no application has been denied.

Regarding the protection of existing clubs, in the application process as noted in my email to Mr. Havran, precedent has been set to deny applications for affiliation based on territory. However, the State Association typically works with proposed affiliates to seek alternative solutions. As an example, in 2010 2 applications in the Greater Des Moines Area (Dallas Center-Grimes and territory covered by Norwalk, Carlisle and Soccer South) were denied based mainly on location. In both cases the State Association conferred with the proposed club's principals to find alternative plans. Please note that, none of the above referenced are "large soccer clubs/coaching businesses."

Showing Non Support for New Organizations. The State Association has approved 14 affiliates in the past 5 years. It has been able to place many teams in existing clubs that inquired about affiliation but club formation was not an option. The State Association expanded its membership classifications in 2010 to better accommodate growth and expansion. It is implementing its Centers of Play Program that is expected to stimulate club growth. It has worked with newly approved affiliates providing free player and coaching clinics as well as administrative and governance support. In a few cases it has been able to assist in finding funds for clubs with disadvantaged populations. These are just a few examples of our commitment to grow and support new organizations. In summary we fully support the growth and expansion of new organizations that have met the guidelines and have shown that they wish to become contributing and valuable members of the State Association.

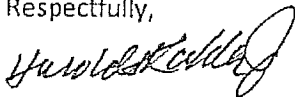
Based on the above, I do not find that the State Association has acted in a manner contrary to its mission and purpose and, therefore, dismiss the complaint with the following corrective action:

1. The State Association will better evaluate its distribution channels when communicating rule and policy clarifications. While the discussed clarification was posted on the website, it was not widely communicated beyond that posting. An email with the clarification could have been broadcast to our targeted groups.
2. The State Association will post the Affiliation Approval Guidelines on its website, on the "Becoming as Affiliate" page. While this criteria is discussed during the application process, having it posted will give potential affiliates the ability to address issues of concern early in their investigative processes.

In the complaint were a number of references to the Urbandale Soccer Club that were not pertinent to this complaint against the State Association, i.e. the status of paid professionals and policies of levels of play. The State Association suggests that you address those issues with the club's Board of Directors.

Thank you for your patience as I worked through the details of the complaint.

Respectfully,



Harold S. Kahler, Jr.
Executive Director

Enc.

Subject: Rebuttal of Undated Findings and Decision of the Iowa Soccer Association (ISA)

To Whom it May Concern,

December 16, 2010

This document serves as Rebuttal by the Complainant, to rebut ISA's findings and decision (hereinafter "Findings & Decision", attached hereto as Exhibit "A") regarding my December 2, 2010 complaint (hereinafter "Complaint").

To rebut ISA's Findings & Decision I share the following:

1) Due to Mr. Harold Kahler's, ISA's executive director's, clear and active involvement in the actions that served as the basis for my Complaint, I was surprised that he did not recuse himself from involvement in compiling and drafting ISA's Findings & Decision. I would ask that ISA has its Hearing Committee Chair review and respond to this Rebuttal, unless ISA determines that the Hearing Committee Chair also has a conflict of interest in this matter. I am unaware of who the Hearing Committee Chair is, but request that whoever reviews and answers this Rebuttal is not associated with one of the Des Moines area clubs protected by ISA's decision to not allow additional affiliates in Des Moines, or associated with a club with paid coaches. I would further note that the Findings & Decision did not show that ISA's board, nor ISA's Hearing Committee Chair, were copied on either my Complaint or Mr. Kahler's Findings & Decision. I recommend that the entire ISA board is copied on this matter.

2) In Mr. Kahler's discussion of Level 2 rules, on the first page of the Findings & Decision, I was disappointed to read his implication that volunteer/parent coached teams, such as ours, were seen as using a "loophole" even though we registered our Level 2 teams within the policies and guidelines of the Urbandale Soccer Club at the time. Similarly it seems perverse that ISA would view the creation of low-cost, volunteer/parent coached teams as a "problem" and "unintended consequences of the rules." Mr. Kahler's open sharing of such a perspective further highlights ISA's collusive relationship with currently affiliated soccer clubs/coaching businesses.

I further object to Mr. Kahler's statement: Coach Bradley's "expressed concerns about independent teams 'cherry picking' can be a potential outcome if teams are allowed to function outside the rules and policies of the club." I would again reiterate that our teams did not operate "outside the rules and policies" of the Urbandale Soccer Club (hereinafter "USC"). ISA is well aware that select teams coached by highly paid professional coaches regularly "cherry pick" off of Level 3 teams, and, yet, when a group of parents voluntarily decides to register a low-cost, volunteer/parent coached team with its club, and ISA receives a telephone call from John "Shedzy" Sheridan, a highly paid professional coach with one of the larger soccer clubs/coaching businesses in Iowa, ISA will deem such action "cherry picking" WITHOUT PERFORMING ANY RESEARCH ON THE OTHER SIDE OF THE MATTER. (emphasis added)

On page two of the Findings & Decision, Mr. Kahler stated that "the State Association does not recognize "independent teams" within affiliates." I would note that we did not seek recognition as "independent teams." We simply registered with USC, just as we did when we were designated as Level 3 teams. I am failing to understand why ISA felt a need to provide further backing to the Level 1 and Level 2 teams with highly paid coaches, to the detriment of low-cost Level 1 or Level 2 teams, coached by volunteers/parents. Each club certainly has the authority to make its own decision on whether to allow either or both types of Level 1 or Level 2 teams. Why did ISA feel a need to involve itself in a matter that was better left to club policy? At the time of Coach Bradley's clarification, USC did not have a policy preventing the registration of low-cost parent/volunteer coached Level 1 or Level 2 teams. Coach Bradley's clarification was then used by USC as partial justification to restrict registration of volunteer coached Level 2 teams within USC.

3) On page two of the Findings and Decision Mr. Kahler states:

"As for the State Association denying approval of a new affiliate, ISA Bylaw Article I, Section F. 2 & 3 (enclosed) govern applications for affiliation. Authority is delegated by the Board of Directors to the Executive Director to review and approve/deny applications." (emphasis added)

Upon review of said section in ISA's Bylaws, I find the above statement as inaccurate as a matter of law. (ISA Bylaw Article I, Section F. 2 & 3 is attached hereto as Exhibit "B") Instead, the Executive Director is merely delegated the authority to "provisionally recognize the organization for a one (1) year probationary period." (emphasis added) This is not the same as delegated authority to "approve/deny applications." As a member of ISA, I certainly do not read the black and white language in the Bylaws in such a manner. If there is any ambiguity regarding the language in the bylaws, I would hope that ISA would err on the side of maintaining authority with the ISA Board of Directors, rather than delegating it to one employee, the Executive Director.

4) As communicated in Mr. Kahler's letter to Mark [REDACTED], dated October 11, 2010, (attached hereto as Exhibit "C") it is clear that the Executive Director, as a matter of policy, has independently decided that there are enough clubs in the Greater Des Moines area, and that ISA will not affiliate additional clubs in Des Moines. On this point, the following questions from my Complaint remain unanswered:

- 1) Who made the decision to not allow additional affiliated clubs in the Des Moines area, and under what authority in ISA's governing documents was said decision made?
- 2) When was the decision made to not allow additional affiliates in the Des Moines area?
- ...
- 4) Why is this restriction not on ISA's website?
- 5) Why has ISA not publicized the restriction of further members in the Des Moines area to ISA's members?
- 6) What analysis was done in the community of Urbandale to determine that an additional club would not best serve our community?

As stated above, a determination not to allow affiliation of additional clubs in Des Moines would be a matter of policy. To this date, ISA has provided no proof that the ISA board approved said policy, delegated the authority to adopt such a policy to the Executive Director, or is even aware that the Executive Director is carrying out such a policy when contacted by potential club affiliates. Policy-making authority should rest with the ISA Board of Directors.

5) The Findings & Decision references outside contacts regarding potential affiliation of new clubs in areas serviced by Dallas Center-Grimes, Norwalk, Carlisle and Soccer South. Mr. Kahler goes on to state: "Please note that none of the above referenced are 'large soccer clubs/coaching businesses.'" While these clubs may not be as large as others, it was my understanding that at least a few of these clubs have expanded their use of paid professional coaches in recent years, or have utilized paid professional coaches for years. Is this understanding inaccurate? Again, we wish to affiliate an all volunteer coached club. I should have stated more broadly in my complaint that ISA is working in a collusive manner to protect soccer clubs/coaching businesses of all sizes in the Des Moines area.

6) The Findings and Decision states:

"In summary we fully support the growth and expansion of new organizations that have met the guidelines and have shown that they wish to become contributing and valuable members of the State Association."

This contradicts ISA's stated policy that it will not accept additional affiliates in the Des Moines area. When Mr. Kahler communicated with Mark [REDACTED], the discussion was not about "guidelines," but rather that there are already enough teams in the Des Moines area, and simply due to the geography of our proposed club, would not be granted affiliation. Again, the Findings and Decision did not reference any needs assessment of the Urbandale community, nor whether the level of youth participation in USC has risen or fallen in the last decade. ISA should have performed this assessment, at the least, before the Executive Director adopted a blanked affiliation policy for the Des Moines area.

7) What is the extent of the ISA Executive Director's authority?

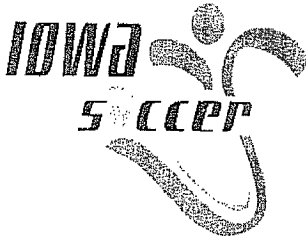
Based on actions and communication up to this point, it would appear that Mr. Kahler, ISA's Executive Director, has the following authority: 1) to unilaterally adopt policy on behalf of ISA; 2) to approve/deny affiliation requests; and, 3) to author ISA's Findings and Decisions or even dismiss a complaint, even if his actions are the partial basis for said complaint. Is this an accurate assessment of the executive director's authority? If so, I would appreciate receiving a copy of meeting minutes or governing documents where such authority is delegated.

For all of the above reasons, and those stated in my Complaint, I request that a disinterested third party review this matter, and make a decision or recommendation to correct ISA's past actions. I further request answers to the questions raised in this Rebuttal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matt Carver".

Matt Carver



The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer.

Matt Carver

Urbandale, IA 50322

Mr. Carver:

In accordance with the Iowa Soccer Association Hearings and Appeals Policy (enclosed) which governs the disposition of complaints, I have reviewed your complaint and now set forth the findings and decision.

The complaint: The State Association is acting in a manner contrary to its mission and purpose based on the following:

1. Collusion with large soccer clubs/coaching businesses
2. Protecting clubs from competition
3. Showing non support for new organizations

The mission: To foster, promote and perpetuate the sport of soccer.

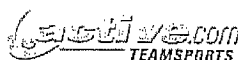
The purpose: to further and promote the sport of soccer through organization, training, and education; to aid, administer, assist and teach the sport of soccer for pleasure, recreational and other nonpofitable purposes to and for citizens of the State of Iowa; to organize soccer teams to compete and participate in soccer; and to promote the sport of soccer through the establishment and development of soccer programs.

Collusion with large soccer clubs/coaching businesses. The allegation of collusion is based on (1) the application of Level 2 rules and (2) denial of an application for affiliation.

First, regarding Level 2 rules, the State Association has the right to create rules and policies for its members and also has the right to clarify those rules and policies. Coach Bradley was contacted by the coaches at the Urbandale Soccer Club and Vision Soccer Academy about a potential loophole in the then recently publicized Levels of Play. Coach Bradley immediately recognized the problem and the unintended consequences of the rules, and published a clarification regarding Level 2 teams. While the potential loophole was discovered by two of the Greater Des Moines clubs, the subsequent clarification, as are the rules, was not designed exclusively for the Urbandale Soccer Club, the Vision Soccer Academy, or "large soccer clubs/coaching businesses" but was designed and applicable to all Iowa Soccer affiliates. The clarification was immediately posted on the Association website for broader distribution.

Second, Coach Bradley's direction in his clarification is consistent with Iowa Soccer philosophy regarding Level 2 opportunities. His expressed concerns about independent teams "cherry picking" can be a potential outcome if teams are allowed to function outside the rules and policies of the club.

Exhibit "A"



Third, Coach Bradley's clarification is in agreement with Section 1 of the ISA Rules (enclosed). In fact the State Association does not recognize "independent teams" within affiliates. Affiliates are responsible for their players and teams. Player selection and team assignment which includes level designations, are the responsibility of the affiliate. Further, each affiliate is responsible for their players and teams and the affiliate can set policy for teams and players as long as the rules/policies do not violate any state or national rule/policy (ISA Rules Section 2.B).

Fourth, Coach Bradley's clarification was in response to an issue brought to the state office by an affiliate. Affiliates, our members, often seek the advice and counsel of the State Association as well as requesting clarification and explanation of rules and policies. If appropriate, action is taken to clarify or correct any inconsistencies or mistakes as was the case here.

As for the State Association denying approval of a new affiliate, ISA Bylaw Article I, Section F. 2 & 3 (enclosed) govern applications for affiliation. Authority is delegated by the Board of Directors to the Executive Director to review and approve/deny applications. However, there has been no formal application submitted and therefore, no formal ruling. Mr. Havran's inquiries regarding affiliation were considered an informal, fact finding process as I noted in previous emails to Mr. Carver. My advice to Mr. Havran was based on the information he provided and on my knowledge of the ISA Affiliation Approval Guidelines. When applications are submitted, the Executive Director's due diligence and decision on formal approval/denial of affiliation is based on these guidelines. The guidelines are enclosed for your convenience.

Protecting Clubs from Competition. This allegation is based on the Level 2 playing issue as addressed above and the presumed denial of an affiliation application. As previously stated, no application has been submitted and therefore no application has been denied.

Regarding the protection of existing clubs, in the application process as noted in my email to Mr. Havran, precedent has been set to deny applications for affiliation based on territory. However, the State Association typically works with proposed affiliates to seek alternative solutions. As an example, in 2010 2 applications in the Greater Des Moines Area (Dallas Center-Grimes and territory covered by Norwalk, Carlisle and Soccer South) were denied based mainly on location. In both cases the State Association conferred with the proposed club's principals to find alternative plans. Please note that none of the above referenced are "large soccer clubs/coaching businesses."

Showing Non Support for New Organizations. The State Association has approved 14 affiliates in the past 5 years. It has been able to place many teams in existing clubs that inquired about affiliation but club formation was not an option. The State Association expanded its membership classifications in 2010 to better accommodate growth and expansion. It is implementing its Centers of Play Program that is expected to stimulate club growth. It has worked with newly approved affiliates providing free player and coaching clinics as well as administrative and governance support. In a few cases it has been able to assist in finding funds for clubs with disadvantaged populations. These are just a few examples of our commitment to grow and support new organizations. In summary we fully support the growth and expansion of new organizations that have met the guidelines and have shown that they wish to become contributing and valuable members of the State Association.

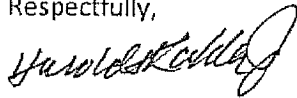
Based on the above, I do not find that the State Association has acted in a manner contrary to its mission and purpose and, therefore, dismiss the complaint with the following corrective action:

1. The State Association will better evaluate its distribution channels when communicating rule and policy clarifications. While the discussed clarification was posted on the website, it was not widely communicated beyond that posting. An email with the clarification could have been broadcast to our targeted groups.
2. The State Association will post the Affiliation Approval Guidelines on its website, on the "Becoming as Affiliate" page. While this criteria is discussed during the application process, having it posted will give potential affiliates the ability to address issues of concern early in their investigative processes.

In the complaint were a number of references to the Urbandale Soccer Club that were not pertinent to this complaint against the State Association, i.e. the status of paid professionals and policies of levels of play. The State Association suggests that you address those issues with the club's Board of Directors.

Thank you for your patience as I worked through the details of the complaint.

Respectfully,



Harold S. Kahler, Jr.
Executive Director

Enc.

other mutually beneficial relationships.

3. Association Rules and Policies

- a. Individual and Organizational Associates are considered non members and as such are not subject to Iowa Soccer Bylaws, rules and policies.

F. Organizational Member responsibilities and voting rights

1. Organizational Members must register all players with Iowa Soccer and/or with an affiliate of USSF.
2. Application for Organizational Membership must be made in writing to the Iowa Soccer office. The signed and dated application must be accompanied by payment of the affiliation fee; a copy of the affiliate's constitution, bylaws and rules and regulations; a list of the Board of Directors; and the names of the Directors of Coaching and Referees as well as the name of the Risk Management Coordinator.
3. When all appropriate items are submitted, the ISA Executive Director may provisionally recognize the organization for a one (1) year probationary period. After the one (1) year probation, and with evidence that the club adhered to the ISA's constitution, bylaws and rules, the organization's application for membership will be re-submitted for approval.
4. Only Organizational Members have voting privileges.
5. Each Organizational Member shall be apportioned votes based on the number of players each Member registers with the Association. The number of votes per Member will be based on the number of players registered during the prior seasonal year. The number of votes per Organizational Member is based on the following:

Number of Players	Number of Votes
1-500	1
501-1000	2
1001-1500	3
1501-2000	4
2001-2500	5
2501 and above	6

6. Voting shall be restricted to those Organizational Members which registered players during the current season. Each Organizational Member must be in good standing and an active, paid member of Iowa Soccer to vote on matters that come before the members.
7. The Presidents of each Organizational Member will be allowed to vote at the annual meeting and at other times when a vote of the membership is called. Each member of the Board of Directors of the Iowa Soccer will be given one vote.
8. Voting by proxy shall be allowed. Those wishing to vote by proxy must notify Iowa Soccer of their intent to vote as such giving the name of the person holding the proxy vote(s) prior to the start of the meeting.
9. All matters requiring a vote at the Annual General Meeting with the exception of these Bylaws shall be approved by majority vote of eligible members present at the meeting.
10. The Board of Directors shall annually recommend to the membership the procedures, rules and policies for Organizational Members for ratification at the Annual General Meeting.
11. The Board of Directors shall annually set the fee for Membership.

G. Players and Coaches

1. The Board of Directors shall annually set registration fees for players and coaches.

Exhibit "B"



IOWA Soccer Association

3850 Merle Hay Rd, Suite 524

Des Moines, IA 50310

(515) 252-6363 voice

(515) 252-7676 fax

www.iowasoccer.org

October 11, 2010

Dear Mark:

In regard to your request that the State Association reconsider its position on the creation and affiliation of another club in the Greater Des Moines area, I offer the following reasons for not considering an application with Iowa Soccer.

1. There are nearly 40 clubs in the Greater Des Moines (GDM) area. Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices.
2. The State Association has worked to help clubs combine efforts in trying to keep the player pool stable and thereby create more stability in the existing clubs.
3. Approving a club in an area that is already served by several other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases.
4. Although I have not canvassed the GDM clubs (a practice I do with any submitted application in the effected geographic area), I believe I can safely say with some certainty that the current clubs in the area are not in favor of having another club established in Greater Des Moines feeling existing clubs provide adequate coverage for the area.
5. Dispersing players already registered with existing clubs and the State Association does not foster the growth of the sport either locally or statewide.

I appreciate your time and commitment to the sport of soccer. I wish you the best moving forward and continued success in your soccer-related work.

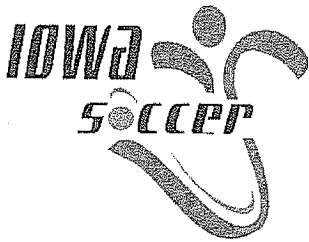
Respectfully,

Harold Kahler
Executive Director

Rebuttal Exhibit "C"

Exhibit B-2

Exhibit B-2



The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer.

3850 Merle Hay Road - Suite 524 - Des Moines, IA - 50310

www.iowasoccer.org

515.252.6363 local - 800.386.4692 free - 515.252.1416 fax

January 19, 2011

Matt Carver

~~Urbandale, IA 50322~~

Urbandale, IA 50322

Dear Mr. Carver:

The Board of Director's of the Iowa Soccer Association met in a special meeting on Friday, January 14 to review your complaint, Mr. Kahler's response, and your rebuttal. We also reviewed the processes involved including applicable policies and rules, and have determined that the Board will not take any further action in this case. The dismissal of the complaint as specified in Mr. Kahler's response on behalf of the Association stands.

If you would wish to pursue this further, I suggest you contact the United States Soccer Federation, 1801 S. Prairie Avenue, Chicago, IL 60616.

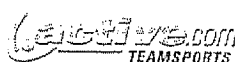
Thank you for your patience and we wish you success moving forward.

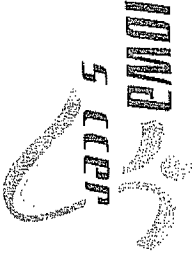
Sincerely,

Rod Olson

Rod Olson, Chair

H



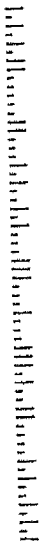


RETURN RECEIPT
REQUESTED

Matt Carver

Urbandale, IA 50322

5032281719



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1000



50322

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February 25, 2011
Mr. Mark Carlson
League Commissioner
Greater Des Moines Junior Soccer League

Dear Mark,

A group of parents in the Urbandale Community has formed the J-Hawk Soccer Club, a new, all volunteer soccer club in the Urbandale community. Due to the Iowa Soccer Association's decision to not allow the affiliation of any additional soccer clubs in the Des Moines area, our club is affiliating through United States Specialty Sports Association (USSSA). USSSA has been an affiliate of USSF since 2001, and provides \$2 million worth of liability and facility insurance coverage. It is our understanding that USSSA clubs have successfully been part of youth leagues in Kansas City (MO), Colorado, and a number of other locations around the country. If GDMJSL has additional questions regarding USSSA, you may contact Craig Scriven, USSSA director of soccer operations, - craig@usssa.com or 816-255-8890.

The J-Hawk Soccer Club is in direct coordination with the City of Urbandale regarding the use of city owned soccer fields for the fall 2011 season. The following quote is from Jan Herke, Urbandale Director of Parks & Receptions, regarding field use for the fall: "A Fall 2011 lease for field usage and accommodations will be negotiated with both the Urbandale Soccer Club and J-Hawk Soccer Club this summer, in preparation for the Fall 2011 season." Ms. Herke provided this statement in an email to GDMJSL, on which the J-Hawk Soccer Club was also copied. We are confident that by providing a low-cost soccer alternative in our community, the cumulative number of youth soccer players between the J-Hawk Soccer Club and USC will be larger than the number of registered players USC had for the fall 2010 season.

The J-Hawk Soccer Club intends to open registration to age groups U6-U19 for the fall 2011 season. Due to the uncertainty of player numbers with such a new club, we provide the following estimation of our fall membership:

U6 – 50 players
U8 – 30 players
U10 – 18 players
U12 – 10 players
U14 – 14 players
U16-U19 – 16 players

Again, the above are estimates. Our club currently has twelve (12) U12 girls participants, and 14 U14 participants. Two players only participate on our teams during the fall season. We further estimate that we would be able to provide 10-15

referees, and are committed to find new referees to the extent that it is necessary to be a productive member of the GDMJSL.

To provide more information regarding the intent of our all-volunteer club, I have copied our mission and vision statements below.

J-Hawk Soccer Club Mission Statement – The J-Hawk Soccer Club exists to provide a low-cost, volunteer led and volunteer coached soccer experience to youth in the Urbandale community, where players learn the importance of citizenship, teamwork, positive attitude, effort, fundamentals, and sportsmanship, in a safe and welcoming environment.

J-Hawk Soccer Club Vision Statement - Our vision is to provide the highest quality soccer experience to all interested youth in the Urbandale community, regardless of their financial means.

Our current slate of board members is as follows:

President – Matt Carver
Vice President – M [REDACTED]
Secretary – Dave Smetzer
Treasurer – E [REDACTED]
Director of Fields – D [REDACTED]
Director of Referees and Registrar – Renee Carver
Director of Communications – D [REDACTED]

We would appreciate GDMJSL's consideration of this request for the J-Hawk Soccer Club to join GDMJSL at the earliest possible time, and begin participating in league games during the fall 2011 season, so that we may move forward with fully promoting our all-volunteer club in the Urbandale community. I will be happy to speak to any league members who have questions about the J-Hawk Soccer Club. My telephone numbers are below. Alternatively, I may be reached through email at: Matt95Renee@msn.com. Finally, board members and parents of the J-Hawk Soccer Club would gladly attend a GDMJSL meeting, if affiliated clubs would find it helpful. Craig Scriven, of USSSA, has also shared that he may be available to attend a GDMJSL meeting.

Go J-Hawks!

Matt Carver
President
J-Hawk Soccer Club
[REDACTED]
Urbandale, IA 50322
tel. – (h) 515 [REDACTED] (w) 515 [REDACTED]



J-Hawk Soccer Club <jhawkssoccerclub@gmail.com>

Message on the pending application before GDMJSL

GDMJSL <gdmjsl@gdmsoccer.org>

Fri, May 6, 2011 at 4:15 PM

To: Gayle Brimeyer <gdmjsl@gdmsoccer.org>

Dear Greater Des Moines Junior Soccer League Members;

The Executive Committee recently met via a conference call and discussed the following:

Prior to an Iowa Soccer annual general meeting in 2007 when by-laws were changed, Greater Des Moines Junior Soccer League was a direct affiliate of Iowa Soccer. Within the Greater Des Moines League, there were many clubs. As an affiliate of Iowa Soccer, the Greater Des Moines League was a member of USYS. Thus, the requirement for any potential affiliate was that they must state in their application and by-laws that they would be a member of USYS.

Subsequent to the Iowa Soccer by-law change in 2007, each Greater Des Moines Junior Soccer League affiliate (club) became a direct affiliate of Iowa Soccer. As an affiliate of Iowa Soccer each club then becomes a member of USYS. The Greater Des Moines League is a sanctioned league of Iowa Soccer and still has the requirement that an applicant of the Greater Des Moines League must be a member of USYS as all of our member clubs register through Iowa Soccer.

A Greater Des Moines League vote on any club becoming a member of the League would be premature prior to Iowa Soccer reaching a decision on affiliate status for any applicant. In light of this information, the motion passed at the April Greater Des Moines League meeting to consider the J-Hawk club application for membership at the May meeting was out of order. Thus, there will be no vote on this matter at the May meeting or any subsequent meeting, unless J-Hawks SC has secured an approval of their ISA affiliation application.

GDMJSL Executive Committee

J

In a message dated 5/5/2011 9:04:49 A.M. Central Daylight Time, [blarson13@](#) writes:

All,

I too like the small add in red. This looks fine to get us moving forward.

Thanks,

Bonnie

On Thu, 5 May 2011 08:33:35 -0500 Cameron Torstenson <[CTorstenson@](#)> writes:

On second thought.... That comment makes us all shiver at this point, don't you think?

Anyway, small comment, in order to better control expectations and, possibly, allow us to work on some more relevant league business, I might suggest the slight change below in red. If the group disagrees, I'm okay with the draft that was originally below.

Cam

From: Rhodes, Mark [<mailto:Rhodes.Mark@>]
Sent: Thursday, May 05, 2011 7:48 AM
To: [blarson13@](#)
Cc: [gdmjst@gdmsoccer.org](#); Cameron Torstenson; [Llcook15@](#); [marklynnr@](#); [backseat123@](#); [cameron@](#); [woodcock23@](#)
Subject: RE: League Communication

I think this is a good summary and still short and to the point. I have added just a little at the end leaving the possibility open that if they would get approved by ISA before the meeting we could still present the application to the membership. If the group doesn't like it that's fine just a suggestion.

Mark Rhodes

[\[REDACTED\]](#)

[\[REDACTED\]](#)

K

Urbandale Soccer Club

A proud Urbandale community partner for over 40 years,

Member of Iowa Soccer Association (ISA) &

United States Youth Soccer (USYS)

Register [HERE](#) for the 2014 Spring Season!

USC offers the most options of any soccer club in Urbandale for your developing soccer player!

Youth Recreational Soccer opportunities include:

U4 Little Kix program

U5 – U8 Age groups (weekly games with other USC teams)

U9 – U14 Age groups (weekly league games with other central Iowa soccer programs)

Registration includes:

Weekly practices and games with a parent volunteer coach

Coaching clinics for the parent volunteers led by professional coaches

“Extra Kicks” supplemental player training sessions led by professional coaches

Register [HERE](#) for the 2014 Spring Season!

www.UrbandaleSoccer.org

Youth Academy Soccer opportunities include:

U9 – U10 Age groups (weekly games with other central Iowa academy programs)

Registration includes:

Greater emphasis on individual player development

Higher level of competitive play

Twice weekly training sessions led by professional coaches

Weekly games with local community academy programs

“Extra Kicks” supplemental training sessions led by professional coaches

Register [HERE](#) for the 2014 Spring Season!

www.UrbandaleSoccer.org

L

Youth Select Soccer opportunities include:

March 6, 2014 5:33 PM

To: Matt Carver
Cc: Dave Smetzer <smetz4@msn.com>
Re: Additional Context from When I Resigned from the USC Board

2 Attachments, 114 KB

Matt - Lots of material but I think I got through everything. These guys have been total [REDACTED] and that is putting it kindly. And believe me I understand that you don't let anyone challenge your honesty or integrity. In fact, I voluntarily left close [REDACTED] because that was happening to me. I am willing to chip in to help fund your grievance or legal action but the bottom line is our girls should not be impacted by this poor behavior and I am afraid they already have been. We have already gone through a couple of seasons with limited playing opportunities and can't keep holding them back because of the idiotic behavior within USC and JUSC. That only allows them to continue to negatively influence our girls.

On Mar 06, 2014, at 02:14 PM, Matt Carver [REDACTED] wrote:

This was just prior to the formation of the J-Hawk SC. Doesn't appear that their behavior has changed much. As a business person you might be interested in our club's impact on the cost of soccer in the community. By the way, I am now 42 years old, have served 20 years in the military (as of this May), and have been the [REDACTED] for [REDACTED] eight years. Outside of soccer, I have NEVER had someone challenge my honesty or integrity. I certainly have my faults, but I don't consider honesty or integrity as being amongst them. While one may look at the recent concessions by USC as a positive step forward (and it certainly does provide additional opportunities for some children), I believe it is fair to question whether those options would be provided without our club having over 300 players (most of whom are U10 and below). Also, it is fair to question what would be provided if our club did not exist. I realize I have dumped a great deal of information on you. Sadly, there is much more from where this came.

Let me be clear too, there is nothing that we would like more than to see the children in both clubs playing games with each other and finding ways to partner in a mutually beneficial manner. Unfortunately, USC's leadership has consistently taken positions that conflict with such efforts. I just wanted you to have a better feel for what we have faced over the last 5 years. In an effort to be positive, we have sheltered our club from probably 90% of what I have shared with you today. While being positive is extremely important, perhaps we should have done a better job of keeping parents informed.

I will talk to you later. Thanks, Matt



Matt Carver...d.pdf (62 KB)

Club Cost Comparison for U7 Players and Cost Savings to Urbandale Parents

Club	Registration Fee (season)	Late Fee	Volunteer Opt Out Fee	Potential Total	Total annual savings, assuming 84% timely & 16% late
J-Hawk Soccer Club	\$40	\$5	\$0	\$45	
Urbandale Soccer Club after formation of J-Hawk SC (Just changed starting spring 2014)	\$60 (Early bird registration fee of \$55)	\$0	\$0	\$60	
Urbandale Soccer Club after formation of J-Hawk SC	\$60 (Early bird registration fee of \$55)	\$10	\$0	\$70	
Urbandale Soccer Club before J-Hawk SC	\$70	\$25	\$0	\$95	\$42,560

M

Johnston Soccer Club (Urbandale Soccer Club's partner)	\$90	\$25	\$20	\$135	\$84,880
West DM Soccer Club	\$95	\$25	\$25	\$145	\$90,220

Based on 312 players in J-Hawk SC and 600 players in USC

Difference in price is similar in other age groups.

504 timely USC players multiplied by timely registration fee difference + 96 USC players multiplied by late fee difference +
262 timely J-Hawk players multiplied by timely registration fee difference + 50 J-Hawk players multiplied by late fee difference

Page 16



J-Hawk Soccer Club <jhawksoccerclub@gmail.com>

Update Regarding Actions Against J-Hawk Soccer Club

[REDACTED]
To: J-Hawk Soccer Club <jhawksoccerclub@gmail.com>

Sun, Jul 6, 2014 at 8:12 PM

Hi Matt... Ive been meaning to respond to your email and am finally taking a moment to do that. As frustrating as it is that we will need to wear a USC rec uniform this year, I know that my own feelings need to be put aside for [REDACTED] and her ability to play the game. I cant even begin to imagine your level of frustration in regards to it all but I want to make sure that you know that I will always appreciate how hard you have pushed for all of these kids. It is because of your efforts that they will play level 2 at lower cost and we all know that. I will watch her play while sporting my JHawk gear on the sideline.

On a different note, [REDACTED] thinks she would like to play this fall on your team if you would have her. She hasn't played in quite some time, other than with [REDACTED], but [REDACTED] and [REDACTED] have her convinced she needs to give it another go. Thoughts?

Thanks!

[REDACTED]

Sent from my iPad
[Quoted text hidden]

N



J-Hawk Soccer Club <jhawksoccerclub@gmail.com>

J-Hawk Soccer Club Participation in Greater Des Moines Junior Soccer League

gdmjssl@gdmsoccer.org <gdmjssl@gdmsoccer.org>

Wed, Aug 27, 2014 at 9:30 AM

To: jhawksoccerclub@gmail.com

Cc: jcosgrove@usyouthsoccer.org, hkahler@iowasoccer.org, dlegg@██████████, jsutter@usyouthsoccer.org, ██████████

Dear J-Hawk Soccer Club;

Thank you for your inquiry and congratulations on the growth of your Club. As you are aware, the Greater Des Moines Junior Soccer League operates for the benefit of its member Clubs in order to provide playing opportunities to those Clubs. The League operates as a closed league and requires that all players shall be affiliated with United States Youth Soccer (USYS). We have clarified that this manner of operation is compliant with USYS and the United States Soccer Federation (USSF). Because your Club is not affiliated with USYS, it is ineligible for membership. This requirement is clearly stated in the League Rules, which have been in effect and unchanged since prior to the inception of your Club. These requirements have been met by each and every one of the League's current 39 member Clubs.

Also of note is that membership in the League requires approval by two-thirds of the league members. Thus, in itself, affiliation with USYS is not a guarantee of league entry.

However, we believe that you have a variety of options available to provide League access to your players. We are aware that one of your teams played in the League in the Spring 2014 season by registering through a member club, thus becoming affiliated with USYS and meeting the Leagues' eligibility requirements. This option provided these players immediate access to League play.

Since you have indicated your desire to file a grievance with USSF, we have taken the liberty of copying the pertinent parties on this response so that those parties may have direct access to us in the event they have questions.

Sincerely,

The Executive Committee of the Greater Des Moines Junior Soccer League

----- Forwarded Message -----

From: J-Hawk Soccer Club <jhawksoccerclub@gmail.com>

To: "blarson13@juno.com" <blarson13@juno.com>

Date: Mon, 18 Aug 2014 14:05:55 -0500

Subject: J-Hawk Soccer Club Participation in Greater Des Moines Junior Soccer League

Message-ID: <CADRmw2ssTqTfUBxKyrWhV8Sn4mSx_3Sieay0cMEhO3jgy-dEow@mail.gmail.com>

Bonnie,



Prior to the J-Hawk Soccer Club filing its grievance with USSF, we are wishing to find out if GDMJSL has taken a new position regarding the J-Hawk Soccer Club's participation in your league. We now have nearly 400 players and continue to be affiliated through USSSA, which provides our player cards and insurance. Please let me know as soon as possible, as we anticipate filing the grievance during the next several weeks.

I am always happy to talk if anyone from your league has any questions.

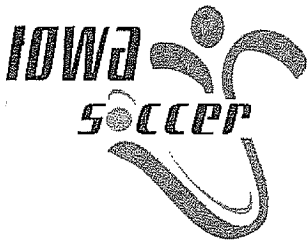
Thanks,

Matt Carver

President

J-Hawk SC

cell - 515-689-1213



The mission of the Iowa Soccer Association is to foster, promote and perpetuate the sport of soccer.

3850 Merle Hay Road - Suite 324 - Des Moines, IA - 50310

www.iowasoccer.org

515.252.6163 local - 800.386.4692 free - 515.252.6163 fax

August 16, 2011

Matt Carver

4500 [REDACTED]
Urbandale, IA 50322

Dear Matt:

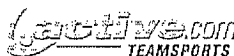
Pursuant to my desire to have the Urbandale Soccer Club/J-Hawk Soccer Club meetings play out before making a determination on your club's affiliation with Iowa Soccer, and now with the conclusion of the discussions which included the Urbandale City Council's field leasing decisions, I am now prepared to make the final determination. I appreciate your understanding and patience during this time.

I have been very transparent in my desire to have the two clubs communicate and work together in the community regardless of state/national affiliation, which is why I encouraged they enter discussions. I have mixed feelings about the outcome of the discussions, and the apparent lack of cooperation between the two clubs, but I also appreciate each club's persistence and commitment to their ideals and mission.

My original concerns about having a second club in the same community, which is one of several affiliation guidelines to consider, have been reinforced with the launch of the USSSA J-Hawk Soccer Club in the City of Urbandale. Without pointing fingers and laying blame, the disagreements on both sides have persisted over the past year despite efforts to mediate them and to establish an amicable working relationship between the parties. For our organization's members and in the interest of the sport statewide, I believe it would not be in the best interest to have two member clubs from the same community, who despite philosophical differences, do offer similar options to players and teams. Further, there are low cost alternatives available from clubs in the Greater Des Moines area that are in reasonable distance from Urbandale. Finally, the J-Hawk Soccer Club's commitment to a select program is not consistent with Iowa Soccer's position to hold/reduce, not increase, the number of select programs in the state. Therefore, I'm denying the J-Hawk application for affiliation with the Iowa Soccer Association.

There are a variety of member clubs in the Greater Des Moines area with which your teams can become members of the Iowa Soccer Association and US Youth Soccer. I believe you have a good feel of the club landscape in this area but if you feel I may be able to assist you and your teams, let me know.

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I know you are pursuing other opportunities to realize your goals with USSSA and the Central Iowa Youth Soccer League and wish you the best moving forward. Please feel free to contact me with any questions and good luck this coming fall season. I've enclosed your application and check for your convenience.

Respectfully,

A handwritten signature in cursive script, appearing to read "Harold", written in dark ink.

Harold S. Kahler, Jr.
Executive Director

Enc.

**Fwd: J-Hawk Soccer Club****Matt Carver** <[REDACTED]@[REDACTED].org>

Tue, Jan 14, 2014 at 7:41 PM

To: J-Hawk Soccer Club <jhawksoccerclub@[REDACTED].org>

Sent from my iPhone

Begin forwarded message:

From: Dean Legg <dlegg@[REDACTED].org>**Date:** January 14, 2014 at 5:10:18 PM CST**To:** <[REDACTED]@[REDACTED].org>**Cc:** Harold Kahler <hkahler@iowasoccer.org>, Dorothy S Pisarski <[REDACTED]@[REDACTED].org>, Sharon Robinson <[REDACTED]@[REDACTED].com>, "Cristy Hamblin" <[REDACTED]@[REDACTED].org>**Subject:** J-Hawk Soccer Club

Matt – sorry it has taken me so long to response from our luncheon meeting on October 10th.

It is my understanding you are asking for a review of your past attempts to affiliate with ISA as an independent club and the handling of this situation by our Executive Director Harold Kahler and the more recent events you've described in your emails to Harold as "blackballing" of your J-Hawk Club by ISA and Affiliates. I have reviewed various documents and correspondence dated back several years now pertaining to this topic.

First of all, I want to point out I appreciate our luncheon meeting had nowhere near the tone of aggression your emails to Harold just a week prior contained. I was glad we could sit and talk calmly about the situation and you could explain your history. It was a very pleasant meeting. I want you to know I personally am totally in favor of your desire to provide competitive coaching via a volunteer coach without paying the fees containing a coaches salary thereby keeping the cost of participation low. As I stated at our luncheon, I had always hoped that the byproduct of all of the time I spent, and many other unskilled youth soccer coaches spent years ago, with our children is that they would grow up and prosper the sport as skilled players and become coaches who had actually played the sport and that the sport in the US would become mainstream and there wouldn't be the need to hire so many coaches. As we look at all youth sports though, once they reach a certain level of competitiveness, hired coaches seem to be the norm anymore even in the traditionally US mainstream sports.

As I understand your situation, you have been unwilling to combine your program with our Affiliates, from which all of your players reside and in fact most separated from our Affiliates to form your club. I understand your club and players are affiliated with USSSA. It is my understanding your main, if not only point of contention of joining our affiliates is cost, both related to coaching and club administration. My opinion is that the J-Hawk Club has evolved at a time that benefits from the past efforts of our local affiliates. In the past we (as a previous club board member) had to negotiate land space for fields from the various cities and we got what they would provide with limited improvements to make it suitable. The clubs were then forced to raise money for field improvements and maintenance. I'm aware that both the Urbandale and Johnston clubs in your area had to do this for the complexes they have. You described

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your battles with the Urbandale City over field use time, and lack thereof, which only continues to demonstrate the financial needs for facilities which your club currently doesn't incur. Also as a club grows in membership, many times the strain on volunteers performing the administration becomes too much and paid staff become necessary. You acknowledged that you doubted another volunteer would do the administration work your wife does for your club without some sort of compensation. You were even unsure if the Club would sustain if you and your wife were not involved. Your membership is definitely getting good value for the expense however it doesn't appear sustainable.

When our Executive Director provided mediation and the option of your participation with our Affiliates, your demands of their withdrawal from our organization and dictating of the use of their financial resources is very disturbing and raises question of your true intentions.

Additionally, through your numerous somewhat scathing emails to our Executive Director, you have used the terms "blackballing" and "pay for play". I have found no effort by our organization or anyone within our organization of any effort to "Blackball" the J-Hawk Club. As our affiliates sanction the tournaments they host, they can sanction them as restricted or unrestricted. Ever since my involvement with sanctioned tournaments going back to the early 90's it has been the standard practice to sanction them as restricted tournaments to help provide policing of registrants and the inherent problems of teams formed and desiring participation when the levels of play differ substantially from the desire of the tournament. When teams sign up for a restricted tournament, they can be reasonably assured the opposing teams formation and ability will probably be similar to theirs. When you open the doors by sanctioning it as unrestricted, this opens the flood gates for all kinds of weird scenarios. The sanctioning of tournaments as restricted or unrestricted is completely allowable in the Federations rules and is not something new.

You had the option of grieving our Executive Director's prior decision to the Federation and may still have that option. From what I have reviewed I believe what has been done was in compliance with the Federation Bylaws.

If you want to open discussions again about joining with our affiliates we are willing to assist with this.

Dean

Dean Legg

Matt Carver <[REDACTED]>

January 15, 2014 4:05 PM

To: Dean Legg <dlegg@prospect.com>

Cc: Harold Kahler <hkahler@iowasoccer.org>, Dorothy S Pisarski <doris.pisarski@iowa.edu>, Sharon Robinson

<[REDACTED]>, "Cristy Hamblin" <[REDACTED]>

Re: J-Hawk Soccer Club

5 Attachments, 910 KB

Harold and ISA Board,

I have forwarded Dean's message to the J-Hawk Soccer Club's board, which has 10 members. The board may or may not have a response after our upcoming board meeting. Please consider this email as coming from me personally.

Since most members of ISA's leadership have never spoken to me or know me, I would like to give you some background. I started playing soccer in the Urbandale Soccer Club in the spring of 1980, or there around. I went on to have a very successful period as a four-year varsity starter for Urbandale High School. As a senior, I was voted MVP of the first of two undefeated varsity boys teams in the history of UHS. A talented sophomore on that team was a young man by the name of Aaron Leventhal. As some of you may be aware, Aaron is a member of your organization's hall of fame. After high school, I attended the University of Notre Dame on an Army ROTC scholarship. Upon graduation and commissioning, I served on activity duty for four years, 3 1/2 of which was at Hohenfels, Germany. During my time overseas I had the opportunity to participate as the only American player in a German men's league, and I further had an opportunity to see how the German youth soccer system worked. I would note that in Germany youth coaches are only paid at youth academies in the top several professional divisions. After active duty service, I enrolled in the University of Iowa's College of Law, and also joined the Iowa Army National Guard (I am now a LTC in the Guard, and drill out of Iowa City). After law school graduation my family moved to Urbandale, where I almost immediately became a coach of our oldest daughter's soccer team with USC (we now have four children, ranging in ages from 7-16, all of whom play soccer). Approximately a year after my start as a coach with USC, I joined the board of USC. This participation with USC was interrupted from December of 2003, until the spring of 2005, due to a deployment for over a year in support of Operation Iraqi Freedom. Upon returning from deployment I immediately started coaching soccer again and joined the USC board for a second time within a couple of years. I only left the USC board after it was clear that USC was not going to permit volunteer coaches to coach Level 2 teams. (see the attached USC policy) In addition to the above activities, my wife, Renee and I have served as adult leaders with the UHS chapter of Fellowship of Christian Athletes since 2001. I also chaired a successful \$29 million board referendum for a significant addition to UHS, and have served on the boards of Endow Urbandale, as well as the Urbandale Public Library (on which board I served for 6 years). My wife has volunteered almost weekly in Urbandale schools since 2002, and is the volunteer registrar of J-Hawk Soccer Club, which now has over 315 players and over 50 coaches. To add further color to my background, I was raised by my father to take action when I find injustice. I would encourage you to watch the following, brief MLK video, which characterizes how I approach my duty to confront injustices in life: http://youtu.be/-DXWd2_EpCA.

I understand that you as members of the board are volunteers yourself, and perhaps have an even more exhaustive list of community service. So what is my point?! I consider it my duty to take the steps we have taken, along with hundreds of other parents, to provide an all-volunteer soccer club in the DSM area. While they may be offensive or disturbing to you, I do not shy away from some of the strong terms and phrases I have previously used. (ISA may not choose to deny J-Hawk SC's affiliation because you may have a difference of philosophy with me, or you do not feel we will get along. Please see pages 7 and 8 of the attached North Dakota grievance, attached). As long as I have good health, I will continue to strongly advocate for those children who are unable to advocate for themselves. I am extremely confident that after reviewing the USSF policies and grievance decisions which I have provided that you will know in both your heart and mind that ISA is directly violating USSF policies. The result of ISA's position is that J-Hawk Soccer Club children are unable to participate in the largest league in Des Moines and numerous tournaments throughout the state.

I ask you as board members to read the documents yourself, along with Harold's letter to J-Hawk SC and reply as to whether you truly believe ISA is following USSF guidance and policies. I am not asking if you have your own rationalizations or justifications, but whether you personally find that ISA is following USSF policies. Harold's letter includes language which is almost verbatim what language is in the Columbia Basin grievance (attached). I see that one of your directors is a member of law enforcement (I appreciate your service). An officer of the law does not simply disregard her duty because she may not like a member of the community, or because that member may have made negative comments about the police department. Similarly, ISA has a duty to follow USSF policies and bylaws.

As for my comments about blackballing, I have a couple of questions for you, Harold. Have you ever discouraged representatives from other clubs from participating against J-Hawk Soccer Club teams? Have you ever been in discussions (whether oral or written) with members of other soccer clubs about the danger or threat J-Hawk SC represents to the current soccer system in Iowa?

And for the board members, does the action of ISA to deny membership to an all-volunteer soccer club with over 315 players represent why you have spent so many years volunteering in the sport of soccer? ISA's motto is: "Let the kids play." The J-Hawk SC is providing the lowest fees in the DSM area (a third of what some others charge for recreational soccer, and an 1/8 of what some charge for competitive soccer). We are as sustainable as any other club our size, and I trust ISA has many affiliates with fewer members.

Perhaps Dean was implying this when he wrote his email, but I trust you find irony in the fact that I represent the very volunteers Dean

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was hoping ISA would produce. I played soccer at a high level for 20 years. I obtained my ISA D license, and just want, along with other parents, to coach my children at the highest level, while providing low cost soccer to others. I believe we celebrate freedom of association in our country. We should be no more required to join USC, than you should be required to eat at McDonalds rather than a newer fast food restaurant, even though McDonalds may have laid the groundwork for how such restaurants operate.

As I mentioned to Dean on the telephone this morning, I include my cellphone number on almost any communication I send, and often encourage adults in other soccer organizations to contact me, so we may discuss youth soccer. Would you like to know how many adults have contacted me when offered the opportunity over the last 3 1/2 years?! Zero. I now extend that offer to you, so you may get to know me better and understand the uphill battle we have faced to simply provide a low cost opportunity in Des Moines without taking away options of others to spend as much money as they wish. Please call me at any time. I would very much look forward to speaking with you. Again, I would appreciate your written response to the above questions. I am more than happy to oblige you with written responses to any questions you may have for me. Dean, thanks for meeting with me and answering my calls. If you ask Harold, he will confirm that I have met with him as well and had multiple, cordial telephone conversations, in spite of the strong words in my emails in disapproval of his actions. Finally, as for my comments about others leaving ISA, if you believed that an organization was openly violating the law and the result of that violation would injure children, would you be part of that organization?! I contacted Dean with the hope that ISA would change its indefensible position after board members had the opportunity to read USSF policies and bylaws themselves.

I look forward to hearing from you and reading your responses.

Best regards,

Matt Carver

515-222-1230

The below may be found on the United States Soccer Federation's website by searching "USSF grievance" on Google.

GRIEVANCE SYNOPSIS: COLUMBIA BASIN SOCCER ACADEMY v. WSYSA

November 16, 2002

CBSA, a club located in the state of Washington, asked to join a local association that was part of Washington State Youth Soccer Association. CBSA wished to serve as a competitive club, but had not yet put together any teams. The local association rejected the request, stating that it already had a competitive club in its region, and that a second club would have a "detrimental impact" on the competitive club.

The USSF Board of Directors appointed a hearing panel to consider the grievance. The panel submitted a recommendation to the Board, and the Board adopted this recommendation. The Board ruled that the grievance must be denied, because CBSA had not yet put together teams or chosen players so that it could apply as a "club" for membership. The Board ruled that "unless and until CBSA puts together its teams, and subsequently is denied the opportunity to play within WSYSA, CBSA has nothing to grieve."

The hearing panel also stated, and the Board agreed, that once "CBSA has teams and players, WSYSA has an obligation to provide a mechanism for affiliation" and **rejected "WSYSA's claim that a club can be turned away because it determines that there is no 'need' for the club in a certain area."** (emphasis added)

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IOWA Soccer Association

3850 Merle Hay Rd, Suite 524

Des Moines, IA 50310

(515) 252-6363 voice

(515) 252-7676 fax

www.iowasoccer.org

October 11, 2010

Dear Mark:

In regard to your request that the State Association reconsider its position on the creation and affiliation of another club in the Greater Des Moines area, I offer the following reasons for not considering an application with Iowa Soccer.

1. There are nearly 40 clubs in the Greater Des Moines (GDM) area. Players wanting the opportunity to play at any level in the area have ample opportunity and a variety of choices.
2. The State Association has worked to help clubs combine efforts in trying to keep the player pool stable and thereby create more stability in the existing clubs.
3. Approving a club in an area that is already served by several other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases.
4. Although I have not canvassed the GDM clubs (a practice I do with any submitted application in the effected geographic area), I believe I can safely say with some certainty that the current clubs in the area are not in favor of having another club established in Greater Des Moines feeling existing clubs provide adequate coverage for the area.
5. Dispersing players already registered with existing clubs and the State Association does not foster the growth of the sport either locally or statewide.

I appreciate your time and commitment to the sport of soccer. I wish you the best moving forward and continued success in your soccer-related work.

Respectfully,

Harold Kahler
Executive Director

United States Soccer Federation (USSF) Bylaws and Policies Regarding Interplay and Participation in Affiliated Organizations

Bylaw 603. INTERPLAY

Section 1. One Organization Member may not require that all of the players, coaches, teams, and administrators of another Organization Member (who have been registered with, and fees paid to, the Federation as required by section 1 of Bylaw 212) be registered with the first Organization Member as a condition for only some of those players, coaches, teams, or administrators participating in the activities of the first Organization Member. The first Organization Member may require registration of only those players, coaches, teams, and administrators of the other Organization Member that actually participate in the activities of the first Organization Member. Those players, coaches, teams, and administrators of the other Organization Member registering with the first Organization Member shall comply with all of the regular registration requirements of the first Organization Member.

Section 2. An Organization Member (other than a Professional League) shall not discriminate against the participation of players, teams, coaches or clubs on the basis of that player, coach, team, or club's membership in, or affiliation with, another organization. The Federation encourages its Organization Members to allow teams of all other Members to participate in tournaments sponsored by them or any of its organization members when the teams otherwise comply with the tournament eligibility requirements. A tournament sponsor may charge each team of another Member an additional fee of not more than \$25 to participate in the tournament.

Policy 212-1 Participation in Affiliated Organizations

Preamble: The purpose of this policy is to clarify terms under which participants may participate in the various programs offered by Organization Members. This policy should be read in conjunction with Bylaws 212 and 603.

Section 1. For purposes of this policy, the following shall apply:

- (a) "Affiliated Organization" means any Organization that is a member or identifiable subset of any USSF Organization Member.
- (b) "Organization" means a club, league, team, association, or other group of Participants.
- (c) "Organization Member" shall have the meaning set forth in USSF Bylaw 109.
- (d) "Participant" means any player, coach, trainer, manager, administrator, or official that is sponsored, financed, coached, organized, or administered by an Organization.
- (e) Any reference in this policy to registering with, becoming a member of, or complying with the requirements of an Organization Member may include registering with, becoming a member of, or complying with the requirements of a member of that Organization Member.

Section 2. Every Participant in every Affiliated Organization must be registered with at least one Organization Member. A Participant may be registered with more than one Organization Member.

Section 3. If an Organization that is not an Affiliated Organization wishes to become a member of an Organization Member, that Organization Member must require that the Organization comply with section 2 of this policy, either by registering every Participant in that Organization with that Organization Member or by providing reasonable proof (including, for instance, a verification letter from another Organization Member of the number of players registered from that Organization) upon request that every Participant that it does not register with that Organization Member is registered with another Organization Member.

Example: A club with 5,500 players wishes to join an Organization Member (OM-USA). The club is not currently affiliated with any Organization Member. If the club wants to register only a portion (for instance, 1,000) of its players with OM-USA, OM-USA must reject the request unless the club either agrees to register the other 4,500 players with OM-USA as well, or agrees to register these 4,500 players with another Organization Member.

If, however, the club is affiliated with another Organization Member already, and wishes to register only 1,000 players with OM-USA, the club must provide reasonable proof if requested to OM-USA of registration of the other players with the other Organization Member, and then OM-USA must allow the club to register only those 1,000 players (subject to section 4 of this policy).

Section 4. An Organization Member must allow Participants from any Affiliated Organization to participate in its programs if those Participants register and comply with all of the reasonable policies, rules, regulations, and requirements of the Organization Member.

(a) Each Participant (and only those Participants) that actually participates in the programs of the Organization Member must register with the Organization Member and pay any applicable registration fees.

(b) An Organization Member must allow a group of Participants from any Affiliated Organization to participate in its programs if that group of Participants complies with all reasonable policies, rules, regulations, and requirements of the Organization Member.

For purposes of this section, “reasonable policies, rules, regulations, and requirements” may include but are not limited to the following:

- (i) A requirement that the group of Participants be of a minimum size (such as having a minimum number of players, teams, or age groups);
- (ii) A requirement that the group of Participants include a minimum percentage or number of recreational players, unless the group of Participants are already registered with another Organization Member and are directly affiliated with a group of recreational players who could satisfy this minimum requirement;
- (iii) A requirement that the group of Participants follow all team formation rules;
- (iv) A requirement that the group of Participants follow all competition rules (such as numbers of players per team, game rules, and team selection rules);
- (v) A requirement that the group of Participants follow all licensing and certification rules (such as rules relating to referee certifications and coaching licenses);
- (vi) A requirement that the group of Participants observe rationally supportable

geographic rules of the Organization Member;

(vii) A requirement that the group of Participants be subject to all disciplinary rules of the Organization Member;

(viii) A requirement that the group of Participants identify a board or governing body that will handle administrative issues and be responsible for compliance with applicable Organization Member rules (but the Organization Member may not mandate that the group of Participants form a new corporation or entity, or identify a different board or governing body than the one already running the Affiliated Organization);

and

(ix) A requirement that the group of Participants meet standards of financial accountability and transparency as well as any insurance and risk management standards.

(c) For purposes of this Section 4, an Organization Member must apply its requirements consistently.

Unfortunately, much of what Mr. Cook testified to in terms of his discussions regarding the reason FSC teams were not permitted to participate in the FMWFSL was based on hearsay, and specifically, his discussions with Dan Dunn, who attended the November 15, 2007 meeting that is the subject of the so-called transcript admitted into evidence. Mr. Cook therefore could only testify as to what Mr. Dunn told him occurred at that meeting, and Mr. Dunn's recollection of conversations with others who were in attendance at that meeting. Thus, Mr. Cook's testimony in this issue is not particularly helpful. Rather, we have the transcript and can refer to the transcript as the best available evidence as to the reasons FSC teams were excluded from this league.¹¹

The transcript begins by referring to the league as "a collegial, respectful, civic group." Those forming the group thought it "best for the community to respect boundaries within our community." However, the boundaries they were talking about were not geographic boundaries, as enunciated at USSF Policy 212-1, Section 4b, but essentially team boundaries. Thus, to participate, a team or club is required to comply with a rule that either prohibits the recruitment of players that have played, or are playing, on other teams, or obtain the consent of the original team before the player can change teams or play on the additional team. It is hard to imagine that one team would want to "lose" players to another team and give permission for these solicitations. Thus, the effect of such a rule is to impair the ability of players to register with more than one Organization Member, directly contravening the provisions of the second sentence of Policy 212-1, Section 2, which states that a participant may be registered with more

¹¹ As NDYSA noted in its post-hearing brief, it would have been helpful if the member clubs who formed this league had testified at the hearing as to their reasons for denying FSC teams' participation. However, nothing prevented these clubs from testifying and presenting evidence at the hearing. In preparing their case, Respondents could have requested such participation from the member clubs. They either chose not to do so, or their Organization Members declined to participate and assist Respondents in defending against this Grievance.

than one Organization Member. Moreover, such a rule, relying upon the subjective decision of one of the clubs as to whether players can play for another club, could essentially allow the soliciting club to be blocked from playing in a league for any reason whatsoever, including the mere fact that the soliciting club was a member of a different Affiliated Organization.

A further review of the transcript, and the testimony of Mr. Schneweis provides further evidence that FSC was barred from participating in this league for subjective reasons not contemplated by USSF Policy 212-1, Section 4b. Mr. Schneweis talked about the “philosophy” of the league members. Mr. Dunn, in the transcript, makes it very clear that membership is based on philosophies, and similar subjective criteria when he talks about recruitment, and concludes: “here is what it comes down to. It’s been collegial. It’s been respectful. . . .” He states that one must “get along,” to be a member of the league. While it is an admirable goal to have all members be collegial, respectful, and “get along,” that is not a rule that can be legislated, and it is not reasonable to exclude a group of participants from joining a league on the basis that they will not be collegial or “get along.” Such a requirement is reminiscent of the types of requirements for social clubs that were designed to exclude minorities. Such rules have been carefully reviewed in appropriate cases by the courts of the United States, and any similar rule adopted by an Organization Member of USSF would violate USSF Bylaw 105, Section 2.

Another stated ground for exclusion of FSC from one or both of these leagues is that these are recreational leagues, and that FSC acknowledged that its purpose in joining recreational leagues was, in part, to provide experience to its players, such that they could become more competitive, and ultimately move into higher leagues. It is certainly permissible to form leagues for recreational play only. However, there is no provision of USSF Policy 212-1, Section 4b that suggests that players who play in recreational leagues cannot do so for the purpose of gaining

Matt Carver <mcarver@urbandale.org>

January 17, 2014 9:55 AM

To: Dean Legg <dlegg@prostruct.com>

Cc: 'Harold Kahler' <hkahler@iowasoccer.org>, 'Dorothy S Pisarski' <dorothy.pisarski@urbandale.org>, 'Sharon Robinson'

<sharon572@urbandale.org>, 'Cristy Hamblin' <hamblin@urbandale.org>

Re: J-Hawk Soccer Club

Dean,

We are seeking clarification as to whether ISA would affiliate J-Hawk SC. I am also seeking answers to the questions I asked of Harold, as well as the board members individually.

I would enjoy speaking with any of you. I am 100% confident as to what the law is regarding this situation. As your board may or may not know, it costs approximately \$3600 to file a grievance with USSF, which is a rather high bar.

Again, I am confident that the information I sent is so clear that each of you know in your heart and mind that ISA's position is in violation of USSF bylaws and policies.

Thanks,

Matt

515-555-5555

On Jan 17, 2014, at 9:53 AM, Dean Legg <dlegg@prostruct.com> wrote:

Matt – please clarify what you are currently seeking from ISA. Are you seeking affiliation or something else?

Dean

From: Matt Carver [mailto:mcarver@urbandale.org]

Sent: Wednesday, January 15, 2014 4:06 PM

To: Dean Legg

Cc: Harold Kahler; Dorothy S Pisarski; Sharon Robinson; Cristy Hamblin

Subject: Re: J-Hawk Soccer Club

Harold and ISA Board,

I have forwarded Dean's message to the J-Hawk Soccer Club's board, which has 10 members. The board may or may not have a response after our upcoming board meeting. Please consider this email as coming from me personally.

Since most members of ISA's leadership have never spoken to me or know me, I would like to give you some background. I started playing soccer in the Urbandale Soccer Club in the spring of 1980, or there around. I went on to have a very successful period as a four-year varsity starter for Urbandale High School. As a senior, I was voted MVP of the first of two undefeated varsity boys teams in the history of UHS. A talented sophomore on that team was a young man by the name of Aaron Leventhal. As some of you may be aware, Aaron is a member of your organization's hall of fame. After high school, I attended the University of Notre Dame on an Army ROTC scholarship. Upon graduation and commissioning, I served on activity duty for four years, 3 1/2 of which was at Hohenfels, Germany. During my time overseas I had the opportunity to participate as the only American player in a German men's league, and I further had an opportunity to see how the German youth soccer system worked. I would note that in Germany youth coaches are only paid at youth academies in the top several professional divisions. After active duty service, I enrolled in the University of Iowa's College of Law, and also joined the Iowa Army National Guard (I am now a LTC in the Guard, and drill out of Iowa City). After law school graduation my family moved to Urbandale, where I almost immediately became a coach of

Matt Carver <[REDACTED]>

March 7, 2014 9:42 AM

To: Dean Legg <dlegg@preschool.com>

Cc: 'Harold Kahler' <hkahler@iowasoccer.org>, 'Dorothy S Pisarski' <dorothy.pisarski@iowasoccer.org>, 'Sharon Robinson'

<sharon@iowasoccer.org>, 'Cristy Hamblin' <c.hamblin@iowasoccer.org>

Re: J-Hawk Soccer Club

Dean and ISA Board,

Perhaps it should be of no surprise, but I have not heard from any of you. If you had the courage of your convictions or were able to articulate how ISA was indeed in compliance with USSF guidance and policies, I would think that someone would have communicated such a position. While I realize I have previously provided Harold's letter in its entirety as well as USSF guidance, I have copied below a portion of Harold's letter and a statement from the Columbia Basin grievance from USSF's website. How could it be any more clear that ISA is violating USSF policies, and knowingly doing so. While I am sure you are all fine people and I had a pleasant lunch and some pleasant conversations with Dean in the past, I will tell you that I would consider such knowing violation as malicious.

Please let this email serve as notice that I will be seeking a motion at the J-Hawk SC's board meeting this coming Tuesday to set aside \$4,000 for a grievance against ISA and the GDMJSL. Please consider that after arbitration the grievance decision will be placed on USSF's website for the entire world to see. I will be sending the arbitrator a great deal of information. Some examples will include: Harold's letter to our organization; the application to ISA; ISA's answer; the J-Hawk SC's rebuttal; ISA's answer to that rebuttal; and, numerous email communications, to include this email.

We could forego all of this if ISA agrees to affiliation teams in our club which wish to participate in the GDMJSL. If you believe that I am bluffing, I am afraid you are mistaken. My wife and I have decided that even if it takes finding money on our own, we will ensure that J-Hawk's grievance is funded. I hope you understand how weak your position currently is. I am 100% certain that the result of our grievance will be that you will have to affiliate our teams anyway, while facing the publicity of a decision on the USSF website and likely media coverage. You will also have to pay for 1/3 of the cost of arbitration.

If I do not hear from you before Tuesday evening, please expect that we will be filing a grievance within the coming weeks. Unless I receive a definitive answer before Tuesday evening, we will move forward. We will not be stalled, as we want our children to be able to play in the fall league. As an update, our club already has around 300 players for the spring season, with over four weeks before our first games. I expect that we are again going to create a new record for our membership. We have grown every season since starting with 26 players in 2010-11. I am sure you are all pleased that more children are playing soccer.

Remember your motto: "Let the Kids Play!" I would still enjoy speaking with any of you. Please call me at any time, I will get back to you, as soon as possible.

Matt Carver, President, J-Hawk Soccer Club, [REDACTED]

ISA

Approving a club in an area that is already served by several other clubs may cause an erosion of the player bases of the existing clubs and a subsequent erosion of their revenue bases. Although I have not canvassed the GDM clubs (a practice I do with any submitted application in the effected geographic area), I believe I can safely say with some certainty that the current clubs in the area are not in favor of having another club established in Greater Des Moines feeling existing clubs provide adequate coverage for the area.

USSF

The hearing panel also stated, and the Board agreed, that once "CBSA has teams and players, WSYSA has an obligation to provide a mechanism for affiliation" and rejected "WSYSA's claim that a club can be turned away because it determines that there is no 'need' for the club in a certain area."

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||| there is no 'need' for the club in a certain area."

On Jan 17, 2014, at 9:55 AM, Matt Carver <[REDACTED]> wrote:

Dean,

We are seeking clarification as to whether ISA would affiliate J-Hawk SC. I am also seeking answers to the questions I asked of Harold, as well as the board members individually.

I would enjoy speaking with any of you. I am 100% confident as to what the law is regarding this situation. As your board may or may not know, it costs approximately \$3600 to file a grievance with USSF, which is a rather high bar.

Again, I am confident that the information I sent is so clear that each of you know in your heart and mind that ISA's position is in violation of USSF bylaws and policies.

Thanks,

Matt

[REDACTED]

On Jan 17, 2014, at 9:53 AM, Dean Legg <[REDACTED]> wrote:

Matt – please clarify what you are currently seeking from ISA. Are you seeking affiliation or something else?

Dean

From: Matt Carver [mailto:[REDACTED]]

Sent: Wednesday, January 15, 2014 4:06 PM

To: Dean Legg

Cc: Harold Kahler; Dorothy S Pisarski; Sharon Robinson; Cristy Hamblin

Subject: Re: J-Hawk Soccer Club

Harold and ISA Board,

I have forwarded Dean's message to the J-Hawk Soccer Club's board, which has 10 members. The board may or may not have a response after our upcoming board meeting. Please consider this email as coming from me personally.

Since most members of ISA's leadership have never spoken to me or know me, I would like to give you some background. I started playing soccer in the Urbandale Soccer Club in the spring of 1980, or there around. I went on to have a very successful period as a four-year varsity starter for Urbandale High School. As a senior, I was voted MVP of the first of two undefeated varsity boys teams in the history of UHS. A talented sophomore on that team was a young man by the name of Aaron Leventhal. As some of you may be aware, Aaron is a member of your organization's hall of fame. After high school, I attended the University of Notre Dame on an Army ROTC scholarship. Upon graduation and commissioning, I served on activity duty for four years, 3 1/2 of which was at Hohenfels, Germany. During my time overseas I had the opportunity to participate as the only American player in a German men's league, and I further had an opportunity to see how the German youth soccer system worked. I would note that in Germany youth coaches are only paid at youth academies in the top several professional divisions. After active duty service, I enrolled in the University of Iowa's College of Law, and also joined the Iowa Army National Guard (I am now a LTC in the Guard, and drill out of Iowa City). After law school graduation my family moved to Urbandale, where I almost immediately became a coach of our oldest daughter's soccer team with USC (we now have four children, ranging in ages from 7-16, all of whom play soccer). Approximately a year after my start as a coach with USC, I joined the board of USC. This participation with USC was interrupted from December of 2003, until the spring of 2005, due to a deployment for over a year in support of Operation Iraqi Freedom. Upon returning from deployment I immediately started coaching soccer again and joined the USC board for a

Matt Carver <[REDACTED]>

To: diegg@prostruct.com

Update from ISA

March 11, 2014 3:03 PM

Dean,

Does ISA have an update? The J-Hawk SC's board meeting is tonight. Thank you, Matt

Matt Carver [redacted]
To: Dean Legg
Re: J-Hawk Soccer Club

March 12, 2014 3:39 PM

Dean,

Is ISA stating that it will affiliate J-Hawk Soccer Club, but we must mediate to play more games with USC? If so, we have always been in favor of having more games with USC teams. If not, is ISA still refusing to affiliate J-Hawk SC or other clubs in Des Moines because there is no need for additional clubs in the area? Thanks, Matt

On Mar 11, 2014, at 5:31 PM, Dean Legg <[redacted]> wrote:

Matt – the ISA Board discussed the J-Hawk Club extensively at our Board meeting February 22nd and after conducting some further fact finding, decided on the following: The J-Hawk Soccer Club must reach a mediated settlement with the Urbandale Soccer Club or, if choosing not to, must file their grievance with USSF. Iowa Soccer is more than willing to find an appropriate mediator. Our focus has been and will continue to support an effort for all soccer players in Urbandale to play together.

Dean Legg, Chairperson
Iowa Soccer Association

From: Matt Carver [mailto:[redacted]]
Sent: Friday, March 07, 2014 9:43 AM
To: Dean Legg
Cc: Harold Kahler; Dorothy S Pisarski; Sharon Robinson; Cristy Hamblin
Subject: Re: J-Hawk Soccer Club

Dean and ISA Board,

Perhaps it should be of no surprise, but I have not heard from any of you. If you had the courage of your convictions or were able to articulate how ISA was indeed in compliance with USSF guidance and policies, I would think that someone would have communicated such a position. While I realize I have previously provided Harold's letter in its entirety as well as USSF guidance, I have copied below a portion of Harold's letter and a statement from the Columbia Basin grievance from USSF's website. How could it be any more clear that ISA is violating USSF policies, and knowingly doing so. While I am sure you are all fine people and I had a pleasant lunch and some pleasant conversations with Dean in the past, I will tell you that I would consider such knowing violation as malicious.

Please let this email serve as notice that I will be seeking a motion at the J-Hawk SC's board meeting this coming Tuesday to set aside \$4,000 for a grievance against ISA and the GDMJSL. Please consider that after arbitration the grievance decision will be placed on USSF's website for the entire world to see. I will be sending the arbitrator a great deal of information. Some examples will include: Harold's letter to our organization; the application to ISA; ISA's answer; the J-Hawk SC's rebuttal; ISA's answer to that rebuttal; and, numerous email communications, to include this email.

We could forego all of this if ISA agrees to affiliation teams in our club which wish to participate in the GDMJSL. If you believe that I am bluffing, I am afraid you are mistaken. My wife and I have decided that even if it takes finding money on our own, we will ensure that J-Hawk's grievance is funded. I hope you understand how weak your position currently is. I am 100% certain that the result of our grievance will be that you will have to affiliate our teams anyway, while facing the publicity of a decision on the USSF website and likely media coverage. You will also have to pay for 1/3 of the cost of arbitration.

If I do not hear from you before Tuesday evening, please expect that we will be filing a grievance within the

Matt Carver <[REDACTED]>

March 14, 2014 2:01 PM

To: Dean Legg <[REDACTED]>

Cc: Harold Kahler <hkahler@iowasoccer.org>, 'Cristy Hamblin' <[REDACTED]>, Dorothy S Pisarski

<dorothy.pisarski@drake.edu>, Sharon Robinson <[REDACTED]>

Re: J-Hawk Soccer Club

2 Attachments, 164 KB

Dean,

Thank you for our conversation this morning. I called to clarify ISA's position and wish to attempt to summarize what you shared with me on the telephone.

- 1) ISA would prefer that the result of mediation would be for the clubs to combine.
- 2) ISA might also be supportive of J-Hawk SC players registering through USC so they may get additional league games.
- 3) The result of the mediation would not include that ISA might change its position and affiliate J-Hawk SC or teams within J-Hawk.

As I shared with you this morning, I believe it is important for the board to know that the number of soccer players between USC and J-Hawk SC surpassed 900 players this past year. This is over a 200 player increase as compared to USC's numbers before the formation of the J-Hawk SC. As such, the concerns about players just shifting between clubs has not come to fruition. Instead, more children are playing soccer. Not only are more children playing, but they are playing at a substantially reduced price (J-Hawk SC has the lowest fees in the Des Moines area and USC has reduced or eliminated its late fee, which was \$25, and lowered its registration fees as well). What a wonderful thing!

As another point of clarification, the city of Urbandale has no official position on whether there should be one, two, three, or four soccer clubs. Urbandale has over 40,000 residents. In fact, the J-Hawk SC has leased land with the city for the past several years, and the city approved a lease for J-Hawk SC which runs through part of 2016.

I have provided below the Columbia Basin grievance synopsis as well as a couple of the pertinent USSF provisions. You will note Policy 212-1 effectively states that ISA must allow Participants (such as J-Hawk SC players) who are from an Affiliated Organization (J-Hawk SC is an Affiliated Organization through our membership in USSSA) to participate in ISA's programs, if our Participants register through ISA and comply with reasonable policies, rules, regulations, and requirements. ISA has no reasonable policy, rule, or regulation in place that permits your board to deny affiliation of our Participants. Please read the Columbia Basin guidance again carefully, as well as Policy 212-1.

Finally, our board unanimously voted at its last meeting to file a grievance against ISA and GDMJSL. We would prefer not to spend \$3600 on such a grievance, which we would rather use on goals, other equipment, or scholarships for the many low-income children we have in our club. I anticipate that it will take a number of weeks before our board approves the grievance language I will be drafting. I hope that after reviewing the below information you change your position, which I am confident is not a legally defensible one.

I still would enjoy speaking with any of you. Our volunteer club is extremely proud of the fact that we have grown from 26 players to over 300 players in 3 years, greatly reduced the cost of soccer, and that over 200 additional children are playing soccer in our community. I have also included a photo of one of the teams from our club. A change in your position would positively affect these children, who are currently not permitted to play in GDMJSL or several Iowa tournaments. Six boys in the photo are first generation Americans. I am extremely proud to be their coach.

Have a good weekend,

Matt Carver

[REDACTED]
515-388-1213

GRIEVANCE SYNOPSIS: COLUMBIA BASIN SOCCER ACADEMY v. WSYS

November 16, 2002

CBSA, a club located in the state of Washington, asked to join a local association that was part of Washington State Youth Soccer Association. CBSA wished to serve as a competitive club, but had not yet put together any teams. The local association rejected the request, stating that it already had a competitive club in its region, and that a second club would have a "detrimental impact" on the competitive club.

The USSF Board of Directors appointed a hearing panel to consider the grievance. The panel submitted a recommendation to the Board, and the Board adopted this recommendation. The Board ruled that the grievance must be denied, because CBSA had not yet put

together teams or chosen players so that it could apply as a "club" for membership. The Board ruled that "unless and until CBSA puts together its teams, and subsequently is denied the opportunity to play within WSYSA, CBSA has nothing to grieve."

The hearing panel also stated, and the Board agreed, that once "CBSA has teams and players, WSYSA has an obligation to provide a mechanism for affiliation" and rejected "WSYSA's claim that a club can be turned away because it determines that there is no 'need' for the club in a certain area."

- See more at: <http://www.ussoccer.com/about/federation-services/resource-center/legal/grievances-and-appeals/ussf-grievance-decisions.aspx#sthash=arFp4u5.douf>



[United State ...\).pdf \(67 KB\)](#)



On Mar 13, 2014, at 4:43 PM, Dean Legg <dlego@prostruct.com> wrote:

Matt

Thank you for the follow up. The State Association will participate as an equal party in the mediation along with the Jayhawk Soccer Club and the Urbandale Soccer Club. The State Association will also ask the Urbandale City Council to participate at some level. We will find a mediator that will be agreeable to all parties either using recommendations from the Federation or selecting a local or regional mediator.

The Urbandale Soccer Club has been contacted and is willing to mediate as is the State Association. I hope you/Jayhawk are willing to be a part of this process.

From: Matt Carver [mailto:carvermatt@jshwa.org]
Sent: Friday, March 14, 2014 2:01 PM
To: Dean Legg
Cc: Harold Kahler; Cristy Hamblin; Dorothy S Pisarski; Sharon Robinson
Subject: Re: J-Hawk Soccer Club

Dean,

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Matt Carver <[REDACTED]@iowa.org>

March 26, 2014 3:26 PM

To: Dean Legg <dlegg@prostruct.com>

Cc: 'Dave Smetzer' <smetz4@msn.com>, 'Val Thacker' <[REDACTED]@msn.com>, 'Thacker Matt' <ThackerMatt@msn.com>

'Dawn Plimmer' <dawnplimmer@prostruct.com>, 'Dawn Plimmer' <[REDACTED]@prostruct.com>, "Lori Eubanks"

<[REDACTED]@prostruct.com>, 'Jen Hanson' <jenhanson@prostruct.com>, 'Jake Troja' <jaketroja@gmail.com>, 'Carey Bewyer'

<bewyer@prostruct.com>, "Tim & [REDACTED] Carver" <[REDACTED]@prostruct.com>, 'Jay Templeman' <jaytempleman@prostruct.com>

Re: J-Hawk Soccer Club

Dean,

J-Hawk Soccer Club is always pleased to meet with other clubs and adults to discuss how we might improve soccer opportunities for children to enjoy the sport of soccer. We are very pleased that over 200 additional children are playing soccer in Urbandale, between the Urbandale Soccer Club and J-Hawk SC, since the formation of J-Hawk SC. This is a conservative number. We are also pleased that parents between these clubs are collectively paying many tens of thousands of dollars less than they formerly would have paid, or as compared to other clubs in the area.

It is very clear to us that adding a second club in Urbandale has provided a tremendous benefit to children and families in the area. We will continue to move forward with the J-Hawk SC's mission to serve children and families and we trust USC will do so as well. It is difficult to argue against the tangible benefits mentioned above, which directly resulted from there being two clubs.

When we talked on the telephone I asked if ISA would affiliate J-Hawk SC and you responded that ISA would support us combining with USC or registering teams through USC. I thought you even said that ISA's position had not changed. If it has, then would you respond to our board whether ISA will now affiliate J-Hawk SC? If so, under what conditions?

As an update, J-Hawk SC now has approximately 345 players in our club. 26 players to 345 players in 3 years. What a tremendous accomplishment for our all-volunteer club! I would think ISA would want to welcome us with open arms and find out the keys to our rapid success.

As we have completed putting our teams together and developing schedules, we would appreciate a direct response regarding our affiliation, as we will be drafting our grievance in the near future. Again, we are happy to meet with USC to discuss how our teams might play more games with their teams. My U13 boys team will actually be scrimmaging a USC U14 team this weekend. Again, what a wonderful opportunity for the kids.

Our clubs will not be combining in the foreseeable future, so it would be most constructive to move past that discussion.

Thanks Dean,

Matt Carver

J-Hawk SC

On Mar 26, 2014, at 10:19 AM, Dean Legg <dlegg@prostruct.com> wrote:

Matt

Thank you for the follow up. I do not recall discussing item number 3 below. We feel your item 1 is the best option for all involved. The State Association will participate as an equal party in the mediation along with the Jayhawk Soccer Club and the Urbandale Soccer Club. The State Association will also ask the Urbandale City Council to participate at some level. We will find a mediator that will be agreeable to all parties either using recommendations from the Federation or selecting a local or regional mediator.

The Urbandale Soccer Club has been contacted and is willing to mediate as is the State Association. I hope you/Jayhawk are willing to be a part of this process.

Thank you for your consideration.

Dean Legg, Chairperson

Iowa Soccer Association

Club Cost Comparison for U7 Players and Cost Savings to Urbandale Parents

Club	Registration Fee (season)	Late Fee	Volunteer Opt Out Fee	Potential Total	Total annual savings, assuming 84% timely & 16% late
J-Hawk Soccer Club	\$40	\$5	\$0	\$45	
Urbandale Soccer Club after formation of J-Hawk SC (Just changed starting spring 2014)	\$60 (Early bird registration fee of \$55)	\$0	\$0	\$60	
Urbandale Soccer Club after formation of J-Hawk SC	\$60 (Early bird registration fee of \$55)	\$10	\$0	\$70	
Urbandale Soccer Club before J-Hawk SC	\$70	\$25	\$0	\$95	\$42,560
Johnston Soccer Club (Urbandale Soccer Club's partner)	\$90	\$25	\$20	\$135	\$84,880
West DM Soccer Club	\$95	\$25	\$25	\$145	\$90,220

Based on 312 players in J-Hawk SC and 600 players in USC

Difference in price is similar in other age groups.

504 timely USC players multiplied by timely registration fee difference + 96 USC players multiplied by late fee difference + 262 timely J-Hawk players multiplied by timely registration fee difference + 50 J-Hawk players multiplied by late fee difference

T