

# EXHIBIT B

**DECLARATION OF GEOFFREY C. BLACKWELL  
IN SUPPORT OF THE NATIONAL CONGRESS OF AMERICAN INDIANS'  
MOTION TO DISMISS**



## NATIONAL CONGRESS OF AMERICAN INDIANS

August 18, 2023

Josh Harris  
*Managing Partner*  
Washington Commanders  
FedEx Field  
1600 Fedex Way  
Landover, MD 20785

Sent via electronic correspondence at: [Jean.Medina@commanders.com](mailto:Jean.Medina@commanders.com);  
[Joe.Maloney@commanders.com](mailto:Joe.Maloney@commanders.com); [jason.wright@commanders.com](mailto:jason.wright@commanders.com)

From the National Congress of American Indians - Re: Invitation to Continued Dialogue

Dear Mr. Harris and the Washington Commanders' Ownership Group and Leadership Team:

Congratulations on your recent purchase of the Washington Commanders football team. Owning and leading a professional sports franchise—especially one with the history of your organization—is a great responsibility, and, on behalf of the National Congress of American Indians (NCAI), we wish you and your team good health and success in the upcoming season and beyond.

Please allow us a minute to introduce ourselves. NCAI is the oldest, largest, and most representative organization in the United States serving the broad interests of Tribal Nations and Native people. NCAI has helped lead Indian Country's advocacy to retire harmful, unsanctioned Native "themed" mascots, imagery, and branding from sports and popular culture for generations. NCAI only advocates for positions that have broad consensus among the hundreds of Tribal Nation members of our organization.

NCAI adopted its first resolution addressing the issue of inappropriate and stereotypical Native representation more than seventy years ago in 1950. NCAI's position—and the position of the hundreds of Tribal Nations it represents—against harmful Native mascots, imagery, and other forms of unsanctioned representation has never wavered. As the decades passed, critical research verified what Tribal Nation leaders already knew: the monikers, images, and fan behaviors associated with Native "themed" mascots cause significant and identifiable harm to Native people, particularly Native youth.

In July 2020, when the previous ownership group—and, more broadly, the franchise itself—eliminated a brand that disrespected, demeaned, and stereotyped all Native people, NCAI publicly commended those actions. The franchise took the concerns of millions of Native people seriously, making the difficult decision to rebrand because it was the right thing to do. In July 2021, Indian Country celebrated the one-year anniversary of the mascot's retirement by taking time "to recognize the grit and dedication of Tribal Nations, tribal leaders, citizens, advocates, and allies who tirelessly helped in the mission to educate Americans on the immense harms Native-themed mascots and team names cause Native people." In February 2022, we expressed gratitude as the franchise closed "a dark era, one in which the NFL and the Washington franchise commercially exploited and dehumanized Native people and culturally appropriated our most sacred practices." However, in doing so, NCAI also took note that—despite adopting a new moniker—the franchise had "yet to take step one...toward owning the genocidal history of the former name...[showing] a lack of accountability for the unspeakable harm to our citizens that [was] accepted, perpetuated, and profited from."

While you are new to the Washington Commanders franchise, we hope that you will learn from the past and we invite you to engage in a meaningful dialogue with NCAI's leadership

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**EXECUTIVE DIRECTOR**  
**Larry Wright, Jr.**  
*Ponca Tribe of Nebraska*

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about how to truly honor and respect Native people. NCAI's invitation for dialogue could not come at a more opportune time as we are aware of recent interviews in which members of the ownership group—including yourself—have used the old team name in reference to the franchise. From our perspective, these statements are disappointing and dangerous. We urge you and your fellow owners to swiftly end this practice and for the organization to publicly make clear that it will not tolerate further use of this offensive and pejorative racial slur. It is time to leave the former name in the past.

This is a moral issue of deep concern for many Tribal Nations and Native individuals. To that end, we invite you to begin a dialogue with the duly elected tribal leaders who represent their Tribal Nations and with us, the National Congress of American Indians, to discuss why the continued use of the former moniker is far from innocuous. We can work together to pursue a meaningful and reciprocal partnership with the communities directly impacted by its use to ensure that the harms done in the past are not repeated by future generations.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Wright, Jr.", written in a cursive style.

Larry Wright, Jr.  
Executive Director  
National Congress of American Indians