

**Adam MacDowell**

---

RECEIVED/REVIEW

**From:** Ryan Romaguera <ryan@romaguera.com>  
**Sent:** Wednesday, November 11, 2020 11:53 AM  
**To:** Adam MacDowell  
**Subject:** Fwd: Form Submission: Contact Form - 02/23/2018 07:13:33 PM

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

**From:** **Martin Muller** <emailsupport@photobiz.com>  
**Date:** Fri, Feb 23, 2018 at 7:13 PM  
**Subject:** Form Submission: Contact Form - 02/23/2018 07:13:33 PM  
**To:** <ryan@romaguera.com>



Thank you for contacting us!

We have received your message and will contact you shortly

**START CONVERSATION**

Contact Form

First Name  
Martin

Last Name  
Muller

Email  
MGMNET@COX.NET

Phone  
5043051824

Message

I'd like to purchase some LHSAA State Wrestling Championships photos, but I am not affiliated with any school. Is there a way I can get an generic email address and access code so I can do that?

| <http://www.romapics.com>

--  
Thanks,

Ryan Romaguera  
Romaguera Photography  
2319 Metairie Rd.  
Metairie, LA 70001  
504-828-3064 - Office  
504-648-5553 - Direct  
504-382-3771 - Cell

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**Adam MacDowell**

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**From:** Ryan Romaguera <ryan@romaguera.com>  
**Sent:** Wednesday, November 11, 2020 11:53 AM  
**To:** Adam MacDowell  
**Subject:** Fwd: Wrestling championships press credentials...

RECEIVED REVIEW  
*[Handwritten signature]*

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

**From:** **Rusty Costanza** <rusty@romaguera.com>  
**Date:** Wed, Nov 11, 2020 at 11:16 AM  
**Subject:** Fwd: Wrestling championships press credentials...  
**To:** Ryan Romaguera <ryan@romaguera.com>

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

**From:** **Martin Muller** <mgmnet@cox.net>  
**Date:** Thu, Sep 24, 2020 at 3:56 PM  
**Subject:** Wrestling championships press credentials...  
**To:** <rusty@romaguera.com>

Dear Mr. Romaguera,

Did my not being there last February increase your revenues from the LHSAA State Wrestling Championships enough for you to suggest to the LHSAA that the *Louisiana Wrestling News* be denied press credentials again for the 2021 event?

Yours sincerely,

Martin G. Muller

Editor – Louisiana Wrestling News – [www.lawrestlingnews.com](http://www.lawrestlingnews.com)

Archivist – Louisiana High School Wrestling Archives – [www.lhswa.org](http://www.lhswa.org)

10510 Clinton Street

River Ridge, LA 70123

(504) 305-1824

RECEIVED  
SD

--

Thanks,

Ryan Romaguera  
Romaguera Photography  
2319 Metairie Rd.  
Metairie, LA 70001  
504-828-3064 - Office  
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**EXHIBIT**

Editor – *Louisiana Wrestling News*

[www.lawrestlingnews.com](http://www.lawrestlingnews.com)

10510 Clinton Street

River Ridge, Louisiana 70123

(504) 305-1824

[mgmnet@cox.net](mailto:mgmnet@cox.net)

RECEIVED REVIEW

<LWN State T-shirt Ptototype.jpg>



Archivist Lhswa

...

1 hr · 🌐

I'm 95% sure the LHSAA is not going to give me the three press passes they said I would get two weeks ago. I intend on knowing for sure tomorrow.

In the meantime, would some of you message me about your experiences with RomaPics over the years, positive or negative? I am not confident that I know enough about the procedures involved re getting them to photograph certain schools or individuals, and I do not want to be inaccurate as I suspect they are why I am being "shut out." I have no intention of using any of your names if I find the need to describe your experiences.

*Handwritten signature*  
RECEIVED

Thanks.

Below are the first nine responses I received:



You know how I feel. Roma Pics didn't even take a single picture of Col e's final, or many others, because they were not individually contracted by parents like me with a pay in advance BS system, which I was not even aware of. So instead of shooting all the finals and offering pics for sale, they don't cover it. It's ridiculous



Archivist Lhswa you can use my name. They do not do a good,thorough job at all. Imagine the official, contracted photography company for LHSAA tourney that doesn't take a single pic of finals matches! Ludicrous


Like · Reply · 8m




Never got any pictures of Daniel in his finals matches all 3 years. I was told you have to specifically go to them before the match, pay them to take pictures or they do not. I 100% got better pictures from you because you know the sport of wrestling and how to get the action shots and when. Good luck





Not me personally but a couple of friends of mine pre paid for photos of the finals and their kids lost. They were busy dealing with the loss and the pictures were not the number 1 concern. They were told they could order online with their credit instead of a refund because they didn't want the losing pics. The credit expired rather quickly and they never received any pictures

 They had kiosks and you had to search through purgatory to find a pic. Not even categorized


 I believe they are photographers that do not know the sport and provide mediocre quality at best. I recall that searching through photos to be very difficult. They are a disservice to the sport and the athletes.

RECEIVED

 Also, they did not seem to be able to photograph all matches in a given round... there were no photos of J's quarterfinal match 😞

 I have never found pictures of Peyton that I thought was worth their prices. The first year I thought in theory the kiosk thing was neat, but it a pain to search through.

Like · Reply · 1m

 What the LHSAA has done to Archivist over the years as he performs a wonderful service of both photojournalism and analysis each year is a great example of how out of touch the LHSAA is regarding Louisiana Wrestling. They should be providing resources not obstacles.

These are the thoughts of people from whom RomaPics is trying to make a profit.

In their defense, I will say I believe trying to make a profit photographing the state wrestling championships is a "no-win" scenario.

At the high school football, basketball, soccer, baseball, softball and many other LHSAA championship events, RomaPics knows who is there. There are two teams. If they are not sure of someone's name, most have numbered jerseys and a team roster can tell them the names. The photographers have access on the edge of the playing areas and for something like football, they can just move down the sidelines with the ball and have guys posted in the end zones. In basketball they can just be near each basket. The games' action lasts 48-60 minutes. Sports like swimming and track pose a few more difficulties, but they are nothing compared to wrestling.

The state wrestling tournament consists of two full days of matches, or action, and that is before the most important aspect of the event, the finals. This year 95 teams and 800-900 wrestlers are vying for six places in 14 weight classes in three divisions. The action occurs on 10 mats until the finals. I go home with about 20,000 photographs and it takes me months to sort them into divisions, weight classes and rounds, and then choose the ones I want to use, edit them and name them. The research for what I write takes time, but nothing compared to the time the photographs require. I create about 50 webpages on which I place the about 1,500 to 2,000 photographs with all of the analysis and captions the weight classes and photos require. If I wanted to make a profit off of all of this, I would have to charge



about \$200 per photograph and sell 50 of them just to break even. Nobody is going to pay \$200 for a photo of their child wrestling. Aside from never intending to profit off of this venture of mine, I would be a complete idiot to even consider doing so.

The point of my sending these comments is not to belittle RomaPics, but to make you understand that it is not me who is causing them to make little if any profit. According to the above comments, RomaPics does not communicate their system to the fans very well, the fans do not like their system and hence their system does not work. I really do not think any system involving a profit will work.

Well, that's it. That's my 1984 Boston College vs. Miami Orange Bowl Doug Flutie end of the game "Hail Mary" pass. Hopefully you will let me know tomorrow whether Gerard Phelan caught it this time.

Thanks!

Martin G. Muller – Editor – *Louisiana Wrestling News*  
[www.lawrestlingnews.com](http://www.lawrestlingnews.com)  
10510 Clinton Street  
River Ridge, Louisiana 70123  
(504) 305-1824  
[mgmnet@cox.net](mailto:mgmnet@cox.net)

RECEIVED  
E.P.H.  
REVIEW

## Adam MacDowell

---

**From:** Martin Muller <mgmnet@cox.net>  
**Sent:** Thursday, February 6, 2020 2:50 PM  
**To:** Adam MacDowell  
**Subject:** Press credentials answer...

RECEIVED  
EJF

Hey Andy!

Forgive me for bothering you, but I simply cannot get an answer from Kate about whether I will get the three media credential she said I would get two weeks ago, but now seem to be in limbo after the call I got from Ryan Romaguera on Monday. I think the email I sent her last night rather proves that I am not the reason they do not make money off of the state championships, but I still believe they are a large part of why, as I suspect, my request will be denied.

I've already told my photographers they will not get the majority of the money I planned on paying them, and luckily they only spent it "mentally" ahead of time, although one gave up a Valentine's night bartending shift at which he would have made a lot of money.

I just need a "Yes" or a "No." If "No" I would appreciate knowing the reasons why, in the event I can do anything to resolve them now or next year. If "Yes," then I have to think you agree with my argument that I am not the reason RomaPics does not make the money they want. And if you do agree with it then perhaps you will let me get the six press passes I asked for initially so I can cover the event properly. If only three, I'll live.

But honestly, I have to make some plans that depend on whether I will have a seat at the press table or simply be a spectator from the stands. (I trust I will be allowed to do that if I am denied the press passes.)

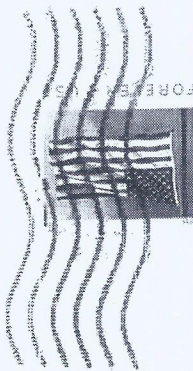
FYI, if you saw the letter please know that while I did not expect someone Kate's age understanding the "Doug Flutie" thing, I bet that you would.

Thanks!

Martin G. Muller – Editor of the *Louisiana Wrestling News*  
[www.lawrestlingnews.com](http://www.lawrestlingnews.com)  
10510 Clinton Street  
River Ridge, Louisiana 70123  
(504) 305-1824  
[mgmnet@cox.net](mailto:mgmnet@cox.net)

M. Muller  
10510 Clinton Street  
River Ridge, LA 70123

NEW ORLEANS LA 700  
05 JUL 2020 PM 1 L



Mr Edward Bonine  
Executive Director  
LH SAA  
12720 Old Hammond Hwy.  
Baton Rouge, LA 70816

RECEIVED  
*[Signature]*

70816-103720



August 5th, 2020

Mr. Edward Bonine – LHSAA Executive Director  
12720 Old Hammond Highway  
Baton Rouge, LA 70816

RECEIVED  
LHSAA

Re: Request for six *Louisiana Wrestling News* (LWN) press passes for the 2021 LHSAA State Wrestling Championships

Dear Mr. Bonine,

I realize the LHSAA is facing unprecedented situations and I apologize for asking you about this so early.

I am sure you know the *LWN* was denied press credentials in 2020 after covering the prior seven tournaments. As Ms. Adams is no longer there, Mr. MacDowell just stayed out of it, and Ms. Smith I imagine knows very little about it, I believe you are the only person who has the ability to remedy the situation.

First, please know that I have no problem with RomaPics being the "official photographers." I do find it odd that they blame the photos I published of the 2019 state championships as having any significant effect on their revenues from that event. My photos, even though are free, were not available until 11 weeks after the event.

What you may not know is that solely using RomaPics was a great disservice to a lot of wrestling families. Many live on tight budgets and find RomaPics prices too expensive. Their only options are to spend money they cannot afford or not have any photographs of their children at all, in what the LHSAA Media Resources page calls "a once-in-a-lifetime experience for most of the participants." If you would like to know how parents, coaches and ex-wrestlers feel about the decision please look at a Facebook page entitled "Let the *Louisiana Wrestling News* Photograph the State Championships." I created the page as a blank blackboard. The respondents brought the chalk.

I am a freelance writer on the subject and am not "accredited" by anyone save the Louisiana Wrestling Community. I can say that the *LWN* website is the only one of its kind in the nation. I can say I am registered with the LA Secretary of State as an "Active", "In Good Standing" "Non-Profit Organization." I ask that you take a brief look at the website. The current volume does not have a lot on it, so try "VOLUME XIII 2019-20," if you would. You will see that I mainly provide results and analysis of wrestling events, and that the website is not simply a blog.

Ms. Adams did not inform me my request was denied until February 7<sup>th</sup>, one week before the event started. I felt obligated to pay my photographers something for rearranging their schedules, which was around \$4,000. They want to go to Baton Rouge in February of 2021. I would like them to have more than a week's notice to make decisions.

As I am sure you are extremely busy I am more than happy to discuss this matter with Ms. Smith and perhaps she can submit a summary for your review. If that is amenable to you, please email me and I will contact her.

The saddest part of this entire issue is that somewhere between the contracts, credit and revenue streams, it is the kids who fall between the cracks. In the long-run, isn't it about the kids?

Sincerely,

  
Martin Muller

Editor - Louisiana Wrestling News ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))  
10510 Clinton Street  
River Ridge, Louisiana 70123  
(504) 305-1824 | [mgmnet@cox.net](mailto:mgmnet@cox.net)

## Morgan Smith

---

**From:** Martin Muller <mgmnet@cox.net>  
**Sent:** Friday, August 14, 2020 8:31 PM  
**To:** Morgan Smith  
**Subject:** "Louisiana Wrestling News" ...  
**Attachments:** LHSAA Eddie Bonine - 08-02-20.docx



Dear Ms. Smith,

We have not met yet, but if asked you may be told I am the one who caused RomaPics to lose money on the 2019 LHSAA State Wrestling Championships. I am the guy who spends three months after the event before publishing a 50+ page article on it, along with around 7,500+ photographs which are available to the public at no cost. The general consensus of the Louisiana Wrestling Community (yes, they deserve a capitalized moniker) is that I simply take better photos and that if they did not, or could not afford to, as is the case with many, pay RomaPics to photograph their children on the mats, it is worth waiting the three months to see what I publish.

Before I go farther I want you to know that I have no qualms with RomaPics being the designated official photographer of the event. I am fine with their being able to be on the mats taking photographs. That feeling, I fear, is not mutual. Heck, neither one of us can guarantee good photographs of certain kids or matches - my non-guarantee just costs less. And yes, they offered to work "with me" for the 2020 event. That included my giving them my photographs to sell, with my getting credit for taking them by being put on the LHSAA website as a sponsor. Another offer was to help defer their bid costs and then give them my photographs and I could get on the LHSAA website. They were really under the impression that my Website needed publicity. I believe they might have thought that would benefit me financially. Apparently some people have a really hard time grasping that I have never intended on making any money from any wrestling websites I have built, and happily spend about \$10K per season covering events in Louisiana, Alabama and Florida (the last two states when Louisiana teams travel there). Oh - they also offered to "archive" my state tournament photographs from 2013 through 2019, and they would give me credit when they sold them. As you will hopefully see, those photos are already available on my website.

Attached is a letter that should have been received by Mr. Bonine earlier this week. I would like to know if the subject of the letter is being addressed or if the letter was just thrown away. Granted, this is very early to request press credentials for an event held, if at all, in February, but last year I was only notified I would not receive press credentials a week before the event. That was very inconvenient for me, but more so for the photographers I hire and pay quite a bit to help me over that weekend. They want to come to Baton Rouge from Shreveport for this year's tournament, and I would like to give them some proper notice as to whether they should make plans for the trip.

I trust that, as one person in your position did a few years ago, you will not ask me to explain what the *Louisiana Wrestling News* ([www.lawrestlingnews.com](http://www.lawrestlingnews.com)) website is about - you do know you can just go to it and find out, I trust. Not much has happened in this year of Volume IX (that's an old journalism more) so if you would like to investigate it a little, I suggest you try Volume XIII. As for the coverage of a state tournament, I suggest the 2019 one. Links to those areas may be found on the left side of the website. On the website you will also find a link to a Facebook page I created, but on which wrestlers, ex-wrestlers and wrestler family members voice their opinions.

If you would be so kind, please get back to me this week as to whether Mr. Bonine or Mr. MacDowell are even considering the letter I sent or if they have decided against replying to or acknowledging it.

Thanks much and I hope you had a nice weekend. Feel free to call me if that will help clarify anything.

Martin G. Muller

Editor: *Louisiana Wrestling News* ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))  
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*[Handwritten signature]*  
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August 5th, 2020

Mr. Edward Bonine – LHSAA Executive Director  
12720 Old Hammond Highway  
Baton Rouge, LA 70816

RECEIVED  
8/10/20

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As I am sure you are extremely busy I am more than happy to discuss this matter with Ms. Smith and perhaps she can submit a summary for your review. If that is amenable to you, please email me and I will contact her.

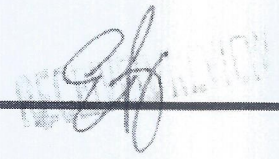
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Martin Muller  
Editor - Louisiana Wrestling News ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))  
10510 Clinton Street  
River Ridge, Louisiana 70123  
(504) 305-1824 | [mgmnet@cox.net](mailto:mgmnet@cox.net)

**Morgan Smith**

---



**From:** Morgan Smith  
**Sent:** Monday, August 17, 2020 10:00 AM  
**To:** Martin Muller  
**Subject:** RE: "Louisiana Wrestling News"...

Hello Mr. Muller,

Thank you for your email. I have been out of the office since early last week and I will not be returning to the office until next week.

These are unprecedented times right now and as a result we are still working on the details for fall media credentials. I understand your concern, unfortunately at this time I am unable to accept or decline your request for wrestling credentials.

I apologize for any inconvenience this may bring at this time, I would suggest checking back once it gets closer to the start of winter sports.

Sincerely,

*Morgan Smith*

Front Desk & Communications Liaison  
Louisiana High School Athletic Association  
Main Phone: 225-296-5882

**From:** Martin Muller [mailto:mgmnet@cox.net]  
**Sent:** Friday, August 14, 2020 8:31 PM  
**To:** Morgan Smith <msmith@lhsaa.org>  
**Subject:** "Louisiana Wrestling News"...

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If you would be so kind, please get back to me this week as to whether Mr. Bonine or Mr. MacDowell are even considering the letter I sent or if they have decided against replying to or acknowledging it.

Thanks much and I hope you had a nice weekend. Feel free to call me if that will help clarify anything.

Martin G. Muller

Editor: *Louisiana Wrestling News* ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))

Archivist: *Louisiana High School Wrestling Archives* ([www.lhswa.org](http://www.lhswa.org))

10510 Clinton Street

River Ridge, Louisiana 70123

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[mgmnet@cox.net](mailto:mgmnet@cox.net)



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## Morgan Smith

---

**From:** Martin Muller <mgmnet@cox.net>  
**Sent:** Thursday, August 20, 2020 4:33 PM  
**To:** Morgan Smith  
**Subject:** "Louisiana Wrestling News" press credentials...

*[Handwritten signature]*  
NEED REVIEW

August 20, 2012

Dear Ms. Smith,

I very much appreciate your responding to my query of last Friday so quickly. Please know that I will take no offense should I not hear from you again until next week as you are currently out of the office.

Unfortunately, the usual LHSAA time-frame worked not at all for me last year and I am hesitant to believe it will this time.

To find out if my request is being considered by Mr. Bonine or Mr. MacDowell should take all of 30 seconds in an elevator, hallway or just a brief office "duck-in." If it is your decision to make, it should take even less time at this point.

If it is being considered favorably I understand that it will take some time to relay the news to the "official" photographers. That is perhaps a 10-minute phone conversation and at the most maybe a half-hour contract revision. Should the "official" photographer company call me to rehash the offers they made last season, I expect that to be a very short experience.

If the LHSAA would be kind enough to respond with an answer by September 8th, I would appreciate it very much. And please know that my credentials request stands at six, to include five photographers plus myself taking photographs, as well as my being able to use the press table (in case that means I need a separate type of credential).

I understand that working with the fall media credentials must be difficult. The LHSAA website is pretty concise re which types of media will get credentials. Yet, for security purposes, I am sure there are procedures you must follow to make sure the applications for credentials are legitimate requests. Adam MacDowell knows very well what I do and that neither my photographers nor myself are security issues. Regardless, I have to think verifying such issues is a very hard task, particularly as the application for fall media credentials is not yet available on the LHSAA Website.

Yours sincerely,

Martin Muller  
Editor – Louisiana Wrestling News ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))  
Archivist – Louisiana High School Wrestling Archives ([www.lhswa.org](http://www.lhswa.org))  
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## Morgan Smith

---

**From:** Martin Muller <mgmnet@cox.net>  
**Sent:** Friday, August 28, 2020 11:14 PM  
**To:** Morgan Smith  
**Subject:** Probable error on my part...



Dear Ms. Smith,

Having just reread what you wrote to me I believe I owe you an apology for my comment re "we are still working on the details for fall media credentials." That could easily entail figuring out what types of safety measures you will require of media personnel at fall championship events, how you will enforce that, how you will describe that in the media credentials application and possibly changes in the media credentials application form itself. That could end up being a large amount of work and explain why the application for fall media credentials is not available on the LHSAA website yet. I wish you the best of luck in completing that task and hope the changes you make now will make the winter and spring media applications process easier for you.

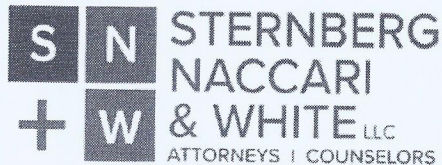
That being said I still am not happy with the LHSAA **not allowing me to spend about \$5,000** at the 2020 state wrestling championships (the fundamental reason as to why RomaPics and I cannot work together) and my desire to be allowed to photograph the 2021 state championships remains undaunted.

Yours sincerely,

Martin G. Muller  
Editor – Louisiana Wrestling News ([www.lawrestlingnews.com](http://www.lawrestlingnews.com))  
10510 Clinton Street  
River Ridge, Louisiana 70123  
(504) 305-1824  
[mgmnet@cox.net](mailto:mgmnet@cox.net)

[WARNING: This email is from an external source. Do not click links or attachments unless you recognize the sender and know the content is safe.]

**EXHIBIT III**



DIRECT CONTACT

Scott L. Sternberg  
504.324.1887  
scott@snw.law

November 10, 2020

VIA E-MAIL: ebonine@lhsaa.org / beyondthegame@lhsaa.org

Edward Bonine  
Executive Director  
Louisiana High School Athletic Association  
12720 Old Hammond Highway  
Baton Rouge, Louisiana 70816

**RE: Martin Muller / LHSAA State Wrestling Championships  
Access for *Louisiana Wrestling News* [www.lawrestlingnews.com](http://www.lawrestlingnews.com)**

Mr. Bonine:

The undersigned and this law firm represent Mr. Martin Muller, in addition to his online news website *Louisiana Wrestling News (LWN)*, a specialty publication available for free online at [www.lawrestlingnews.com](http://www.lawrestlingnews.com).

My Client has run *LWN*, a news and information website about Louisiana high school wrestling, since approximately 2012. His specific knowledge about wrestling, and his photographic coverage of your events, has been essential to wrestling enthusiasts and the families of wrestlers participating in your events.

My Client and his photographers have traditionally been provided press credentials to cover the LHSAA state championships. However, in 2020 he was denied press credentials because LHSAA has engaged in a contract with "RomaPics," and was told by the LHSAA that his coverage, which includes photos, adversely affected the revenue stream of RomaPics.

The LHSAA cannot pick and choose which media outlets it provides access to based on how much money it will stand to make. I am sure that if you discuss this matter with your counsel you will agree. The LHSAA administers a public function – its meetings are open meetings, and its monopoly on high school sports in Louisiana means that it cannot discriminate based on the speaker or his or her views.

In this matter, it certainly appears that you are discriminating against my Client because his photographs would affect one of your vendors. The work that my Client performs is incredibly important for the wrestling community in Louisiana and I would request that you reconsider your decision.

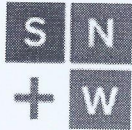
In the past, other publications have had issues with how LHSAA credentials its media. These issues have always been resolved amicably. I trust that this situation can also be resolved

**NEW ORLEANS**  
935 Gravier Street, Suite 2020  
New Orleans LA 70112  
o. 504.324.2141 | f. 504.534.8961

Please Respond To New Orleans Office

[www.snw.law](http://www.snw.law)

**BATON ROUGE**  
2133 Silverside Drive, Suite B  
Baton Rouge, LA 70808  
o. 225.289.4033 | f. 225.286.3043



RECEIVED REVIEW

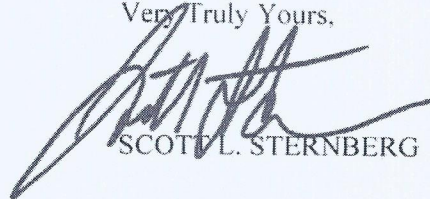
November 10, 2020

amicably. My Client is an enthusiast who deserves the same access provided to the legacy media of this state (many of whom I also represent, incidentally).

On behalf of our Client, we would like assurances from you that you will provide press credentials to *Louisiana Wrestling News* regardless of your financial arrangement with RomaPics. We would like assurances within 10 days of receipt of this letter.

If you do not provide this assurance we will be forced to initiate legal action. Please feel free to contact me at your earliest convenience to resolve this matter.

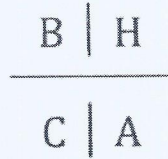
Very Truly Yours,



SCOTT L. STERNBERG

**EXHIBIT IV**

Randy P. Angelle  
Mark D. Boyer  
Bart J. Hebert  
A. Todd Caruso  
F. Dominic Amato



Christi R. Hemphill  
Lesley J. Beam  
Diana L. Tonagei  
Benjamin R. McDonald

BOYER, HEBERT, CARUSO  
& ANGELLE

Attorneys and Counselors at Law (A Limited Liability Company)

J. Brent Barry\*  
Neal C. Angelle\*  
Jerry L. Denton, Jr.\*  
\*Special Counsel

RECEIVED/REVIEW  
11/11/20

(Reply to Denham Springs)  
November 13, 2020

**VIA FACSIMILE 504-534-8961 & US MAIL**

Scott L. Sternberg  
935 Gravier Street, Suite 2020  
New Orleans, LA 70112

Re: Martin Muller/LHSAA State Wrestling Championships  
BHCA Client: Louisiana High School Athletic Association

Dear Mr. Sternberg:

This law firm serves as general counsel to the Louisiana High School Athletic Association. I am in receipt of a copy of your November 10, 2020 correspondence directed to LHSAA Executive Director, Eddie Bonine. Although I disagree with your assertion that the "LHSAA administers a public function-its meetings are open meetings", it is probably not an issue that needs to be addressed at this point.

Your client, Martin Muller, will be provided with media credentials in the same form and fashion as other members of the media who will be in attendance at the LHSAA State Wrestling Championships.

Should you wish to discuss this in further detail, please do not hesitate to contact and/or write.

With best wishes, and kindest personal regards, I am

Sincerely,  
**BOYER, HEBERT, CARUSO & ANGELLE, LLC**

Mark D. Boyer

MDB/ale  
cc: Adam McDowell



**EXHIBIT V**

Mr. Muller,

Per the 2020-2021 LHSAA Media Policies & Procedures, the LHSAA has the right to limit the number of media credentials a media outlet can request for state tournament events depending upon the media outlet's purpose and coverage. Websites/internet news outlets such as [www.lawrestlingnews.com](http://www.lawrestlingnews.com), are considered on a case-by-case basis. In this case, [www.lawrestlingnews.com](http://www.lawrestlingnews.com) will receive two (2) media credentials for the 2021 LHSAA Wrestling State Championships.

Thank you,

Vincent Cacioppo

LHSAA Director of Communications

A handwritten signature in black ink, appearing to read 'V. Cacioppo', with a long horizontal flourish extending to the right.