



ATTORNEY GENERAL  
DEPARTMENT OF LEGAL AFFAIRS

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**CIVIL RIGHTS AND CONSUMER PROTECTION  
INVESTIGATIVE SUBPOENA DUCES TECUM  
WITHOUT DEPOSITION**

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**IN THE INVESTIGATION OF:**

**MAJOR LEAGUE BASEBALL  
AG CASE NO: 2026-CVR-0014**

TO: Robert D. Manfred Jr.  
Commissioner  
Major League Baseball  
1271 Avenue of the Americas  
New York, NY 10020

c/o: Lara Pitaro Wisch  
Executive Vice President & General Counsel  
Major League Baseball  
1271 Avenue of the Americas  
New York, NY 10020  
(212) 485-8490  
Lara.Wisch@mlb.com

This Subpoena Duces Tecum without Deposition is issued under the Florida Civil Rights Act of 1992, Sections 760.01-760.11 and 509.092, Florida Statutes, and the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes, in the course and authority of an official investigation of the Attorney General under Section 16.57, Florida Statutes, and Section 501.206, Florida Statutes. The general purpose and scope of this investigation extend to possible civil rights and deceptive and unfair trade practices violations in matters of employment concerning the business practices, policies, and procedures of Major League Baseball.

**YOU ARE COMMANDED** to appear at Department of Legal Affairs, Office of the Attorney General, Office of Civil Rights, at 107 West Gaines Street, Suite L43, Tallahassee, Florida, on July 23, 2026, at 9:00 AM, and to have with you at that time

and place the documents and items that will be inspected and may be copied at that time. You will not be required to surrender the original items.

You may comply with this Subpoena by providing legible copies of the documents or items described herein that are in your possession, custody, or control, or that are in the possession, custody, or control of your officers, directors, employees, agents, attorneys, representatives, subsidiaries, affiliates, predecessors, and successors, including documents, electronically-stored information, and things to Danille R. Carroll, Director, Department of Legal Affairs, Office of the Attorney General, Office of Civil Rights, at 107 West Gaines Street, Suite L43, Tallahassee, Florida 32301, or on or before the date set forth above. These documents, information, and things are deemed necessary in connection with the administration of the Florida Civil Rights Act of 1992, sections 760.01-760.11 and 509.092, Florida Statutes, and the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes, as specified below in connection with this investigation, including, but not limited to, all documentary material and other tangible evidence requested herein that is in your possession, custody, or control or that are in the possession, custody, or control of your officers, directors, employees, agents, attorneys, representatives, subsidiaries, affiliates, predecessors, and successors. The general purpose of this Subpoena is to investigate employment matters concerning the business practices, policies, and procedures of Major League Baseball, in accordance with the Florida Civil Rights Act of 1992 and the Florida Deceptive and Unfair Trade Practices Act.

#### **AMERICANS WITH DISABILITIES ACT NOTICE**

If you are a person with a disability who needs an accommodation to participate in this proceeding or respond to this subpoena, in accordance with the Americans with Disabilities Act of 1990, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the above noted Director, no later than five (5) business days before the proceeding at the Department of Legal Affairs, Office of the Attorney General, Office of Civil Rights, at 107 West Gaines Street, Suite L43, Tallahassee, Florida, or (850) 414-3300. If you are hearing impaired, telephone the Florida Relay Service at (800) 955-8771 for assistance.

## Definitions

- A. “Club” means any of the 30 MLB member clubs, including its players and employees.
- B. “Concerning” or “Relating to” means directly or indirectly pertaining to, connected with, referencing, discussing, analyzing, describing, evidencing, supporting, or contradicting the subject matter identified in the request, regardless of the form of the document or the context in which the subject matter appears.
- C. “The Code” means the MLB-MLBPA Workplace Code of Conduct: Harassment & Discrimination.
- D. “Document” means any recorded information in any form and any medium, whether created, stored, or transmitted in written, electronic, digital, audio, visual, or any other format, including, but not limited to, letters, memoranda (including inter- and intra-office memoranda, memoranda for file), agendas, reports, minutes of meetings, records of meetings, conferences, agendas, and transcripts, manuals, reports, strategies, plans, studies, and analysis. The term “documents” shall also include all associated metadata. The term “document” shall also include any communications, including any transmission of information in any form or by any means, including written, oral, electronic, or recorded transmissions, whether internal or external to the MLB.
- E. “Florida Workplaces” means any location in Florida where MLB players or personnel are employed, in any capacity, on behalf of the League or a Club, including, but not limited to, the home ballparks of the Tampa Bay Rays (St. Petersburg) and the Miami Marlins (Miami) and all Grapefruit League spring-training facilities, including without limitation those located in or around Bradenton, Clearwater, Dunedin, Fort Myers, Jupiter, Lakeland, North Port, Port Charlotte, Port St. Lucie, Sarasota, Tampa, and West Palm Beach.
- F. “Florida personnel” means any player or employee working at a Florida Workplace.
- G. The term “identify,” when used with respect to a person, means to state that person’s full name, title, employer, and last known contact information. The term “identify,” when used with respect to a document, electronically stored information or things, means to state the date, author, recipient(s), general subject matter, and current location of the document, information, or thing.
- H. “June 2026 Warnings” or “June 2026 Cap Writing” means the events concerning the warnings issued by the MLB in response to Landen Roupp and two other

pitchers with the San Francisco Giants writing Scripture verses on their ball caps during a game against the Chicago Cubs on Friday, June 12, 2026.

- I. “MLB” or “League” means Major League Baseball in whatever legal form it exists or has existed. The term includes the Office of the Commissioner of Baseball, and all committees, subsidiaries, affiliates, and organizational units, thereof, including, but not limited to, MLB Baseball Operations.
- J. “MLB Official Baseball Rules” means the MLB’s official codes, regulations, or policies governing the game of baseball by professional teams in the MLB, including, but not limited to, the most recent version of the “Official Baseball Rules” issued by the MLB.
- K. “Permitted Expression” means any writing, marking, message, patch, logo, or modification that MLB has approved, authorized, permitted, or declined to discipline or take any other action against the player on a player’s uniform, cap, or equipment, including, but not limited to: the 2020 “Black Lives Matter” and “United for Change” sleeve patches; the 2020 relaxation of cleat restrictions to permit messages promoting “social justice”; commercial sponsor names, logos, and marks approved for display on uniforms or caps; the white “51” markings worn by Los Angeles Dodgers and Toronto Blue Jays players during the 2025 World Series in tribute to Alex Vesia; and the “K ALS” marking worn on a player’s cleat during the 2004 World Series.
- L. “Reflect” means evidencing, demonstrating, showing, indicating, describing, memorializing or otherwise containing information from which the subject matter of the request can be in, in whole or in part, regardless of whether the document was created for the specific purpose of addressing that subject matter.
- M. “Religious Expression” means any verbal, written, or symbolic communication, or ritual or practice, reflecting religious beliefs, including, but not limited to, scriptural citations and the decision to wear or decline themed apparel.
- N. “Relevant Period” means January 1, 2020, to the present date, unless a specific request states a different period of time or date.
- O. “You” or “Your” means the MLB as defined above, and any present or former officers, directors, employees, agents, representatives, attorneys, predecessors, successors, or other person acting on behalf of the MLB.

## Instructions

- A. Each record, information, document, or item produced pursuant to this Subpoena shall be numbered consecutively on its face in a color other than black and shall identify clearly the paragraph of the Subpoena to which it is responsive. Copies of originals shall be legible in their entirety.
- B. The documents and information to be produced pursuant to each request should be segregated and identified specifically to indicate clearly the number of the particular request to which they are responsive. Also, number and mark each box to indicate the request number which corresponds to the responsive materials each contains. If documents or information is responsive to more than one request, produce it with materials for the request to which it is primarily responsive. Further, list the record control number and identify where it is filed under each other request to which it is responsive.
- C. Electronically Stored Information (ESI) is to be produced in the form in which it is ordinarily maintained. For example, native files would include email, spreadsheets and word processing files. Responsive documents that exist in electronic format shall be provided in native format (e.g., Microsoft Word files (.doc) or Outlook (.pst), emails, spreadsheets and word processing documents) with standard metadata intact, as outlined below. Before any production of responsive data from a structured database (e.g., Oracle, SAP, SQL, MySQL, QuickBooks, etc.), the producing party shall first provide the database dictionary and a list of all reports that can be generated from the structured database. The list of reports shall be provided in native Excel (.xls) format. The database format will be requested for production after both parties agree on the format. Please include sufficient identification of the applicable software program to permit access to, and use of, each document. All attachments must be linked to their electronic documents. Native files should be provided in directories which are identifiable as responsive to a specific document request. All documents produced in native form should be produced on CDROM, DVDROM, External USB, or other similar drive media of a type that can be read by any standard computer. Unless otherwise agreed to, standard metadata in electronically stored information shall be preserved and produced, such as: Custodian, To, From, CC, BCC, Dates and Times (Sent, Received and Modified), Attachments, Links and Document types. A more complete list can be provided upon request. Questions about electronic production should be directed to the Assistant Attorney General whose name appears on this Subpoena. Arrangements will be made for the communication with the appropriate in-house technical expert.

- D. Each document or item produced pursuant to this Subpoena shall be complete and un-redacted, submitted as found in the recipient's files. In the event that any item is withheld, please provide the following information for each item:
- (a) the date of the item.
  - (b) the general character or type of the item (*i.e.*, letter, memorandum, notes, etc.).
  - (c) the identity of the person in possession of the item.
  - (d) the basis for withholding the item including, but not limited to, any legal objection, privilege or claim and the facts supporting the objection, privilege or claim.
- E. In the event You seek to assert trade secret protection under section 119.0715, Florida Statutes, or other applicable Florida Statute, for each Document for which trade secret protection is claimed:
- (a) Provide prior to, or simultaneous with, production of the Document at issue, a sworn affidavit from a person with knowledge as to the basis for the trade secret claim, which complies with the following requirements:
    - i. The affidavit should specify the bates range of the claimed trade secret Documents at issue, generally describe the Documents at issue, and provide evidence of the application of the trade secret exemption.
    - ii. The affidavit should attach a certification (similar in form to a traditional privilege log) that identifies the following information for each separate claimed trade secret Document: (i) the bates range of the Document; (ii) a description of the Document sufficient to determine the application of the trade secret exemption; and (iii) the specific element(s) or provision(s) of section 688.002 that render the Document at issue a trade secret exempted from public records.
- F. If you do not have possession, control, or custody of any document, information, or thing that is responsive to any numbered request set forth below, state this fact by specifying in your response to said request.
- G. The use of the singular form of a word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.
- H. Unless otherwise specified, original documents must be produced. If your "original" is a photocopy, then the photocopy would be and should be produced as the original.

- I. This Subpoena is for the production of all responsive documents, items, and information in your possession, custody, or control regardless of whether such documents, items, or information are possessed directly by your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or their agents, employees, representatives or investigators. This Subpoena includes documents, information and records of the MLB or its 30 member clubs and any records maintained in any archival storage facility or otherwise.
- J. If a responsive document or information cannot be produced in full, you are to produce it to the fullest extent possible, identify the document or information, or portion of the document or information, that cannot be produced in full and state with particularity the reason(s) that the document or information cannot be produced in full.
- K. Documents not otherwise responsive to this Subpoena shall be produced if such documents are attached to documents called for by the Subpoena and constitute routing slips, transmittal memoranda, or letters, comments, evaluations or similar materials.
- L. If a document once existed and has subsequently been lost, destroyed, or is otherwise no longer in your possession, custody, or control, identify with specificity said document and state with specificity the factual circumstances in which said document was lost, destroyed, or became otherwise no longer in your possession, custody, or control. Further, fully describe such document and identify any person who has knowledge of the factual circumstances surrounding such document.
- M. In responding to these requests you are to include documents (a) obtained from witnesses who gave information to any governmental agency or investigatory body; (b) that constitute, refer, or relate to summaries of testimony or other statements in connection with any governmental agency or investigatory body proceedings or investigations; or (c) obtained on your behalf by counsel in preparing for testimony or interviews before any governmental agency or investigatory body.
- N. All document destruction or retention policies and practices and electronic file deletion or disk management policies and practices (including, but not limited to, reformatting practices) that could have the effect of altering or deleting information requested by this Subpoena should be suspended.
  - (a) Because electronically stored information is an important and irreplaceable source of evidence, you must take appropriate steps to preserve all potentially relevant documents within your control or [practical ability to access], which

includes, but is not limited to, preserving information from computer systems, removable or portable electronic media (like CDs/DVDs, USB drives), e-mail, text/instant messaging, “tweets” and other electronic correspondence at work and other locations, word processing documents, spreadsheets, databases, calendars, telephone logs, cell phones, voicemail, blogs, social media, internet usage files, website data, personal computers/laptops, personal data assistants (PDAs), servers, and archives/backup files, as well as other tangible documentation that will be relevant to the discovery of admissible evidence in this matter, so as to avoid any potential claims for spoliation of evidence. This request pertains not only to documents that are directly responsive to this Subpoena, but to all other documents that relate to the subject of our investigation as well.

(b) Preservation of electronic data in its native format is essential, as a paper printout of text contained in a computer file does not completely reflect all information contained within an electronic file. Additionally, due to its format, electronic evidence can be easily altered, deleted, corrupted or otherwise modified. Accordingly, you are required to take every reasonable step to preserve this information until the resolution of this matter. This includes, but is not limited to, the following obligations:

- i. Discontinue all data destruction and overwriting/recycling processes of relevant data;
- ii. Preserve passwords, decryption procedures (and accompanying software), access codes, ID codes, etc.; and
- iii. Maintain all pertinent information and tools needed to access, review and reconstruct all requested or potentially relevant electronic data.

O. Your obligations under the law are ongoing and should be considered in force and effect until the resolution of this matter. Accordingly, with regard to electronic data and documents that are created subsequent to the date of this Subpoena, relevant evidence is not to be destroyed or overwritten and you should take whatever steps are necessary to avoid destruction of potentially relevant evidence.

Each document request is continuing in nature. If you obtain or become aware of additional responsive documents after your initial production, you are required to supplement your production promptly. Documents should be produced in the order in which they are kept in the ordinary course of business or organized and labeled to correspond to the specific document request to which they are responsive.

**WHEREFORE YOU ARE HEREBY COMMANDED TO PRODUCE:**

1. All rules, policies, on-field or uniform guidelines, equipment standards, and interpretive memoranda—whether contained in the MLB’s Official Baseball Rules or in any other public or non-public document—concerning the MLB’s contention on the prohibition or restriction of writing, markings, or modifications on caps or uniforms, including identifying the specific provision relied upon as the basis for the June 2026 warnings issued for writing on “Pride Night” caps.
2. All documents concerning MLB’s representation that the warnings in Request #1 above were issued “consistent with normal practice,” including:
  - (a) all documents, policies, or communications defining, describing, or otherwise characterizing that practice and what consequence that practice prescribes for a violation that follows a warning;
  - (b) every instance during the Relevant Period in which a player or employee was warned, fined, or otherwise disciplined for writing or markings on a cap or uniform, with the message at issue, the individual’s club and work location, and the disposition—including, but not limited to, the warnings MLB claims were given “numerous times in the past to players for messages such as ‘Dad’, ‘Happy Mother’s Day, I Love Mom’ and names of family members”; and
  - (c) every instance during the Relevant Period in which a player placed writing, markings, or modifications on a cap, uniform, or equipment and was not warned or disciplined, including, but not limited to, the white “51” markings worn by Dodgers and Blue Jays players during the 2025 World Series, the “K ALS” marking worn on a player’s cleat during the 2004 World Series, and any other writing on a cap, uniform, or equipment that was not warned, fined, or otherwise disciplined, as well as any scriptural or religious citation worn on a “Pride Night” cap.
3. All documents—including league directives, and email communications to Clubs—concerning the approval of, authorization of, or relaxation of uniform or equipment rules to permit any Permitted Expression during the Relevant Period, and all documents identifying which categories or types of message contents were permitted, vetted, or prohibited.
4. All documents concerning or relating to how MLB distinguishes, for purposes of the uniform and equipment rules, between Permitted Expression and player Religious Expression, and any document stating the basis for permitting the former while restricting the latter.

5. All documents concerning the recording, retention, and disciplinary effect of a warning issued under the rules identified in Request 1, including whether a warning is retained in any personnel or disciplinary file, the duration it remains active, and whether and how a prior warning increases the penalty or shortens the path to sanction for a later violation—including as applied to Florida personnel.
6. All documents concerning any policy, directive, or expectation—formal or informal—addressing whether players or employees are required, encouraged, or expected to wear “Pride Night” or comparable themed apparel, and any consequence in discipline, playing time, compensation, roster or assignment decisions, media or promotion, or organizational standing attaching to a decision to decline—including as applied to Florida personnel and at Florida Workplaces.
7. All documents concerning any policy, directive, or practice that concerns any consequences in discipline, playing time, compensation, roster or assignment decisions, media or promotion, or organizational standing on the basis of a player’s or employees’ Religious Expression.
8. All documents concerning complaints, reports, investigations, and dispositions arising under the Code’s reporting channels concerning discrimination or less favorable treatment because of religion during the Relevant Period, including any matter involving Florida personnel or arising at a Florida Workplace.
9. All documents concerning how MLB reconciles enforcement of uniform or equipment rules against player Religious Expression with the Code’s definition of discrimination as “any adverse job-related decision or less favorable treatment of an individual or group because of a protected characteristic,” including any compliance or human-resources analysis of that question.
10. All documents concerning training materials or guidance issued under the Code that differentiate or instruct personnel regarding the protected characteristics of religion and sexual orientation, including any materials directing differential treatment of either characteristic.
11. All documents, including drafts and internal deliberations, concerning MLB’s decision to issue and publicly announce the June 2026 warnings, and any analysis of whether doing so adhered to the Code or with MLB’s treatment of comparable non-religious expression.
12. All documents sufficient to identify the players and employees constituting Florida personnel during the relevant period and the MLB policies governing them, and all documents reflecting any instance in which Florida personnel engaged in Religious Expression and the treatment that followed.

13. All documents concerning how MLB characterized or classified the June 2026 cap writing, including, for example, whether MLB treated it as religious expression, political messaging, protest, or a violation unrelated to its content.
14. All documents concerning what prompted MLB's review of and warning regarding the June 2026 cap writing, including any complaint, media inquiry, internal escalation, or third-party communication received before the warning issued, and the timing of each relative to the warning.
15. All documents concerning the actual June 2026 warnings issued by the MLB to any club.

WITNESS, Department of Legal Affairs, Office of the Attorney General, Office of Civil Rights, at Tallahassee, Florida, this 19th day of June 2026.

Respectfully submitted,

JAMES UTHMEIER  
Attorney General  
State of Florida

/s/ Jason Hilborn

Jason Hilborn  
*Deputy Attorney General*  
*Civil Enforcement*

FLORIDA OFFICE OF THE ATTORNEY GENERAL  
PL-01, The Capitol  
Tallahassee, Florida 32399  
Office: (850) 414-3300  
jason.hilborn@myfloridalegal.com