

August 1, 2020

**Via USPS and Fed Ex 7711 5014 1918**

Deputy Chief Jose Velez  
Investigative Services Bureau  
Orlando Police Department Headquarters  
120 West South Street  
Orlando, FL 32805

Re: 2019 Report of alleged inappropriate sexual conduct with a minor.  
Alleged perpetrator, Jerry Harris

Dear Deputy Chief Velez,

I am writing on behalf of Varsity Brands and its subsidiaries and affiliates (“Varsity”), including Varsity Spirit LLC (“Varsity Spirit”). Varsity recently received information from an individual alleging inappropriate sexual conduct by a person who was previously employed by Varsity Spirit. Varsity is reporting this information under Fla. Stat. Ann. § 39.201. The alleged perpetrator was not an active employee or contractor with Varsity Spirit at the time of the alleged incidents. As a result of the recent allegation, we have barred this person from having any affiliation with Varsity Brands or any of its subsidiaries or affiliates now and in the future. Although the alleged conduct dates back to 2019, Varsity only learned of the allegation recently.

The alleged conduct involved an individual by the name of Jeremiah (“Jerry”) Harris and occurred on or about May 3, 2019, when Mr. Harris was a member of Cheer Athletics.<sup>1</sup> The alleged abuse occurred at a Varsity Spirit event called The Summit in Orlando, Florida. Jerry Harris attended the event, but was not actively employed by Varsity at the time. While at the event, he allegedly sent text messages to a male cheerleader, a minor who was approximately 13 years old, saying: “I found a place for us to do stuff” and sending a suggestive emoji, and asking “would you ever want to \*\*\*\*.” Images of the text messages are attached as Exhibit A.

A prior alleged incident involving another minor, male cheerleader, the twin brother of the cheerleader involved in the May incident, occurred at an American Cheerleaders Association event in Fort Worth, Texas, on or about February 9, 2019. While at the event, Mr. Harris allegedly took the boy to a remote bathroom and asked him to perform sexual acts. Like the other incident, Varsity only learned of this alleged conduct recently. Varsity reported this incident to the Fort Worth Police Department on August 1, 2020. *See* attached Letter to Ft. Worth Police Department.

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<sup>1</sup> Mr. Harris was previously a team captain for the Navarro College Bulldogs Cheer Team, which is based in Corsicana, Texas, and is featured in the Netflix show “Cheer.”



In addition to the above-described alleged incidents, the reporting party also alleged that Mr. Harris engaged in a series of harassing conduct with the minor boys over an extended period of time from approximately late 2018 until early 2020, including sending text messages, nude pictures, and a video of Mr. Harris masturbating. He also requested and may have received the same from the minor boys.

The reporting party is the mother of the minor cheerleaders, Kristen [REDACTED] Ms. [REDACTED] contact information is [REDACTED] or [REDACTED]. To the best of our knowledge, Mr. Harris' last known address is [REDACTED] and his email is [REDACTED].

Finally, under the circumstances and given that he is not an employee of Varsity Brands or any subsidiary or affiliate, Varsity has taken steps to bar Mr. Harris from any current or future affiliation, though it has not proactively notified Mr. Harris of its decision to bar him from any future affiliation. Please feel free to call me at [REDACTED] with any questions you have or if you need any additional information about this report. Varsity is willing to assist any investigation initiated by law enforcement. Please do not hesitate to let us know if we can provide any additional information or support law enforcement in any other respect.

Sincerely,



Burton Brillhart  
Chief Legal Officer and General Counsel

**EXHIBIT A**

14460 Varsity Brands Way  
Farmers Branch, TX 75244



[varsitybrands.com](http://varsitybrands.com)





14460 Varsity Brands Way  
Farmers Branch, TX 75244



varsitybrands.com



9:23



< 394



jerry harris >

Fri, May 3, 6:19 PM

Hey btw I found a place for us to do stuff it's actually pretty good haha

Fri, May 3, 7:39 PM

lol

So?

i cant sorry

Ok

maybe another time

There won't be but it's ok I still wanna hangout w you

okayyyyyy

:)))

wyd

I'm at Disney springs rn



iMessage



460 Varsity Brands Way  
Farmers Branch, TX 75244

varsitybrands.com



August 1, 2020

**Via USPS and Fed Ex 7711 5022 0235**Fort Worth Police Department  
Crimes Against Children Unit  
908 Southland Ave  
Fort Worth, TX 76104Re: 2019 Report of alleged inappropriate sexual conduct with a minor.  
Alleged perpetrator, Jeremiah (“Jerry”) Harris

I am writing on behalf of Varsity Brands and its subsidiaries and affiliates (“Varsity”), including Varsity Spirit LLC (“Varsity Spirit”). Varsity is reporting this information under Tex. Fam. Code. § 261.01. The alleged perpetrator was not an active employee or contractor with Varsity Spirit at the time of the alleged incidents. As a result of the recent allegation, we have barred this person from having any affiliation with Varsity Brands or any of its subsidiaries or affiliates now and in the future. Although the alleged conduct dates back to 2019, Varsity only learned of the allegation recently.

The alleged conduct involved an individual by the name of Jeremiah (“Jerry”) Harris and occurred on or about February 9, 2019 when Mr. Harris was a member of Cheer Athletics.<sup>1</sup> The alleged abuse occurred at an American Cheerleaders Association event in Fort Worth, Texas. Jerry Harris attended the event, but was not actively employed by Varsity at the time. While at the event, he allegedly took a male cheerleader, a minor who was approximately 13 years old, to a remote bathroom and asked him to perform sexual acts.

Another alleged incident occurred on or about May 3, 2019 at a Varsity Spirit event called The Summit in Orlando, Florida. Jerry Harris attended the event, but was not actively employed by Varsity at the time. While at the event, he allegedly sent text messages to another minor, male cheerleader, who is the twin brother of the male cheerleader involved in the February incident, stating: “I found a place for us to do stuff” and sending a suggestive emoji, and asking “would you ever want to \*\*\*\*.” Like the other incident, Varsity only learned of this alleged conduct recently. Varsity reported this incident to the Orlando Police Department on August 1, 2020. *See* attached Letter to Orlando Police Department.

In addition to the above-described alleged incidents, the reporting party also alleged that Mr. Harris engaged in a series of harassing conduct with the minor boys over an extended period of time from approximately late 2018 until early 2020, including sending text messages, nude pictures, and a video of Mr. Harris masturbating. He also requested and may have received the same from the minor boys.

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<sup>1</sup> Mr. Harris was previously a team captain for the Navarro College Bulldogs Cheer Team, which is based in Corsicana, Texas, and is featured in the Netflix show “Cheer.”

The reporting party is the mother of the minor cheerleaders, Kristen [REDACTED] who previously reported this incident to the Fort Worth Police Department. Ms. [REDACTED] contact information is [REDACTED] or [REDACTED]. To the best of our knowledge, Mr. Harris' last known address is [REDACTED] and his email is [REDACTED].

Finally, under the circumstances and given that he is not an employee of Varsity Brands or any subsidiary or affiliate, Varsity has taken steps to bar Mr. Harris from any current or future affiliation, though it has not proactively notified Mr. Harris of its decision to bar him from any future affiliation. Please feel free to call me at [REDACTED] with any questions you have or if you need any additional information about this report. Varsity is willing to assist any investigation initiated by law enforcement. Please do not hesitate to let us know if we can provide any additional information or support law enforcement in any other respect.

Sincerely,



Burton Brillhart  
Chief Legal Officer and General Counsel