

To: Hon. Vanessa Bryant

Affidavit of Ashley Massaro (DOB: 5/26/79)

My name is Ashley Massaro and I am a plaintiff in the lawsuit, *Laurinaitis et. al. v. WWE et. al.*, pending before you. This affidavit is signed and sworn under the penalties of perjury. I am making this statement freely and voluntarily. I have read and understood everything written in this statement. The facts, names, dates and information in this statement are made to the best of my recollection.

WWE Career: 2005

On August 15, 2005, after weeks of competition on air LIVE on Monday Night RAW, I won the 2005 RAW Diva Search, which the WWE had represented would entitle me to \$250,000 in prize money and a one-year contract with the WWE. I continued to wrestle for the WWE until July of 2008. I did not wrestle for any other entity before or after my time with the WWE.

Upon winning the competition, I was informed that I could choose to accept the \$250,000 prize money, and rather than work for WWE as a wrestler, serve as the “face” of the women’s division. I accepted this offer. It was my understanding that I would receive the full \$250,000 and would not be required to wrestle but would work for WWE in a spokesmodel capacity for one year.

I was given a contract by John Laurinaitis, which I no longer have a copy of, and signed it. After I signed the contract, Vince McMahon insisted that I had been “represented” by an individual named “Rich” in Marina Del Ray, CA, and tried to force me to pay him 20% of the \$250,000. This individual had never represented me so I refused – which almost resulted in me losing my contract. This was my introduction to the coercive and unscrupulous tactics employed by the WWE to take advantage of its performers.

I was classified by WWE as an independent contractor rather than an employee. I still have copies of payment records. Despite WWE’s classification of me as an independent contractor, I was obligated to perform at shows four to five days every week. At the time, I didn’t really understand the difference the significance of this distinction.

Not only was the requirement that I perform 4-5 days a week inconsistent

with my independent contractor status, but it came a shock to me because I was specifically told I would not have to wrestle and would serve as the “face of the women’s division. However, one week from the day I won the competition, I was thrown into a wrestling match and forced to perform in a wrestling match. I had literally no wrestling training at the time and I did not know how to safely execute any moves or be on the receiving end of any moves.

As a result of being immediately thrown into a grueling schedule of performing at shows four to five days week with no training, I immediately began sustaining constant injuries. In my first month with WWE, I had a match with a veteran WWE female wrestler at a house show. She performed a move on me called a back-breaker. I had an expectation at the time that if she intended to perform such a move in a match, she would have taken me aside beforehand to show me how to do the move properly as she was aware I had no training and was expected to learn along the way. However, she not only neglected to teach me how to perform the move, but she worked me stiff (which means she was being particularly rough) because I was new. As a result, my back was slammed directly into her knee, and I sustained a severe back injury.

During my second week with the WWE, I asked Stephanie McMahon if I could receive wrestling training. Typically, this would have required me to attend WWE’s Ohio Valley Wrestling (OVW) school in Louisville, Kentucky. Stephanie said no, because I would be off TV and I would lose my fan base, and I would lose my spot and the WWE would not give it back to me. The reason for this was that I had been fortunate enough to develop a strong fan base while participating in the Diva Search competition. This however was a double-edged sword. Since I was popular with fans and generating higher ratings and profits for the WWE, WWE would not allow me to take any time to actually learn how to wrestle.

During my time wrestling for the WWE, I sustained multiple concussions and did not receive appropriate (or in many cases any) treatment for my injuries. As an example, shortly after I started performing for WWE, on or around September 5, 2005, I had a match with Torrie Wilson, and while rehearsing for our match, she performed a move on me known as the neck-breaker. Again, I did not

know how to safely be on the receiving end of this move, and as a result, I was knocked unconscious for five minutes. I received no treatment for the concussion, and the only person to even say anything to me about it was Trish Stratus, who advised me to “shake it off.” She was trying to help and gave me this advice because she knew from experience that I would get in trouble if I spoke up. The only choice I felt I had was to ask that this move be left out of the match. My request was not well received, but was granted, and then immediately after, I had to perform in the match in the live show.

After this incident, which was around my third week of working for WWE, I approached Stephanie McMahon again about my need to receive training. I asked if I could train on my own in the 2 days per week that I had off from working for the WWE in Deer Park, NY, where I am from. She said no. I was terrified that I would keep getting injured I would end up dead or permanently disabled, so I started training on my own anyway during the two days per week that I was not performing in shows. Stephanie found out soon after, and told me I had to stop. She said that the WWE didn’t know anything about the gym where I was training and it could create a liability for the WWE and if I got hurt training, I wouldn’t be able to perform. At the time, I didn’t understand the concept that I was classified as an independent contractor, and would have been within my rights to continue to train on my days off, so I acquiesced and stopped training. I wish now that I had been aware of my rights and continued training, as I likely could have prevented at least some of the injuries I was about to suffer.

Aside from numerous concussions, I received a multitude of other injuries as a result of WWE’s failure to properly train me or provide proper treatment for my injuries. For example, I suffered a hairline fracture in my spine and sustained numerous back injuries, in addition to the one described above, and ultimately was diagnosed with herniated discs in C4 and C5 of my vertebrae.

#### WWE Career: 2006

An injury that haunts me to this day occurred on February 20, 2006, when I was injured in the ring in the Woman’s Battle Royal. I suffered a large fracture that went around my leg bone twice and a piece of bone became loose. On February

22, 2006, I had to undergo surgery to have a five-inch metal plate, eight screws, and staples placed in my leg. My leg was then placed in a cast and I clearly should not have been performing while I recovered from this surgery.

However, a storyline was written very shortly after where Mickie James was to kidnap me and I was supposed to fall out of a chair during a match so the camera would have a better angle to capture a match between Mickie James and Trish Stratus. Including me in this storyline and requiring me to perform in the ring was entirely inappropriate as my leg was protected for a reason and I should not have been forced to intentionally fall out of a chair. And, I should not have been forced to remain in a spot where I was likely to get hit or have someone fall on me (which happened – Trish fell on top of me accidentally during the match), causing further damage to my already severely injured leg, which, at the time, was still in a cast from my most recent injury. I required revisionary surgeries stemming from this injury in 2008. In addition, in 2010, I required a related revisionary surgery on my ankle.

A few months after fracturing my leg, in the summer of 2006, I shattered my knuckle of my right hand in a match against Kristal. Dr. Rios treated me; my hand was put in a cast; which he said had to remain on for about four weeks. A week or two later, Vince McMahon wanted me to perform in a show. He knew that my cast was not supposed to come off for at least a couple more weeks but did not care. He ordered the cast sawed off my hand backstage by WWE crew so that I could perform in a match. At the time, I had been managing and valeting for Paul London and Brian Kendrick's tag team, and I recall that Paul London was present and witnessed this incident.

#### WWE Career: 2007

Far worse than the severe physical damage that was inflicted on my back, neck, ankle, leg, knuckle, and any other body part from wrestling, the worst injury – to my mind, my body, and my soul - that I sustained while working for the WWE was the result of an experience I suffered in 2007 in Kuwait.

I am a strong supporter of the US military and was always very enthusiastic when given the opportunity to do something to help the men and women fighting

overseas for our freedom. I am also very friendly and personable by nature so I developed a strong rapport with the many veterans and active service members that I encountered in my work with the WWE. As a result, I was one of four performers chosen to go on a two-week tour in support of our troops in Afghanistan, Kuwait, and Saudi Arabia. The other performers in attendance were Maria Kanellis, Ron Simmons, and Jimmy Hart. Gary Hart was also in attendance in a supervisory role.

While I was initially thrilled to have this opportunity, I began experiencing issues from the outset. At the beginning of the trip, I received harsh treatment from several men in Saudi Arabia, even while wearing a burqa. Maria Kanellis did not receive this type of treatment, so I suspected that it was related to my fair skin and light eyes. This made me very uncomfortable, but I brushed it off and was still looking forward to the tour.

Then, after we had arrived in Kuwait, I began to suffer from menstrual cramps. I had asked to rest in the Humvee, which was air-conditioned during a break, and the US Army soldiers insisted I was suffering from dehydration, notified Gary, and insisted on taking me to a nearby military base in Kuwait. I was told at the base that I needed an IV for dehydration. I protested but they insisted that I needed it and it was very common due to the hot weather.

When I arrived at the sickbay, an IV was placed in my arm almost immediately. After sitting with the IV in my arm for what felt like hours, Jimmy Hart came to check up on me and make sure I was ok. I told him I was fine but that they wouldn't let me leave because they said I had to wait to see a doctor. Jimmy said he and the rest of the group were going to get lunch and left.

Another couple of hours went by and then a man appeared in the sickbay, dressed in an orange t-shirt and cargo shorts, and I had heard others comment that it was his birthday. He represented himself as a US Army doctor but I observed that all the other doctors at the facility had been wearing scrubs so I do not know whether this was true. He was with a woman who was dressed in full military fatigues. While I was still in the sickbay, he approached me and almost immediately administered an IV of an unknown substance in my other arm. Almost

immediately after, the alleged doctor and the woman in fatigues moved me into a room that did not appear to be a treatment room and placed me on a table. The woman guarded the door while the man proceeded to inject me with a drug that caused me to be unable to move my body or to scream.

The man then proceeded to violently rape and sodomize me. I was completely helpless to defend myself against this attack as the drug he injected rendered me temporarily paralyzed. Despite being unable to control my movements, I remained fully conscious for every second of the attack. I felt excruciating pain as a result of this man penetrating me by force and against my will, in a violent and aggressive manner, while I was completely defenseless. Each second that went by was excruciating and I have never felt more helpless or been more terrified in my entire life. The experience was a living nightmare.

I don't know exactly how long this went on for but it felt like an eternity. The suffering I endured far surpassed all the injuries I had ever suffered in the ring put together; I was experiencing not only severe physical pain but severe emotional and psychological trauma. I have always considered myself to be a fighter and survivor so I can't even find the words to describe what it felt like to be thrown on a table and stripped and then brutalized in the worst possible way that one human being is capable of brutalizing another - all while being unable to move or speak. In addition to the pain and terror, I felt almost dehumanized, and was extremely disturbed by the feeling that I was somehow given to this man as some type of sick birthday present, and it also made me sick that the female soldier willingly guarded the door for him while he raped me without blinking an eye.

Finally, Gary returned and was banging on the door. The man and woman yelled "one minute" and threw a dirty quilt on me as I was lying naked on the table, and when Gary entered the room he attempted to ask them what was going on but they immediately stormed out. At the time, my body was still limp and my speech impaired, so Gary wrapped me in the quilt and carried me out to the Humvee outside and took me back to my hotel room and then put me in my bed, as I needed to sleep. Gary said to call when I woke up and that he, or one of the others we were traveling with, would come back to get me.

Three hours later, I woke up suddenly and jumped out of bed and had regained the ability to move and speak. My mind however could barely process the fact that I had just been drugged and then violently and brutally raped and sodomized repeatedly by a man who was celebrating his birthday and claimed to be a US Army doctor. I also felt a sense of abandonment and wished someone had just stayed with me at the base as this likely would never have happened had I not been left there alone.

Shortly after I woke, Maria appeared in my hotel room. She had heard from Gary that when he picked me up from the base, my body was limp and my speech was impaired. I explained to her that I was injected with an IV of an unknown substance, which left me unable to move or scream, and then was sexually assaulted. She was very sympathetic and nice when I told her what had happened.

She then relayed this information to Jimmy, Ron, and Gary. I then met the rest of the group because we had to head to the next location on the tour schedule. Obviously, given my mental and physical condition, and that I was in Kuwait and the group had to leave for the next destination, I was not in a position to stick around by myself and have a rape kit administered. While en route to the next destination, I told Jimmy, Ron, Maria that I did not want them to tell anyone else what had happened. They agreed to respect my wishes.

Finally, the tour was over and we were in Saudi Arabia and about to get on our flight home via London and my ticket was inexplicably missing. We couldn't get another ticket and Gary could not get in touch with WWE's travel coordinators to get me a ticket on their flight. Their solution was to leave me in Riyadh alone and put me up in a hotel by the airport. At this point, I had already given the burqa I had borrowed from the US Service members back to them and they had left; Riyadh was the location where I was harassed at the beginning of the trip when while wearing a burqa; and I had just been drugged and viciously raped. I could not believe that anyone would expect me to stay there overnight alone given the circumstances. Nevertheless, Gary and rest of the group left and got on their flight.

I could not believe what was happening, but there was no way I was staying

alone in a hotel without a burqa in Riyadh for the night so I called a friend who is a travel agent who arranged for me meet an airline employee who by some miracle got me onto a flight. Thankfully, I was able to return home, but I was still incredibly upset at the fact that I had been abandoned in a dangerous situation by my colleagues who knew what I had just endured, and thought it was inappropriate that even the WWE office, while not aware of the rape yet, would think it was a good plan for the rest of the group to leave me alone there overnight.

After I returned to the US, Dr. Rios set a meeting with me and questioned me about the incident. I have no idea how he knew anything had happened. I suspect that either something showed up in my drug test results, one of the other individuals on the tour reported it to him, or he could just sense from my demeanor that something was wrong. Regardless, he told me that I needed to tell him what had happened. I finally agreed on the condition that he not disclose the information to anyone else and told him what had occurred.

Dr. Rios then informed Vince, who informed Kevin Dunn, John Laurinaitis, and several other company executives or lawyers that I had never even met but were all present at a meeting that I was called into shortly after. Vince led the meeting with these men and asked me to recount what happened in Kuwait. Then he said it was not in the best interest of the WWE for me to make the information about my attack public. I was still completely traumatized at that point and I just agreed. It was clear that there had already been a conversation and that they had reached a decision on their own prior to consulting with me as this was not a debate but rather Vince instructing me to keep this confidential.

Vince did at least apologize for what I went through, but then stressed that if I disclosed this incident it would ruin the relationship between the WWE and the US Military. He told me not to let one bad experience ruin the good work they were doing. His lack of sensitivity in referring to my ordeal as "one bad experience" left me speechless. Vince went on to say that I would not be required to travel to the Middle East ever again and that the WWE would institute a new policy where any time a female WWE performer went to the Middle East, she would have a female WWE escort with her 24/7 to ensure this did not happen again. This did not make

me feel better about the situation. It had already happened to me and the damage was already done. But again, I felt so defeated at that point that it seemed pointless to protest. I also admittedly was uncomfortable with the thought of all the wrestlers finding out so I asked Vince and those in the room to keep the incident quiet and they agreed.

At the time, I was completely traumatized and had literally no support. I also had no evidence as I was unable to have a rape kit administered and did not even know the name of my rapist. I was also not in the appropriate mental state to determine the proper channels to go through to report a crime that happened on a military base in Kuwait and was committed by a man I could not identify by name. Given my condition, I simply did not have it in me to go against the wishes of the WWE and to attempt to pursue the matter any further and I remained silent. The easiest thing to do seemed to be to try to pretend it didn't happen (which of course ultimately never works).

This experience was by far the most traumatic and emotionally damaging thing that has ever happened to me and it and it haunts me to this day. People often speak of having nightmares where they are being attacked but for some unknown reason are unable to scream or run. This happened to me - in real life - and I can't count the number of times I have relived this incident in my mind. Obviously, I should have received counseling or therapy after the attack, but neither Dr. Rios nor Vince had even suggested therapy or counseling of any sort and I was forced to deal with and live with this incident on my own.

I felt that that Dr. Rios, as he had been in all of my interactions with him, was sympathetic and would have liked to do more to help, but he was under the thumb of the WWE, and in particular, Vince. In the past, when I had been injured, Dr. Rios had administered cortisone shots and prescribed pain medication and muscle relaxers for me, but I imagine he knew these were just "band-aids" used to allow me to continue to perform in the short-term. Dr. Rios had said at one point that I really needed a break, given the number of injuries I had sustained over a relatively short time span, but his advice was ignored by WWE. As Vince demonstrated when he ordered the crew to prematurely saw a cast off my hand,

he was not concerned for my health or safety and was only concerned about putting on a show and making money.

Vince approached my rape in the same manner he approached all wrestler injuries. He did not want to damage the reputation of the WWE by making them public knowledge, so he exerted extreme pressure on us to stay silent, to perform whether or not it was safe to do so, and had almost no regard for our well-being. We were treated as replaceable commodities. WWE's top priorities seemed to be generating profits and avoiding liabilities, regardless of how this affected its workers.

As an aside, I kept my silence about this incident for years – at first because of pressure from WWE and fear of losing my job – and then because I felt like it would do little or no good to report a rape that occurred years ago in Kuwait by a man I could not identify. However, when I learned that the WWE had been concealing the risks of long-term damage from repeated head injuries, and thought back to how WWE has a culture of silencing and mistreating its performers; and how as a result, so many men and women today are either dead or left dealing on their own with the horrific aftermath of their injuries, I became angry. I am angry that WWE doesn't educate/inform/train its performers. I'm angry that WWE silences its performers. I'm angry that WWE puts its performers in dangerous situations. I am angry that WWE fails to provide appropriate treatment when injuries occur. I am angry that I'm already suffering from long term effects of in-ring injuries which may get worse over time and that WWE disclaims responsibility. This pattern of behavior illustrates a lack of concern on the part of the WWE for the health, safety, and well-being of its performers, and I broke my silence finally because I thought my story would help shed light on what I view as an important cause that has deeply affected me personally and so many others. WWE has utterly failed in its duties to promote and protect the safety and well-being of the man and women who dedicate their lives to the business, and it should not be permitted to continue to sweep important issues under the rug. Finally, I hope that telling my story may cause a young person aspiring to be a professional wrestler to think twice and consider the realities of the situation and not make the same

mistake that I did.

WWE Career: 2008

By 2008, one of the screws, which was been placed in my leg after my in-ring injury in 2006, had come loose, and I was required to have a revisionary surgery and required the replacement of a 5-inch metal plate in my leg.

WWE Career: Classification as an Independent Contractor

As discussed above, I was not even cognizant of the distinction between and employee and independent contractor when I signed my contract with the WWE, and if I had been, may have disregarded Stephanie McMahon's order not train on my own so that I could have learned how to wrestle and prevented some of the injuries that plague me to this day. It is incomprehensible that I was classified as an independent contractor while being forced to perform five days a week and ordered not to train the other two days. It is also unfathomable that John Laurinaitis would be able to just negotiate a deal for me to appear on the cover of Playboy if I was truly an independent contractor. To this day, I don't even know whether I received full compensation for the cover because everything was handled by the WWE and its lawyers. If the WWE could tell me I had to pose nude for a magazine and handle all aspects of the transaction, this suggests it exerted some level of control over me that is more akin to an employee.

It eventually became painfully obvious that I was being treated as an independent contractor because I was forced to spend approximately \$55,000 per year on rental cars and hotels since WWE only paid for our flights. This was unfair as we were in reality employees and these expenses should have been reimbursed. Even if one takes the opposite position, we should have at least had assistance from WWE in making reservations.

One night, I was making a very long drive with Jillian Hall to get to a show and we were in the middle of nowhere. Jillian had booked the only hotel in the area and it ended up being connected to a strip club. Jillian was still in her stage clothes; I observed some men throwing beer bottles in the parking lot and wanted to just leave immediately; but there were no other hotels in the area so she proceeded to take the keys through a window and drive around to the back of the

motel where the entrance to our room was. We were immediately barricaded by three large vehicles so we could not move the car in any direction and the men in the vehicles got out of their cars and started banging on the car windows. I laid on the horn for at least a full minute before a motel employee finally came out and the men returned to their vehicles and drove off. We drove off once we were certain they were not able to follow us to look for another hotel.

WWE plays up the sex appeal of the Divas. We were sometimes forced to hit the road to get to the next show without even having time to change, as Jillian was that night. Sometimes, WWE did not want to pay for our flights so we had to rent cars and take very long drives and sometimes it was through the middle of nowhere. We were constantly traveling, so we did not have time to make sure every hotel we book is going to be perfectly safe. WWE should not send scantily clad female performers on long drives through the middle of nowhere late at night and not provide them with a safe place to stay or a safe method of transportation.

WWE also failed to provide information to me regarding my legal rights whether as an independent contractor or an employee (or even explain the difference) and never communicated or posted signs regarding my rights under OSHA or any other labor laws. While I worked for the WWE, it displayed a reckless disregard for the safety and health of its performers who were unaware of their rights. WWE failed to even report my injuries in the ring and my rape in Kuwait to OSHA and provided me with no information and posted no signage regarding OSHA. Presumably, this derives from WWE's misclassification of me and other wrestlers as independent contractors.

#### WWE Career: TBI/ CTE Risks

While I wrestled for the WWE, I was never informed of the risks that I was exposing myself to when I stepped into the ring. I was never informed of the long-term risks associated with concussions or repeated head trauma and I had never even heard the terms TBI or CTE mentioned. Even after I was literally knocked out cold for five minutes, not only did I not receive treatment, but I was told to brush it off. The closest thing to education or treatment that I can recall receiving was about once per year, we would have to get EKG tests in one particular state

because was mandated by that state's regulations.

WWE was in a better position than I was to have knowledge of the risks associated with in-ring injuries, including TBI and CTE, and had a duty to warn me of these risks, and it clearly failed to fulfill its obligations to me. It provided me with literally no information about any of these risks and I was kept completely in the dark. While I was unaware of this at the time, WWE had filmed episodes of RAW focused on TBI as part of the storyline before I even entered the Diva Search Competition. And, while I still worked for WWE, Chris Benoit tragically killed himself and was later diagnosed with CTE, so there is no question it had knowledge of these risks. Since WWE was aware of the injuries I had sustained, it had an obligation to contact me and at the very least, inform me of the risks I face today.

#### WWE Career: Conclusion

To this day, I am battling the long-term health effects of my WWE career. I have suffered long-lasting effects of the physical injuries sustained in my WWE career and I have had to have follow-up surgeries to correct my ankle and knee injuries. In 2010 I required revisionary surgery for my ankle injury and in 2016, I required another surgery to treat an ankle injury I suffered while wrestling for the WWE. The WWE has not contributed to the costs of these follow-up surgeries and I have been forced to rely on New York's Medicaid program. I also have had to see a pain management physician every single month since leaving the WWE due to the pain that I have experienced to this day from my in-ring injuries. WWE did not make any payments to me assist in my recovery or for my continuing need for follow-up medical care.

Briefly, I would also like to note that the above is not a comprehensive list of my in-ring injuries as there were far too many to recount in this affidavit. For example, I still suffer from a torn meniscus, and I was supposed to have surgery for this in 2016, but have put it off as it will cause a financial hardship and because I fear that having to take pain medication to recover from the surgery could have negative repercussions. I am however scheduled to have the surgery next month.

On a similar note, WWE used narcotics as a tool to allow me and other

wrestlers to perform through our injuries. If we took enough pills, the pain went away (temporarily) and we were able to wrestle. Obviously, this worsened our injuries and required us to take more pain medication the next time to decrease the pain to a tolerable level. The quantity of pills we were given and the strengths of the dosages were so high that even after the injuries healed, our bodies were addicted to the medication itself and would be in pain without it. This becomes a vicious cycle, and as I have only recently become aware, is often exacerbated by repetitive head trauma. I fell victim to this cycle myself and developed an addiction to pain medication. After I required the revisionary surgery in 2010, it got worse. I then sought help for my addiction. I worked with Anne Russo Gordon (a Manager of the WWE Talent Relations Department) who ran the “WWE Former Talent Rehab Program.” I underwent treatment through that program in September of 2010. I remained in the program for 42 days.

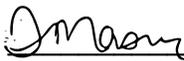
Years later, I received a letter from Paul Levesque dated November 7, 2014 regarding the “WWE Former Talent Drug and Alcohol Rehabilitation Assistance Program.” The letter, which I still have, states that “help will be provided to participants regardless of the reason for departure from WWE or amount of time performed for WWE.” It seems contradictory that WWE acknowledges a duty to assist former talent with drug and alcohol treatment but does not acknowledge any duty for the treatment of the head injuries that led to the addictions.

Aside from my on-going physical injuries that were sustained in the ring, and my former battle with addiction, to this day, I suffer from depression, for which I take medication; migraine headaches; and severe short-term memory loss. I have been receiving medical treatment for these problems since I left the WWE and am currently still undergoing treatment. I attribute these issues to my work-related injuries sustained while working for the WWE, and specifically to the routine repetitive blows to the head I received in the ring over the course of my care which were not properly diagnosed or treated, despite WWE’s admitted had and has a duty to take all reasonable steps to protect the health and safety of its performers and to inform its performers of the risks of long-term impairments from repetitive brain trauma. It owed me this duty during and after my wrestling career

and it failed to live up to its obligations. As a result, it has caused me severe and ongoing pain and suffering, emotional distress, and financial hardship.

WWE has continued its relationship with me, despite failing in these duties, first by providing my rehabilitation treatment, and second by continuing to this day to make royalty payments to me. These payments are often of a miniscule amount that could not begin to cover any of my required medical care. I hope that justice will be served and that the WWE will be forced, moving forward, to fulfill the other obligations it has to me and other former wrestlers that it has so recklessly ignored for so many years. I also specifically hope that it is forced to acknowledge and provide monitoring and necessary treatment for the long-lasting effects caused specifically by the repetitive head trauma we were subjected to without any warning or education regarding the risks.

Ashley Massaro



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Signed Under Penalties of Perjury  
November 1, 2017