



City of Cleveland

Justin M. Bibb, Mayor

Office of the Mayor

Cleveland City Hall

601 Lakeside Avenue, Room 202

Cleveland, Ohio 44114

216/664-3990 • Fax 216/420-8766

www.cleveland-oh.gov

December 30, 2024

Sent Via E-Mail

Cleveland Browns Football Company LLC
c/o Jimmy and Dee Haslam
76 Lou Groza Blvd.
Berea, OH 44017

Re: Ohio Revised Code § 9.67

Dear Mr. and Mrs. Haslam:

I am writing this letter on behalf of the City of Cleveland (the “City”) to the Cleveland Browns Football Company LLC (the “Browns”), as owner of the professional sports team known as the Cleveland Browns.

As you are well aware, in 1996, following the relocation of the Browns to Baltimore, the Ohio General Assembly enacted, and the Governor signed, Ohio Revised Code § 9.67. Known as the Modell Law, the statute provides in full:

No owner of a professional sports team that uses a tax-supported facility for most of its home games and receives financial assistance from the state or a political subdivision thereof shall cease playing most of its home games at the facility and begin playing most of its home games elsewhere unless the owner either:

(A) Enters into an agreement with the political subdivision permitting the team to play most of its home games elsewhere;

(B) Gives the political subdivision in which the facility is located not less than six months’ advance notice of the owner’s intention to cease playing most of its home games at the facility and, during the six months after such notice, gives the political subdivision or any individual or group of individuals who reside in the area the opportunity to purchase the team.

R.C. § 9.67.

The Browns play home games in Cleveland at “a tax-supported facility” now known as Huntington Bank Field (“HBF”). Indeed, during roughly the last 20 years, the City has spent over \$350 million for the construction, repair, and maintenance of HBF. Nevertheless, the Browns have also expressed publicly a desire to move.

Yet, to date, the Browns have not provided the City or others with the opportunity to purchase the team, as required by law. And if that opportunity were provided, the City intends to take a leadership role in assembling an “individual or group of individuals who reside in the area” in purchasing the team.

If the Browns intend to begin the six-month window during which the team must be offered for purchase, please identify (1) the date on which the team will be offered for purchase and (2) a date and time at which we can send our representatives to begin inspection and evaluation of the Browns’ records, as defined in R.C. § 1706.01.

Please respond to this letter by January 9, 2025. If you do not formally respond to this letter by that date—or if you inform the City that you do not intend to comply with R.C. § 9.67 or the terms of the Browns’ contractual obligations—the City intends to take appropriate legal action.

Respectfully,



Justin M. Bibb
Mayor | City of Cleveland

cc: David A. Yost, Ohio Attorney General
Kip T. Bollin, Thompson Hine LLP
Justin E. Herdman, Jones Day