

January 6, 2015

**Via Email**

Douglas E. Mirell, Esq.  
Harder Mirell & Abrams LLP  
1925 Century Park East, Suite 800  
Los Angeles, California 90067-2749

Re: *An Open Secret*/SAG-AFTRA

Dear Doug:

As you know, we represent Disarming Films, Amy Berg, and Esponda Productions (collectively “Disarming”) in connection with the documentary *An Open Secret*.

After reviewing your concerns, Disarming is willing to edit the chyron that, in its current form, identifies Michael Harrah as a member of SAG-AFTRA’s Young Performers Committee. To be clear, Mr. Harrah was a member of the committee as recently as March 26, 2014, when he was interviewed for the documentary. Indeed, SAG-AFTRA insisted on arranging and hosting Ms. Berg’s interview with Mr. Harrah, ostensibly because of his membership on the Young Performers Committee. Moreover, SAG-AFTRA’s subsequent April 18 and September 22, 2014 letters to Ms. Berg about Mr. Harrah did not in any way suggest that he had departed the committee. If, as we infer from your letter, Mr. Harrah departed the committee between late September and early November 2014, Disarming is happy to update the chyron. To ensure that Disarming has accurate information on this issue, please provide the date that Mr. Harrah left the committee and any public statement that SAG-AFTRA disseminated announcing his departure.

Disarming will not, however, “delete ... references to ‘SAG’, to SAG-AFTRA or to any SAG-AFTRA committees ... in any portions of the documentary.” 12/03/14 Letter at 1. SAG-AFTRA is an extremely influential organization in the entertainment industry, and its “first priority is to provide security and protection for [its] members while they work, and this is particularly true for young performers.” 09/18/14 Letter at 1. Mr. Harrah was a member of SAG’s Young Performers Committee for decades (he told Ms. Berg that he co-founded it in 1975), was a member of the committee when he allegedly engaged in improper conduct with a young actor who appears in the documentary, and was a member of the committee when Ms. Berg interviewed him about the sexual exploitation of minors in the entertainment industry. Under these circumstances, there is no legal requirement or editorial justification for stripping

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the documentary of any references to SAG, SAG-AFTRA, or the Young Performers Committee.<sup>1</sup>

If you would like to discuss these issues, please don't hesitate to call me.

Sincerely,



Alonzo Wickers IV  
Davis Wright Tremaine LLP

cc: Amy Berg  
Matthew Valentinas

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<sup>1</sup> The documentary does not state or imply that SAG, or later SAG-AFTRA, knew of alleged misconduct by Mr. Harrah.