2012 National Baseball Arbitration Competition

Nelson Cruz v. Texas Rangers
Submission on Behalf of Nelson Cruz
Midpoint: $5 million
Submission by: Team 6
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I. Introduction and Request for Hearing Decision

This brief analyzes the contributions of right fielder Nelson Cruz for an arbitration hearing governed by the Major League Baseball Collective Bargaining Agreement. Criteria include: quality of contributions to the club during the past season, career contributions past compensation, comparative baseball salaries, physical defects, and recent club performance.

Based on these criteria, Nelson Cruz is entitled to a salary exceeding the $5 million midpoint and he respectfully requests the panel find he is entitled to an award of $5.3 million.

II. Quality of the Player’s Contributions During Past Season

Nelson Cruz finished his strong 2011 season with a postseason performance of historic proportions. Cruz tied the record for the most postseason homeruns in a season, joining just Barry Bonds and Carlos Beltran with 8, when he hit his second World Series homerun.\(^1\) He also had an historic American League Championship Series (ALCS), earning the ALCS MVP.\(^2\) Cruz earned this distinction with his consistent and remarkable offensive production. He won game 2 with a walk-off grand slam, becoming the first to do so in postseason play. Two days later he won game 4 with a three-run homerun, making him the first player to hit more than one extra-inning homerun in the same postseason series.\(^3\) Cruz scored 7 runs, hit 6 homeruns and 13 RBI while hitting for an astounding 1.713 OPS over the course of that series.\(^4\) His 6 homeruns are the most ever in a league championship series. His heroics were not confined to offensive production, as he saved game 4 with a strong throw from right field, throwing out Miguel Cabrera at the plate in the eighth inning of the tied game.

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\(^4\) All statistics are from www.baseball-reference.com unless otherwise noted.
Cruz’s regular season performance was also strong, both at the plate and in the field. Cruz hit for average and for power throughout the season, finishing with an OPS of .821. He scored 64 runs and hit in another 87 RBI. Cruz hit 29 homeruns over 475 at bats, giving him the 8th best HR/AB ratio in the American League.

| TABLE 1: NELSON CRUZ OFFENSIVE PRODUCTION 2011 (RANK IN AL) |
|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Games | Run | RBI | HR | AVG. | SLG* | OPS |
| 124 | 64 | 87 (20th) | 29 (13th) | .263 | .509 (11th) | .821 |

* At least 375 AB

Cruz also excelled defensively, committing only 6 errors—tied for 5th lowest among AL outfielders. In 2011, he boasted the top range factor per nine innings (2.29) among right fielders, indicating he makes more plays at his position than any other right fielder.

III. Length and Consistency of Career Contributions

Nelson Cruz’s career bulk demonstrates that his 2011 success is no aberration. In 2010 Cruz had similar postseason heroics as in his platform season. In his two years of postseason production Cruz hits more homeruns per at bat than all but three players in history. His 14 postseason homeruns are the most by anyone in consecutive years. Cruz’s 2010 postseason demonstrate both power and average. He hit for a .359 AVG, combining with his .733 SLG, to give him an impressive 1.083 OPS. In just 16 games that postseason, Cruz scored 13 runs, hit 6 HR and 7 doubles, and drove in 11 RBI.

Nelson Cruz began his career as a Dominican prospect, initially more interested in basketball when he signed with the New York Mets. He spent three years in the Mets’

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7 This assumes at least 75 at bats, only bested by Carlos Beltran, Babe Ruth, and Troy Glaus. Jeff Caplan, Nelson Cruz is having series for the ages, Texas Rangers Report, ESPN (Oct. 12, 2011). Available online at: http://espn.go.com/blog/dallas/texas-rangers/category/_/name/2011-postseason/count/226
Dominican Summer League team before being promoted to the US. Following a number of years in the minors and a few trades, Cruz debuted for the Milwaukee Brewers in 2005, before being dealt to the Rangers. He played 2006-2008 for the Rangers before finding a permanent starting spot with the team in the 2009 season.

In the last three seasons since 2009, Cruz has produced consistently year-to-year. Playing in over 100 games each of the last three years, Cruz also annually scored at least 60 runs, hit at least 20 homeruns, and drove in at least 75 RBI.\(^{10}\)

<table>
<thead>
<tr>
<th>Season</th>
<th>Games</th>
<th>Run</th>
<th>RBI</th>
<th>HR</th>
<th>AVG.*</th>
<th>SLG*</th>
<th>OPS*</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>8</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>.200</td>
<td>.400</td>
<td>.829</td>
</tr>
<tr>
<td>2006</td>
<td>41</td>
<td>15</td>
<td>22</td>
<td>6</td>
<td>.223</td>
<td>.385</td>
<td>.645</td>
</tr>
<tr>
<td>2007</td>
<td>96</td>
<td>35</td>
<td>34</td>
<td>9</td>
<td>.235</td>
<td>.287</td>
<td>.671</td>
</tr>
<tr>
<td>2008</td>
<td>31</td>
<td>19</td>
<td>26</td>
<td>7</td>
<td>.421</td>
<td>.609</td>
<td>1.030</td>
</tr>
<tr>
<td>2009</td>
<td>128</td>
<td>75</td>
<td>76</td>
<td>33 (8(^{\text{th}}))</td>
<td>.260</td>
<td>.524 (13(^{\text{th}}))</td>
<td>.856</td>
</tr>
<tr>
<td>2010</td>
<td>101</td>
<td>60</td>
<td>78</td>
<td>22</td>
<td>.318 (6(^{\text{th}}))</td>
<td>.576 (5(^{\text{th}}))</td>
<td>.950 (6(^{\text{th}}))</td>
</tr>
<tr>
<td>2011</td>
<td>124</td>
<td>64</td>
<td>87 (20(^{\text{th}}))</td>
<td>29 (13(^{\text{th}}))</td>
<td>.263</td>
<td>.509 (11(^{\text{th}}))</td>
<td>.821</td>
</tr>
<tr>
<td>CAREER</td>
<td>536</td>
<td>269</td>
<td>323</td>
<td>106</td>
<td>.270</td>
<td>.504</td>
<td>.834</td>
</tr>
</tbody>
</table>

* At least 375 AB for comparison

Cruz earned the distinction of All Star in his breakout 2009 season. He also participated in the Home Run Derby that year, finishing in second place.\(^{12}\) He hit the eighth most home runs (33) in the AL and was third in the AL with only 14 at bats per homerun.

Cruz produced solid numbers in 2010 despite missing 52 due to hamstring issues. While his run production and homeruns diminished slightly, his batting average, slugging percentage, and on-base plus slugging ranked in the top ten among players with at least 375 at bats.

Cruz has also been a dependable mainstay in right field throughout his career. Among active players, he’s 21st for most number of games played in right field, 19th in putouts, 22nd in


\(^{11}\) Statistics, Major League Baseball. Available online at www.mlb.com/stats

\(^{12}\) King of homers: Prince reigns supreme in Derby, Major League Baseball. Available at: http://mlb.mlb.com/mlb/events/all_star/y2009/hr_derby.jsp
assists, and 12th in fewest errors. Among all right fielders, he has the best range factor per nine innings in 2009, 2010, and 2011.

IV. Comparative Baseball Salaries
Nelson Cruz’s career and platform season are impressive for the bulk of the offensive numbers and defensive reliability. However, the comparisons to similar players provide the most tangible and compelling indications of Nelson Cruz’s value. These comparisons clearly indicate Cruz’s value is above the $5 million midpoint and therefore this panel should decide in his favor.

a. Ryan Ludwick ($5.45 million in 2010)
Comparing Cruz to outfielder Ryan Ludwick demonstrates Cruz’s value as greater than the $5 million midpoint. Ludwick entered 2010 arbitration with a previous salary of $3.7 million, a great match to Cruz’s $3.65 million. He then went on to receive a $1.75 million raise, bringing his 2010 salary to $5.45 million, well in excess of the $5 million midpoint in discussion here. Cruz produced better career and platform season numbers than Ludwick, in addition to historic playoff performances; as such, he deserves a salary at least commensurate to Ludwick’s. Since Ludwick’s salary exceeds the midpoint, Cruz’s value should also.

| Table 3: Comparative Hitting Statistics between Nelson Cruz and Ryan Ludwick |
|------------------|----|---|---|----|---|---|---|---|----|---|
|                  | MLS | GS | R  | HR | RBI | SB | AVG. | OPS | GS | R  | HR | RBI | SB | AVG. | OPS |
| Cruz            | 4.082 | 122 | 64 | 29 | 87  | 9  | .263 | .821 | 494 | 269 | 106 | 323 | 52  | .270 | .834 |

Career
Heading into their second-time arbitration eligibility, Cruz has been slightly more productive. Cruz played in slightly more games (536 to 515) but importantly served as a starter in substantially more games than Ludwick (494 to 407). As demonstrated in the table below, Cruz has more R, HR, RBI, and SB. He hit for almost an identical batting average and OPS. He hit for a slightly higher SLG and a slightly lower OBP.

Both players spent a few years developing in the system prior to playing their first 100
game season. Cruz and Ludwick were also both awarded the distinction of All Star, though
neither in their platform seasons.

While their career numbers are remarkably similar, their playoff experiences differ
dramatically, and in favor of Cruz. Ludwick has no playoff experience while Cruz has contributed
to his team’s success the past two years, breaking records and for his offensive production (see
above). Even assuming that Cruz and Ludwick had basically identical careers, this playoff
experience alone should lead to a higher valuation for Cruz.

*Platform Season*
The platform seasons of Cruz and Ludwick are also remarkably similar but again Cruz
edges him out in a number of important categories. They both started the same number of games
(122), scored about as often (64 to 63), and hit for almost the same batting average (.263 to
.265). Cruz, however, hit more homeruns (29 to 22) and hit for a higher OPS (.821 to .775).
Ludwick hit 10 more RBI. Similar to the career comparison, Cruz earned ALCS MVP honors in
his historic platform season playoff performance where as Ludwick had zero playoff experience.

Because their numbers and careers are so similar and Cruz has been more productive,
Cruz’s true value exceeds or matches Ludwick’s—well in excess of the $5 million midpoint.

b. Jeff Francoeur ($5 million in 2010)
Outfielder Jeff Francoeur does not provide as close of a match up to Nelson Cruz as
Ludwick because he has a different career trajectory and much lower prior salary, but the
comparison still clearly establishes Nelson Cruz’s value above the $5 million midpoint. Jeff
Francoeur signed for $5 million in 2010, a $1.625 million raise from his previous salary of
$3.375. Francoeur’s previous salary essentially represents a starting point $275 thousand less
than Cruz’s, and so even a discounted raise—that is, a raise of $1.35 million and a penny—would place Cruz’s value above the $5 million midpoint.

Francoeur’s career differs from Cruz is important ways, making this an imperfect comparison but still one that values Cruz more and therefore above the midpoint. Cruz has enjoyed a better platform season, arguably better career statistics, and far superior playoff contributions. Most importantly, Cruz has enjoyed much greater power numbers.

Cruz hits for significantly greater power both in his career and his platform season. Cruz almost doubled Francoeur’s homerun production in their respective platform seasons and hit for a much higher OPS (.821 compared to .732 in platform; .834 to .743 in career). He also hit 9 more RBI and stole 3 more bases in his platform season. These general trends are the same for their career contributions except Francoeur has more RBI. Cruz was dubbed an All Star where as Francoeur has not. Both players have playoff experience but Cruz contributed in historic ways resulting in the ALCS MVP and a number of records (see above discussion). By contrast, Francoeur has limited experience, playing in just one postseason series. The table below summarizes these stark postseason differences.

Table 5: Postseason Comparison Between Cruz and Francoeur

<table>
<thead>
<tr>
<th>Years</th>
<th>G</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>AVG.</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cruz</td>
<td>2010, 2011</td>
<td>33</td>
<td>26</td>
<td>14</td>
<td>27</td>
<td>.270</td>
</tr>
<tr>
<td>Francoeur</td>
<td>2005</td>
<td>4</td>
<td>2</td>
<td>0</td>
<td>1</td>
<td>.235</td>
</tr>
</tbody>
</table>

Francoeur has played more games; he was called up about 85 games into the 2005 season, and then went on to play 162 games in 2006 and 2007, 155 games in 2008, and 157 games in 2009—his platform season for his second arbitration. His career numbers best Cruz in
games played and, as a result, in runs and runs batted in. Defensively, both players are solid, but only Francoeur won a Gold Glove award (2007).

In a system where “power pays” and platform seasons are critical to valuations, this comparison demonstrates Cruz’s superior value. Fortunately the system can place this valuation difference in a tangible context, as their respective first arbitration eligible contracts represent. As can be seen in the table below, the first time arbitration for Cruz and Francoeur displayed many of these same differences and resulted in a significantly higher valuation for Cruz ($3.6 million as compared to $3.375 million). In their second time arbitration eligible platform seasons, Cruz again had the better platform season and logically therefore should again be valued higher. This valuation necessarily places Cruz above the $5 million midpoint.

<table>
<thead>
<tr>
<th>Table 6: Valuation Context—Cruz and Francoeur in First Time Arbitration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Value</strong></td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td>Cruz</td>
</tr>
<tr>
<td>Francoeur</td>
</tr>
</tbody>
</table>

c. **Carlos Quentin (5.065 million in 2011)**
Comparing Nelson Cruz to then-White Sox outfielder Carlos Quentin also places Cruz’s value at greater than the $5 million midpoint. The comparison is especially helpful in this case because Cruz and Quentin have both had seasons shortened by injury. Cruz has performed better than Quentin, though, with less debilitating injuries, and therefore should be valued higher. Quentin received a $1.865 million raise in the context of 2011 arbitration to place his salary just above the midpoint at $5.065 million. It is important to note that his salary previous to second time arbitration was $450 thousand less than Cruz’s, meaning that Quentin’s platform season would need to be substantially better to warrant a higher valuation.
Both players have needed time off due to injuries. In Cruz’s platform season, he missed 17 games due to an injury to his quadriceps and another 13 due to a hamstring strain. In 2010, he missed 52 games due to a hamstring strain. In 2009, a sprained ankle sidelined Cruz for 15 days.

While Cruz’s injuries have been typical day-to-day injuries incurred as part of being a major league baseball player, Quentin’s injuries are more troublesome. Quentin started in just 64 games in 2007 due to a torn left labrum for which he later had surgery and then a hamstring injury.\textsuperscript{14} Quentin then broke his wrist due to his temper in 2008, cutting short his season. He slammed his hand into his bat in frustration after fouling off a pitch, breaking his hand and forcing him to miss the final 25 games of the season and the whole of the playoffs that year.\textsuperscript{15} In 2009, Quentin suffered from plantar fasciitis, causing him to start only 96 games and have diminished power and speed.\textsuperscript{16} Quentin was healthier in his platform season than in other years but still only started in 126 games.

Cruz’s injuries have been less devastating than Quentin’s, he has demonstrated better offensive production, and has better playoff experience. As seen in Table 7, they share very similar platform seasons. Cruz hit 3 more homeruns, stole 7 more bases, and hit for a better average. Quentin scored 9 more runs. They had the same number of RBI and identical OPS.

The main difference in their platform seasons is Cruz’s playoff heroics (discussed above).

| Table 7: Comparative Hitting Statistics between Nelson Cruz and Carlos Quentin |
|---------------------------------|------------------|------------------|
|                                  | PLATFORM         | CAREER           |
|                                  | MLS  | GS  | R   | HR   | RBI  | SB  | AVG. | OPS  | GS  | R   | HR   | RBI  | SB  | AVG. | OPS  |
| Cruz                            | 4.082| 122 | 64  | 29   | 87   | 9   | .263 | .821 | 494 | 269 | 106  | 323  | 52  | .270 | .834 |
| Quentin                         | 4.065| 126 | 73  | 26   | 87   | 2   | .243 | .821 | 457 | 268 | 97   | 306  | 15  | .251 | .835 |

\textsuperscript{14} Nick Plecoro, Quentin sidelined until spring, The Arizona Republic (Oct. 11, 2007). Available online at: www.azcentral.com/sports/diamondbacks/articles/1011dbnotes1012.html


Cruz has enjoyed better career production than Quentin as well. Cruz started in more games, hit more home runs and RBI, while stealing more bases and hitting for a better batting average. The two have almost identical run totals and an almost identical OPS. They both have All Star honors but not in their platform seasons. Career-wise, Cruz has demonstrated playoff heroics where as Quentin has no experience. It is important to note that Quentin would have had playoff experience after the White Sox won their division in 2008 except he broke his wrist after he let his temper get out of control and he was instead sidelined for postseason play.

Cruz and Quentin are similar in that they both have had to miss time due to injuries. Cruz’s injuries have been less severe though, he has played better in his platform season as well as his career, and has post-season heroics compared to Quentin’s self-inflicted lack of post season experience. Quentin, coming form a lower base salary during the 2011 arbitration season, signed a one-year contract just above the midpoint in this case. Because Cruz is demonstrably better than Quentin, he also deserves more than the midpoint.

V. Existence of Physical or Mental Defects
Nelson Cruz has suffered from a variety of injuries common to baseball players as a result of the day-to-day grind. He missed 15 games in 2009 due to a sprained ankle, 52 games in 2010 due to hamstring issues, and 30 games in 2011 due to injuries to his hamstring and quadriceps. Despite these injuries, Cruz has had three straight productive seasons, scoring at least 60 runs, hitting at least 20 homeruns and batting in at least 75 RBI. He has been consistent enough that—despite a relatively young career—he is 21st among active players in games played in right field. The comparison with Carlos Quentin demonstrates that even taking into account his injuries, his value is still greater than the $5 million midpoint.

VI. Recent Performance of the Club
Nelson Cruz has served as an offensive and defensive mainstay in this powerful Texas
Rangers lineup known for its ability to score runs. Throughout the past few seasons he helped contribute toward this offensive power by putting up strong numbers. Just as importantly, if not more so, Cruz provided historic levels of offensive production in the playoffs the past two years, helping the Rangers reach the World Series.

**VII. Past Compensation**
Despite being one of the strongest contributors during his career, Cruz earned close to the league minimum each year up until his previous salary negotiated in the context of arbitration eligibility. He earned $3.65 million this previous season.

**VIII. Conclusion**
Nelson Cruz has enjoyed a productive career and a great platform season. He has consistently contributed toward bettering the Rangers via his offense and defense. Comparing Cruz to similar players clearly demonstrates his value in excess of the $5 million midpoint. Cruz had a better platform season, more career bulk, and by far better playoff experience than Ryan Ludwick who signed an second-time-arbitration-eligible contract for $5.45 million—far in excess of the $5 million midpoint. Cruz has had a different career trajectory than Jeff Francoeur, but Cruz’s higher base salary, power numbers, and playoff heroics comfortably place his value higher than Francoeur’s $5 million contract. Any injury concerns are quelled by his past three seasons of strong production—over 60 runs, 20 HRs, and 75 RBI in each. Cruz has performed better in his platform season and over the course of his career than Carlos Quentin, all the while suffering from less debilitating and more understandable injuries. This places his value above Quentin’s $5.065 million, and therefore comfortably above the $5 million midpoint. For these reasons we ask the arbitration panel to find for Nelson Cruz and award him $5.3 million.