

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CURTIS E. BLACKWELL, II,

Plaintiff.

v.

**LOU ANNA K. SIMON,
MARK DANTONIO, et al.,**

Defendants.

Case No. 1:18-cv-1261

Hon. Janet T. Neff

Mag. Judge Sally J. Berens

AFFIDAVIT OF LA KESHIA NEAL

NOW COMES LA KESHIA NEAL, a natural person, being first duly sworn and deposed, and under the penalty of perjury states the following:

1. That I am the mother of former five-star recruit, Daelin Hayes, who now attends University of Notre Dame on a football athletic scholarship.
2. That my son, Daelin Hayes, attended and played football at Ann Arbor Skyline High School.
3. That my son, Daelin Hayes, was offered football scholarships by numerous schools including the University of Alabama, the Ohio State University, the University of Michigan, the University of Georgia, Penn State University, and Michigan State University ("MSU").
4. That on or about December 7, 2015, former MSU Head Football Coach Mark Dantonio came to my home for an official recruiting visit in an effort to recruit my son, Daelin Hayes, to attend MSU and play on the MSU football team.
5. That at the December 7, 2015 official recruiting visit, MSU Head Football Coach Mark Dantonio had three individuals with him. The three (3) individuals that were with Coach

Mark Dantonio in my home were Curtis Blackwell, Harlon Barnett and Mike Tressel, all of whom identified themselves as being representatives of the MSU football program.

6. That during the official recruiting visit in my home, I made a big breakfast for all the MSU football staff that were present and took a picture of the food I prepared for them.
7. MSU Head Football Coach Mark Dantonio, Curtis Blackwell, Harlon Barnett and Mike Tressel all ate breakfast with myself and my son in my home.
8. That after we finished eating breakfast, we all went in my living room where I took a picture of Coaches Dantonio, Barnett, Tressel and Curtis Blackwell posing with my son and I retained copies of those pictures that I had taken on December 7, 2015.
9. That I can say with absolute certainty that Curtis Blackwell was in my home with MSU Head Football Coach Mark Dantonio and the other MSU football coaches during my son's official recruiting visit on December 7, 2015.
10. That the pictures I took on December 7, 2015 are attached hereto as **Exhibit 1**.
11. If called as a witness, I am competent to testify as to the facts stated herein.

FURTHER AFFIANT SAYETH NOT.


LA KESHIA NEAL

Subscribed and sworn to before me

On this 13th day of February, 2020.


NOTARY PUBLIC

My Commission Expires: 4/13/20

BRITTANY BEAUDRY
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Apr 13, 2020
ACTING IN COUNTY OF Wayne

EXHIBIT 1



