UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:24-cv-00238-CCE-JEP

REESE BRANTMEIER and MAYA JOINT, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC ASSOCIATION,

Defendant.

DECLARATION OF JERRY VAUGHN REGARDING PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

I, Jerry Vaughn, hereby declare as follows:

1. I am currently employed as Managing Director of Division I Governance and Member Services at the National Collegiate Athletic Association ("NCAA").

1. I received a bachelor's degree in sport management from North Carolina State University and a master's degree in sport administration from Canisius College.

2. I have worked for the NCAA for more than twelve years and have held my position as Managing Director of Division I Governance and Member Services since January 12, 2026. In this role, as well as in my prior roles with the NCAA, I have provided oversight of the staff responsible for administering

the athletics eligibility process. Additionally, I have supported membership governance bodies including the NCAA Division I, II, and III Committees on Student-Athlete Reinstatement and various working groups that have reviewed the topic of eligibility. In the regular performance of my job duties, I am familiar with the business records created and maintained by the NCAA relating to student-athlete eligibility.

3. I submit this Declaration in response to issues that I understand were raised at the hearing regarding Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement.

4. The NCAA is a voluntary association created by member colleges and universities across the country to administer college athletics. The NCAA is led by its nearly 1,100 member schools. The participating colleges and universities competing in NCAA Division I adopted the NCAA Division I Manual, which defines the NCAA's purpose and sets out its fundamental policies and rules. The NCAA acts only where its member schools have delegated responsibility. For example, the Division I schools set rules governing athletics eligibility, the recruitment of athletes, the rules of competition, and eligibility certification, and they delegated to the NCAA the power to enforce those rules.

5. Prior to changes resulting from this proposed class action settlement, NCAA rules governing prize money, governed by Bylaw 12.1.2.4

(the "Prize Money Rules"), generally prohibited prospective student-athletes from accepting prize money that exceeded their actual and necessary expenses.

6. In relation to tennis specifically, the Prize Money Rules stated that before full-time collegiate enrollment, individuals could accept up to $10,000 per calendar year in prize money from the event sponsor, based on place or performance in such athletics events. Once an individual had accepted $10,000 in prize money in a particular year, he or she could receive additional prize money on a per-event basis, so long as that prize money did not exceed actual and necessary expenses for participation in the event.

7. As a result of the negotiations surrounding this proposed class action settlement, the NCAA revised its Prize Money Rules to allow prospective student-athletes to accept prize money based on place finish or performance in athletic events that occur prior to initial, full-time collegiate enrollment. This change to the NCAA's pre-enrollment Prize Money rules benefits prospective student-athletes competing in all sports, not just tennis. *See* Bylaw 12.1.2.4.

8. Prior to this change to the Prize Money Rules, however, if a prospective student-athlete accepted pre-enrollment prize money in excess of $10,000 for tennis events per calendar year or beyond actual and necessary expenses otherwise, he or she was in violation of the NCAA's rules. The NCAA would then impose what are called "certification conditions," meaning

conditions that are imposed on the individual that he or she needed to meet in order to have his or her eligibility reinstated.

9. Pursuant to the NCAA Division I Academics and Eligibility Committee's "Athletics Eligibility Certification Process Guidelines," a prospective student-athlete could have his or her eligibility reinstated following a violation of the pre-settlement prize money rules by engaging in repayment of the impermissible expenses or pre-enrollment prize money received.

10. As a condition of reinstatement, a prospective student-athlete who violated the pre-settlement pre-enrollment prize money rules would be required to make repayment of the impermissible prize money and institutions had the choice to enter into a repayment plan with the prospective student-athlete, subject to approval by NCAA staff. A repayment plan is a good faith agreement between the institution and the prospective student-athlete in which he or she would agree to repay some or all of the money back to a designated entity, often a charity of the individual's choice, and sometimes also would agree to engage in hours of community service, in lieu of some or all of the repayment. The repayment plan would span an agreed-upon amount of time and the individual was deemed eligible to compete provided he or she remained current with the repayment plan. If the individual missed a

scheduled repayment date and competed while not current with the approved repayment plan, then he or she would be declared ineligible.

11. After the pre-enrollment Prize Money rule change took effect, the NCAA informed schools with student-athletes presently in the middle of completing repayment plans based on pre-enrollment prize money acceptance that those plans could be cancelled, and the student-athletes could cease making any remaining payments on their plans without penalty.

12. Specifically, three student-athletes were informed that they are no longer subject to repayment plans that had end dates varying between 2026 and as late as end of 2028.

13. For one of these student-athletes, this means that he/she will not need to repay over $11,000, and for another, almost $40,000. For the remaining student-athlete, he/she will not need to pay the last remaining $210 on his/her payment plan and will not need to complete the remaining number of community service hours that the plan called for.

14. In addition, it is my understanding that if a student-athlete accepted prize money shortly before the change to the pre-enrollment rules, and is seeking to compete this year or in the near future, the NCAA will not declare those incoming student-athletes ineligible to compete. For example, an incoming student-athlete who accepted prize money above actual and

necessary expenses pre-settlement and wants to compete this year will not be declared ineligible.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Indianapolis, Indiana on this 23rd day of June 2026.

By: ______________________
Jerry Vaughn

SUBSCRIBED AND SWORN TO BEFORE ME on this 23rd day of June, 2026, to certify which witness my hand and seal of office.

By: Tammy M LaPointe Potter
Notary Public

TAMMY M LAPOINTE-POTTER
Notary Public - Seal
Marion County - State of Indiana
Commission Number NP0722719
My Commission Expires Oct 1, 2027

Dated: June 23, 2026

Respectfully Submitted,

By: /s/ *Rakesh Kilaru*

WILKINSON STEKLOFF LLP
Rakesh Kilaru
Calanthe Arat
Matthew Skanchy
Cassandra Chee
2001 M Street NW, 10th Floor
Washington, Dc 20036
Telephone: (202) 847-4000
Facsimile: (202) 847-4005
Rkilaru@Wilkinsonstekloff.Com
Carat@Wilkinsonstekloff.Com
Mskanchy@Wilkinsonstekloff.Com
Cchee@Wilkinsonstekloff.com

By: *<u>/s/ Alan M. Ruley</u>*

Bell, Davis & Pitt P.A.
Alan M. Ruley
State Bar No. 16407
PO Box 21029
Winston-Salem, Nc 27120
Telephone: (336) 722-3700
Facsimile: (336) 714-4101
Aruley@Belldavispitt.com

Counsel for National Collegiate Athletic Association

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2026, I electronically filed the foregoing Declaration of Jerry Vaughn Regarding Plaintiffs' Motion for Preliminary Approval of Class Action Settlement with the Clerk of the Court using the CM/Dkt. system which will send notification of such filing to all parties and counsel of record.

Dated: June 23, 2026

By: */s/ Rakesh Kilaru*

Rakesh Kilaru
Wilkinson Stekloff LLP
2001 M Street NW, 10th Floor
Washington, DC 20036
Telephone: (202) 847-4000
Facsimile: (202) 847-4005
rkilaru@wilkinsonstekloff.com

Counsel for National Collegiate Athletic Association