

EXHIBIT 1

Brett Favre 12/11/2023

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

MISSISSIPPI DEPARTMENT OF
HUMAN SERVICES

PLAINTIFF

V.

CASE NO. 25CI1:22-CV-00286-EFP

MISSISSIPPI COMMUNITY
EDUCATION CENTER, INC.,
ET AL

DEFENDANTS

DEPOSITION OF BRETT FAVRE

Taken at the instance of the Plaintiff at
110 South 37th Avenue, Suite 8, Hattiesburg,
Mississippi, on Monday,
December 11, 2023,
beginning at 8:00 a.m.

REPORTED BY:

GINGER H. BROOKS, CCR #1165
CRR, RPR, CRC, CCR, CLR, RSA

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1 behalf of Brett Favre.

2 MR. HERSCHMANN: Eric Herschmann for the

3 witness.

4 MS. ANDERSON: Bob Anderson, I'm Agency

5 representative for the Mississippi Department

6 of Human Services.

7 MR. WAIDE: Jim Waide, Austin Smith.

8 MR. LOTT: Casey Lott on behalf of

9 Family Resource Center, Christi Webb, and the

10 Northeast Mississippi Football Coaches

11 Association.

12 MS. WALKER: Molly Walker for William,

13 Weiss and Hester.

14 MR. SHIELDS: William Shields for

15 William Shields.

16 MS. REEVES: Abbey Reeves for MDHS.

17 MR. STEWART: Austin Stewart on behalf

18 of the USM Athletic Foundation.

19 MR. HARRIS: Andrew Harris on behalf of

20 MDHS.

21 BRETT FAVRE,

22 having been first duly sworn, was examined and

23 testified as follows:

24 EXAMINATION BY MR. STONE:

25 Q. Good morning, Mr. Favre.

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1 Miss, teams like that, don't have, that
2 problem is, we have to figure out how to
3 spend the money, you have to figure out how
4 to get the money."

5 So when Breleigh committed to a
6 university, I knew she was going to play
7 volleyball. Did I think -- keep in mind,
8 Bill McGillis had told me that he was adding
9 beach, but it was going to take a few years.
10 He left. Jon Gilbert took over, and I don't
11 know how long it takes to implement a sport,
12 but it took several years.

13 I knew that there was a very good chance
14 that my daughter would not play in there,
15 because I knew she was going to play beach
16 when it was added, and that's what happened.
17 She never played in there at all.

18 Did I want her to play in there? It
19 would have been nice. Is that the reason I
20 built it, or we built it? Absolutely not.

21 Q. Where --

22 A. It's --

23 Q. I'm sorry, go ahead.

24 A. No, go ahead.

25 Q. I didn't mean to interrupt you.

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1 disagree with Dr. Bennett?

2 A. I don't agree with his testimony.

3 Q. Do you know of any reason why
4 Dr. Bennett, now chancellor at University of
5 Nebraska, would lie?

6 MR. HERSCHMANN: Objection to form.

7 THE WITNESS: That's a good question. I
8 don't.

9 Q. (By Mr. Stone) You don't.

10 I mean, you can't think of any motive he
11 would have to lie, can you?

12 MR. HERSCHMANN: Objection to form.

13 Q. (By Mr. Stone) That's a "no"?

14 A. I have no idea.

15 Q. And you're not aware of him having a
16 monetary interest in the outcome of this
17 litigation, for instance, correct?

18 MR. HERSCHMANN: Object.

19 THE WITNESS: Correct.

20 Q. (By Mr. Stone) But you're --

21 A. But I don't have -- there's -- I
22 wouldn't promise to pay for it all. I never said
23 that. Why would I be introduced to Nancy New
24 off -- right off the git-go if I were going to pay
25 for it all?

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1 that was coming in through Nancy, that that
2 4 million went to volleyball?

3 A. Correct.

4 Q. And Nancy was asking you to make sure
5 that that money went where you wanted it to go?

6 MR. HERSCHMANN: I'm sorry. Give me one
7 second.

8 Objection to form.

9 Q. (By Mr. Stone) "Make sure we get the
10 facility you had hoped for" is the words she used.

11 MR. HERSCHMANN: Objection to form.

12 Q. (By Mr. Stone) Correct?

13 A. Yeah, that's what she said.

14 Q. Mr. Favre, what, if anything, did you do
15 to determine that this plan, this, you know,
16 \$4 million that was coming in through Nancy New
17 and John Davis for the volleyball facility, was
18 lawful, that it was legal? What did you do?

19 A. To -- to make sure it was legal?

20 Q. Yeah.

21 A. I didn't do anything.

22 Q. So you didn't talk to a lawyer about
23 that?

24 MR. HERSCHMANN: Objection to form.

25 THE WITNESS: The lawyers for Southern

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1 Miss, the Attorney General, the governor's
2 office. The governor was involved and was
3 all excited about it.

4 Q. (By Mr. Stone) Did --

5 A. Why would I even think for a second that
6 it was wrong or illegal? There was no reason for
7 me to think it, especially when IHL Board -- I
8 don't know who's on it -- the Attorney General,
9 the governor's office, and the University are okay
10 with it. Why would I think that it was wrong?

11 Q. So the answer is you didn't contact a
12 lawyer, haven't talked to anybody about it --

13 A. That was --

14 MR. HERSCHMANN: Wait, wait, hold on.
15 Let him finish the question.

16 MR. STONE: I thought he was done.

17 MR. HERSCHMANN: No, I'm saying you
18 didn't finish the question, and he jumped in.

19 Q. (By Mr. Stone) But you didn't contact
20 your own lawyer to figure out the legalities of
21 any of this?

22 MR. HERSCHMANN: Objection to form.

23 THE WITNESS: No.

24 Q. (By Mr. Stone) In 2019, when you
25 realized that the project needed a little bit more

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1 CERTIFICATE OF DEPONENT

2 DEPONENT: BRETT FAVRE

DATE: December 11, 2023

3 CASE STYLE: MISSISSIPPI DEPARTMENT OF HUMAN
SERVICES vs. MISSISSIPPI COMMUNITY EDUCATION

4 CENTER, INC., ET AL

ORIGINAL TO: ADAM STONE, ESQ.

5 I, the above-named deponent in the
6 deposition taken in the herein styled and numbered
7 cause, certify that I have examined the deposition
8 taken on the date above as to the correctness
9 thereof, and that after reading said pages, I find
10 them to contain a full and true transcript of the
11 testimony as given by me.

12 Subject to those corrections listed
13 below, if any, I find the transcript to be the
14 correct testimony I gave at the aforesated time
15 and place.

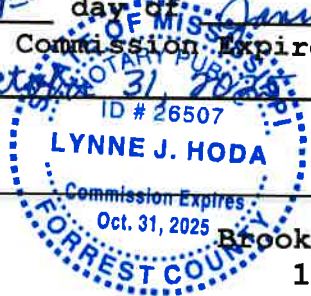
Page	Line	Comments
11	59	12 Change Alan to Adam - Misspoke
	92	25 Change John to Jon - Mistranscription
12	93	7 Change John to Jon - Mistranscription
	130	5 Change John to Jon - Mistranscription
13	161	22 Change Tianna's to Scianna's - Mistranscription
	174	21 Change John to Jon - Mistranscription
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18 This the 19th day of January, 2024
19 Brett Favre
BRETT FAVRE

20 State of Mississippi
21 County of Lamar

22 Subscribed and sworn to before me, this the
23 19th day of January, 2024.

24 My Commission Expires: October 31, 2025
25 Lynne J. Hoda
Notary Public



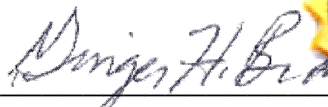

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1 CERTIFICATE OF COURT REPORTER
 2 I, Ginger H. Brooks, Court Reporter and
 3 Notary Public, in and for the State of
 4 Mississippi, hereby certify that the foregoing
 5 contains a true and correct transcript of the
 6 testimony of BRETT FAVRE, as taken by me in the
 7 aforementioned matter at the time and place
 8 heretofore stated, as taken by stenotype and later
 9 reduced to typewritten form under my supervision
 10 by means of computer-aided transcription.

11 I further certify that under the
 12 authority vested in me by the State of Mississippi
 13 that the witness was placed under oath by me to
 14 truthfully answer all questions in the matter.

15 I further certify that, to the best of
 16 my knowledge, I am not in the employ of or related
 17 to any party in this matter and have no interest,
 18 monetary or otherwise, in the final outcome of
 19 this matter.

20 Witness my signature and seal this the
 21 22nd day of December, 2023.

22 
 23 
 24 GINGER H. BROOKS, #1165
 CRR, RPR, CCR

24 My Commission Expires:
 25 September 18, 2025