

NOTICE OF ALLEGATIONS

to the

President of Louisiana State University

Violations Reported by the Institution

1. [NCAA Bylaws 13.5.1 and 13.5.3]

It was reported that during the period from April through August 2009 and while recruiting then football prospective student-athlete ██████████ (██████████, ██████████), the young man was provided impermissible automobile transportation. Specifically:

- a. During the period April 14-16, 2009, and while ██████████ was on an unofficial visit, then assistant football coach ██████████ arranged for ██████████ and ██████████, student workers in the athletics department, to provide ██████████ round-trip automobile transportation at no cost from the New Orleans airport to the institution's campus. [NCAA Bylaw 13.5.3]
- b. During April 14-16 and while ██████████ was on an unofficial visit, ██████████ provided the young man local automobile transportation at no cost to and from her off-campus apartment, the institution's football operations building and at least one restaurant. [NCAA Bylaw 13.5.3]
- c. On or about May 28 when ██████████ arrived in Baton Rouge to attend Baton Rouge Community College (BRCC), ██████████ arranged for a student worker in the athletics department to provide ██████████ with automobile transportation at no cost from the Baton Rouge airport to the institution's football operations building. [NCAA Bylaw 13.5.1]
- d. On or about May 29, ██████████ provided ██████████ with round-trip automobile transportation at no cost from a site near the young man's apartment to BRCC in order for ██████████ to enroll in a course he needed to be eligible for fall enrollment at the institution. [NCAA Bylaw 13.5.1]
- e. On or about July 30, ██████████ provided ██████████ with round-trip automobile transportation at no cost from a site near the young man's apartment to BRCC in order for ██████████ to take a final exam in a course he needed to be eligible for fall enrollment at the institution. [NCAA Bylaw 13.5.1]
- f. On two occasions during the 2009 summer, a football student-athlete provided ██████████ local automobile transportation at no cost to church and ██████████'s home. [NCAA Bylaw 13.5.1]

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Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. A statement indicating how the violations were discovered by the institution and an overview of its investigation.
- b. A statement indicating the date the institution began the recruitment of [REDACTED], the identities of the coaching staff members involved in the young man's recruitment, the dates of the young man's official paid visit and unofficial visit to the institution, the date of enrollment at all two- and four-year institutions by [REDACTED], and whether he signed a National Letter of Intent to attend the institution.
- c. A statement indicating the relationship between [REDACTED] and [REDACTED].
- d. A statement explaining the relationship between [REDACTED] [REDACTED] and [REDACTED], and the date the relationship began.
- e. The employment status of [REDACTED] and [REDACTED] at the time this violation occurred and a detailed description of her athletics department employment responsibilities, including the nature of her contacts with the football coaching staff.
- f. A description of the relationship between [REDACTED] and [REDACTED] and how the relationship began.
- g. A statement indicating the reasons [REDACTED] arranged and provided [REDACTED] with automobile transportation despite NCAA legislation prohibiting such activity.
- h. A statement indicating why [REDACTED] provided local automobile transportation to [REDACTED] during the young man's unofficial visit despite specific NCAA legislation prohibiting such activity. Also, please indicate whether any coaching staff member(s) directed [REDACTED] to provide the transportation and, if so, the identity of the staff member(s) and what the staff member(s) instructed [REDACTED] to do concerning the transportation.
- i. A copy of any unofficial visit forms on file in the athletics department concerning [REDACTED]' April 14-16, 2009, unofficial visit.

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- j. A statement indicating how the institution, during the 2008-09 academic year, monitored unofficial visits of football prospective student-athletes and if it would have been possible for the institution to detect or prevent the violations regarding [REDACTED]
 - k. Copies of any materials provided to university employees that explain NCAA rules.
 - m. A statement indicating why [REDACTED] enrolled at BRCC during May 2009. Also, please indicate whether any coaching staff member(s) arranged or suggested that [REDACTED] enroll at BRCC and, if so, the identity of the staff member(s) and their involvement.
 - n. A statement indicating how the institution, during the 2008-09 academic year, monitored football prospective student-athletes residing in the Baton Rouge area prior to their initial enrollment at the institution and if it would have been possible for the institution to detect or prevent the violations regarding [REDACTED]
 - o. The identities of all athletics department staff members involved in or knowledgeable of [REDACTED] arranging and providing [REDACTED] automobile transportation during the time period in question and a description of this involvement or knowledge prior to, at the time of and subsequent to the provisions being provided.
 - p. A statement indicating the dates of [REDACTED] enrollment and the average number of minutes in which he participated during the 2009 football season.
2. [NCAA Bylaw 13.2.1.1-(h)]

It was reported that during the period April 14-16, 2009, and while then football prospective student-athlete [REDACTED] ([REDACTED], [REDACTED]) was on an unofficial visit, [REDACTED], a student worker in the athletics department, provided [REDACTED] two nights' lodging at her apartment at no cost.

Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. A statement surrounding the circumstances of [REDACTED] making an April 2009 unofficial visit to the institution's campus. Also, please indicate if any members

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of the coaching staff had any knowledge as to where ██████ would stay during the visit.

- b. A statement explaining where ██████ planned to stay in Baton Rouge during his April 14-16 unofficial visit to the institution.
 - c. A statement indicating the reasons why ██████ provided ██████ lodging during an unofficial visit despite NCAA legislation specifically prohibiting such activity.
 - d. A statement indicating how it was discovered that ██████ provided ██████ two nights' lodging at her apartment during the young man's unofficial visit and what action was taken as a result.
 - e. A statement indicating all institutional staff members involved in or knowledgeable of the provision of lodging to ██████ and a description of their involvement or knowledge prior to, at the time of and subsequent to ██████ providing ██████ the lodging.
 - f. A statement indicating how the institution, during the 2008-09 academic year, monitored unofficial visits of football prospective student-athletes and if it would have been possible to detect or prevent the violation regarding ██████
3. [NCAA Bylaw 13.2.1.1-(h)]

It was reported that during the period May 28 to August 5, 2009, and while then football prospective student-athlete ██████ (██████, ██████) was in Baton Rouge to take a course at Baton Rouge Community College (BRCC), which he needed to be eligible for enrollment in the fall at the institution, ██████ resided in the apartment of ██████, a former football student-athlete, at a discount from the typical rent charged of the general public by ██████ for similar apartments. In addition, for three nights in May and four nights in August, ██████ lived in ██████'s apartment at no cost.

Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. The date that ██████ arrived in Baton Rouge to attend BRCC.
- b. A statement explaining where ██████ planned to reside on his arrival in Baton Rouge on May 28 and how the young man came to reside in ██████'s apartment.

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- c. A statement explaining the relationship between [REDACTED] and [REDACTED] and the date the relationship began.
 - d. A statement explaining the relationship between [REDACTED] and [REDACTED].
 - e. A statement describing the circumstances that resulted in [REDACTED] residing in [REDACTED]'s apartment.
 - f. A statement indicating how the violation was discovered by the institution and the knowledge, if any, that the institution had of the violations contemporaneous to its occurrence.
 - g. A statement describing the controls that were in place to ensure that [REDACTED] and the institution complied with NCAA legislation while [REDACTED] resided in the Baton Rouge area.
 - h. A statement indicating the date [REDACTED] enrolled at the institution and his eligibility for practice/competition and athletically related financial aid on enrollment, as well as the number of contests in which he participated for the 2009 season at the institution.
 - i. The identities of all athletics department staff members involved in or knowledgeable of [REDACTED] residing in [REDACTED]'s apartment at a discount and a description of the involvement or knowledge prior to, at the time of and subsequent to [REDACTED] residing in [REDACTED]'s apartment.
 - j. A copy of [REDACTED]'s January 6, 2009, lease for Apartment [REDACTED], located at [REDACTED].
 - k. Provide copies of all receipts of the monthly payments and documentation for [REDACTED] residing in [REDACTED]'s apartment during the 2009 summer as to the form of payment and the dollar amount of the discounted rent.
4. [NCAA Bylaws 13.1.3.1.2, 13.1.3.1.7 and 13.1.3.4.1]

It was reported that from September 25, 2008, through July 27, 2009, members of the institution's football staff and a student worker for the athletics department made impermissible telephone recruiting calls. At least 15 calls were made in violation of the NCAA one-call-per-week rule, seven of the impermissible calls involved the student worker and three calls were placed to a football prospective student-athlete and the young man's family after May 31 of the prospect's junior year of high school but before

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September 1 of his senior year. Some of the impermissible calls occurred because ██████ used a second cell phone to make recruiting calls and did not disclose the phone or the calls to the institution's compliance staff. Specifically:

- a. Between September 25 and December 11, 2008, former assistant football coach ██████ made at least 13 calls to then football prospective student-athlete ██████ in violation of the one-call-per-week rule to a prospective student-athlete while using a second cell phone which was not disclosed to the institution's compliance staff. Also, on October 27, because ██████ called ██████ on a second cell phone and the call was not logged, a member of the football coaching staff made an inadvertent impermissible call to ██████ October 29. Further, on November 18, because ██████ called ██████ on a second cell phone and the call was not logged, a then assistant football coach made an inadvertent impermissible call to ██████ [NCAA Bylaw 13.1.3.1.7]
- b. On four occasions during the period January 9-21, 2009, ██████ called ██████ a student worker in the athletics department and at the time a representative of the institution but not a countable coach. Also, on three occasions on January 27, ██████ called ██████ even though recruiting contact had already occurred that week and ██████ was not a permissible caller. [NCAA Bylaws 13.1.3.1.2 and 13.1.3.4.1]
- c. On two occasions on June 1, 2009, ██████ placed two calls from his second cell phone to the father of a prospective student-athlete who had just completed his junior year of high school. Further, on July 27, ██████ called the prospective student-athlete on his cell phone. [NCAA Bylaw 13.1.3.1.2]

Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. A copy of the institution's telephone call audit that outlines each impermissible call including the (1) identity of the person placing the call, (2) identity of the prospect or prospect's relative telephoned, (3) date and time of the call, and (4) duration of the call.
- b. A statement explaining the reason(s) ██████ made telephone calls to prospective student-athletes from a cell telephone that was not issued by the institution.

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- c. A statement indicating how the violations were discovered by the institution.
- d. A statement indicating the reason the impermissible telephone calls were made to prospective student-athletes, their parents or legal guardian in light of NCAA legislation prohibiting such conduct.
- e. An overview of the institution's compliance procedures for monitoring the football coaching staff's telephone calls to prospective student-athletes during the 2008-09 academic year.
- f. A statement detailing the NCAA rules education related to telephone contacts that the institution provided to the football coaching staff and student workers in the athletics department during the 2008-09 academic year including the dates of the education sessions, subject matter covered during the education sessions, minutes of the education sessions, handouts provided during the education sessions and written documentation as to whether [REDACTED] or [REDACTED] attended each education session.

5. [NCAA Bylaws 11.7.1.2 and 13.1.3.4.1]

It was reported that during the period from August 1, 2008, through April 1, 2010, [REDACTED], [REDACTED]; [REDACTED], [REDACTED], [REDACTED], placed or received approximately 3,669 impermissible recruiting telephone calls. Specifically:

- a. [REDACTED] placed or received 223 impermissible telephone calls to 36 different prospective student-athletes or their parents. Additionally, [REDACTED] placed or received 194 impermissible telephone calls to or from a high school and 61 impermissible telephone calls were placed or received from a high school coach. This amounted to a total of 478 impermissible telephone calls.
- b. [REDACTED] placed or received 63 impermissible telephone calls to 29 different prospective student-athletes or their parents. Additionally, [REDACTED] placed or received 180 impermissible telephone calls to or from a high school and 274 impermissible telephone calls were placed or received from a high school coach. This amounted to a total of 517 impermissible telephone calls.
- c. [REDACTED] placed or received nine impermissible telephone calls to four different prospective student-athletes or their parents. Additionally, [REDACTED] placed 1,883 impermissible telephone calls and received 782 impermissible telephone calls involving 139 different high school coaches, totaling 2,674 impermissible telephone calls.

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Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. A statement indicating how the violations were discovered by the institution.
- b. A statement indicating the reason the impermissible telephone calls were made to prospective student-athletes, their parents, high schools and high school coaches in light of NCAA legislation prohibiting such conduct.
- c. An overview of the institution's compliance procedures for monitoring the football staff's telephone calls to prospective student-athletes during the 2008-09 and 2009-10 academic years.
- d. A statement detailing the NCAA rules education related to telephone contacts that the institution provided to the football staff during the 2008-09 and 2009-10 academic years, including the dates of the education sessions, subject matters covered during the education sessions and written documentation as to whether [REDACTED], [REDACTED] or [REDACTED] attended each education session.

6. [NCAA Bylaw 10.1-(d)]

On July 22 and September 3, 2009, [REDACTED], a then football prospective student-athlete and former football student-athlete at the institution, violated the principles of ethical-conduct legislation when he knowingly provided false and misleading information to the institution concerning his summer housing and transportation arrangements. Specifically:

- a. On July 22, while [REDACTED] was a prospective student-athlete and after Miriam Segar, associate director of athletics, told him that he had an affirmative obligation to be truthful, [REDACTED] failed to advise Segar that his June 25 oral and written statement that he resided at the [REDACTED] with [REDACTED], a girl [REDACTED] met on his official visit and who provided [REDACTED] with automobile transportation to and from work and Baton Rouge Community College (BRCC), was false. [REDACTED] again told Segar that he resided with [REDACTED], but because [REDACTED] had been busy with work and school, [REDACTED] was unable to get [REDACTED] to contact Segar to confirm his living arrangements.

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- b. On September 3, while [REDACTED] was a student-athlete and in an attempt to be certified to travel with the football team to an away football contest, [REDACTED] requested a meeting that was attended by Joe Alleva, director of athletics; [REDACTED], assistant football coach; and Segar. During this meeting, [REDACTED] acknowledged that his story concerning his living arrangements with [REDACTED] was not true. [REDACTED] falsely reported that he had actually resided with [REDACTED] a student worker in the athletics department, in her apartment during the summer and had lied about his living arrangements because [REDACTED]'s family did not approve of their relationship. Subsequently, on September 8, after having learned that his misrepresentation about living with [REDACTED] had been uncovered, [REDACTED] admitted to the institution that during the summer, he had stayed in the apartment of former football student-athlete [REDACTED].

Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

7. [NCAA Bylaws 10.01 and 10.1]

It is alleged that during the 2008-09 academic year, assistant football coach [REDACTED] violated the principles of ethical conduct inasmuch as he did not on all occasions deport himself in accordance with the generally recognized high standards of honesty normally associated with the conduct and administration of intercollegiate athletics in that his knowing involvement in Allegation Nos. 1 and 4 of this inquiry demonstrated a knowing effort on his part to operate the institution's intercollegiate football program contrary to NCAA legislation.

Please indicate whether this information is substantially correct and whether the institution agrees that a violation of NCAA legislation occurred. Submit evidence to support your response.

Also, please provide the following:

- a. The dates of all interviews between [REDACTED], the NCAA enforcement staff and the institution, and the identities of all individuals present for the interviews.
- b. A detailed description and explanation of all disciplinary actions taken against [REDACTED] based on his involvement in violations of NCAA legislation, as determined by the institution and as set forth in this allegation. In that regard, explain the reasons the institution believes these actions were appropriate, indicate the dates that any disciplinary actions were taken and submit copies of all correspondence from the institution to [REDACTED] describing the disciplinary

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actions. Also, please indicate all corrective actions that have been or will be implemented by the institution as a result of this inquiry.

Information requested by the Committee on Infractions

8. Please provide all information concerning other possible violations of NCAA legislation that was discovered by the institution as a result of its review of this matter. In this regard, please indicate the means by which the information was discovered and the institution's position whether a violation has occurred.
9. Please provide a detailed description of any corrective or punitive actions implemented by the institution as a result of the violations acknowledged in this inquiry. In that regard, explain the reasons the institution believes these actions to be appropriate and identify the violations upon which the actions were based. Additionally, indicate the date that any corrective or punitive actions were implemented.
10. Please provide a detailed description of all disciplinary actions taken against any current or former athletics department staff members as a result of violations acknowledged in this inquiry. In that regard, explain the reasons that the institution believes these actions to be appropriate and identify the violations upon which the actions were based. Additionally, indicate the date that any disciplinary actions were taken and submit copies of all correspondence from the institution to each individual describing these disciplinary actions.
11. Please provide a statement indicating the dates and titles of all positions at the institution held by individuals identified during the inquiry as allegedly having significant involvement in NCAA violations as well as a brief overview of each position. Additionally, provide the dates, title and employer of all positions held by such individual(s) during the five years prior to the dates of the alleged violations. Furthermore, provide a brief review of the previous major infractions case history for the identified individuals.
12. Please provide a short summary of every major infractions case involving the institution or individuals named in this notice. In this summary, provide the date of the infractions report, a description of the violations found by the Committee on Infractions, the individuals involved, and the penalties and corrective actions. Additionally, please provide a copy of any major infractions reports involving the institution or individuals named in this notice that were issued by the Committee on Infractions within the last 10 years.
13. Please provide a chart depicting the institution's reporting history of secondary violations for the past five years. In this chart, please indicate for each academic year the number of

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total secondary violations reported involving the institution or individuals named in this notice. Also, please include the applicable bylaws for each violation, and then indicate the number of secondary violations involving just the sports team(s) named in this notice for the same five-year time period.

14. Please provide the institution's overall NCAA division and conference affiliation as well as the total enrollment on campus and the number of men's and women's sports sponsored.
15. Please provide a statement describing the general organization and structure of the institution's intercollegiate athletics department, including the identities of those individuals in the athletics department who were responsible for the supervision of all sport programs during the previous four years, and whether the institution conducts a systematic review of NCAA and institutional regulations for its athletics department employees. If yes, identify the agency, individual or committee responsible for this review and describe the responsibilities and functions of each identified.
16. Please provide the following information concerning the sport programs identified in this inquiry:
 - The average number of initial and total grants-in-aid that have been awarded during the past four academic years.
 - The number of initial and total grants-in-aid in effect for the current academic year (or upcoming academic year if the regular academic year is not in session) and the number anticipated being in effect for the following academic year.
 - The identities of all student-athletes anticipated to be on athletically related financial aid as of the first semester of the next academic year who will have four years of remaining eligibility and five years of enrollment (per the NCAA's five-year rule) to complete those four years; the identities of all student-athletes who have three years of remaining eligibility and four years of remaining enrollment to complete those three years; the identities of all student-athletes who have two years of remaining eligibility and three years of remaining enrollment to complete those two years; and the identities of all student-athletes who have one year of remaining eligibility and two years of remaining enrollment to complete that year.
 - The average number of student-athletes during the previous four years who have redshirted and the number who are redshirting during the current academic year (or upcoming academic year if regular academic year is not in session).

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- The number of student-athletes in each of the previous four years who were awarded athletically related financial aid but who withdrew from the squad for reasons other than graduation or loss of eligibility.
- A list of the institution's win-loss record for the past four seasons and the dates and results of all postseason competition in which the institution has participated during those years. If there was postseason competition, please indicate how this was earned; i.e., conference automatic bid, at-large bid.
- The average number of official paid visits provided by the institution to prospective student-athletes during the past four years.
- The cost of room, board, books and tuition at the institution for the past four academic years.
- Copies of the institution's squad lists for the past four academic years.
- One copy of the institution's media guides for the past four academic years to be sent to Mr. Shep Cooper, director of the Committees on Infractions, and, if available, the Internet URL(s) for the members of the committee to use to review the same information contained in these media guides. If this information is not available through the Internet, then the provision of one complete set of media guides to Mr. Cooper will suffice.
- A review of the institution's obligations (contractual or otherwise) concerning live telecasts of contests during the next three seasons. These should include, but not be limited to, contractual agreements negotiated by the institution's conference and opponent or through its sports network affiliations.
- A statement indicating whether the provisions of NCAA Bylaws 31.2.2.3 and 31.2.2.4 apply to the institution as a result of the involvement of student-athletes in violations noted in this inquiry.
- A statement indicating whether the provisions of NCAA Bylaw 19.5.2.2-(e) apply to the institution as a result of the involvement of student-athletes in violations noted in this inquiry.

Any additional information or comments regarding this case are welcome.

RAJ:smc