

EXHIBIT 1

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8 **IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

9 TAYLOR ANDERS, HENNESSY EVANS,
10 ABBIGAYLE ROBERTS, MEGAN WALAITIS, and
11 TARA WEIR, individually and on behalf of
all those similarly situated

12 *Plaintiffs,*
13 v.

14 CALIFORNIA STATE UNIVERSITY, FRESNO,
TERRENCE TUMEY, in his official capacity as
15 Director of Athletics at California State University, Fresno,
JOSEPH CASTRO, in his official capacity as
16 former President of California State University,
Fresno, DR. SAÚL JIMÉNEZ-SANDOVAL,
17 in his official capacity as Interim
President of California State University, Fresno

18 *Defendants.*

Case No. _____

**DECLARATION OF
TAYLOR ANDERS**

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20 I, Taylor Anders, am over 18 years of age and competent to make the following statement. All of
21 the statements below are based on my personal knowledge.

22 1. I am currently enrolled at California State University, Fresno (“Fresno State”). I am a
23 sophomore majoring in Business Marketing. I expect to graduate in 2023.

24 2. I am a member of the varsity women’s lacrosse team at Fresno State and I have 4 years
25 of athletic eligibility left.

26 3. I am a named plaintiff in this action and I make this declaration in support of this Court
27 preserving the women’s varsity lacrosse team.
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1 4. I am personally devastated that women’s lacrosse is being eliminated as a varsity sport at
2 Fresno State after this season.

3 5. I grew up in Portland, Oregon, and have been involved with sports my entire life.
4 Athletics has instilled in me great discipline and a strong work ethic. It has taught me values and skills
5 that I will carry with me for the rest of my life, including the importance of health and fitness and the
6 ability to work with others. I cannot think of any area of my life that has not been impacted by my
7 involvement with sports.

8 6. I started playing lacrosse in the seventh grade and started to focus more heavily on the
9 sport in my sophomore year of high school. I made first team All-Conference three years in a row. During
10 my junior I made first team All-State and senior year, I made second team All-State.

11 7. Playing lacrosse at the highest level possible was the primary consideration in my college
12 selection process. I chose Fresno State because it would allow me to play Division I and because, after
13 visiting the school, I loved the team. Fresno State also gave me a great athletic scholarship, which enabled
14 me to attend.

15 8. During recruitment, my teammates and I were told all about how great it is to be an athlete
16 at Fresno State, and that the school would value us as community members. But my experience has proved
17 that to be untrue. Our women’s team is consistently treated second-class to the men’s teams, regardless of
18 the teams’ relative performances. It is very degrading that, no matter how hard our women’s team works,
19 we are always treated as less valuable or “sub-par” to the men.

20 9. For example, when the women’s lacrosse team travels, we each get a small per-diem.
21 Certain men’s teams get a substantially larger sum, and the players end up pocketing most of it. Those
22 men’s teams also have great tutors who work with the same team members year after year, building
23 relationships and helping them succeed academically. Our women’s team is offered far less qualified (and
24 less committed) student-tutors, most of whom treat us condescendingly. In fact, I stopped using tutors
25 because I was treated so dismissively.

26 10. Fresno State has continued its preferential treatment of traditional, male-dominated sports
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1 in its approach to managing the COVID-19 pandemic. While, normally, fall and spring athletes have
2 access to the athletic training facilities year-round, Fresno State has restricted access to these facilities for
3 social distancing purposes. In the fall of 2020, spring athletes were not permitted to use the facilities, and
4 my understanding was that the reverse would be true in the spring. I was surprised to recently learn that
5 the football team, a fall team, will continue to have access to facilities throughout the spring.

6 11. The way Fresno State went about cutting the women's lacrosse team and communicating
7 that decision to us has made its disregard for us as a women's team even more clear. On the morning of
8 October 16, 2020, our coach texted us to let us know we had a Zoom call with the athletic administration
9 later that day. We had no idea what the call was about, but thought we might be getting a return-to-play
10 date, since we had not been competing due to the COVID-19 pandemic.

11 12. Instead, to our complete surprise, Fresno State Athletic Director Terrance "Terry" Tumey
12 announced that, due to budget cuts, women's lacrosse would be eliminated. He offered to take questions,
13 but said he had to get on another Zoom call in ten minutes.

14 13. Fresno State is not even taking this lawsuit seriously. After our attorneys sent a demand
15 letter informing Fresno State that they were in violation of Title IX and our team was considering filing
16 suit, the administration did not even bother to get back to our attorneys in the ample time they were given.
17 It is clear they do not take us, our team, or Title IX seriously.

18 14. Fresno State's elimination of our team has caused much anxiety and uncertainty for me.
19 I chose to come to Fresno State believing I would be a valued student-athlete and that I would be able to
20 fulfill my dream of playing Division I lacrosse for four years. I then worked to cultivate a community here
21 and established great friends both on and off my team.

22 15. Fresno State's decision has forced me to consider transferring. However, moving to a
23 new school would not only cause a loss of these personal relationships, but would also set me back
24 athletically, since the schools to which I could transfer are not Division I schools. I am left with no good
25 options. If the team is not preserved, Fresno State will have effectively ended my career as a college athlete
26 after just one season of play.
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