IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

MASON MECKLENBURG,	§ 8
Plaintiff,	§ §
v.	§ Case No. CIV-22-089-G
•	§ Case 110. C1 V-22-089-0
1) KINGFISHER INDEPENDENT	§
SCHOOL DISTRICT NO. 7 OF	§
KINGFISHER COUNTY,	
OKLAHOMA, a/k/a KINGFISHER	§ §
SCHOOL DISTRICT, a/k/a	§
KINGFISHER PUBLIC SCHOOLS;	§
	§ § §
2) JEFF MYERS;	§
A) 3.553 (3.553)	§
3) MICAH NALL;	§ §
A) DEDEK DATTERGON - 1	
4) DEREK PATTERSON; and	§
5) BLAKE EATON	8
5) BLAKE EATON	§ § § §
Defendants.	8
Defendants.	y

AFFIDAVIT OF CLAYTON ABERCROMBIE

Before me, the undersigned, a notary public in and for the State of Oklahoma, on this date personally appeared Clayton Abercrombie, known to me to be the person whose name is subscribed in the foregoing instrument and who, after being duly sworn, on oath deposes and says as follows:

- 1. My name is Clayton Abercrombie. I am over the age of 18, and I am not suffering under any mental or physical disabilities that would prevent me from making this affidavit.
- 2. The statements made in this affidavit are based upon my personal knowledge.

- 3. I graduated from Kingfisher High School in 2020. I played football at Kingfisher High School during my freshman (2016-2017), sophomore (2017-2018), junior (2018-2019), and senior (2019-2020) school years.
- 4. Coach Jeff Myers was the head coach when I played football for the Kingfisher Yellowjackets. I was a starting football player for Coach Myers from my sophomore year to my senior year. I played cornerback, slot receiver, and kicker for Kingfisher High School. I have a twin brother, Keaton Abercrombie, who was also a starting football player from his sophomore year to his senior year. Keaton played strong safety and slot receiver.
- 5. Many of us, including myself, endured abuse from the coaches, specifically Coach Jeff Myers and Coach Micah Nall.
- 6. Many of us, including myself, endured abuse from upperclassman football players.
- 7. No one endured and suffered more verbal and mental abuse from the coaches, specifically Coach Myers, than Mason Mecklenburg.
- 8. No one endured and suffered more verbal, physical, and mental abuse from upperclassman football players than Mason Mecklenburg.
- 9. If I had endured and suffered the verbal, physical, and mental abuse that Mason Mecklenburg was subjected to, I would have been suicidal.
- 10. I witnessed Mason being abused, bullied, and hazed regularly during football practice and after football practice. The coaches and the upperclassman football players targeted Mason.
- 11. In the fall of 2017 when Mason was a freshman, I witnessed senior football player Calvin Vincent whip Mason daily with a wet and torn towel in the football shower and locker room.
- 12. The whippings of Mason with a wet, torn, and even knotted towel in the football shower and locker room by multiple players continued even after Calvin Vincent graduated.
- 13. I saw Mason cry a lot. I never saw anyone on the team brought to tears as much as Mason.
- 14. I never saw Mason instigate or start anything that would justify the verbal, physical, and mental abuse that Mason suffered on the Kingfisher football team.

- 15. When Mason was on the "scout team" as a freshman, Coach Myers and the other coaches would purposely put Mason in a position to run the ball against bigger, stronger, and older football players. Coach Myers and the other coaches enjoyed Mason getting hit again and again by the older football players. It was obvious that the coaches would only stop the drill if Mason was hurt and sometimes not even when Mason was hurt.
- 16. This was always in stark contrast to the players that Coach Myers favored and protected and it encouraged those players to abuse Mason even further in our locker room and in our locker room shower.
- 17. Coach Myers even used Mason as an example, that if our parents ever came to him and complained about our playing time or how we were being treated like Mason's parents had done, then those football players would receive the same treatment as Mason.
- 18. Coach Myers would humiliate Mason by not allowing him to ride on the varsity team bus.
- 19. Coach Myers and the other coaches comments and actions about and towards Mason further encouraged the older players to abuse Mason even more. In my opinion, it seemed like they wanted to hurt Mason and they utilized the older players to do so.
- 20. I witnessed Mason being whipped with torn, knotted, and wet towels to the point of bleeding. There may have been other times that players were snapped with a towel in the football locker room, however Mason is the only one that I saw take beatings from multiple players at once and that his skin would break and bleed.
- 21. I witnessed Mason being forced into The Ring at least five times. The Ring was in the football locker room.
- 22. The worst beatings that Mason received in The Ring were from upperclassman Jett Sternberger, whose father was Superintendent Jason Sternberger and Trey Green, whose father was the Assistant Boys Basketball coach, Danny Green.
- 23. Coach Myers and Coach Nall were well aware of The Ring to the extent that when players were showing obvious signs of injuries they took away the boxing gloves that we were using for the Ring and we had to box with towels wrapped and taped around our fist.
- 24. During my junior year, 2018, I witnessed The Ring fight between Kevin Velarde and Easton Pine. I have seen what has been identified to me as Plaintiff's Exhibit 82 and it is a true and accurate depiction of that fight and the sound of the

- loudspeaker as the fight was occurring. In fact, I am in the video as a spectator wearing a blue shirt with the number 2 on the back.
- 25. I witnessed Mason being struck by a paintball gun. There was a group of players who would utilize a paintball gun inside and outside the football locker room. Those players were Jett Sternberger, Trey Green, Logun Burnham, and Declan Haub. Logun's mother was a Kingfisher teacher and Declan's father was the Kingfisher football team's linebacker coach.
- 26. I witnessed Mason being shot with the paintball gun in the locker room and right outside the locker room and like another player, Zane Buck, being held down while being shot by the paintball gun.
- 27. The upperclassman would shoot the paintball guns in players equipment like their shoes, helmets, and gloves. The coaches knew about the paintball guns because there would be paint residue left in the locker room.
- 28. The photograph that has been identified to me as Plaintiff's Exhibit No. 19 is a true and accurate depiction of the type of bruising that I witnessed on Mason's body from being whipped with a wet towel.
- 29. I witnessed Declan Haub tea-bag Mason Mecklenburg in the football locker room in 2018. I saw Jett Sternberger, Trey Green, Logun Burnham, and Riley Myers hold him down. When they had Mason held down Declan Haub stood over Mason's face and took his towel off and was naked. Declan then sat down on Mason's face and grinded his butt-hole into Mason's nose with Declan's testicles on Mason's face and mouth.
- 30. The next day Coach Myers called a meeting of the players and told us not to talk about what had happened that it would hurt the program. Coach Myers specifically referenced what had happened at Putnam City West. Coach Myers would give us players similar warnings about not talking about things that happened in the locker room and specifically say, "what happens here, stays here".
- 31. Coach Myers and the other coaches knew what was happening in the locker room because they would frequently come into the locker room and the shower room.
- 32. Coach Myers would make fun of players. For example, Coach Myers would play with one of the bigger kid's breasts and nipples in front of the whole team.
- 33. Coach Myers regularly called players pussies and other derogatory names. Players who quit the team when walking past Coach Myers classroom would have to listen to Coach Myers yell out to the hallway that they were a pussy.

- 34. Coach Myers would call Mason Mecklenburg "Snason." He did this in front of the whole team and the other coaches. Players and coaches would laugh when Coach Myers called Mason Snason.
- 35.I witnessed Coach Nall grab my friend Brayden French by his facemask and uppercut him and punch him in the chin three or four times.
- 36. I reached a point during my junior year in the fall of 2018 where I took matters into my own hands. I was standing on the sideline during practice on a Thursday and Jett Sternberger came up from behind me and "smoked" me. He hit me full speed in the middle of my back with his helmet and it whiplashed me. He speared me with his helmet. Players also refer to this as "dicking". I was so mad that I jumped up and my twin brother Keaton and I went after Jett. Coach Myers and the other coaches started yelling at us "don't hurt our fucking quarterback".
- 37. I was done. Myers and the other coaches were always protecting their favorite players.
- 38. I stayed late after practice and after everybody left I took Jett's helmet, shoulder pads, and practice clothes into the shower and I peed all over them. I then placed them all back in Jett's locker.
- 39. The next day, game day, Jett comes right after me because he knows I did it. I told Jett, 'What are you going to do about it, tell on me?" Jett went right to Coach Myers office and told on me.
- 40. Coach Myers calls me in the office and told me that if I did it again I'd be off the team and that I was going have extra running every day. I told Coach Myers that I was sick and tired of accusing me of something that he allows his favorites to get a way with every day.
- 41. I told Coach Myers that he lets Jett, Declan, and Trey get a way with anything and that they were untouchable. When Coach Myers said nothing in response I then said, "You know what they have all been doing to Mason and you've done nothing to stop it." Coach Myers just ignored me and the fact that I had said the truth to him about the abuse suffered by Mason.

FURTHER AFFIANT SAYETH NOT.

SIGNED this 17th day of September, 2023.

Clayton Abercrombie

STATE OF OKLAHOMA

COUNTY OF OKLAHOMA

BEFORE ME, the undersigned authority, personally appeared Clayton Abercrombie, who being duly sworn, and is personally known to me, deposes and says that he has read and signed the foregoing and that the statements herein are true and correct to the best of his knowledge, information, and belief.

SWORN to and SUBSCRIBED before me this the _____ day of September , 2023.

My Commission Expires: I)

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