

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

IN RE JOSEPH NEAL, JR.                    )  
  )     No. MC-112-008  
  )

DECLARATION

I, Sarah Floyd Blake, do hereby declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge and belief:

1. I am 30 years of age and make this Declaration in Support of Joe Neal Jr.'s request to vacate his suspension from practice in this federal district.
2. I am an attorney licensed in Georgia and represented Joseph Neal, Jr. in the Superior Court of Richmond County Case No. 12 RCCR 373.
3. In the course of my representation, I spoke with attorney John B. Long, Sr., regarding a conversation that he had with the alleged victim's father, Dan Sprankle.
4. On March 27, 2012, Mr. Long told Maureen O'Leary Floyd, Mr. Neal's co-counsel, and I that Mr. Sprankle had contacted Mr. Long. Mr. Sprankle inquired about the possibility of Mr. Long representing Melina Sprankle, the alleged victim. However, Mr. Long informed Mr. Sprankle that he could not represent Ms. Sprankle because his representation of Caroline Neal conflicted Mr. Long out of

such representation. Mr. Long also indicated that he did not believe Ms. Sprankle's potential case against Mr. Neal had any monetary value.

5. According to my review of Dan Sprankle's cell phone records subpoenaed during the course of the criminal trial, Mr. Sprankle contacted three well-known civil trial attorneys, Wendell E. Johnston, John Long, Sr. and John R. B. Long, Jr., seven times prior to Melina Sprankle making any report to law enforcement.

6. The efforts to extract money from Mr. Neal continued up to the last few moments of plea negotiations. Assistant District Attorney Geoffrey Fogus originally demanded that Mr. Neal pay Ms. Sprankle \$10,000 as part of the negotiated plea agreement for three misdemeanors. ADA Fogus offered no explanation for the purpose of the payment. When Mr. Neal refused to make the payment, ADA Fogus reduced the amount to \$5,000. Tom Withers asked ADA Fogus about the purpose of the payment and ADA Fogus stated that it was possible that Ms. Sprankle would need therapy. However, ADA Fogus admitted that Ms. Sprankle had sought no medical or psychological treatment since the incident. Mr. Neal again refused, but offered to pay \$2,500, only if such payment was made directly to healthcare providers. Ms. Sprankle rejected this offer.

7. I make this Declaration freely and voluntarily. No one has forced me to sign this and I am signing this Declaration because it is true.

8. I declare under penalty of perjury that the foregoing 7 paragraphs are true and correct, and that this declaration was executed on the 24<sup>th</sup> day of September, 2012, in Augusta, Georgia.



Sarah Floyd Blake