

## Affidavit of Rachel A. Neeley

Until July 1, 2008, Curtis Neeley was under my constant care and I oversaw every detail for him. I provided shelter and the required daily activities of life such as maintaining personal hygiene, nourishment and other support like a minor child would require. Mr. Neeley was very often in a hospital or nursing home during this period and had fragile mental and physical health. He underwent a skin flap surgery due to a pressure sore and had both legs amputated above the knee due to pressure sores. Curtis still requires a daily attendant to assist him with preparing meals, taking showers, changing catheters, etc.

With regard to his photography, I recently saw nude figure photos that were allegedly taken by Curtis displayed with absolutely no warning to minors when I clicked on the search results that described him by name at photo.net. I informed Curtis that I felt it was wrong to have his photos out on a Web site that are easily accessible to children. I would like those photos deleted.

Curtis Neeley has a severe traumatic brain injury and although he was ruled to be legally competent it involved no testimony or testing. His memory is severely reduced, both long term and short term. Although he lives in the community, he needs daily support and care, both with activities of daily life and with higher end decision-making (such as money management). He does not survive completely on his own. I was unable to assist him when he made me aware that he was extremely troubled by his website domains being taken. Providing care for an invalid husband and three children, as well as providing the only income for these dependents, left me no available mental resources with which to deal with Web site issues.

The above statements are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "Rachel Neeley", written over a horizontal line.

12-18-09  
Date

**Witness of Signature**

**State of Arkansas**

**County of Washington**

**On this 18th day of December, 2009.**

**Before me the undersigned notary public, Rachel A. Neeley personally appeared and proved to me with an Arkansas driver's license that Rachel A. Neeley signed the document above.**

Betty Ann Sharp  
Signature of notary public

March 23, 2015

Date my commission expires

