

Exhibit 1

Declaration of Steve A. Brown

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, JOHN)	
MEINERS, and DANIEL UMPA,)	Case No. 4:23-cv-00788-SRB
individually and on behalf of all others)	[Consolidated with 4:23-cv-00945-SRB]
similarly situated,)	
)	Hon. Stephen R. Bough
Plaintiffs,)	
)	
v.)	
)	
NATIONAL ASSOCIATION OF)	
REALTORS, ET AL.,)	
)	
Defendants.)	

**DECLARATION UNDER PENALTY OF PERJURY OF
STEVE A. BROWN**

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, the following:

1. I am Steve A. Brown and I am over 18 years of age and I have personal knowledge of the matters contained in this declaration.

2. I am the President of Residential Sales for all Crye-Leike entities who engage in residential real estate sales. In this position, I monitor performance of and assist, at a high level, the general managers of the Crye-Leike entities that engage in residential real estate sales: Crye-Leike, Inc., Crye-Leike of Arkansas, Inc., Crye-Leike of Nashville, Inc., Crye-Leike of Mississippi, Inc., Crye-Leike South, Inc., and Adaro Realty, Inc. (Adaro does not operate using the Crye-Leike

brand. Adaro is also 100% owned by Harold Crye).

3. In that position, I am aware of the total residential transaction volume of each company each year.

4. As part of my job responsibilities, I work with Kathleen Longoria, Controller, who collects and submits the total transaction volume of each residential company to certain industry consultants, publications, and news outlets including T3 Sixty, publisher of the "T360 Real Estate Almanac" referenced in the National Association of REALTORS® Settlement Agreement. Ms. Longoria submits the figures for each of the six companies I work with and for Crye-Leike Franchises, Inc. I answer her questions regarding the companies' residential sales and work with the General Manager of each company to answer her questions about that company's data. The information she sends breaks down by companies as a group and franchisees as a group.

5. Attached to this declaration is a genuine and accurate copy of the figures sent to T3 Sixty in 2023. For calendar 2022 the total residential sales volume for brokerages operated by Crye-Leike, Inc., Crye-Leike of Nashville, Inc., Crye-Leike of Arkansas, Inc., Crye-Leike of Mississippi, Inc., Crye-Leike South, Inc., and Adaro Realty, Inc. appear together as "Company-Owned Brokerages." The Franchise Brokerages line shows the total residential sales volume for all franchises. Ms. Longoria provided this information for use in the T3 Sixty 2023

Real Estate Almanac. Ex. A, Report of total residential transaction volume for Crye-Leike companies to T3 Sixty.

6. The electronic form sent Ms. Longoria from T3 Sixty contains only two entry lines for annual figures. The first is Company-Owned Brokerages and the second Franchise Brokerages. In responding, we place all five independent corporations' residential transaction volume, agents, and transaction sides under Company-Owned as none of them are franchises.

7. Attached to this declaration a genuine and accurate copy of the page from the T3 Sixty 2023 Real Estate Almanac Mega 1000 that included the total residential transaction volume of all entities using the Crye-Leike trademarks and Adaro. The Company-Owned Brokerages line contains the transaction volume of all five corporations and the Franchise Brokerages Line of all Crye-Leike franchisees. Ex. B, Excerpt from T3 Sixty 2023 Real Estate Almanac Mega 1000.

8. Crye-Leike, Inc.'s total residential transaction volume for the year 2022 was \$1,745,601,747.

9. I reviewed the National Class Action Settlement of the National Association of REALTORS® in the *Burnett v. National Association of Realtors*. Under the terms of that settlement, all brokerages with a broker in charge who is a National Association of REALTORS® member who had a total residential transaction volume less than \$2 billion are released.

10. In addition to my duties as President of Residential Sales, I am a licensed broker in Tennessee and Mississippi.

11. I am broker-in-charge for Crye-Leike, Inc. Memphis and Northern Mississippi operations

12. I am a member of the National Association of REALTORS®.

13. Crye-Leike, Inc. total residential transaction volume in 2022 was less than \$2 billion and it is a released party in the NAR settlement.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. FURTHER DECLARANT SAYETH NAUGHT.

Executed this 24th day of January 2025.

Signature: _____

Print Name: Steve A. Brown



Exhibit A

*Data Submitted for T3 Sixty
MEGA 1000 Report*

Kathleen Longoria

From: Paul Bishop <paul.bishop@t3sixty.com>
Sent: Tuesday, January 10, 2023 10:40 AM
To: Kathleen Longoria
Subject: T3 Sixty Mega 1000 Data Request
Attachments: T3 Sixty 2023 MEGA 1000 Template - Crye Leike.xlsx

Do not open these types of files—unless you were expecting them—these files may contain malicious code and knowing the sender isn't a guarantee of safety.

Kathleen,

It's time to kick off this year's T3 Sixty Mega 1000 ranking of the nation's largest brokerages.

Congratulations on Crye-Leike Realtors' number 35 ranking in the 2022 Mega 1000. The Mega 1000 would not be complete without Crye-Leike Realtors.

Attached is a simple template for submitting Crye-Leike Realtors' 2022 data. There are 2 tabs:

- Company & Franchise Totals – These summary data points for Sales Volume, Transaction Sides and year-end Agent Count drive representation in the Top 20 Enterprise and Top 20 Franchise Brand lists. Note that the data should represent full-year U.S. residential brokerage operations only.
- Brokerages – Include a list of all brokerages with Sales Volume greater than \$200M in 2022. Note that the exact ranking cutoff will be determined after all submissions are finalized. For each brokerage, 2021 results are included for reference. You may add any new brokerages to the bottom of the sheet. For each brokerage, submit full-year data for Sales Volume, Transaction Sides and year-end Agent Count. Also note any known brokerage name changes as well as any consolidations or acquisitions among brokerages.

Please submit the updated information to me by Wednesday, February 1, 2023.

The study is slated for release in May 2023. You and each of your ranked brokerages will also receive a complimentary copy of the results again this year.

Many thanks in advance and please feel free to reach out to me with any questions or clarifications.

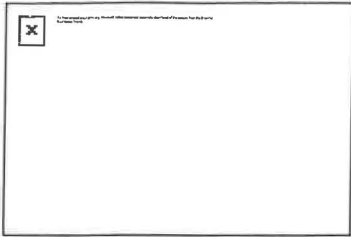
--

Paul Bishop

VP, Economics and Research
paul.bishop@t3sixty.com
Direct (949) 480-1218
Mobile (202) 821-9424

T3 Sixty | t360.com
999 Corporate Drive, Suite 170
Ladera Ranch, CA 92694
707.T3.Sixty





2023 Swanepoel Trends Report
Order now at t3trends.com

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

Company and Franchise Total Data
Data Submitted for T3 Sixty MEGA 1000 Report
Please include U.S. residential sales data only.

	2022 Sales Volume		2022 Transaction Sides		2022 Year-end Agent Count		2021 Sales Volume		2021 Transaction Sides		2021 Year-end Agent Count	
Total Company-Owned Brokerages	\$	7,018,654,369		21,604		2,853	\$	7,445,189,705		25,781		2,966
Total Franchise Brokerages	\$	1,343,820,385		5,520		455	\$	1,338,478,693		6,426		427
Total Company Results	\$	8,362,474,754		27,124		3,308	\$	8,783,668,398		32,207		3,393

Company-Owned and Franchise Brokerage Data

Data Submitted for T3 Sixty MEGA 1000 Report

Please include U.S. residential sales data only. Include the totals for company-owned brokerages and for each brokerage with a 2022 Sales Volume of \$200 million or more that is not company-owned.

Previous Mega 1000 Ranking	Brokerage Name	Franchise	2022 Sales Volume	2022 Transaction Sides	2022 Year-end Agent Count	2021 Sales Volume	2021 Transaction Sides	2021 year-end Agent Count
35	Crye-Leike Realtors (Company-Owned Stores)		\$ 7,018,654,369	21,604	2,853	\$ 7,445,189,705	25,781	2,966
n/a	Crye-Leike Executive Realty	Crye-Leike Franchises	\$ 373,182,905	1,529	101	\$ 339,497,849	1,653	79

Exhibit B

*Excerpt from 2023 T3 Sixty
Real Estate Almanac
MEGA 1000 Report*

Rank	Company Name	State	2022 Sales Volume (in millions)	2022 Transaction Sides	2022 Year-end Agent Count
31	Crye-Leike Realtors	TN	\$ 7,019	21,604	2,853
32	Coldwell Banker Sea Coast Advantage	NC	\$ 6,902	20,558	1,839
33	My Home Group ⁽¹⁾	AZ	\$ 6,842	14,960	2,400
34	First Team Real Estate	CA	\$ 6,531	7,090	1,906
35	Equity Real Estate ⁽¹⁾	UT	\$ 6,367	11,830	3,610
36	Baird & Warner	IL	\$ 6,271	15,454	2,343
37	Keller Williams Cunningham Group	CA	\$ 6,192	4,234	1,311
38	Keller Williams Austin	TX	\$ 6,139	10,061	1,675
39	Real Estate One	MI	\$ 6,137	18,524	1,906
40	William Pitt Julia B. Fee Sotheby's International Realty	CT	\$ 5,756	6,862	1,100
41	West USA Realty	AZ	\$ 5,684	21,672	3,124
42	Keller Williams The Haggard Group	TN	\$ 5,566	13,481	1,704
43	Keller Williams Heritage Memorial Coastal Bend	TX	\$ 5,418	13,933	2,297
44	Keller Williams Ben Kinney Companies	WA	\$ 5,380	8,281	1,621
45	Latter & Blum	LA	\$ 5,373	20,275	3,150