

STATE OF ALABAMA)
MONTGOMERY COUNTY)

BEFORE ME, the undersigned Notary in and for the State of Alabama,
personally appeared John H. Taylor, who, being first duly sworn, states as follows:

1. My name is John H. Taylor. I am a resident of Montgomery County, Alabama and am over the age of 19.
2. I am the Chief of Staff with the Alabama Law Enforcement Agency (“ALEA”) and directly report to Secretary Spencer Collier.
3. On or about early 2015, I received a telephone call from Lance Bell, who represented defendant Mike Hubbard. I knew Mr. Bell represented Mike Hubbard because he told me he did and because I had previously seen and spoken with Mr. Bell and Mark White, another of Hubbard’s defense attorneys, when I was serving as a substitute on Mike Hubbard’s protective detail. This was the first contact, to my knowledge, anyone affiliated with Mr. Hubbard’s defense had with ALEA concerning the Hubbard case. Mr. Bell asserted that an employee of the Attorney General’s Office, Gene Sisson, had information related to wrongdoing on the part of Deputy Attorney General Matt Hart. Mr. Bell asked me if I could help him out and contact someone in the FBI to speak with Micky McDermott, Sisson’s attorney. At Bell’s request, I relayed his information to the FBI in Mobile, Alabama.
4. On or about January 5, 2016, I was contacted again by Mr. Bell concerning the Hubbard case. Mr. Bell told me that he had been speaking with Baron Coleman and that Coleman had information about wrongdoing by Matt Hart in the Hubbard case. Bell said he was acting on Coleman’s behalf and that Coleman wanted him to arrange an interview between Coleman and the Secretary of ALEA, Spencer Collier. After speaking with Bell, I spoke with Coleman who confirmed his desire to speak with Secretary Collier about Deputy Attorney General Hart. Coleman said that he only wanted to speak with Secretary Collier because he was worried that his contact with ALEA would become known if too many people knew of Coleman’s

interaction with ALEA. I have read Coleman's affidavit of February 2, 2016, in which he stated "I was recently contacted by law enforcement and met with them in reference to how and why I received grand jury information from the Lee County Special Grand Jury and with regard to the conduct of Matt Hart in the Hubbard case." The assertion by Coleman that he was contacted by law enforcement directly contradicts the facts known to me. It was Coleman and Mr. Bell who contacted law enforcement seeking an interview between Mr. Coleman and Secretary Collier about Deputy Attorney General Hart.

5. After I relayed Bell and Coleman's request to Secretary Collier, Secretary Collier arranged for an agent from ALEA to interview Coleman. Based on the interview, it was determined that no investigation of Deputy Attorney General Hart would be opened by ALEA.

6. Mr. Coleman never disclosed to me that he was a confidential informant for the Attorney General's Office.

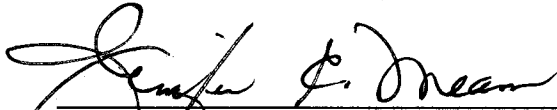
7. Mr. Coleman never alleged any violation of criminal law during my interaction with him.

Further affiant saith not.



John H. Taylor

SWORN TO and SUBSCRIBED BEFORE me on this the 15th day of
February, 2016.



Notary Public
My commission Expires: _____

