

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: The Honorable Robert Bentley
Governor of Alabama
c/o Joseph C. Espy III, Esq.
MELTON, ESPY & WILLIAMS, P.C.
255 Dexter Avenue
Montgomery, Alabama 36104**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

- ☐ To appear before the Committee and be questioned at the place, date, and time specified below:

Place: _____

Date: _____

Time: _____

- ☒ To produce the materials, identified in the attached Exhibit A, to the Committee at the place, date, and time specified below:

Place: 400 20th Street North, Birmingham, Alabama 35203

Date: Monday, October 10, 2016

Time: By no later than 5:00 p.m.

ON BEHALF OF THE COMMITTEE:

ISSUED BY:

Representative Mike Jones
Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

Date: _____

Date: _____

Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

Jackson R. Sharman III
400 20th Street North
Birmingham, Alabama 35203
Telephone: (205) 581-0700
Email: jsharman@lightfootlaw.com

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: The Honorable Robert Bentley
Governor of Alabama
c/o Joseph C. Espy III, Esq.
MELTON, ESPY & WILLIAMS, P.C.
255 Dexter Avenue
Montgomery, Alabama 36104**

**SUBPOENA
EXHIBIT A**

Definitions and Instructions

- A. The term “you” or “your” as used herein refers to Governor Robert Bentley in his personal capacity.
- B. Unless otherwise specified, all items shall encompass the time from January 17, 2011 to the present.
- C. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. All statements for any checking, savings, or investment account in your name, jointly or individually.
2. All federal and state income tax returns, including all schedules, attachments, and W-2s.
3. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods performed for or provided to the State of Alabama, Bentley for Governor, Inc. or you by Rebekah Mason, RCM Communications, Inc., Jon Mason, or JRM Enterprises, Inc.
4. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made by the State of Alabama, Bentley for Governor, Inc. or you or on your behalf to Rebekah Mason, RCM Communications, Inc., Jon Mason, JRM Enterprises, Inc., Alabama Council for Excellent Government, or Bentley for Governor, Inc.
5. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule.
6. A complete list of any and all cellular phones or mobile devices owned or used by you, including for each phone or device the telephone number, account number, the name of the carrier, and the dates of use or service.
7. All bills and usage histories for any cellular phone or mobile device listed in response to the previous Request.

8. A complete list of any and all email accounts and social media accounts owned or used by you.

9. Any and all audio or video recordings of any part of any telephone or other conversations between you and Rebekah Mason.

10. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between you and any of the following persons, including any attorney or other person acting for or on behalf of either you or them:

- a. Rebekah Mason;
- b. Jon Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Cooper Shattuck.

11. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, sent to or received by you concerning:

- a. Spencer Collier;
- b. Rebekah Mason;
- c. Jon Mason;
- d. Alabama Council for Excellent Government;
- e. RCM Communications, Inc.;
- f. JRM Enterprises, Inc.;
- g. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- h. The investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

12. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both you and Spencer Collier were present from January 1, 2014 to the present.

13. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both you and Rebekah Mason were present.

14. Any and all documents, electronic data, and information evidencing or relating to any of the following:

- a. Rebekah Mason;
- b. Jon Mason;
- c. RCM Communications, Inc.;
- d. JRM Enterprises, Inc.;
- e. reimbursements to you by or from the State of Alabama, the National Governors Association, the Republican Governors Association, or Bentley for Governor, Inc.;
- f. Alabama Council for Excellent Government.

15. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods performed or provided by Rebekah Mason, RCM Communications, Inc., Jon Mason, or JRM Enterprises, Inc. for or to the State of Alabama, Governor Robert Bentley, the Office of the Governor, the University of Alabama, Alabama Council for Excellent Government, or Bentley for Governor, Inc.

16. Any and all documents, electronic data, and information evidencing or relating to Statements of Economic Interests filed by you with the Alabama Ethics Commission.

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Governor Robert Bentley
Office of the Governor of Alabama
c/o Ross H. Garber, Esq.
SHIPMAN & GOODWIN LLP
1875 K. Street, NW
Washington, D.C. 20006**

SUBPOENA

**David B. Byrne, Jr., Esq.
Chief Legal Advisor
Office of the Governor of Alabama
State Capitol
600 Dexter Avenue
Montgomery, Alabama 36130**

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

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EXHIBIT A**

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Chief Legal Advisor
Office of the Governor of Alabama
State Capitol
600 Dexter Avenue
Montgomery, Alabama 36130**

Definitions and Instructions

A. The term "Office of the Governor" as used herein refers to Governor Robert Bentley in his official capacity and all current or former members of Governor Robert Bentley's Staff, including but expressly not limited to those assigned to the following offices: Executive Office, Chief of Staff and Deputy Chief of Staff, Legal Office, Communications Office, Legislative Office, Constituent Services Office, Scheduling Office, Appointments Office, Policy Office, Administration Office, Office of the First Lady, and Governor's Mansion. This subpoena is directed to the Office of the Governor as defined herein and shall be construed to include all documents or things in the possession, custody, or control of any and all persons encompassed by that term.

B. Unless otherwise specified, all items shall encompass the period of time beginning January 17, 2011 to the present.

C. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. All State employment policies applicable to the Office of the Governor.
2. Current and previous staff lists, directories, and organizational charts and diagrams for the Office of the Governor.
3. For all current and former members of the Office of the Governor, a list of their work telephone(s) and State-issued cellular telephone(s) and mobile device(s).
4. The complete calendar of Governor Robert Bentley in native electronic format, including any and all electronic data and information evidencing or reflecting any changes made at any time thereto.

5. The complete calendar of Rebekah Mason in native electronic format, including any and all electronic data and information evidencing or reflecting any changes made at any time thereto.
6. For the period of time beginning January 1, 2013 to present, daily and weekly schedules of Governor Robert Bentley, including any and all documents evidencing or relating to any changes made at any time thereto.
7. Any and all documents, electronic data, and information evidencing or relating to the use of State aircraft by, or at the direction of, the Office of the Governor, including but expressly not limited to, all requests for travel, flight plans, flight logs, and flight manifests.
8. Any and all documents, electronic data, and information evidencing or relating to ground transportation of or for Rebekah Mason, including but expressly not limited to all requests to any State agency, route plans, and vehicle manifests.
9. Any and all documents, electronic data, and information evidencing or relating to any and all visits by Rebekah Mason to the Governor's Mansion and its appurtenant facilities.
10. Any and all documents, electronic data, and information evidencing or relating to any and all visits by Rebekah Mason to Wynfield Estate and its appurtenant facilities.
11. Any and all documents, electronic data, and information evidencing or relating to leasing or chartering aircraft for travel by Governor Robert Bentley or Rebekah Mason.
12. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement from State funds, including all supporting documentation, submitted by or on behalf of Governor Robert Bentley from January 1, 2013 to the present.
13. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement from State funds, including all supporting documentation, submitted by or on behalf of Rebekah Mason from January 1, 2013 to the present.
14. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement, including all supporting documentation, submitted to the National Governors Association from January 1, 2013 to the present.
15. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement, including all supporting documentation, submitted to the Republican Governors Association from January 1, 2013 to the present.
16. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement, including all supporting documentation, submitted to Bentley for Governor, Inc. from January 1, 2013 to the present.
17. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement from State funds, including all supporting documentation, for any expense relating to Rebekah Mason submitted by or on behalf of the Office of the Governor from January 1, 2013 to the present.
18. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods performed or provided by Rebekah Mason, RCM Communications, Inc., Jon Mason, or JRM Enterprises, Inc. for or to the State of Alabama, Governor Robert Bentley, the

Office of the Governor, the University of Alabama, Alabama Council for Excellent Government, or Bentley for Governor, Inc.

19. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind to Rebekah Mason, RCM Communications, Inc., Jon Mason, or JRM Enterprises, Inc.

20. Any and all documents, electronic data, and information evidencing or relating to any nondisclosure or confidentiality agreements signed by or proffered to any person by or on behalf of the Office of the Governor.

21. Any and all documents, electronic data, and information evidencing or relating to any and all temporary or permanent removals, reassignments, replacements, or terminations of any persons in the Office of the Governor.

22. Any and all documents, electronic data, and information evidencing or relating to any and all temporary or permanent removals, reassignments, replacements, or terminations of any officers or employees of the Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions from January 1, 2014 to present.

23. Any and all documents, electronic data, and information evidencing or relating to any formal or informal files maintained, whether electronically or otherwise, by or within the Office of the Governor related to any of the following:

- a. Spencer Collier;
- b. Rebekah Mason;
- c. Jon Mason;
- d. Dianne Bentley;
- e. Bentley for Governor, Inc.;
- f. Alabama Council for Excellent Government;
- g. RCM Communications, Inc.;
- h. JRM Enterprises, Inc.;
- i. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.
- j. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

24. Any and all documents, electronic data, and information evidencing or relating to the job titles, duties, or performance of Rebekah Mason.

25. Rebekah Mason's personnel file.

26. A list of any and all email accounts used by Governor Robert Bentley.

27. A list of any and all email accounts used by Rebekah Mason.
28. An electronic copy in native format of any and all email accounts assigned to or used by Rebekah Mason.
29. A complete list of any and all cellular phones or mobile devices issued to or used by Governor Robert Bentley, including for each phone or device the telephone number, account number, the name of the carrier, and dates of use or service.
30. All bills and usage histories for any cellular phone or mobile device listed in response to the previous Request.
31. A complete list of any and all cellular phones or mobile devices issued to or used by Rebekah Mason, including for each phone or device the telephone number, account number, the name of the carrier, and dates of use or service.
32. All bills and usage histories for any cellular phone or mobile device listed in response to the previous Request.
33. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between Governor Robert Bentley and Rebekah Mason, including any attorney or other person acting for or on behalf of either of them.
34. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between Governor Robert Bentley and Jon Mason, including any attorney or other person acting for or on behalf of either of them.
35. Any and all audio or video recordings of any part of any telephone or other conversations between Governor Robert Bentley and Rebekah Mason.
36. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both Governor Robert Bentley and Spencer Collier were present from January 1, 2014 to the present.
37. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both Governor Robert Bentley and Rebekah Mason were present.
38. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between the Office of the Governor and Spencer Collier, including any attorney or other person acting for or on behalf of either of them, from January 1, 2014 to present.
39. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between the Office of the Governor and Stan Stabler, including any attorney or other person acting for or on behalf of either of them, from January 1, 2014 to present.
40. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice

messages, between the Office of the Governor and Ray Lewis, including any attorney or other person acting for or on behalf of either of them, from January 1, 2014 to present.

41. Any and all documents, electronic data, and information evidencing or relating in any way to the substance of the press release by the Office of the Governor on March 22, 2016 (which is attached hereto as **Attachment 1**), including but expressly not limited to:

- a. placing Spencer Collier on medical leave;
- b. internal review of the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions;
- c. misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies departments or divisions;
- d. termination of Spencer Collier.

42. Any and all documents, electronic data, and information evidencing or relating to the Alabama Council for Excellent Government.

43. Any and all documents, electronic data, and information evidencing or relating to the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

44. Any and all documents, electronic data, and information evidencing or relating to the 2014 gubernatorial campaign, including but expressly not limited to Bentley for Governor, Inc.

45. Any and all documents, electronic data, and information evidencing or relating to Statements of Economic Interests filed by the Office of the Governor with the Alabama Ethics Commission.

46. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, sent to or received by the Office of the Governor concerning:

- a. Rebekah Mason;
- b. Alabama Council for Excellent Government;
- c. RCM Communications, Inc.;
- d. JRM Enterprises, Inc.;
- e. Bentley for Governor, Inc.



The Office of Alabama Governor
Robert Bentley

Governor Bentley Announces Termination of Spencer Collier as Alabama Law Enforcement Agency Secretary

March 22, 2016
Press Releases

MONTGOMERY – Governor Robert Bentley on Tuesday announced the termination of Alabama Law Enforcement Agency Secretary Spencer Collier effective immediately.

"Spencer Collier and I have served together a long time, dating back to my time in the Alabama House of Representatives," Governor Bentley said. "He is a friend of mine, and led the implementation of the consolidation of state law enforcement functions into one singular agency, the Alabama Law Enforcement Agency (ALEA). I appreciate Spencer's service to the State of Alabama.

"After placing Spencer on medical leave a few weeks ago to allow him to recover from back surgery, Acting ALEA Secretary Stan Stabler identified several areas of concern in the operations, policies and procedures at ALEA. After an internal review, the ALEA Integrity Unit found a number of issues, including possible misuse of state funds. I am disappointed to learn these facts, and today, I relieved Spencer Collier of his duties as ALEA Secretary."

Governor Bentley also announced the appointment of Stan Stabler to serve as Secretary of ALEA.

"Stan Stabler is a veteran law enforcement officer who has 30 plus years in law enforcement, I appreciate his service as Acting Secretary, and cannot think of a more qualified person to serve as ALEA Secretary. I appreciate Stan joining my team to lead the dedicated men and women who respond when Alabamians call on them in emergencies," Bentley added.

Provided by the Office of the Governor of Alabama | governor.alabama.gov

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Bentley for Governor, Inc.
c/o Joseph C. Espy III, Esq.
MELTON, ESPY & WILLIAMS, P.C.
255 Dexter Avenue
Montgomery, Alabama 36104**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

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Representative Mike Jones
Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

Date: _____

Date: _____

Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

Jackson R. Sharman III
400 20th Street North
Birmingham, Alabama 35203
Telephone: (205) 581-0700
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**BEFORE THE JUDICIARY COMMITTEE
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EXHIBIT A**

Definitions and Instructions

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B. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. Any and all documents Bentley for Governor, Inc. has ever submitted to the Secretary of State of Alabama, without time limitation, including but expressly not limited to certificate(s) of name reservation, articles of incorporation, and certificate(s) of formation.

2. Bentley for Governor, Inc.'s articles of incorporation, bylaws, and all amendments to bylaws.

3. Minutes for any meetings of Bentley for Governor, Inc.'s shareholders and directors.

4. Any and all documents Bentley for Governor, Inc. has ever submitted to the Internal Revenue Service and the Alabama Department of Revenue, together with all related schedules and attachments.

5. All federal and state tax returns, including all schedules and attachments, from Bentley for Governor, Inc.'s formation to the present.

6. A complete list of all of Bentley for Governor, Inc.'s directors, stockholders, officers and employees, including their title and contact information, and organizational charts or diagrams showing the relationships between and among all such persons.

7. Any and all documents filed with any agency of the State of Alabama, including but expressly not limited to any documents filed pursuant to the Alabama Fair Campaign Practices Act.

8. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursement, or other payments of any kind made to Bentley for Governor, Inc. by the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the University of Alabama, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.

9. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind by Bentley for Governor, Inc. to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.

10. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between any of Bentley for Governor, Inc.'s directors, officers, and employees and any of the following persons, including any attorney or other person acting for or on behalf of either Bentley for Governor, Inc. or them:

- a. Rebekah Mason;
- b. Jon Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- g. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.;
- h. any director, officer, employee, agent, or representative of Alabama Council for Excellent Government.

11. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, sent to or received by any of Bentley for Governor, Inc.'s directors, officers, and employees concerning:

- a. Rebekah Mason;
- b. Jon Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. RCM Communications, Inc.;

- g. JRM Enterprises, Inc.;
- h. Alabama Council for Excellent Government;
- i. State aircraft;
- j. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- k. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

12. Any and all documents, electronic data, and information evidencing or relating to any of the following:

- a. Rebekah Mason;
- b. Jon Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. RCM Communications, Inc.;
- g. JRM Enterprises, Inc.;
- h. Alabama Council for Excellent Government;
- i. State aircraft;
- j. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- k. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

13. Any and all documents, electronic data, information, or other things that you believe are relevant, in any way, to the proposed Articles of Impeachment Against Governor Bentley, a copy of which is enclosed as Attachment 1, or the investigation pertaining thereto.

1 HR367
2 176360-2
3 By Representatives Henry, Whorton (I), Sessions, Ball,
4 Patterson, Hanes, Whorton (R), Holmes (M), Standridge, Moore
5 (B), Crawford, Farley, Williams (JW), Ainsworth, Ford, Todd,
6 Wilcox, Butler, Nordgren, Williams (P), Morrow, Ingram and
7 Mooney
8 RFD: Judiciary
9 First Read: 28-APR-16

2
3
4
5
6
7
8 ARTICLES OF IMPEACHMENT AGAINST GOVERNOR BENTLEY.
9

10 WHEREAS, in 2010, Governor Bentley was elected the
11 53rd Governor of the State of Alabama and was reelected to a
12 second term in 2014; and

13 WHEREAS, Section 173 of the Constitution of Alabama
14 of 1901 provides that the Governor and other constitutional
15 officers of this state may be impeached upon the adoption of
16 articles of impeachment by this body and upon trial by the
17 Senate, acting as a court of impeachment; and

18 WHEREAS, two formal complaints have been filed with
19 the Alabama Ethics Commission to determine whether Governor
20 Bentley violated state ethics laws by misusing state property;
21 and

22 WHEREAS, in recognition of the gravity of the
23 adoption of these articles of impeachment and upon findings
24 that Governor Bentley has violated the public trust, this body
25 concludes Governor Bentley should be impeached for cause; now
26 therefore,

1 BE IT RESOLVED BY THE HOUSE OF REPRESENTATIVES OF
2 THE LEGISLATURE OF ALABAMA, That Governor Bentley is impeached
3 for cause and that the following articles of impeachment,
4 based upon the findings in this resolution, be transmitted to
5 the Senate for trial as provided in Section 173 of the
6 Constitution of Alabama of 1901:

7 ARTICLE I.

8 Willful Neglect of Duty.

9 Credible evidence exists to create probable cause to
10 believe that, in his conduct while Governor of the State of
11 Alabama, he willfully neglected his duty as Governor by
12 failing to faithfully execute the laws of this state and by
13 refusing to perform his constitutional and statutory duties.

14 ARTICLE II.

15 Corruption in Office.

16 Credible evidence exists to create probable cause to
17 believe that, in his conduct while Governor of the State of
18 Alabama, he unlawfully misused state property, misappropriated
19 state resources, and consistently acted in violation of law to
20 promote his own personal agenda.

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Mr. Michael H. Echols
c/o Hon. R. Bernard Harwood, Jr.
ROSEN HARWOOD
2200 Jack Warner Parkway, Ste. 200
Tuscaloosa, Alabama 35401**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

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Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

Date: _____

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Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

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**BEFORE THE JUDICIARY COMMITTEE
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**TO: Mr. Michael H. Echols
c/o Hon. R. Bernard Harwood, Jr.
ROSEN HARWOOD
2200 Jack Warner Parkway, Ste. 200
Tuscaloosa, Alabama 35401**

**SUBPOENA
EXHIBIT A**

Definitions and Instructions

- A. The term "Office of the Governor" as used herein refers to Governor Robert Bentley in his official capacity and all current or former members of Governor Robert Bentley's Staff, including but expressly not limited to those assigned to the following offices: Executive Office, Chief of Staff and Deputy Chief of Staff, Legal Office, Communications Office, Legislative Office, Constituent Services Office, Scheduling Office, Appointments Office, Policy Office, Administration Office, Office of the First Lady, and Governor's Mansion.
- B. Unless otherwise specified, all items shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods performed or provided by you for or to the Alabama Council for Excellent Government; RCM Communications, Inc., JRM Enterprises, Inc., Bentley for Governor, Inc., Governor Robert Bentley in his personal capacity, or Rebekah Mason, from January 1, 2014 to the present.
2. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made to Bentley for Governor, Inc. by the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.
3. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made by Bentley for Governor, Inc. to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.
4. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made to the Alabama

Council for Excellent Government by the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, Bentley for Governor, Inc., RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.

5. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made by the Alabama Council for Excellent Government to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, Bentley for Governor, Inc., RCM Communications, Inc., JRM Enterprises, Inc., or Governor Robert Bentley in his personal capacity.

6. Any and all documents, electronic data, and information evidencing or relating to any compensation, loans, gifts, payments, or other transfers of money or things of value between Governor Robert Bentley in his personal capacity and Rebekah Mason.

7. Any and all notes, memoranda, analysis, summaries, or compilations of records, prepared or maintained by you, solely or working with others, relating to the financial activity or conduct of Governor Robert Bentley in either his official or personal capacity.

8. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between you and any of the following persons, including any attorney or other person acting for or on behalf of either you or them:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;
- d. Rebekah Mason;
- e. Jon Mason;
- f. any director, officer, employee, agent, or representative of Alabama Council for Excellent Government;
- g. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.;
- h. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- i. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.

9. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between you and any person, whether sent by you, sent to you, or copied to you, concerning:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;

- d. Rebekah Mason;
- e. Bentley for Governor, Inc.;
- f. Alabama Council for Excellent Government;
- g. RCM Communications, Inc.;
- h. JRM Enterprises, Inc.

10. Any and all documents, electronic data, and information evidencing or relating to any of the following:

- a. the Office of the Governor;
- b. Rebekah Mason;
- c. Alabama Council for Excellent Government;
- d. Bentley for Governor, Inc.;
- e. RCM Communications, Inc.;
- f. JRM Enterprises, Inc.

11. Any and all documents, electronic data, information, or other things that you believe are relevant, in any way, to the proposed Articles of Impeachment Against Governor Bentley, a copy of which is enclosed as Attachment 1, or the investigation pertaining thereto.

1 HR367
2 176360-2
3 By Representatives Henry, Whorton (I), Sessions, Ball,
4 Patterson, Hanes, Whorton (R), Holmes (M), Standridge, Moore
5 (B), Crawford, Farley, Williams (JW), Ainsworth, Ford, Todd,
6 Wilcox, Butler, Nordgren, Williams (P), Morrow, Ingram and
7 Mooney
8 RFD: Judiciary
9 First Read: 28-APR-16

8 ARTICLES OF IMPEACHMENT AGAINST GOVERNOR BENTLEY.
9

10 WHEREAS, in 2010, Governor Bentley was elected the
11 53rd Governor of the State of Alabama and was reelected to a
12 second term in 2014; and

13 WHEREAS, Section 173 of the Constitution of Alabama
14 of 1901 provides that the Governor and other constitutional
15 officers of this state may be impeached upon the adoption of
16 articles of impeachment by this body and upon trial by the
17 Senate, acting as a court of impeachment; and

18 WHEREAS, two formal complaints have been filed with
19 the Alabama Ethics Commission to determine whether Governor
20 Bentley violated state ethics laws by misusing state property;
21 and

22 WHEREAS, in recognition of the gravity of the
23 adoption of these articles of impeachment and upon findings
24 that Governor Bentley has violated the public trust, this body
25 concludes Governor Bentley should be impeached for cause; now
26 therefore,

1 BE IT RESOLVED BY THE HOUSE OF REPRESENTATIVES OF
2 THE LEGISLATURE OF ALABAMA, That Governor Bentley is impeached
3 for cause and that the following articles of impeachment,
4 based upon the findings in this resolution, be transmitted to
5 the Senate for trial as provided in Section 173 of the
6 Constitution of Alabama of 1901:

7 ARTICLE I.

8 Willful Neglect of Duty.

9 Credible evidence exists to create probable cause to
10 believe that, in his conduct while Governor of the State of
11 Alabama, he willfully neglected his duty as Governor by
12 failing to faithfully execute the laws of this state and by
13 refusing to perform his constitutional and statutory duties.

14 ARTICLE II.

15 Corruption in Office.

16 Credible evidence exists to create probable cause to
17 believe that, in his conduct while Governor of the State of
18 Alabama, he unlawfully misused state property, misappropriated
19 state resources, and consistently acted in violation of law to
20 promote his own personal agenda.

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Mr. Jonathan Mason
c/o Robert D. Segall, Esq.
COPELAND, FRANCO, SCREWS & GILL
444 South Perry Street
Montgomery, Alabama 36104**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

- ☐ To appear before the Committee and be questioned at the place, date, and time specified below:

Place: _____

Date: _____

Time: _____

- ☒ To produce the materials, identified in the attached Exhibit A, to the Committee at the place, date, and time specified below:

Place: 400 20th Street North, Birmingham, Alabama 35203

Date: Monday, October 10, 2016

Time: By no later than 5:00 p.m.

ON BEHALF OF THE COMMITTEE:

ISSUED BY:

Representative Mike Jones
Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

Date: _____

Date: _____

Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

Jackson R. Sharman III
400 20th Street North
Birmingham, Alabama 35203
Telephone: (205) 581-0700
Email: jsharman@lightfootlaw.com

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Mr. Jonathan Mason
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- C. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods you performed for or provided to the State of Alabama, the Office of the Governor, the University of Alabama, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., Bentley for Governor, Inc., or Governor Robert Bentley in his personal capacity.
2. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursements, or other payments of any kind made to you by the State of Alabama, the Office of the Governor, the University of Alabama, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Bentley for Governor, Inc.
3. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made by you to the State of Alabama, the Office of the Governor, the University of Alabama, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Bentley for Governor, Inc.
4. Any and all documents, electronic data, and information evidencing or relating to any loans, gifts, payments or other transfers of money or things of value to you from or on behalf of Governor Robert Bentley in his personal capacity.

5. All statements for any checking, savings, or investment account into which, or from which, any of the compensation, reimbursement, expenses, loans, gifts, payments, or other transfers of money or things of value referred to in Requests 2 through 4 were deposited or withdrawn.

6. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement from State funds, including all supporting documentation, submitted by you or on your behalf from January 1, 2013 to the present.

7. Any and all documents, electronic data, and information evidencing or relating to your job titles, duties, or performance with or for the State of Alabama, Bentley for Governor, Inc., or the 2014 gubernatorial campaign of Governor Robert Bentley.

8. Any and all documents, electronic data, and information evidencing or relating to any nondisclosure or confidentiality agreements signed by you or proffered to you by or on behalf of Governor Robert Bentley, in his personal capacity, or the Office of the Governor.

9. A complete list of any and all email accounts and social media accounts owned or used by you.

10. Any and all documents, electronic data, and information evidencing or relating to State business.

11. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between you and any of the following persons, including any attorney or other person acting for or on behalf of either you or them:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;
- d. any other member of the Bentley family;
- e. Spencer Collier;
- f. Stan Stabler;
- g. Ray Lewis;
- h. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- i. any director, officer, employee, agent, or representative of Alabama Council for Excellent Government;
- j. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.

12. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, sent to or received by you concerning:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
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- d. any other member of the Bentley family;
- e. Spencer Collier;
- f. Stan Stabler;
- g. Ray Lewis;
- h. Alabama Council for Excellent Government;
- i. RCM Communications, Inc.;
- j. JRM Enterprises, Inc.;
- k. Bentley for Governor, Inc.;
- l. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions;
- m. State aircraft;
- n. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- o. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

13. Any and all documents, electronic data, and information evidencing or relating to any of the following:

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- g. Alabama Council for Excellent Government;
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- k. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

14. Any and all audio or video recordings of any part of any telephone or other conversations between you and Robert Bentley.

15. Any and all documents, electronic data, and information evidencing or relating to Statements of Economic Interests filed by you with the Alabama Ethics Commission.

16. Any and all documents, electronic data, information, or other things that you believe are relevant, in any way, to the proposed Articles of Impeachment Against Governor Bentley, a copy of which is enclosed as Attachment 1, or the investigation pertaining thereto.

1 HR367
2 176360-2
3 By Representatives Henry, Whorton (I), Sessions, Ball,
4 Patterson, Hanes, Whorton (R), Holmes (M), Standridge, Moore
5 (B), Crawford, Farley, Williams (JW), Ainsworth, Ford, Todd,
6 Wilcox, Butler, Nordgren, Williams (P), Morrow, Ingram and
7 Mooney
8 RFD: Judiciary
9 First Read: 28-APR-16

8 ARTICLES OF IMPEACHMENT AGAINST GOVERNOR BENTLEY.
9

10 WHEREAS, in 2010, Governor Bentley was elected the
11 53rd Governor of the State of Alabama and was reelected to a
12 second term in 2014; and

13 WHEREAS, Section 173 of the Constitution of Alabama
14 of 1901 provides that the Governor and other constitutional
15 officers of this state may be impeached upon the adoption of
16 articles of impeachment by this body and upon trial by the
17 Senate, acting as a court of impeachment; and

18 WHEREAS, two formal complaints have been filed with
19 the Alabama Ethics Commission to determine whether Governor
20 Bentley violated state ethics laws by misusing state property;
21 and

22 WHEREAS, in recognition of the gravity of the
23 adoption of these articles of impeachment and upon findings
24 that Governor Bentley has violated the public trust, this body
25 concludes Governor Bentley should be impeached for cause; now
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9 Credible evidence exists to create probable cause to
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11 Alabama, he willfully neglected his duty as Governor by
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13 refusing to perform his constitutional and statutory duties.

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15 Corruption in Office.

16 Credible evidence exists to create probable cause to
17 believe that, in his conduct while Governor of the State of
18 Alabama, he unlawfully misused state property, misappropriated
19 state resources, and consistently acted in violation of law to
20 promote his own personal agenda.

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Mrs. Rebekah Mason
c/o Robert D. Segall, Esq.
COPELAND, FRANCO, SCREWS & GILL
444 South Perry Street
Montgomery, Alabama 36104**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

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Place: _____

Date: _____

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Place: 400 20th Street North, Birmingham, Alabama 35203

Date: Monday, October 10, 2016

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ON BEHALF OF THE COMMITTEE:

ISSUED BY:

Representative Mike Jones
Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

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Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

Jackson R. Sharman III
400 20th Street North
Birmingham, Alabama 35203
Telephone: (205) 581-0700
Email: jsharman@lightfootlaw.com

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Mrs. Rebekah Mason
c/o Robert D. Segall, Esq.
COPELAND, FRANCO, SCREWS & GILL
444 South Perry Street
Montgomery, Alabama 36104**

**SUBPOENA
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- C. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. A complete copy of your personnel file(s) with the State of Alabama or the Office of the Governor.
2. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule from January 17, 2011 to March 30, 2016.
3. Your federal and state income tax returns, including all schedules, attachments, and W-2s, for 2011 to the present.
4. Any and all documents, electronic data, and information evidencing or relating to any and all work, services, or goods you performed for or provided to the State of Alabama, the Office of the Governor, the Alabama Council for Excellent Government, Bentley for Governor, Inc. or Governor Robert Bentley in his personal capacity.
5. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made to you by the State of Alabama, the Office of the Governor, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Bentley for Governor, Inc.
6. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind made by you to the State

of Alabama, the Office of the Governor, the Alabama Council for Excellent Government, RCM Communications, Inc., JRM Enterprises, Inc., or Bentley for Governor, Inc.

7. Any and all documents, electronic data, and information evidencing or relating to any loans, gifts, payments, or other transfers of money or things of value to you from or on behalf of Governor Robert Bentley in his personal capacity.

8. All statements for any checking, savings, or investment account into which, or from which, any of the compensation, reimbursements, expenses, loans, gifts, payments, or other transfers of money or things of value referred to in Requests 5 through 7 were deposited or withdrawn.

9. Any and all documents, electronic data, and information evidencing or relating to any requests for reimbursement from State funds, including all supporting documentation, submitted by you or on your behalf from January 1, 2013 to the present.

10. Any and all documents, electronic data, and information evidencing or relating to your job titles, duties, or performance with or for the Office of the Governor, the State of Alabama, Bentley for Governor, Inc., or the 2014 gubernatorial campaign of Governor Robert Bentley.

11. Any and all documents, electronic data, and information evidencing or relating to any filings you have submitted to, or training you have received from, the Alabama Ethics Commission.

12. Any and all documents, things, or electronic data that you removed from State property.

13. Any and all documents, electronic data, and information that you have received since March 30, 2016 evidencing or relating to State business.

14. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both Governor Robert Bentley and Spencer Collier were present from January 1, 2014 to the present.

15. Any and all documents, electronic data, and information evidencing or relating to any nondisclosure or confidentiality agreements signed by you or proffered to you by or on behalf of Governor Robert Bentley, in his personal capacity, or the Office of the Governor.

16. A complete list of any and all cellular phones or mobile devices owned or used by you, including for each phone or device the telephone number, account number, the name of the carrier, and the dates of use or service.

17. All bills and usage histories for any cellular phone or mobile device listed in response to the previous Request.

18. A complete list of any and all email accounts and social media accounts owned or used by you.

19. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between you and any of the following persons, including any attorney or other person acting for or on behalf of either you or them:

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- e. Spencer Collier;
- f. Stan Stabler;
- g. Ray Lewis;
- h. any director, officer, employee, agent, or representative of Alabama Council for Excellent Government ;
- i. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.;
- j. any director, officer, employee, agent, or representative of RCM Communications, Inc.

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- j. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions;
- k. State aircraft;
- l. RCM Communications, Inc.;
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- a. The Office of the Governor;
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- d. any other member of the Bentley family;
- e. Alabama Council for Excellent Government or any of its current or former directors or officers;
- f. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions, including any current or former officers or employees of any of the foregoing;
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22. Any and all audio or video recordings of any part of any telephone or other conversations between you and Governor Robert Bentley.

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16 articles of impeachment by this body and upon trial by the
17 Senate, acting as a court of impeachment; and

18 WHEREAS, two formal complaints have been filed with
19 the Alabama Ethics Commission to determine whether Governor
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11 Alabama, he willfully neglected his duty as Governor by
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13 refusing to perform his constitutional and statutory duties.

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15 Corruption in Office.

16 Credible evidence exists to create probable cause to
17 believe that, in his conduct while Governor of the State of
18 Alabama, he unlawfully misused state property, misappropriated
19 state resources, and consistently acted in violation of law to
20 promote his own personal agenda.

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Alabama Council for Excellent
Government
c/o Richard J. R. Raleigh, Jr., Esq.
WILMER & LEE, P.A.
100 Washington Street Northeast
Huntsville, Alabama 35801**

SUBPOENA

PURSUANT TO THE COMMITTEE RULES OF THE HOUSE JUDICIARY COMMITTEE FOR THE IMPEACHMENT OF GOVERNOR ROBERT BENTLEY, THE JUDICIARY COMMITTEE OF THE ALABAMA HOUSE OF REPRESENTATIVES ("THE COMMITTEE") HEREBY COMMANDS YOU:

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ON BEHALF OF THE COMMITTEE:

ISSUED BY:

Representative Mike Jones
Chairman, Alabama House Judiciary Committee

Jeffrey Woodard
Clerk, Alabama House of Representatives

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Any questions pertaining to this Subpoena should be directed to the Special Counsel for the Committee:

Jackson R. Sharman III
400 20th Street North
Birmingham, Alabama 35203
Telephone: (205) 581-0700
Email: *jsharman@lightfootlaw.com*

**BEFORE THE JUDICIARY COMMITTEE
OF THE ALABAMA HOUSE OF REPRESENTATIVES**

**TO: Alabama Council for Excellent
Government
c/o Richard J. R. Raleigh, Jr., Esq.
WILMER & LEE, P.A.
100 Washington Street Northeast
Huntsville, Alabama 35801**

**SUBPOENA
EXHIBIT A**

Definitions and Instructions

- A. The term "Office of the Governor" as used herein refers to Governor Robert Bentley in his official capacity and all current or former members of Governor Robert Bentley's Staff, including but expressly not limited to those assigned to the following offices: Executive Office, Chief of Staff and Deputy Chief of Staff, Legal Office, Communications Office, Legislative Office, Constituent Services Office, Scheduling Office, Appointments Office, Policy Office, Administration Office, Office of the First Lady, and Governor's Mansion.
- B. Documents responsive to any items shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by item number. If a document is responsive to more than one item, it shall be produced in response to the item to which it is primarily responsive.

Documents and Things Requested

1. Any and all documents the Alabama Council for Excellent Government ("ACEG") has ever submitted to the Secretary of State of Alabama, including but expressly not limited to certificate(s) of name reservation, and certificate(s) of formation.
2. ACEG's articles of incorporation or formation, bylaws, and all amendments to bylaws.
3. Minutes of any meetings of ACEG's Board of Directors.
4. Any and all documents ACEG has ever submitted to the Internal Revenue Service and the Alabama Department of Revenue, together with all related schedules and attachments.
5. All federal and state tax returns, including all schedules and attachments, from ACEG's formation to the present.
6. A complete list of all of ACEG's directors, members, stockholders, officers and employees, including their title and contact information, and organizational charts or diagrams showing the relationships between and among all such persons.
7. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursements, or other payments of any kind made to ACEG by the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, RCM

Communications, Inc., JRM Enterprises, Inc., Bentley for Governor, Inc., or Governor Robert Bentley in his personal capacity.

8. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursements, or other payments of any kind made by ACEG to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, RCM Communications, Inc., JRM Enterprises, Inc., Bentley for Governor, Inc., or Governor Robert Bentley in his personal capacity.

9. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursement, or other payments of any kind made to ACEG by any political action committee (a "PAC").

10. Any and all documents, electronic data, and information evidencing or relating to any and all donations, contributions, compensation, reimbursement, or other payments of any kind made by ACEG to any PAC.

11. Any and all documents, electronic data, and information evidencing or relating to State business.

12. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between any of ACEG's directors and any of the following persons, including any attorney or other person acting for or on behalf of either ACEG or them:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;
- d. any other member of the Bentley family;
- e. Rebekah Mason;
- f. Jon Mason;
- g. Spencer Collier;
- h. Stan Stabler;
- i. Ray Lewis;
- j. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- k. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.;
- l. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.

13. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, sent to or received by any of ACEG's directors concerning:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;
- d. any other member of the Bentley family;
- e. Rebekah Mason;
- f. Jon Mason;
- g. Spencer Collier;
- h. Stan Stabler;
- i. Ray Lewis;
- j. RCM Communications, Inc.;
- k. JRM Enterprises, Inc.;
- l. Bentley for Governor, Inc.;
- m. State aircraft;
- n. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- o. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

14. Any and all documents, electronic data, and information evidencing or relating to any of the following:

- a. the Office of the Governor;
- b. Governor Robert Bentley in his personal capacity;
- c. Dianne Bentley;
- d. any other member of the Bentley family;
- e. Rebekah Mason;
- f. Jon Mason;

- g. Spencer Collier;
- h. Stan Stabler;
- i. Ray Lewis;
- j. RCM Communications, Inc.;
- k. JRM Enterprises, Inc.;
- l. Bentley for Governor, Inc.;
- m. State aircraft;
- n. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- o. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

15. Any and all documents, electronic data, information, or other things that you believe are relevant, in any way, to the proposed Articles of Impeachment Against Governor Bentley, a copy of which is enclosed as Attachment 1, or the investigation pertaining thereto.

1 HR367
2 176360-2
3 By Representatives Henry, Whorton (I), Sessions, Ball,
4 Patterson, Hanes, Whorton (R), Holmes (M), Standridge, Moore
5 (B), Crawford, Farley, Williams (JW), Ainsworth, Ford, Todd,
6 Wilcox, Butler, Nordgren, Williams (P), Morrow, Ingram and
7 Mooney
8 RFD: Judiciary
9 First Read: 28-APR-16

8 ARTICLES OF IMPEACHMENT AGAINST GOVERNOR BENTLEY.
9

10 WHEREAS, in 2010, Governor Bentley was elected the
11 53rd Governor of the State of Alabama and was reelected to a
12 second term in 2014; and

13 WHEREAS, Section 173 of the Constitution of Alabama
14 of 1901 provides that the Governor and other constitutional
15 officers of this state may be impeached upon the adoption of
16 articles of impeachment by this body and upon trial by the
17 Senate, acting as a court of impeachment; and

18 WHEREAS, two formal complaints have been filed with
19 the Alabama Ethics Commission to determine whether Governor
20 Bentley violated state ethics laws by misusing state property;
21 and

22 WHEREAS, in recognition of the gravity of the
23 adoption of these articles of impeachment and upon findings
24 that Governor Bentley has violated the public trust, this body
25 concludes Governor Bentley should be impeached for cause; now
26 therefore,

1 BE IT RESOLVED BY THE HOUSE OF REPRESENTATIVES OF
2 THE LEGISLATURE OF ALABAMA, That Governor Bentley is impeached
3 for cause and that the following articles of impeachment,
4 based upon the findings in this resolution, be transmitted to
5 the Senate for trial as provided in Section 173 of the
6 Constitution of Alabama of 1901:

7 ARTICLE I.

8 Willful Neglect of Duty.

9 Credible evidence exists to create probable cause to
10 believe that, in his conduct while Governor of the State of
11 Alabama, he willfully neglected his duty as Governor by
12 failing to faithfully execute the laws of this state and by
13 refusing to perform his constitutional and statutory duties.

14 ARTICLE II.

15 Corruption in Office.

16 Credible evidence exists to create probable cause to
17 believe that, in his conduct while Governor of the State of
18 Alabama, he unlawfully misused state property, misappropriated
19 state resources, and consistently acted in violation of law to
20 promote his own personal agenda.