

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

**TO: JRM Enterprises, Inc.
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*

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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 JRM Enterprises, Inc. ("JRM") 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. JRM's articles of incorporation, bylaws, and all amendments to bylaws.
3. Minutes for any meetings of JRM's shareholders and directors.
4. All federal and state tax returns, including all schedules and attachments, from JRM's formation to the present.
5. A complete list of all of JRM'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.
6. 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 JRM by the State of Alabama, the Office of the Governor, the University of Alabama, the Alabama Council for Excellent Government, RCM Communications, Inc., Bentley for Governor, Inc., or Governor Robert Bentley in his personal capacity.
7. Any and all documents, electronic data, and information evidencing or relating to any and all compensation, reimbursements, expenses, and payments of any kind by JRM to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the Alabama Council for Excellent

Government, RCM Communications, Inc., Robert 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 State business.

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 any of JRM's directors, officers, and employees and any of the following persons, including any attorney or other person acting for or on behalf of either JRM 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. Spencer Collier;
- g. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- 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.

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, sent to or received by any of JRM's directors, officers, and employees concerning:

- a. the Office of the Governor;
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- f. Spencer Collier;
- g. RCM Communications, Inc.;
- h. Alabama Council for Excellent Government;
- i. Bentley for Governor, Inc.;

- j. State aircraft;
- k. 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;
- l. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

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

- a. the Office of the Governor;
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12. 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.

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