



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 23, 2016

Via United States Mail and Electronic Mail

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

Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Raleigh:

Enclosed with this letter is a request for documents directed to the Alabama Council for Excellent Government ("ACEG") on behalf of the Alabama House Judiciary Committee. I understand that you represent ACEG in the case styled *Collier v. Bentley et al.* in the Circuit Court of Montgomery County, Alabama. I send this letter to you as a professional courtesy and with the expectation that you will forward it to ACEG. If you do not represent ACEG in connection with this matter, or if you prefer that I communicate directly with ACEG, please let me know immediately.

Please produce all documents and things requested no later than by **5:00 p.m.** on **Tuesday, September 13, 2016**. Please convey to ACEG that, although it is not required to treat this request as confidential, I ask that it do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jack Sharman".

Jack Sharman

**COMMITTEE
EXHIBIT**

2-A

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

**DOCUMENT REQUEST TO THE
ALABAMA COUNCIL FOR EXCELLENT GOVERNMENT**

**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**

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 Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- C. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

October 4, 2016

Via Electronic and U.S. Mail

Michael W. Robinson, Esq.
General Counsel
Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36103
michael.robinson@dps.alabama.gov

Re: Impeachment Investigation of Governor Robert Bentley

Dear Michael:

Based upon our discussions about the request for documents to the Alabama Law Enforcement Agency ("ALEA") on September 21, 2016, I am providing you with a list of subject matter topics to aid you in your response. This list is not exhaustive and is provided solely for the purpose of facilitating ALEA's cooperation with the Committee. It does not in any way alter or supplant the document requests.

After reviewing this list, please let us know if you have any specific objections to the individual document requests and the basis for each of those objections. Otherwise, please produce responsive documents by October 7, 2016. If you intend to produce documents on a rolling basis, please contact me to discuss the appropriate order of priority.

TOPICS

1. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, for the benefit of Rebekah Mason;
2. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;

**COMMITTEE
EXHIBIT**

2-B

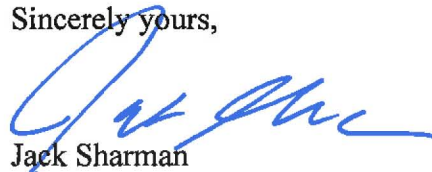
3. Any changes to or discrepancies in State records or in recordkeeping procedures related to any personal relationship between Governor Bentley and Rebekah Mason;
4. Any personnel decisions or actions, including but not limited to any temporary or permanent removals, reassignments, replacements, or terminations, that were influenced in any way, whether directly or indirectly, by Rebekah Mason or the relationship between Governor Bentley and Rebekah Mason;
5. Governor Bentley's placement of Spencer Collier on medical leave and his later termination of Spencer Collier as Secretary of Law Enforcement;
6. The removal, reassignment, or termination of any other ALEA employees in connection with, or around the time of, Spencer Collier's leave and termination;
7. Governor Bentley's promotion of Stan Stabler to Secretary of Law Enforcement;
8. Any investigations into ALEA or Spencer Collier while Secretary of Law Enforcement, including but not limited to investigations into any actual or alleged misuse of State funds by officers or employees of ALEA;
9. The request by the Attorney General's office for an affidavit(s) concerning ALEA's investigation into the release of Hubbard grand jury testimony, Spencer Collier's and other ALEA personnel's response thereto (including any draft affidavits reviewed or edited by the Office of the Governor), the instruction to Spencer Collier and other ALEA personnel not to submit an affidavit, and any meetings related to the foregoing;
10. Communications between Rebekah Mason and officials or employees of ALEA;
11. Communications between the Office of the Governor and officials or employees of ALEA regarding the relationship between Governor Bentley and Rebekah Mason.

* * * *

Please feel free contact me with any questions. The Committee looks forward to ALEA's cooperation in its investigation.

With best wishes, I am

Sincerely yours,



Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

September 8, 2016

Via United States Certified Mail
Return Receipt Requested
Ms. Jennifer Ardis



Re: Impeachment Investigation of Governor Robert Bentley


Dear Ms. Ardis:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-C

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO JENNIFER ARDIS

TO: Ms. Jennifer Ardis


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 Requests shall encompass the period of time beginning January 17, 2011 to the present.

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

D. Produce all documents and things requested no later than by **5:00 p.m. Thursday, September 29, 2016.**

Documents and Things Requested

1. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule from January 17, 2011 until the end of your service with the Office of the Governor.

2. 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.

3. 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.

4. 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.

5. 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 from January 1, 2014 to the present.

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 end of your service with the Office of the Governor.

7. 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. Governor Robert Bentley;
- b. Rebekah Mason;
- c. Jon Mason;
- d. Spencer Collier;
- e. Stan Stabler;
- f. Ray Lewis;
- g. any director, officer, employee, agent, or representative of Alabama Council for Excellent Government;
- h. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.;
- i. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- j. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.;
- 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;

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 person, whether sent by you, sent to you, or copied to you, concerning:

- a. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government, including but expressly not limited to communications concerning formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- l. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- m. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- n. 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 the present.

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

- a. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government, including but expressly not limited to formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, Inc.;
- j. State aircraft;
- k. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- l. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- m. 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 the present.

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

11. Any and all documents, things, or electronic data that you removed from the Office of the Governor.

12. Any and all documents, electronic data, and information that you have received from the Office of the Governor since the end of your service with the Office of the Governor.

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, between you and the Office of the Governor, including any attorney or other person acting for or on behalf of either you or it, since the end of your service with the Office of the Governor.

14. 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 the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, including any attorney or other person acting for or on behalf of either you or it, since the end of your service with the Office of the Governor.

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 30, 2016

Via United States Mail

Mr. Paul Bentley



Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Bentley:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "J. Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-D

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO PAUL BENTLEY

TO: Mr. Paul Bentley

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Documents and Things Requested

1. Any and all audio or video recordings of any part of any telephone or other conversations between Governor Robert Bentley and Rebekah Mason.
2. Any and all audio or video recordings of any part of any telephone or other conversations between you and Rebekah Mason.
3. Any and all electronic devices that were used by you or by any other person to record or capture the recordings, identified in Requests One and Two, and upon which such recordings are preserved.

4. 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.

5. Any and all notes, memoranda, summaries, or other records or compilations of records, relating to the financial activity or conduct of Governor Robert Bentley in either his official or personal capacity.

6. 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. Rebekah Mason;
- c. Jon Mason;
- d. Spencer Collier;
- e. Stan Stabler;
- f. Ray Lewis;
- g. Mike Echols;
- 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.;
- k. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.

7. 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. Rebekah Mason;
- c. Spencer Collier;

- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, Inc.

8. 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. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, Inc.

9. 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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 12, 2016

Via United States Mail and Electronic Mail

Joseph C. Espy III, Esq.
MELTON, ESPY & WILLIAMS, P.C.
255 Dexter Avenue
Montgomery, Alabama 36104

Re: Impeachment Investigation of Governor Robert Bentley

Dear Joe:

Enclosed with this letter is a request for documents directed to Governor Bentley in his personal capacity. I understand that you will accept service on behalf of Governor Bentley, and will cause him to be served.

Please produce the documents and things requested no later than by 5:00 p.m. on Friday, September 2, 2016.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to be "J. Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-E

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO GOVERNOR ROBERT BENTLEY

**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**

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 Requests shall encompass the time from January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in file folders or with other enclosures that segregate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request 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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 23, 2016

Via United States Mail and Electronic Mail

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

Re: Impeachment Investigation of Governor Robert Bentley

Dear Joe:

Enclosed with this letter is a request for documents directed to Bentley for Governor, Inc. on behalf of the Alabama House Judiciary Committee. I understand that you represent Bentley for Governor, Inc., and I trust that you will accept service on its behalf and will cause it to be served. If I am incorrect in that regard, please let me know right away.

Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016**. If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

**COMMITTEE
EXHIBIT**

2-F

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO BENTLEY FOR GOVERNOR, INC.

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

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 Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- C. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

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

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 17, 2016

Via United States Mail and Electronic Mail

Mr. J. Spencer Collier
c/o Kenneth J. Mendelsohn, Esq.
JEMISON & MENDELSON, P.C.
1772 Platt Pl.
Montgomery, Alabama 36117

Re: Impeachment Investigation of Governor Robert Bentley

Dear Kenny:

Enclosed with this letter is a request for documents directed to Mr. Collier on behalf of the Alabama House Judiciary Committee. I understand that you represent Mr. Collier, and I trust that you will accept service on his behalf and will cause him to be served. If I am incorrect, please let me know right away.

Please produce all documents and things requested no later than by 5:00 p.m. on Wednesday, September 7, 2016. Please convey to Mr. Collier that, although he is not required to treat this request as confidential, I ask that he do so in order to preserve the integrity of this investigation.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "J. Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-G

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO J. SPENCER COLLIER

**TO: Mr. J. Spencer Collier
c/o Kenneth J. Mendelsohn, Esq.
JEMISON & MENDELSON, P.C.
1772 Platt Pl.
Montgomery, Alabama 36117**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request 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 Alabama Law Enforcement Agency.
2. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule from January 17, 2011 to March 22, 2016.
3. Any and all documents, electronic data, and information evidencing or relating to your job titles, duties, or performance as Secretary of Law Enforcement.
4. Any and all documents, electronic data, and information evidencing or relating to your placement on medical leave and subsequent termination as Secretary of Law Enforcement.

5. 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.

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

7. Any and all documents, electronic data, and information evidencing or relating to any meetings at which Rebekah Mason was present from January 1, 2014 to the present.

8. Any and all audio or video recordings of any part of any telephone or other conversations between Governor Robert Bentley and Rebekah Mason.

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 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. Rebekah Mason;
- f. Jon Mason;
- g. Stan Stabler;
- h. Ray Lewis;
- i. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, and trial of former Alabama Speaker of the House Mike Hubbard, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding.

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 you 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. Stan Stabler;
- h. Ray Lewis;
- i. Alabama Council for Excellent Government;
- j. RCM Communications, Inc.;
- k. JRM Enterprises, Inc.;
- l. 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- m. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- n. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- o. 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 the present.

11. 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. Stan Stabler;
- h. Ray Lewis;
- i. Alabama Council for Excellent Government or any of its current or former directors or officers;
- j. State aircraft;
- k. RCM Communications, Inc.;
- l. JRM Enterprises, Inc.
- m. 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- n. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- o. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions and internal investigation into the same;
- p. 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 the present.

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

13. Any and all documents, electronic data, and information evidencing or relating to the public statements you have made related to Governor Robert Bentley.

14. 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.

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

16. Any and all documents, electronic data, and information that you have received since March 22, 2016 evidencing or relating to State business.

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 30, 2016

Via United States Mail

Mr. Michael H. Echols
MICHAEL H. ECHOLS & ASSOCIATES
1629 McFarland Blvd North, Suite 401
Tuscaloosa, Alabama 35406

Re: Impeachment Investigation of Governor Robert Bentley

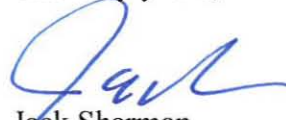
Dear Mr. Echols:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,


Jack Sharman

**COMMITTEE
EXHIBIT**

2-H

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO MICHAEL H. ECHOLS

**TO: Mr. Michael H. Echols
MICHAEL H. ECHOLS & ASSOCIATES
1629 McFarland Blvd North, Suite 401
Tuscaloosa, Alabama 35406**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

COMMITTEE
EXHIBIT

2-I

September 8, 2016

Via United States Mail and Electronic Mail

The Honorable Seth Hammett
c/o Tommy Spina, Esq.
Joe Mclean, Esq.
1330 21st Way South, Suite 200
Birmingham, Alabama 35205

Re: Impeachment Investigation of Governor Robert Bentley

Dear Gentlemen:

Enclosed with this letter is a request for documents directed to Mr. Hammett on behalf of the Alabama House Judiciary Committee. I understand that you represent Mr. Hammett, and I trust that you will accept service on his behalf and will cause him to be served. If I am incorrect, please let me know right away.

Please produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016**. Please convey to Mr. Hammett that, although he is not required to treat this request as confidential, I ask that he do so in order to preserve the integrity of this investigation.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink that reads "Jack Sharman" followed by a stylized flourish that appears to be "WBG".
Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO SETH HAMMETT

**TO: The Honorable Seth Hammett
c/o Tommy Spina, Esq.
Joe Mclean, Esq.
1330 21st Way South, Suite 200
Birmingham, Alabama 35205**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Documents and Things Requested

1. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule during your tenure as Chief of Staff.
2. Any and all documents, electronic data, and information evidencing or relating to your duties or performance as Chief of Staff.
3. Any and all documents, electronic data, and information evidencing or relating to the confidentiality agreement signed by you, a copy of which is enclosed as Attachment 1, including but expressly not limited to any drafts of the agreement, memoranda concerning the

agreement, or lists of members of the Office of the Governor to whom the agreement was proffered or by whom it was signed.

4. 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.

5. 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.

6. 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.

7. Any and all documents, electronic data, and information evidencing or relating to any relationship, professional or otherwise, between Governor Robert Bentley and Rebekah Mason.

8. Any and all notes, memoranda, summaries, or other records or compilations of records, relating to the financial activity or conduct of Governor Robert Bentley in either his official or personal capacity.

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 of the following persons, including any attorney or other person acting for or on behalf of either you or them:

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

- 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;

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 person, whether sent by you, sent to you, or copied to you, concerning:

- a. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government, including but expressly not limited to communications concerning formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- l. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- m. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;

- n. 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.

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

- a. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Alabama Council for Excellent Government, including but expressly not limited to formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- g. Bentley for Governor, Inc.;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, Inc.;
- j. State aircraft;
- k. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- l. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- m. 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.

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 the end of your tenure as Chief of Staff evidencing or relating to State business.

14. 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 the Office of the Governor, including any attorney or other person acting for or on behalf of either you or it, since the end of your tenure as Chief of Staff.

15. 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 the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, including any attorney or other person acting for or on behalf of either you or it, since the end of your tenure as Chief of Staff.

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 2, or the investigation pertaining thereto.

**OFFICE OF THE GOVERNOR
CONFIDENTIALITY AGREEMENT**

1. Confidential Information

- (a) Exclusive Property of Office of the Governor. You are appointed and serve in your position at the pleasure of the Governor. At all times during and after the date hereof, Appointee shall keep in confidence and trust all non-public information which may have been communicated to, acquired, or learned by Appointee in the course of or as a result of his/her employment with the Office of the Governor. Appointee hereby acknowledges that the Office of the Governor may possess certain Confidential Information. Appointee affirms that any such Confidential Information is the exclusive property of the Office of the Governor.
- (b) Confidential Information. For purposes of this Agreement, the term "Confidential Information" shall mean any and all information of any nature and in any form, including but not limited to, the Office of the Governor's existing, future and contemplated: (i) meetings and appointments; (ii) materials submitted to Appointee by the Office of the Governor and/or Governor's staff or persons who conduct business with the Office of the Governor; and (iii) any and all directly and indirectly related records, documents, specifications, data, and/or other information with respect thereto. Appointee acknowledges that such Confidential Information is confidential and proprietary. Appointee further acknowledges by signing this Agreement that the Office of the Governor has expended much time, cost, and difficulty in developing and maintaining the Confidential Information. The Office of the Governor acknowledges that Confidential Information may be a public record(s) subject to the Alabama Open Records Act. Appointee agrees not to disclose Confidential Information, falling under the Open Records Act, except as authorized below.
- (c) Unauthorized Use or Disclosure Prohibited. Appointee agrees: (i) to use the Confidential Information solely for the purpose of performing his/her duties on behalf of the Office of the Governor and for no other purpose whatsoever; (ii) not to, directly or indirectly, at any time during or after his/her employment by the Office of the Governor, disclose Confidential Information to any other Person (except to the Governor's staff in connection with his/her duties on behalf of the Office of the Governor) or use or otherwise exploit the Confidential Information to the benefit of the Appointee or any other Person or to the detriment of the Office of the Governor. For purposes of this Agreement, the term "Person" means any individual, corporation, limited or general partnership, limited liability company, joint venture, association, trust or other entity or organization.
- (d) Office of the Governor's Retention of Records. Upon the termination of Appointee's employment relationship with the Office of the Governor, Appointee hereby agrees that the Office of the Governor shall retain possession of all records, documents, computer data, electronically stored information and any other Confidential Information, including but not limited to, the names, addresses and telephone

numbers of staff members and constituents of the Office of the Governor and all copies thereof (collectively, the "Records") relating to the Confidential Information; and if such Records are not on the Office of the Governor's premises, Appointee hereby unconditionally agrees to return such Records, and all copies thereof, including those maintained on Appointee's personal phone, laptop, tablet, computer, and/or any other personal electronic device, to the Office of the Governor as soon as practical, but in any event no later than the date of termination. Additionally, Appointee agrees to return all originals and copies of Records upon demand by the Office of the Governor during the employment relationship.

2. Conflicts of Interest

Appointee acknowledges and agrees that he/she shall not use, copy, distribute, install or download any of the Office of the Governor's software or computer files or use any of the Office of the Governor's equipment for personal use, gain or profit or for use, gain or profit by any other Person, without the express written consent of the Office of the Governor (which may be withheld in the Office of the Governor's sole discretion).

Signed: _____

Print Name: _____

Date: _____

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

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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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 23, 2016

Via United States Mail

JRM Enterprises, Inc.
c/o Jonathan Mason
[REDACTED]

Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Mason:

Enclosed with this letter is a request for documents directed to JRM Enterprises, Inc. on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jack Sharman".
Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-J

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO JRM ENTERPRISES, INC.

**TO: JRM Enterprises, Inc.
c/o Jonathan Mason**



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 Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- C. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

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;

- 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. 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;
- 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. 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.

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

ARTICLES OF IMPEACHMENT AGAINST GOVERNOR BENTLEY.

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

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

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

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



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

**COMMITTEE
EXHIBIT**

2-K

August 30, 2016

Via United States Mail and Electronic Mail

Mr. Wendell Ray Lewis
c/o John D. Saxon, Esq.
JOHN D. SAXON, P.C.
2119 3rd Avenue North
Birmingham, Alabama 35203

Re: Impeachment Investigation of Governor Robert Bentley

Dear John:

Enclosed with this letter is a request for documents directed to Mr. Lewis on behalf of the Alabama House Judiciary Committee. I understand that you represent Mr. Lewis, and I trust that you will accept service on his behalf and will cause him to be served.

Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016**. Please convey to Mr. Lewis that, although he is not required to treat this request as confidential, I ask that he do so in order to preserve the integrity of this investigation.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to be "J. Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO WENDELL RAY LEWIS

**TO: Mr. Wendell Ray Lewis
c/o John D. Saxon, Esq.
JOHN D. SAXON, P.C.
2119 3rd Avenue North
Birmingham, Alabama 35203**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Documents and Things Requested

1. A complete copy of your personnel file(s) with the State of Alabama or the Alabama Law Enforcement Agency.
2. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule from January 17, 2011 until you ceased employment with the State of Alabama.
3. Any and all documents, electronic data, and information evidencing or relating to your job titles, duties, or performance as an employee of the State of Alabama.

4. 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.

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

6. 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 from January 1, 2014 to the present.

7. Any and all audio or video recordings of any part of any telephone or other conversations between Governor Robert Bentley and Rebekah Mason.

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. any other member of the Bentley family;
- e. Rebekah Mason;
- f. Jon Mason;
- g. Spencer Collier;
- h. Stan Stabler;
- 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.;
- k. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- l. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.;

- m. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, and trial of former Alabama Speaker of the House Mike Hubbard, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding.

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. any other member of the Bentley family;
- e. Rebekah Mason;
- f. Spencer Collier;
- g. Stan Stabler;
- h. Alabama Council for Excellent Government;
- i. Bentley for Governor, Inc.;
- j. RCM Communications, Inc.;
- k. JRM Enterprises, Inc.;
- l. 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- m. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- n. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- o. 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 the present.

10. 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. Spencer Collier;
- g. Stan Stabler;
- h. Alabama Council for Excellent Government or any of its current or former directors or officers;
- i. Bentley for Governor, Inc.;
- j. RCM Communications, Inc.;
- k. JRM Enterprises, Inc.;
- l. State aircraft;
- m. 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, to the extent such documents, electronic data, and information do not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- n. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- o. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions and internal investigation into the same;
- p. 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 the present.

11. Any and all documents, electronic data, and information evidencing or relating to Statements of Economic Interest filed by you with 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 you ceased employment with the State of Alabama evidencing or relating to State business.

14. 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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 23, 2016

Via United States Mail

Mr. Jonathan Mason
[REDACTED]

Re: Impeachment Investigation of Governor Robert Bentley


Dear Mr. Mason:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-L

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO JONATHAN MASON

TO: Mr. Jonathan Mason


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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

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;
- c. Dianne Bentley;
- 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:

- 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. RCM Communications, Inc.;
- g. Alabama Council for Excellent Government;
- h. Bentley for Governor, Inc.;
- 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.

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

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3
4
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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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 17, 2016

Via United States Mail and Electronic Mail

Mrs. Rebekah Mason
c/o William Patton Gray, Jr., Esq.
Douglas N. Robertson, Esq.
GRAY & ASSOCIATES, LLC
3800 Colonnade Parkway, Suite 350
Birmingham, Alabama 35243

Re: Impeachment Investigation of Governor Robert Bentley

Dear Gentlemen:

Enclosed with this letter is a request for documents directed to Mrs. Rebekah Mason on behalf of the Alabama House Judiciary Committee. I understand that you represent Mrs. Mason and trust that you will accept service on her behalf and will cause her to be served. If I am incorrect in that regard, please let me know right away.

Please produce all documents and things requested no later than by 5:00 p.m. on Wednesday, September 7, 2016. Please convey to Mrs. Mason that, although she is not required to treat this request as confidential, I ask that she do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "J. Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-M

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO REBEKAH MASON

**TO: Mrs. Rebekah Mason
c/o William Patton Gray, Jr., Esq.
Douglas N. Robertson, Esq.
GRAY & ASSOCIATES, LLC
3800 Colonnade Parkway, Suite 350
Birmingham, Alabama 35243**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request 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:

- 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 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.

20. Any and all documents, electronic data, and information evidencing or relating to any communications, including but expressly not limited to letter, 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;
- c. Dianne Bentley;
- d. any other member of the Bentley family;

- e. Spencer Collier;
- f. Stan Stabler;
- g. Ray Lewis;
- h. Bentley for Governor, Inc.;
- i. Alabama Council for Excellent Government;
- j. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions;
- k. State aircraft;
- l. RCM Communications, Inc.;
- m. JRM Enterprises, Inc.;
- 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.

21. 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. 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;
- g. State aircraft;
- h. RCM Communications, Inc.;
- i. JRM Enterprises, Inc.;

- 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.

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

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

24. 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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 12, 2016

Via United States Mail and Electronic Mail

Ross H. Garber, Esq.
SHIPMAN & GOODWIN LLP
1875 K. St., NW
Washington, D.C. 20006

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

Re: Impeachment Investigation of Governor Robert Bentley

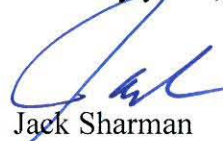
Dear Gentlemen:

Enclosed with this letter is a request for documents directed to the Office of the Governor, including Governor Robert Bentley in his official capacity. I understand that you will accept service on behalf of Governor Bentley, and will cause him to be served.

Please produce the documents and things requested no later than by 5:00 p.m. on Friday, September 2, 2016. If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

**COMMITTEE
EXHIBIT**

2-N

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO THE OFFICE OF THE GOVERNOR

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

**David B. Byrne, Jr., Esq.
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. These requests are 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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request 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



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

September 8, 2016

Via Electronic Mail

Mr. David Perry
[REDACTED]

Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Perry:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,

Jack Sharman / WBG
Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-0

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO DAVID PERRY

TO: Mr. David Perry


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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Documents and Things Requested

1. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule during your tenure as Chief of Staff.
2. Any and all documents, electronic data, and information evidencing or relating to your duties or performance as Chief of Staff.
3. 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.
4. 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.

5. 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.

6. Any and all documents, electronic data, and information evidencing or relating to any relationship, professional or otherwise, between Governor Robert Bentley and Rebekah Mason.

7. Any and all notes, memoranda, summaries, or other records or compilations of records, 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. Governor Robert Bentley;
- b. Rebekah Mason;
- c. Jon Mason;
- d. Spencer Collier;
- e. Stan Stabler;
- f. Ray Lewis;
- 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. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;

- d. Stan Stabler;
- e. Ray Lewis;
- f. Bentley for Governor, Inc.;
- g. RCM Communications, Inc.;
- h. JRM Enterprises, Inc.;
- i. State aircraft;
- j. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- k. 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.

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

- a. Governor Robert Bentley in his personal capacity;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- f. Bentley for Governor, Inc.;
- g. RCM Communications, Inc.;
- h. JRM Enterprises, Inc.;
- i. State aircraft;
- j. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- k. 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.

11. Any and all documents, things, or electronic data that you removed from State property.
12. Any and all documents, electronic data, and information that you have received since the end of your tenure as Chief of Staff evidencing or relating to State business.
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, between you and the Office of the Governor, including any attorney or other person acting for or on behalf of either you or it, since the end of your tenure as Chief of Staff.
14. 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 the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, including any attorney or other person acting for or on behalf of either you or it, since the end of your tenure as Chief of Staff.
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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 23, 2016

Via United States Mail and Electronic Mail

RCM Communications, Inc.
c/o Robert D. Segall, Esq.
COPELAND, FRANCO, SCREWS & GILL, P.A.
P.O. Box 347
Montgomery, Alabama 36101

Re: Impeachment Investigation of Governor Robert Bentley

Dear Bobby:

Enclosed with this letter is a request for documents directed to RCM Communications, Inc. on behalf of the Alabama House Judiciary Committee. I understand that you represent RCM Communications, Inc., and I trust that you will accept service on its behalf and will cause it to be served. If I am incorrect, please let me know right away.

Please produce all documents and things requested no later than by **5:00 p.m.** on **Tuesday, September 13, 2016**. Please convey to RCM Communications, Inc. that, although it is not required to treat this request as confidential, I ask that it do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jack Sharman".

Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

COMMITTEE
EXHIBIT

2-P

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO RCM COMMUNICATIONS, INC.

**TO: RCM Communications, Inc.
c/o Robert D. Segall, Esq.
COPELAND, FRANCO, SCREWS & GILL, P.A.
P.O. Box 347
Montgomery, Alabama 36101**

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 Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- C. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 13, 2016.**

Documents and Things Requested

1. Any and all documents RCM Communications, Inc. ("RCM") 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. RCM's articles of incorporation, bylaws, and all amendments to bylaws.
3. Minutes for any meetings of RCM's shareholders and directors.
4. All federal and state tax returns, including all schedules and attachments, from RCM's formation to the present.

5. A complete list of all of RCM'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 RCM by the State of Alabama, the Office of the Governor, the University of Alabama, the Alabama Council for Excellent Government, JRM Enterprises, Inc., Robert 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 RCM to the State of Alabama, the Office of the Governor, Rebekah Mason, Jon Mason, the Alabama Council for Excellent Government, JRM Enterprises, 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 JRM Enterprises, 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;
- 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. JRM Enterprises, 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;
- 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. JRM Enterprises, 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.

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

September 23, 2016

Via United States Certified Mail

Return Receipt Requested

Clayton M. Ryan, Esq.
500 22nd Street South, Suite 504
Birmingham, Alabama 35233

Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Ryan:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Friday, October 14, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

COMMITTEE
EXHIBIT

2-Q

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO CLAYTON M. RYAN

**TO: Clayton M. Ryan, Esq.
500 22nd Street South, Suite 504
Birmingham, Alabama 35233**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.

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

D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, October 11, 2016.**

Documents and Things Requested

1. 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, Bentley for Governor, Inc., or Governor Bentley in his personal capacity.

2. 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.

3. 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, social media 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, related to any of the subject matter topics identified in Appendix A:

- a. Governor Robert Bentley;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- 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.;
- 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding.

4. Any and all documents, electronic data, and information evidencing or relating to any of the subject matter topics identified in Appendix A.

5. 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.

Appendix A: Topics

1. Governor Bentley's relationship with Rebekah Mason;
2. Rebekah Mason's compensation for her services, from any source;
3. The establishment, purpose, funding, and operations of the Alabama Council for Excellent Government;
4. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, for the benefit of Rebekah Mason;
5. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
6. Any changes to State records or in recordkeeping procedures related to any personal relationship between Governor Bentley and Rebekah Mason;
7. Any use of campaign property, equipment, funds, or other assets, whether directly or indirectly, for the benefit of Rebekah Mason;
8. Any use of campaign property, equipment, or funds in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
9. Any personnel decisions or actions taken by the Office of the Governor, including but not limited to any temporary or permanent removals, reassignments, replacements, or terminations, that were influenced in any way, whether directly or indirectly, by Rebekah Mason or the relationship between Governor Bentley and Rebekah Mason;
10. The request by the Attorney General's office for an affidavit(s) concerning ALEA's investigation into the release of Hubbard grand jury testimony, Spencer Collier's and other ALEA personnel's response thereto (including any draft affidavits reviewed or edited by the Office of the Governor), the instruction to Spencer Collier and other ALEA personnel not to submit an affidavit, and any meetings related to the foregoing;
11. Governor Bentley's placement of Spencer Collier on medical leave and his later termination of Spencer Collier as Secretary of Law Enforcement;
12. The removal, reassignment, or termination of any other ALEA employees in connection with, or around the time of, Spencer Collier's leave and termination;
13. Any investigations into ALEA or Spencer Collier while Secretary of Law Enforcement;
14. Any undertakings by Governor Bentley or the Office of the Governor to conceal information related to the above topics from public disclosure.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

August 30, 2016

Via United States Mail

Cooper Shattuck, Esq.
[REDACTED]

Re: Impeachment Investigation of Governor Robert Bentley

Dear Mr. Shattuck:

Enclosed with this letter is a request for documents directed to you on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me (or to have your counsel contact me, if you have retained counsel).

With best wishes, I am

Sincerely yours,

A handwritten signature in blue ink, appearing to read "J. Sharman".
Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-R

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO COOPER SHATTUCK

TO: Cooper Shattuck, Esq.

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, September 20, 2016.**

Documents and Things Requested

1. 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. any director, officer, employee, agent, or representative of the Alabama Council for Excellent Government;

- d. any director, officer, employee, agent, or representative of Bentley for Governor, Inc.;
- e. any director, officer, employee, agent, or representative of RCM Communications, Inc.;
- f. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.

2. 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. Rebekah Mason;
- b. Alabama Council for Excellent Government, including but expressly not limited to communications concerning formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- c. RCM Communications, Inc.;
- d. JRM Enterprises, Inc.;
- e. Bentley for Governor, Inc.
- f. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions;
- 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.

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

- a. Rebekah Mason;
- b. Alabama Council for Excellent Government, including but expressly not limited to formation of a 501(c)(4) entity with the same or similar purpose as the Alabama Council for Excellent Government;
- c. RCM Communications, Inc.;
- d. JRM Enterprises, Inc.;

- e. Bentley for Governor, Inc.
- f. Alabama Law Enforcement Agency or any of its subordinate agencies, departments, or divisions;
- 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.

4. 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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

COMMITTEE
EXHIBIT

2-S

September 8, 2016

Via United States Certified Mail

Return Receipt Requested

The Honorable Stan Stabler
Secretary of Law Enforcement
Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36103

Re: Impeachment Investigation of Governor Robert Bentley

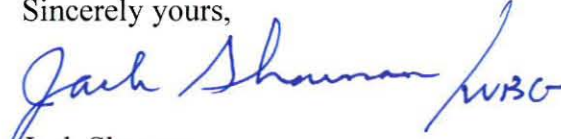
Dear Secretary Stabler:

Enclosed with this letter is a request for documents directed to you in your personal capacity on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me, or to have your counsel contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO SECRETARY STAN STABLER

**TO: The Honorable Stan Stabler
Secretary of Law Enforcement
Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36103**

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. The term "you" or "your" as used herein refers to Secretary Stan Stabler in his personal capacity.
- C. Unless otherwise specified, all Requests shall encompass the period of time beginning January 17, 2011 to the present.
- D. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- E. Produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Documents and Things Requested

1. 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.
2. Any and all documents, electronic data, and information evidencing or relating to your daily and weekly schedule from January 17, 2011 until your promotion to the office of Secretary of Law Enforcement.

3. Any and all documents, electronic data, and information evidencing or relating to your job titles, duties, or performance as an employee of the State of Alabama.

4. Any and all documents, electronic data, and information evidencing or relating to your promotion to the office of Secretary of Law Enforcement.

5. Any and all audio or video recordings of any part of any telephone or other conversations between Governor Robert Bentley and Rebekah Mason.

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

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

8. 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.

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 of the following persons, including any attorney or other person acting for or on behalf of either you or them:

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

- k. any director, officer, employee, agent, or representative of JRM Enterprises, Inc.;
- l. Matt Hart, Mike Duffy, or any other person involved in the investigation, indictment, prosecution, and trial of former Alabama Speaker of the House Mike Hubbard, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding.

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 person, whether sent by you, sent to you, or copied to you, concerning:

- a. Governor Robert Bentley in his personal capacity;
- b. Dianne Bentley;
- c. any other member of the Bentley family;
- d. Rebekah Mason;
- e. Spencer Collier;
- f. Ray Lewis;
- g. Alabama Council for Excellent Government;
- h. Bentley for Governor, Inc.;
- i. RCM Communications, Inc.;
- j. JRM Enterprises, Inc.;
- 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- l. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- m. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- n. 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 the present.

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

- a. Governor Robert Bentley in his personal capacity;
- b. Dianne Bentley;
- c. any other member of the Bentley family;
- d. Rebekah Mason;
- e. Spencer Collier;
- f. Ray Lewis;
- g. Alabama Council for Excellent Government or any of its current or former directors or officers;
- h. Bentley for Governor, Inc.;
- i. RCM Communications, Inc.;
- j. JRM Enterprises, Inc.;
- k. State aircraft;
- l. 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, to the extent such documents, electronic data, and information do not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- m. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard;
- n. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions and internal investigation into the same;
- o. 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 the present.

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

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

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.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

September 8, 2016

Via United States Certified Mail

Return Receipt Requested

The Honorable Stan Stabler
Secretary of Law Enforcement
Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36103

Re: Impeachment Investigation of Governor Robert Bentley

Dear Secretary Stabler:

Enclosed with this letter is a request for documents directed to the Alabama Law Enforcement Agency on behalf of the Alabama House Judiciary Committee. Please produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Although you are not required to treat this request as confidential, I ask that you do so in order to preserve the integrity of this investigation. If you have any questions, please do not hesitate to contact me, or to have your counsel contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-T

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO THE ALABAMA LAW ENFORCEMENT AGENCY

**TO: The Honorable Stan Stabler
Secretary of Law Enforcement
Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36103**

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. These Requests seek all responsive documents and things within the custody or control of the Alabama Law Enforcement Agency or any of its subordinate agencies, departments, and divisions.
- C. Requests that seek documents or things associated with a specific person shall be construed to include documents or things associated with that person in all of his or her current and former positions within the Alabama Law Enforcement Agency.
- D. These Requests do not seek records of open and ongoing criminal investigations.
- E. Unless otherwise specified, all Requests shall encompass the period of time beginning January 17, 2011 to the present.
- F. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- G. Produce all documents and things requested no later than by **5:00 p.m. on Thursday, September 29, 2016.**

Documents and Things Requested

1. The complete personnel files for Stan Stabler, Spencer Collier, Ray Lewis, John "Hal" Taylor, J. T. Jenkins, Jay Howell, Camilla Gibson, Merritt Hayes, and Jack Wilson.
2. Any and all documents, electronic data, and information evidencing or relating to the temporary or permanent removals, reassignments, replacements, or terminations of Spencer Collier, Ray Lewis, John "Hal" Taylor, J. T. Jenkins, Jay Howell, Camilla Gibson, Merritt Hayes, and Jack Wilson.
3. 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.
4. 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 the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, route plans, and vehicle manifests.
5. 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.
6. 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 from January 1, 2014 to the present.
7. Any and all documents, electronic data, and information evidencing or relating to any meetings at which both Stan Stabler and Spencer Collier were present from January 1, 2014 to the present.
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 Stan Stabler and Spencer Collier concerning:
 - a. Governor Robert Bentley;
 - b. Ray Lewis;
 - c. Rebekah Mason;
 - d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
 - e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;

- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.
- h. 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, , to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- i. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

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 Stan Stabler and Ray Lewis concerning:

- a. Governor Robert Bentley;
- b. Spencer Collier;
- c. Rebekah Mason;
- d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
- e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;
- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.
- h. 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;

- i. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

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 Stan Stabler and the Office of the Governor or Governor Robert Bentley in his personal capacity concerning:

- a. Spencer Collier;
- b. Ray Lewis;
- c. Rebekah Mason;
- d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
- e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;
- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.
- h. 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, , to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- i. 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 communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between Stan Stabler and Rebekah Mason.

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 Spencer Collier and Ray Lewis concerning:

- a. Governor Robert Bentley;
- b. Stan Stabler;

- c. Rebekah Mason;
- d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
- e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;
- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.
- h. 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, , to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- i. 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 communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between Spencer Collier and the Office of the Governor or Governor Robert Bentley in his personal capacity concerning:

- a. Stan Stabler;
- b. Ray Lewis;
- c. Rebekah Mason;
- d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
- e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;
- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.

- h. 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, , to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;
- i. 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 communications, including but expressly not limited to letters, notes, emails, text messages, and voice messages, between Spencer Collier and Rebekah Mason.

15. 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 Ray Lewis and the Office of the Governor or Governor Robert Bentley in his personal capacity concerning:

- a. Spencer Collier;
- b. Stan Stabler;
- c. Rebekah Mason;
- d. Spencer Collier's placement on medical leave and subsequent termination as Secretary of Law Enforcement;
- e. Stan Stabler's promotion to the office of Secretary of Law Enforcement;
- f. actual or alleged misuse of State funds by the Alabama Law Enforcement Agency or any of its subordinate agencies, departments or divisions, and internal investigation into the same;
- g. 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 the present.
- h. 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, , to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding;

- i. the investigation, indictment, prosecution, or trial of former Alabama Speaker of the House Mike Hubbard.

16. 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 Ray Lewis and Rebekah Mason.



ALABAMA HOUSE OF REPRESENTATIVES
JUDICIARY COMMITTEE

JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203

September 20, 2016

Via United States Mail and Electronic Mail

Ms. Angella Stalnaker
c/o Joe Hubbard, Esq.
JOE HUBBARD LAW FIRM
313 N. Hull Street
Montgomery, Alabama 36104

Re: Impeachment Investigation of Governor Robert Bentley

Dear Joe:


Enclosed with this letter is a request for documents directed to Ms. Angella Stalnaker. I understand that you represent Ms. Stalnaker and trust that you will accept service on her behalf and will cause her to be served. If I am incorrect in that regard, please let me know right away.

Please produce all documents and things requested no later than by 5:00 p.m. on **Tuesday, October 11, 2016**. Please convey to Ms. Stalnaker that, although she is not required to treat this request as confidential, I ask that she do so in order to preserve the integrity of this investigation.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-U

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO ANGELLA STALNAKER

**TO: Ms. Angella Stalnakar
c/o Joe Hubbard, Esq.
JOE HUBBARD LAW FIRM
313 N. Hull Street
Montgomery, Alabama 36104**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.

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

D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, October 11, 2016.**

Documents and Things Requested

1. 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, Bentley for Governor, Inc., or Governor Bentley in his personal capacity.

2. 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.

3. 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, social media 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, related to any of the subject matter topics identified in Appendix A:

- a. Governor Robert Bentley;
- b. Rebekah Mason;
- c. Spencer Collier;
- d. Stan Stabler;
- e. Ray Lewis;
- 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.;
- 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, to the extent such communications did not reference, concern or relate to any pending criminal investigation or grand jury proceeding.

4. Any and all documents, electronic data, and information evidencing or relating to any of the subject matter topics identified in Appendix A.

5. 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.

Appendix A: Topics

1. Governor Bentley's relationship with Rebekah Mason;
2. Rebekah Mason's compensation for her services, from any source;
3. The establishment, purpose, funding, and operations of the Alabama Council for Excellent Government;
4. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, for the benefit of Rebekah Mason;
5. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
6. Any changes to State records or in recordkeeping procedures related to any personal relationship between Governor Bentley and Rebekah Mason;
7. Any use of campaign property, equipment, funds, or other assets, whether directly or indirectly, for the benefit of Rebekah Mason;
8. Any use of campaign property, equipment, or funds in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
9. Any personnel decisions or actions taken by the Office of the Governor, including but not limited to any temporary or permanent removals, reassignments, replacements, or terminations, that were influenced in any way, whether directly or indirectly, by Rebekah Mason or the relationship between Governor Bentley and Rebekah Mason;
10. The request by the Attorney General's office for an affidavit(s) concerning ALEA's investigation into the release of Hubbard grand jury testimony, Spencer Collier's and other ALEA personnel's response thereto (including any draft affidavits reviewed or edited by the Office of the Governor), the instruction to Spencer Collier and other ALEA personnel not to submit an affidavit, and any meetings related to the foregoing;
11. Governor Bentley's placement of Spencer Collier on medical leave and his later termination of Spencer Collier as Secretary of Law Enforcement;
12. The removal, reassignment, or termination of any other ALEA employees in connection with, or around the time of, Spencer Collier's leave and termination;
13. Any investigations into ALEA or Spencer Collier while Secretary of Law Enforcement;
14. Any undertakings by Governor Bentley or the Office of the Governor to conceal information related to the above topics from public disclosure.

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.



ALABAMA HOUSE OF REPRESENTATIVES

JUDICIARY COMMITTEE

**JACK SHARMAN
SPECIAL COUNSEL
LIGHTFOOT, FRANKLIN & WHITE LLC
400 20TH STREET NORTH
BIRMINGHAM, ALABAMA 35203**

September 20, 2016

Via United States Mail and Electronic Mail

Ms. Collier Tynes
c/o Joe Hubbard, Esq.
JOE HUBBARD LAW FIRM
313 N. Hull Street
Montgomery, Alabama 36104

Re: Impeachment Investigation of Governor Robert Bentley

Dear Joe:

Enclosed with this letter is a request for documents directed to Ms. Collier Tynes. I understand that you represent Ms. Tynes and trust that you will accept service on her behalf and will cause her to be served. If I am incorrect in that regard, please let me know right away.

Please produce all documents and things requested no later than by 5:00 p.m. on **Tuesday, October 11, 2016**. Please convey to Ms. Tynes that, although she is not required to treat this request as confidential, I ask that she do so in order to preserve the integrity of this investigation.

If you have any questions, please do not hesitate to contact me.

With best wishes, I am

Sincerely yours,


Jack Sharman

cc: The Honorable Mike Jones, Chairman, Alabama House Judiciary Committee
Enclosure

**COMMITTEE
EXHIBIT**

2-V

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

**In Re: The Impeachment Investigation of
Governor Robert Bentley**

DOCUMENT REQUEST TO COLLIER TYNES

**TO: Ms. Collier Tynes
c/o Joe Hubbard, Esq.
JOE HUBBARD LAW FIRM
313 N. Hull Street
Montgomery, Alabama 36104**

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 Requests shall encompass the period of time beginning January 17, 2011 to the present.
- C. Documents responsive to any Request shall be produced together, in electronic or paper file folders or with other enclosures that separate the files by Request number. If a document is responsive to more than one Request, it shall be produced in response to the Request to which it is primarily responsive.
- D. Produce all documents and things requested no later than by **5:00 p.m. on Tuesday, October 11, 2016.**

Documents and Things Requested

1. 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 or Governor Bentley in his personal capacity.
2. 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.

3. 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, social media 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, related to any of the subject matter topics identified in Appendix A:

- a. Governor Robert Bentley;
- b. Dianne Bentley
- c. any other member of the Bentley family;
- d. Rebekah Mason;
- e. Spencer Collier;
- f. Stan Stabler;
- g. Ray Lewis;

4. Any and all documents, electronic data, and information evidencing or relating to any of the subject matter topics identified in Appendix A.

5. 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.

Appendix A: Topics

1. Governor Bentley's relationship with Rebekah Mason;
2. Rebekah Mason's compensation for her services, from any source;
3. The establishment, purpose, funding, and operations of the Alabama Council for Excellent Government;
4. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, for the benefit of Rebekah Mason;
5. Any use of State property, equipment, funds, or other assets (including State aircraft), whether directly or indirectly, in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
6. Any changes to State records or in recordkeeping procedures related to any personal relationship between Governor Bentley and Rebekah Mason;
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8. Any use of campaign property, equipment, or funds in the furtherance of any personal relationship between Governor Bentley and Rebekah Mason;
9. Any personnel decisions or actions taken by the Office of the Governor, including but not limited to any temporary or permanent removals, reassignments, replacements, or terminations, that were influenced in any way, whether directly or indirectly, by Rebekah Mason or the relationship between Governor Bentley and Rebekah Mason;
10. The request by the Attorney General's office for an affidavit(s) concerning ALEA's investigation into the release of Hubbard grand jury testimony, Spencer Collier's and other ALEA personnel's response thereto (including any draft affidavits reviewed or edited by the Office of the Governor), the instruction to Spencer Collier and other ALEA personnel not to submit an affidavit, and any meetings related to the foregoing;
11. Governor Bentley's placement of Spencer Collier on medical leave and his later termination of Spencer Collier as Secretary of Law Enforcement;
12. The removal, reassignment, or termination of any other ALEA employees in connection with, or around the time of, Spencer Collier's leave and termination;
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14. Any undertakings by Governor Bentley or the Office of the Governor to conceal information related to the above topics from public disclosure.

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

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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.