

INDICTMENT

THE STATE OF ALABAMA, LEE COUNTY

CIRCUIT COURT, SPECIAL GRAND JURY TERM, 2014

COUNT 1

The Grand Jury of said County charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: Chairman of the Alabama Republican Party, to obtain personal gain, to wit: lawful US currency or checks from the Alabama Republican Party, for himself or a business with which he is associated, to wit: Craftmaster Printers, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 2

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: Chairman of the Alabama Republican Party, to obtain personal gain, to wit: lawful US currency or checks from the Alabama Republican Party, for himself or a business with which he is associated, to wit: Auburn Network, d/b/a Network Creative Media, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 3

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: Chairman of the Alabama Republican Party, to obtain personal gain, to wit: lawful US currency or checks from the Alabama Republican Party through Majority Strategies, for himself or a business with which he is associated, to wit: Craftmaster Printers, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 4

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: Chairman of the Alabama Republican Party, to obtain personal gain, to wit: lawful US currency or checks from the Alabama Republican Party through Tim Howe d/b/a The Howe Group, LLC and/or SRM Media and Advertising, LLC, for himself or a business with which he is associated, to wit: Auburn Network, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 5

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a member of a legislative body, to wit: the Alabama House of Representatives, did intentionally vote for legislation, to wit: Senate Bill 143 of the 2013 Regular Legislative Session, and he knew or should have known that he had a conflict of interest, in violation of Section 36-25-5(b) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 6

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: lawful US currency or checks from American Pharmacy Cooperative, Inc. ("APCI") to Mike Hubbard d/b/a Auburn Network, from a lobbyist, subordinate of a lobbyist, or principal, to wit: APCI, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 7

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: a member of the Alabama House of Representatives, to obtain personal gain, to wit: lawful US currency or checks from the Southeast Alabama Gas District ("SEAGD"), for himself or a business with which he is associated, to wit: Auburn Network, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 8

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally, for a fee, reward, or other compensation, in addition to that received in his official capacity, to wit: lawful US currency or checks from the Southeast Alabama Gas District ("SEAGD") to Mike Hubbard d/b/a Auburn Network, represent a person, firm, corporation, or other business entity, to wit: SEAGD, before an executive department or agency, to wit: The Alabama Department of Commerce, in violation of Section 36-25-1.1 of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 9

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally, for a fee, reward, or other compensation, in addition to that received in his official capacity, to wit: lawful US currency or checks from the Southeast Alabama Gas District ("SEAGD") to Mike Hubbard d/b/a Auburn Network, represent a person, firm, corporation, or other business entity, to wit: SEAGD, before an executive department or agency, to wit: Office of the Governor for the State of Alabama, in violation of Section 36-25-1.1 of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 10

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: lawful US currency or checks from Edgenuity, Inc. and/or E2020, Inc. to Mike Hubbard d/b/a Auburn Network, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Edgenuity, Inc. and/or E2020, Inc., in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 11

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, did intentionally use or cause to be used his official position or office, to wit: a member of the Alabama House of Representatives, to obtain personal gain, to wit: lawful US currency or checks from Robert Abrams d/b/a CV Holdings, LLC, for himself or a business with which he is associated, to wit: Auburn Network, and such use and gain were not otherwise specifically authorized by law, in violation of Section 36-25-5(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 12

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally, for a fee, reward, or other compensation, in addition to that received in his official capacity, to wit: lawful US currency or checks from Robert Abrams d/b/a CV Holdings, LLC to Mike Hubbard d/b/a Auburn Network, represent a person, firm, corporation, or other business entity, to wit: Robert Abrams d/b/a CV Holdings, LLC, before an executive department or agency, to wit: The Alabama Department of Commerce, in violation of Section 36-25-1.1 of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 13

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally, for a fee, reward, or other compensation, in addition to that received in his official capacity, to wit: lawful US currency or checks from Robert Abrams d/b/a CV Holdings, LLC to Mike Hubbard d/b/a Auburn Network, represent a person, firm, corporation, or other business entity, to wit: Robert Abrams d/b/a CV Holdings, LLC, before an executive department or agency, to wit: Office of the Governor for the State of Alabama, in violation of Section 36-25-1.1 of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 14

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally use or cause to be used equipment, facilities, time, materials, human labor, or other public property under his discretion or control, to wit: a state computer, a state email account, or the human labor and/or the time of himself and another state employee, for the private benefit or business benefit of the public official, public employee, or any other person, to wit: lawful US currency or checks from Robert Abrams d/b/a CV Holdings, LLC to Mike Hubbard d/b/a Auburn Network, which did materially affect his financial interest, and such benefit was not otherwise provided by law or as provided pursuant to a lawful employment agreement regulated by agency policy, in violation of Section 36-25-5(c) of the Code of Alabama, 1975, against the peace and dignity of the State of Alabama.

COUNT 15

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit a thing of value, to wit: an investment in Craftmaster Printers, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Dax Swatek, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 16

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: \$150,000.00 investment in Craftmaster Printers, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Will Brooke, Board Member of the Business Council of Alabama ("BCA"), in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 17

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: \$150,000.00 investment in Craftmaster Printers, from a lobbyist, subordinate of a lobbyist, or principal, to wit: James Holbrook and/or Sterne Agee Group, Inc., in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 18

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value to wit: \$150,000.00 investment in Craftmaster Printers from lobbyist, subordinate of a lobbyist, or principal, to wit, Jimmy Rane, President of Great Southern Wood, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 19

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: \$150,000.00 investment in Craftmaster Printers, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Robert Burton, President of Hoar Construction, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 20

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: assistance with obtaining new clients for Auburn Network, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Bob Riley, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 21

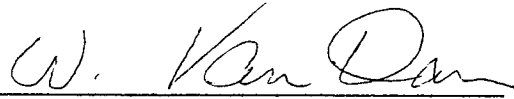
The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: consulting assistance and support for Mike Hubbard d/b/a Auburn Network, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Minda Riley Campbell, in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 22

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: assistance with obtaining new clients for Auburn Network, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Billy Canary, President and CEO of the Business Council of Alabama ("BCA"), in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

COUNT 23

The Grand Jury of said County further charges that before the finding of this Indictment, MICHAEL GREGORY HUBBARD, alias MIKE HUBBARD, whose true name is to the Grand Jury unknown otherwise than stated, being a public official or public employee, to wit: a member of the Alabama House of Representatives, did intentionally solicit or receive a thing of value, to wit: assistance with obtaining new clients for Auburn Network and/or financial advice regarding Craftmaster Printers, from a lobbyist, subordinate of a lobbyist, or principal, to wit: Will Brooke, Board Member of the Business Council of Alabama ("BCA"), in violation of Section 36-25-5.1(a) of the Code of Alabama (1975), against the peace and dignity of the State of Alabama.

A handwritten signature in cursive script, reading "W. Van Davis", positioned above a horizontal line.

W. VAN DAVIS
Supernumerary District Attorney,
Acting Attorney General
State of Alabama

Grand Jury No. CS14-1473

CC No. _____

A TRUE BILL:---

Sharon Haden

Foreperson Grand Jury

Filed in open Court on the 17th day of October, 2014, in the presence of the Grand Jury.

W. B. ...

Clerk

Presented to the Circuit Judge in open Court by the Foreperson of the Grand Jury, in the presence of other Grand Jurors, and filed by order of Court this 17th day of October, 2014.

W. B. ...

Clerk

Bail fixed at \$5,000 each this 17th day of October, 2014.

*Count 1-10
\$3,000 11-23 counts*

James A. ...

Circuit Judge

**THE STATE OF ALABAMA
LEE COUNTY
CIRCUIT COURT
Special Term, 2014**

THE STATE
VS.

Michael Gregory Hubbard, alias
Mike Hubbard

Date of Arrest:

SID#

INDICTMENT

Counts 1-4: Use of office for personal gain, §36-25-5(a); Count 5: Voting for legislation with conflict of interest, §36-25-5(b); Count 6: Soliciting or receiving thing of value from a lobbyist or principal, §36-25-5.1(a); Count 7: Use of office for personal gain, §36-25-5(a); Counts 8-9: Lobbying an executive department or agency for a fee, §36-25-1.1; Count 10: Soliciting or receiving thing of value from a lobbyist or principal, §36-25-5.1(a); Count 11: Use of office for personal gain, §36-25-5(a); Count 12-13: Lobbying an executive department or agency for a fee, §36-25-1.1; Count 14: Use of equipment, materials, etc., §36-25-5(c); Counts 15-23: Soliciting or receiving thing of value from a lobbyist or principal, §36-25-5.1(a);

WITNESSES:

Special Agent Robert Stuart, Office of Attorney General
Special Agent D. Keith Baker, Office of Attorney General