

AFFIDAVIT

Comes now the undersigned Affiant and, after having been duly sworn, states on oath to the best of my recollection, information, and belief, the following statements set forth in paragraphs one through six are true and correct:

My name is Robert R. Riley Jr. I am an attorney practicing law in Birmingham, Alabama at the law firm of Riley & Jackson, P.C. I graduated from the University of Alabama in 1988 with a degree in Economics, Yale Law School in 1991, with a J.D. degree, and the University of Cambridge (England) in 1992, with a LL.M. degree. My father, Bob Riley, was elected Governor of Alabama in November, 2002 and was re-elected Governor in November, 2006.

I have no memory of being on a phone call with Jill Simpson ("Ms. Simpson") on November 18, 2002. Furthermore, I do not believe a phone call occurred that involved Ms. Simpson, former Alabama Supreme Court Justice Terry Butts ("Mr. Butts"), Bill Canary ("Mr. Canary"), and myself on November 18, 2002 in which Mr. Butts allegedly stated that he would confront former Alabama Governor Don Siegelman ("Mr. Siegelman") with photographs of a political prank, described in the following paragraph, and would attempt to convince Mr. Siegelman to concede the election based on said photographs, or that Mr. Canary allegedly made statements to the effect that "his girls" would take care of Mr. Siegelman, or that "Karl" had spoken to, or gone over to, the Department of Justice and that the Department of Justice was pursuing, or would pursue, a case against Mr. Siegelman.

I have never been told by Mr. Butts, or anyone else, that Mr. Butts spoke with Mr. Siegelman on November 18, 2002, and convinced Mr. Siegelman to concede the 2002 campaign for Governor. Other than from Ms. Simpson's Affidavit, I have never heard anyone say that Mr. Siegelman conceded the election in exchange for not releasing photographs of a political prank involving Democratic operatives putting up Riley for Governor signs at a KKK rally. Other than in Ms.

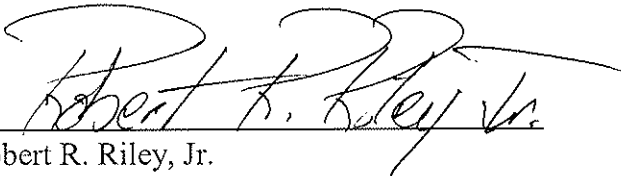
Simpson's testimony of September 14, 2007, I have never heard that Mr. Siegelman conceded the election in exchange for immunity from prosecution. I have never made a statement to Ms. Simpson that there was an agreement between Mr. Butts and Mr. Siegelman regarding Mr. Siegelman's concession of the 2002 campaign for Governor.

I do not believe that I have ever met or spoken with Judge Mark Fuller ("Judge Fuller"). Other than what I have read in Ms. Simpson's testimony and the documents that I understand she produced at the time of her testimony, I have no knowledge of any ownership in any business or alleged grudges Ms. Simpson says Judge Fuller holds against Mr. Siegelman, and I never discussed such with Ms. Simpson. I have spoken with Stewart Hall ("Mr. Hall") since Ms. Simpson's testimony was released. Mr. Hall has told me that, to the best of his recollection, he has never met or spoken with Judge Fuller at any time in his life, nor does he have knowledge of any businesses in which Judge Fuller has been involved or any alleged grudge that Judge Fuller has against Mr. Siegelman. Ms. Simpson stated in her testimony that she understood that Judge Fuller was in "college" at "Alabama" with Stewart and me. It is my understanding based on an internet search that Judge Fuller graduated from college at the University of Alabama in 1982. I began college at the University of Alabama in 1984. Mr. Hall has told me that he began college at the University of Alabama in January, 1985.

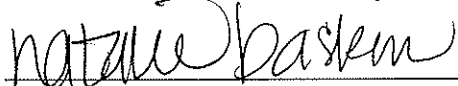
I have never requested Karl Rove's ("Mr. Rove") assistance to "speed up" checks for any of Ms. Simpson's clients, or his assistance on any other federal matter, nor have I ever told Ms. Simpson that I was doing so. Ms. Simpson's belief that I e-mailed a copy of a document to Mr. Rove regarding a matter associated with a FEMA appeal is not correct. The document that Ms. Simpson has discussed in her testimony was sent to Mr. Karl Dix, who is an attorney in Atlanta,

Georgia, practicing with the law firm of Smith, Currie, and Hancock, who provided assistance with the appeal. Furthermore, I did not tell Ms. Simpson that Mr. Rove was assisting with this project.

I have not been told or provided information that Mr. Siegelman would be prosecuted if he ran for political office again after the 2002 election; that Mr. Rove had spoken to someone about prosecuting Mr. Siegelman; that Judge Fuller was going to be appointed the Judge of the Siegelman-Scrushy case; that a case would be brought against Mr. Siegelman and Mr. Scrushy or that specific charges were going to be brought against them; nor have I made statements to this effect to Ms. Simpson. Furthermore, at no time have I participated, in any manner or way, in the criminal prosecutions of Mr. Siegelman or Mr. Scrushy.


Robert R. Riley, Jr.

In Jefferson County, Alabama, on the 22nd day of October, 2007, before me, a Notary Public in and for the above-state and county, personally appeared Robert R. Riley, Jr., known to me or proved to be the person named in and who executed the foregoing instrument, and being first duly sworn, such person acknowledged that he or she executed said instrument for the purposes therein contained as his of her free and voluntary act and deed.


Notary Public
My commission expires: 03/02/10