

DECLARATION

I, Toni Knight, residing at 705 21st Avenue, N.W., Birmingham, AL 35215 make the following declaration:

1. In the early part of 1996, I was involved in the formation and operation of a business entity known as the American Management and Marketing Corporation ("AMMC"). I was a member of the Board of Directors of AMMC. I was also a Vice President of AMMC.
2. AMMC was founded and incorporated for the purpose of operating a radio station. This radio station was owned by the American Trust Corporation and was located in Prattville, Alabama, and had the call letters WTQR.
3. I became involved in AMMC at the suggestion of Earl F. Hilliard. Earl F. Hilliard wanted me to be involved due to my approximately 17 years of experience in radio. My involvement in AMMC was to include setting up and operating the radio station in Montgomery, Alabama, and helping to turn the radio station into a profitable business enterprise. At the time I first became involved, the radio station was located in a trailer in Prattville, Alabama. AMMC leased the radio station from American Trust Corporation and agreed to pay a fee every month for use of the radio station.
4. The other individuals involved in this business venture included John Hilliard and Deborah Lumpkin. I accompanied Earl Hilliard during a visit to the radio station at its location in Prattville, Alabama.
5. In connection with my involvement with AMMC, I visited a building located at 1614 3rd Avenue North approximately two times for meetings. I do not know whether or not the office was a campaign office for the Hilliard for Congress Campaign or any campaign activities taking place in that building.
6. I made several trips to Montgomery, Alabama to locate office space for AMMC. I located a property at 128 Lee Street in Montgomery, Alabama that was available for leasing by AMMC.
7. On or about March 15, 1996, I negotiated a lease of 128 Lee Street in Montgomery, Alabama with Pizitz Realty Company. The lessor wanted a guarantor of the lease because AMMC was a new company, and Earl F. Hilliard agreed to be the guarantor. 128 Lee Street in Montgomery, Alabama was leased by AMMC for the exclusive purpose of housing a radio station in it. The property was not leased for any other purpose during my short involvement. After my involvement ceased, I had no knowledge of how this building was used by Mr. Hilliard.

DECLARATION OF TONI KNIGHT

Page 2

8. It was my intention to operate WJQR as a Christian radio station, and that the rent for use of 128 Lee Street in Montgomery, Alabama would be paid with funds raised through sales of radio advertising.
9. AMMC never became a profitable business enterprise, and WJQR never moved into 128 Lee Street in Montgomery, Alabama while I was involved with AMMC. My involvement in AMMC ended in approximately July 1996. I visited 128 Lee Street in Montgomery, Alabama approximately five times during my involvement in AMMC. My most recent visit to 128 Lee Street in Montgomery, Alabama was in July of 1996, and at the time of this visit the property was still vacant.
10. While I was involved with AMMC, AMMC did not sublease 128 Lee Street in Montgomery, Alabama to American Trust Corporation or the Hilliard for Congress Campaign. I have no knowledge or awareness of the use of the property located at 128 Lee Street in Montgomery, Alabama by the Hilliard for Congress Campaign.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Friday, Oct 13, 2000



Toni Knight