

AFFIDAVIT OF JEFFREY LEE LOWE

STATE OF Florida)

COUNTY OF Duval)

BEFORE ME, the undersigned, personally appeared JEFF LOWE, who produced DL# 011234835 (form of identification), and who after being first duly sworn, deposes and says:

1. I, JEFF LOWE am over the age of eighteen (18) and can truthfully and competently testify to the matters contained herein based upon my personal knowledge.

2. The factual statements contained herein are true and correct to the best of my knowledge, information, and belief.

3. I currently reside in Love County, Oklahoma

4. A conversation never took place with Ashley Webster on or about February of 2017 when the alleged hiring of a hitman to kill Carole Baskin allegedly occurred. .

5. I did not engage in a conversation with Ashley Webster at any time during the four days she was employed at park about a plot to kill Carole Baskin.

6. Ashley Webster was involved in a sexual relationship with the alleged hitman Alan Glover. This relationship was never disclosed. Matthew Bryant asked us not to reveal this information on March 25, 2019. I recently disclosed this information to Mr. Maldonado-Passage's attorneys.

7. I became aware that James Garretson was working as an undercover informant with the FBI and United States Fish and Wildlife around September of 2017.

8. As early as October 2017 I agreed that if Alan Glover was a problem at the park, we could send him packing back to South Carolina.

9. Alan Glover did not tell me he left the park to go "take out" Baskin. Glover did not tell me that he spent all the money while in Florida for thirty (30) days.

10. The FBI Report #030 is inaccurate. This conversation did not happen. I did not discuss different ways for Alan Glover to kill or practice killing Carole Baskin.

11. The February 26, 2018 conversation between myself and Alan Glover regarding the murder for hire of Carole Baskin includes text messages that were created by me and staged. These were created in an effort to help re-facilitate charges on the murder for hire involving Alan Glover.

12. I knew I was being recorded in the May 10, 2018 conversation with James Garretson and statements made by me regarding Alan Glover being paid \$3,000 to go to Tampa to kill Carole Baskin were not true. Alan Glover never went to Florida. I never witnessed any money exchanging hands between Alan Glover and Joseph Maldonado-Passage.

13. In my interview of June 5, 2018, Agent Matthew Bryant with Federal Fish and Wildlife told me the elements we needed to meet and the overt acts we needed proof of in order to convict Joseph Maldonado-Passage on wildlife and murder for hire charges.

14. In my June 5, 2018 interview with Matt Bryant, Bryant told me exactly what I needed to get Joe and Alan to say in order to complete the alleged murder for hire.

15. My phone call with Alan Glover on June 6, 2018 was turned over to Agent Bryant who then orchestrated the questions I should ask on subsequent phone calls. This included Alan falsely admitting to his involvement with and/or participation in overt acts that would support the alleged murder for hire. I did this at the direction of Agent Bryant because he told me we needed "an overt act or it's all just talk."

16. At the direction of Agent Matthew Bryant, I began recording telephone calls with Joseph Maldonado Passage. When my conversations with Maldonado-Passage failed to provide the information Agent Bryant needed to prove the murder for hire plan, he instructed me to get the admissions from Allen Glover.

17. Agent Bryant helped circumvent the USDA requirement for vet of record after Dr. Green left for providing him with information in the case.

18. Matthew Bryant continuously directed me to try different ways of getting the information he needed from Joseph Maldonado-Passage to support the elements of the murder for hire.

19. I was the one who provided the picture to Alan Glover and identified Robert Engesser to him as the individual who I suspected made the cub purchase on November 22, 2018. I have no knowledge of Robert Engesser being at the park or buying a cub on November 22, 2018.

20. I helped coordinate and was present for the interviews with Alan Glover, Marc Thompson, Melicia Thompson, Amber Eastep, Bruce David, Marsha David, Eric Cowie, Dylan West and Brenda Varga. These interviews took place in my personal residence or my office on park property.

21. While I was working for Agent Bryant, he continuously asked me to call him and not text because the text messages had to be disclosed. He stated to me that he shorthanded his notes to control the narrative of the written report that was subject to discovery. Agent Bryant did not report every phone conversation or meeting that we had. There were too many to count.

22. While working with Agent Bryant he was constantly on a mission to collect souvenirs from the park to "collect souvenirs for his boss, Amanda Green." Agent Bryant took political signs, political condoms and a sign that says "Jail Carole Baskin."

23. On August 3, 2018, Agent Bryant asked me to let him see the inside of Joseph Maldonado-Passage's boarded up house. He told me as the property owner it was legal for me to break into Mr. Maldonado-Passage's house. I gained entry and Agent Bryant went through the house looking for additional memorabilia.

24. Agent Bryant also took a bunch of records and binders containing passwords and bank records, birth records and a shotgun from the park.

25. While Agent Bryant was on the premises on August 3, 2018, he took a banker box filled with credit card and bank statements and put it in his silver pick-up truck without explanation.

26. Agent Bryant disclosed various details of the case to me, including Joseph Maldonado-Passage's plea deal, witnesses that were testifying at trial, what they were going to say and described the state's case. This conversation wherein he disclosed Joseph Maldonado-Passage's plea-deal was not previously disclosed and was recently turned over to Mr. Maldonado-Passage's attorneys. After an interview with a witness, he would call us and tell us everything the witness said.

27. The United States Fish and Wildlife Agents asked me to sign a search and consent release to dig up the alleged euthanized tigers. Agent Bryant stated "you know if I were a person who had connections with a TV station, I might call that person and see if they have a helicopter available, but I didn't say that." While they were digging up the tigers, Bryant stated "I only want to take the heads." I asked why and he stated, "if they show what I think they will show, a gunshot to the head has a shock value and it is a much more effective statement to a jury." He further stated, "if we have to autopsy these bodies it makes it much more confusing to the jury because Joe will

argue that they had illnesses.” “A jury is not sophisticated enough to understand autopsy reports, but everyone knows what a shot gun to the head means.”

28. While discussing the motion to sever Agent Bryant told me that the murder charges were stacked on top of the murder for hire charges so “we get some jurors’ heartstrings bleeding on shooting those cats and showing pictures of the tiger dig and all of that. And they might be prejudicial where we are weak on the murder for hire.” This phone call was not disclosed and I recently provided it to Joseph Maldonado-Passage’s attorneys. He also stated that he was afraid that Carole Baskins unlikable personality would make it difficult for jurors to convict on circumstantial evidence, but killing majestic tigers would demonize him to most jurors. He also stated this to me again after the trial.

29. On February 13, 2019, during a recorded call with Agent Bryant while discussing the case, Agent Bryant discussed “holes in the case.” When I asked what the holes were, he stated “Glover, he was the only witness to money exchanging hands.” He also stated he would like to have Joseph Maldonado-Passage’s phone “to see who in the [explicit] it was that showed up that day, that got the liger.” He further stated, “I don’t believe it was Engesser, Engesser spilled his guts and told me about cub sales and money and wire transfers that I knew nothing about. He said that day was not me.”

30. Matt Bryant would contact us by telephone nightly to tell us about the testimony that occurred at trial each day. He would also ask for clarification on some of the witnesses’ testimony. He also asked if we had any additional information to provide him that the prosecutor could ask since they had the ability to re-question them.

31. Agent Bryant confirmed to me that captive-bred and captive-held wildlife were not typically protected by the Endangered Species Act, but he was confident that Joseph Maldonado-

Passage's court appointed attorney would have no clue of this zoo animal exemption. This information was not previously disclosed. I recently provided these recordings to Mr. Maldonado-Passage's attorneys.

32. James Garretson revealed to me several times that Agent Bryant had instructed him to record his calls with me, but James told me he wasn't going to record me; When I asked James if that would raise any suspicion, he said that because Matt was using his meetings with his informant as a cover for Matt's "extra-curricular activities" that there was nothing to be concerned over. Agent Bryant was using James as an excuse to be absent from work and James was his cover if Agent Bryant ever got challenged on his whereabouts."

33. Agent Bryant made some calls to get Alan Glover's DUI case handled. Agent Bryant told me that a conviction could impugn the credibility of the statements to the government. Bryant called Sheriff Rhodes the day before Alan's arraignment and worked out a deal with Sheriff Rhodes to keep this off Alan's record. Agent Bryant would always tell me that I had to try to keep Alan Glover out of the spotlight.

34. Amanda Green told me during my trial preparation that she cannot stand the sight of Joseph Maldonado-Passage.

35. In a conversation I had with Agent Bryant, he stated that Amanda Green has been obsessed with taking Joe down to the point of having a photo of him in her office with a bullseye centered on his head.

36. Joseph Maldonado-Passage's trial attorneys did not try to take my deposition or speak to me prior to the trial.

FURTHER AFFIANT SAYETH NOT

Jeffrey Lee Lowe
Jeffrey Lee Lowe

8-6-21

Date

Catherine Halsema
Notary Public

8-6-21

Date

Catherine Halsema

Type or Print Name

My Commission Expires:

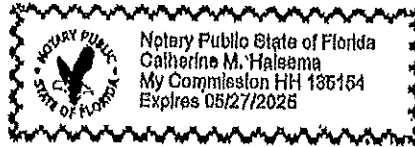


Exhibit 2