

AFFIDAVIT OF JAMES GARRESTON

STATE OF Florida)

COUNTY OF Duval)

BEFORE ME, the undersigned, personally appeared JAMES GARRESTON, who produced _____ (form of identification), and who after being first duly sworn, deposes and says:

1. I, JAMES GARRESTON 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. For the past 8 years I have resided in Monroe County, Florida, Tarrant County, Texas and Jefferson County, Oklahoma.

4. On September 18, 2017, I agreed to serve as a cooperating private individual for the United States Department of the Interior Fish and Wildlife Service under the direction of Special Agents Matthew Bryant and Andrew Farabow in a criminal case against Joseph Maldonado-Passage.

5. Under the direction of the agents, I began recording my interactions with Joseph Maldonado-Passage.

6. I recorded calls about cub sales, document forgery and an alleged murder for hire plan involving Alan Glover as the hitman.

7. I was provided protection from the government in return for signing up as a confidential informant.

8. I did not call Carole Baskin to warn her about the murder-for-hire. I called her about selling the park.

9. I was never present when Joseph Maldonado-Passage and Alan Glover initially discussed a plot for the alleged Murder-for-hire.

10. I was constantly instructed by the government on what questions to ask and not to use certain words "us" or "we" because it can't be my idea. It has to be Joseph Maldonado-Passage's idea.

11. Matt Bryant asked me for a picture of Robert Engesser to provide it to Alan Glover so that Alan Glover could identify Mr. Engesser as the individual who was involved in the cub purchase. Alan Glover did not know who Robert Engesser was.

12. When it became clear to Bryant that the information regarding an alleged murder for hire plan involving Alan Glover would not materialize, it was Matt Bryant and Andrew Farabow who insisted and directed me to introduce the undercover agent to Joseph Maldonado-Passage. They asked me to do the initial introduction and stay out of the conversation.

13. I introduced the undercover agent to Joe Maldonado Passage at the direction of Matthew Bryant and Andrew Farabow for the purpose of creating a crime as all of the information previously gathered concerning any murder plan, was inaccurate.

14. On December 8, 2017, I introduced the undercover agent to Maldonado Passage. I recorded the meeting for Bryant. To my knowledge, Maldonado Passage never acted on any of the details of any murder for hire plan discussed in that meeting.

15. On June 5, 2018, Special Agent Matt Bryant interviewed Jeff Lowe. I was present for the entire interview. I was present when Bryant told Jeff Lowe exactly what was needed to

secure a murder for hire charge against Maldonado Passage. This interview took place after the undercover agent failed in his attempt to create a murder for hire plan with Maldonado Passage.

16. This is consistent with my individual communications with Bryant as well. Throughout my service as a cooperating private individual, Bryant constantly directed me on what to do and what to say. He wanted me to go in there and do certain things and to meet their element. He told me we've got to get cash. We've got to get money. Money has to change hands.

17. I was present for the conversations where Jeff Lowe used threats to coerce Alan Glover into testifying in a way that matched Bryant's theory of the alleged crime.

18. This is information previously undisclosed to the government and the trial attorneys for Maldonado Passage.

19. I did not turn over the entire text history of messages between myself and Maldonado Passage and myself and Jeff Lowe. I have provided this information to Mr. Maldonado-Passage's counsel.

20. This is information previously undisclosed to the government and the trial attorneys for Maldonado Passage. I have provided this information to Mr. Maldonado-Passage's counsel.

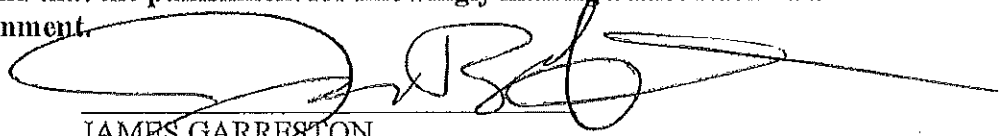
21. Matt Bryant disclosed to me that he spoke with witnesses Chealsi Putnam and Jeff Johnson frequently. Most of these calls were never recorded or disclosed.

22. Leading up to and immediately before trial I talked to Howard Baskin via text message and he thanked me for getting these people off the streets and promised they would help provide protection from the USDA.

23. I have not received anything in exchange for this Affidavit.

FURTHER AFFIANT SAYETH NOT.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this petition and that the punishment for knowingly making a false statement includes fines and/or imprisonment.



JAMES GARRESTON

7-30-21

Date

7-30-21
Date

Catherine M. Halsema

NOTARY PUBLIC

Catherine M. Halsema

Type or Print Name / My Commission Expires

