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My name is Carolyn Lewis-Gibbons. I am 47 years of age. I was married to Milford Gibbons, also known as Sam Gibbons, who died in 1991. I have five children ranging in age from 16 to 29, two of whom still reside with me. Since 1983, I have lived with my family at 75 Eldred Street in Ashland, Alabama.

Sometime after we moved to Eldred Street but before 1987, my husband acquired a shotgun a photo of which is attached to this statement as Exhibit A. It was the only weapon he ever had during our marriage other than a pistol which he also owned for a period of time. I do not know where or how or from whom he acquired the shotgun shown in Exhibit A to this statement. However, I know that it was kept in our bedroom in our house on Eldred Street from the time he got it until shortly after his death in 1991.

During the time my husband was alive, to the best of my knowledge, the gun was never used by him except on New Year's Eve when he would take the gun outside and fire it into the air. My husband was not a hunter nor to the best of my knowledge did he engage in any other activity in which a shotgun might be used.

Sometime towards the end of October 1997, approximately two weeks prior to the murder in Sylacauga, Alabama for which Harvey Venn and William Kuenzel were arrested, Harvey Venn borrowed my husband's shotgun. Although I am not sure I ever met Harvey Venn, I had heard about him from my husband who at that time worked with him at the Madix plant in Goodwater. Venn knocked on our front door or rang the doorbell between 10 and 11 p.m. one night and borrowed the gun. I remember the incident because my husband and I were already in bed and my husband had to go downstairs to open the front door and then come up again to

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get the shotgun . He told me at that time that it was Harvey Venn at the door and that he wanted to borrow the gun to go hunting.

I heard about the murder within a few days after it happened, either from the newspapers, radio , TV or my husband. At the time, I remember my husband expressing concern that his shotgun borrowed by Venn might have been the murder weapon and wondering whether he should consult an attorney. Shortly after that, however, he told me that the police had ruled out his shotgun as the murder weapon. I believe, based on what my husband told me at the time, that he was interviewed by the police and that he showed them the shotgun that Venn had borrowed from him.

I do not recall when the shotgun was returned to us or or how or by whom. However, after it was returned it was once again stored in our bedroom where it remained until my husband's death, as described above.

Other than this one incident involving Harvey Venn, I have no recollection of the shotgun having been borrowed or used by anyone else other than my husband as described above.

Shortly after my husband's death in 1991, I moved the gun from our bedroom to a van parked in front of our house which was used for storage rather than transportation. I stored the gun under the back seat in the van to make sure that my children wouldn't find it. To the best of my knowledge, there the gun remained untouched until March 28, 1998 when I was visited by Josiah E. Thompson and his colleague, Luther Brannon, who identified themselves as private investigators working for an attorney representing William Kuenzel. At that time, I removed the gun from the van and showed it to Messrs. Thompson and Brannon

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who examined it and photographed it. (One of their photographs of the shotgun is attached hereto as Exhibit A.)

After they left my house on March 28, 1998, I returned the gun to the same place in the van where it remained until Tuesday, May 5, 1998, when I again removed it to show it to Mr. Thompson and Mr. Kuenzel's attorney, David Dretzin. At that time, I turned over the gun to Mr. Thompson for examination by experts and for possible use as evidence in a proceeding brought by Mr. Kuenzel for relief from the sentence of death rendered against him in connection with the murder referred to above. At that time, on Tuesday, May 5, 1998, Mr. Thompson in my presence wrapped the gun in bubble wrap and a garbage bag and placed it in a cardboard carton. He then wrote and signed a letter to me an exact copy of which is attached hereto as Exhibit B. Messrs. Thompson and Dretzin then left with the carton containing the shotgun.

I might add that I know nothing about guns and dislike having them around.

I have made this statement of my own free will and not in response to any threat of harm or promise of benefit from anyone. CHG

Caroleen P. Gibbons

Sworn to before me
this 11 day of Feb, 1999.

Luther P. Brannon

my commission expires may 11, 2002.

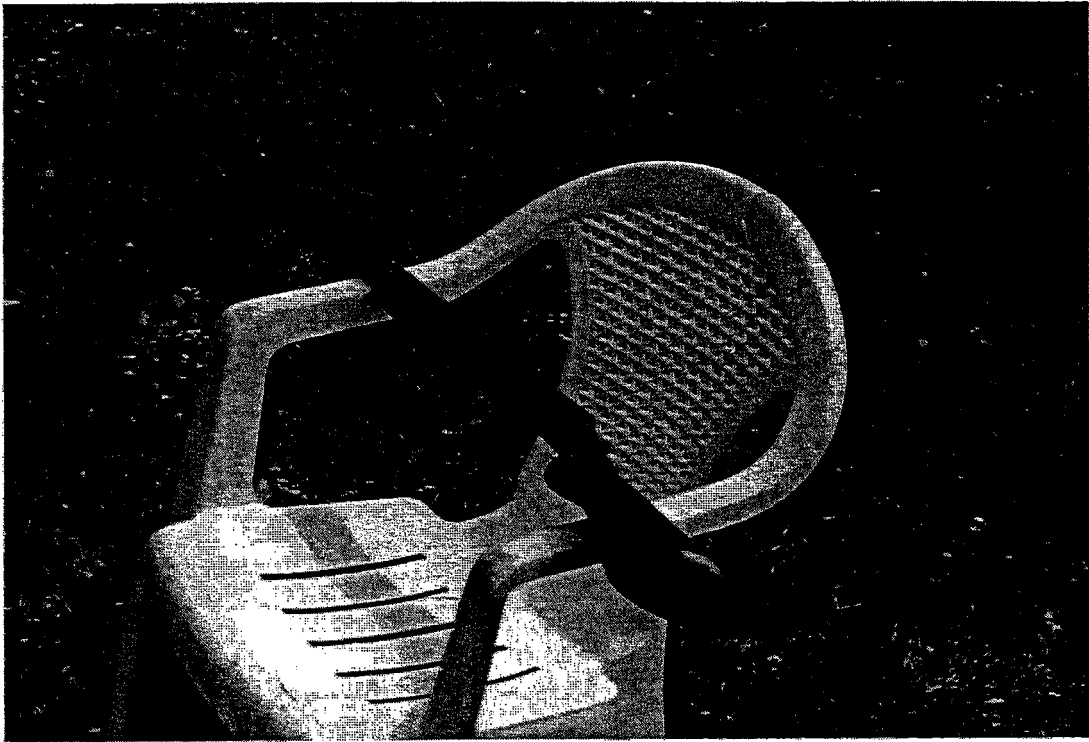


EXHIBIT A

May 4, 1998
Ashland, Alabama

Carolyn Lewis-Hibbons
362 Fourth Avenue
Ashland, Alabama 36251

Re: Kuenzel v Alabama

Dear Ms. Lewis-Hibbons,

This will acknowledge that you have delivered to me today a 16 gauge shot gun marked "16 gauge full choke ~~and~~ barrel and by forged in me" for the purpose of having it examined by experts and for possible use in the above designated proceeding now pending in the Circuit Court of Talladega County.

JD
This will further acknowledge that this shotgun is your property and will be returned to you after the above designated proceeding is finally adjudicated.

Sincerely,

JOSEPH E. THOMPSON