

## **DECLARATION OF ANTHONY HARGROVE**

I submit this declaration in order to describe instructions I was given by New Orleans Saints Coaches about what to tell NFL investigators during their 2010 investigation of the Saints' so-called 'bounty' program.

1. On or about February 24, 2010, I returned to New Orleans, Louisiana after a mission trip to Swaziland, Africa, and I received a telephone call from my New Orleans Saints defensive line coach, Bill Johnson. Coach Johnson informed me that Defensive Coach Gregg Williams needed to talk to me at the Saints facility. I immediately went to Coach Williams' office for the meeting.
2. When I arrived in his office, Coach Williams was working on a depth chart, and he said to me, "I've got you plugged in at left end, Tony." Coach Williams knew that defensive end was my preferred position. It wasn't until later that I realized that the presentation Coach Williams gave me regarding my opportunity to start at defensive end might have had something to do with what he was about to tell me to do. In fact, later, after I had re-signed with New Orleans and had concluded my meeting with NFL security in the manner Coach Williams had instructed me, I was never given the opportunity to compete for the starting defensive end job.
3. Assistant Coach Joe Vitt joined Coach Williams and me in Williams' office. Coach Williams told me that the NFL was coming to the Saints facility to ask questions about a complaint from the Vikings that there had been a "bounty" placed on Vikings quarterback Brett Favre by the New Orleans Saints defense prior to the NFC Championship game.
4. Williams said that some people thought that I had told Vikings player Jimmy Kennedy about the existence of a "bounty" on Brett Favre because I am friends with Jimmy from our playing days at St. Louis.
5. Williams said he was going to deny the existence of any bounty on any player to the NFL, and I should deny it, too. Coach Vitt also said he was going to deny the existence of any bounties. Coach Williams said: "Those motherf-ckers [the NFL] have been trying to get me for years," and if we all "stay on the same page, this will blow over."
7. Coach Vitt also told me that I should deny the existence of any bounty or bounty program, and he told me to remember that he was the person who "brought [me] into the League and brought [me] to the Saints."

8. The meeting lasted approximately 30 minutes, and during that time, both Coach Williams and Coach Vitt told me that I should deny the existence of any bounty or bounty program to the NFL. Williams and Vitt repeatedly stated that they “care about me, and...if we all stay on the same page about this, it will blow over.” They told me that when the NFL asked me about any bounty or bounty program, I should “just play dumb.”

9. In mid-March 2010, approximately two weeks after the meeting with Coach Williams and Coach Vitt, I met with one person from NFL Security at the New Orleans Saints facility.

10. The NFL Security personnel asked me if there had been a bounty on Brett Favre in the NFC Championship game, and as instructed by Coach Williams and Coach Vitt, I denied all knowledge of a bounty or bounty program.

11. The NFL Security personnel then asked several questions about whether there was a bounty program, whether Saints players contributed money to a bounty pool, and whether I had ever received bounty money. In response to these questions, I followed the clear directions I had received from Coach Williams and Coach Vitt, and I repeatedly denied knowledge of any bounty or bounty program.

12. Approximately a week after I had been questioned by NFL Security, Gregg Williams asked me about the interview; he asked “Did you stick to the story?” I told him that I responded to all of the NFL’s questions as he and Coach Vitt had instructed me: I denied any knowledge of a bounty program.

13. After that conversation with Gregg Williams in late March 2010, I never discussed my interview with the NFL or the instructions that I had been given by Coach Williams and Coach Vitt until NFLPA attorneys informed me in mid-March 2012 that the NFL might want to talk to me about the March 2010 interview and the alleged bounty program again.

I swear that the above statements are truthful.

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Anthony Hargrove

Dated: \_\_\_\_\_