April 3, 2025

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Melissa S. Scott, Esquire General Counsel The Mississippi Bar Post Office Box 2168

Jackson, Mississippi 39225-2168

Re: Robert W. Wilkinson - Bar Complaint

Ellen Hall and Joseph Jewell

Dear Ms. Scott:

I am advised that a Bar Complaint has been filed against Robert W. Wilkinson by Ellen Hall and by Joseph Jewell. It is my further understanding that this relates to the Securix, LLC contract with the City of Ocean Springs.

The following is the information I have with regard to Jonathan Miller, who was President of Securix, LLC and their dealings in Ocean Springs.

1. My name is Mark Dunston. I was Chief of Police for the City of Ocean Springs from March 2015 until my retirement in September 2023. I have been in law enforcement for over 39 years and have previously served as the Executive Board of the Mississippi Police Chief Association's state representative to the International Association of Chiefs of Police 2019-2022. I also have testified as an expert witness in proceedings and court and have been qualified as an expert in both State and Federal Courts more than one hundred times throughout the United States. In 2022, I was advised of presentation made by Jonathan Miller and others at Securix, LLC with regard to an Uninsured Motorist LPR Program that had been presented to another municipality on the Mississippi Gulf Coast. I advised Mr. Wilkinson that I was interested in such a program for the City of Ocean Springs, Mississippi.

2. After an Attorney General Opinion was obtained regarding the legality of such system, I and members of my administrative team met with Jonathan Miller. Mr. Wilkinson was not present at said meeting wherein Mr. Miller made a presentation for the Program. Thereafter, I made a recommendation and presented the Program, in executive session, to the Mayor and

Board of Aldermen of Ocean Springs, Mississippi. Mr. Wilkinson was present in the executive session but did not participate in my presentation.

3. The Uninsured Motorist Program ultimately was approved by the Mayor and Board of Aldermen of Ocean Springs, and it was under my control and supervision. All decisions with regard to the Program were made by me. I was aware that Mr. Wilkinson was representing Securix, LLC in certain litigation and in Securix, LLC's business with other municipalities in Mississippi. He did not offer, nor did I accept, legal advice on the Securix Program in Ocean Springs, Mississippi.

4. The Securix Uninsured Motorist Program in Ocean Springs, Mississippi was, ultimately, a failure. It failed because of the way Jonathan Miller attempted to run the Program in the City. For approximately one (1) year I had numerous interactions and conversations with Jonathan Miller. It became my opinion that Jonathan Miller was untrustworthy and untruthful. He misrepresented matters and made false statements to me on a regular basis. Mr. Miller has subsequently made statements to the media that I was paid by Securix, LLC for work related to the Ocean Springs, Mississippi Securix, LLC contract. That is a blatantly false statement. His accusations that I acted unethically are blatantly false.

5. It is my opinion that Jonathan Miller lacks integrity, honesty and fabricates matters to attempt to justify that it is he who is always right, on every subject. Having worked with the attorneys and, specifically city attorneys, for my entire career, I know of nothing that Mr. Wilkinson did, during the Securix, LLC contract with the City of Ocean Springs that was improper or unethical.

I am willing to attend any hearings that you may have in Jackson or in any location to provide testimony, under oath, to the above matters and any other matters relating to Securix.

Sincerely,

Mark S. Dunston