



COMMONWEALTH OF KENTUCKY
KENTUCKY GENERAL ASSEMBLY
In the House of Representatives

IN RE: Impeachment of Attorney General Daniel Cameron

PETITIONERS' REQUEST FOR PRODUCTION OF EVIDENCE

Come the Petitioners, by counsel, and request that the Attorney General provide the following documents in furtherance of a thorough and transparent review of the Petition and more particularly, the Response his counsel filed thereto, which contains no affidavit or rebuttal assertions signed by the Attorney General himself. In order to expedite review, such documents should be produced prior to any substantive hearing on the merits of either motion. Petitioners suggest a response date of 2/5/21 by 4 p.m.

1. With regard to the Breonna Taylor case, all documents supporting the Attorney General's unsworn assertion that he "told . . . the grand jury all charges" including:

(a) the Attorney General's directions to the Special Prosecutor team assisting with the Grand Jury; and

(b) reports from that team to the Attorney General or his designate on the information provided to the Grand Jury with regard to possible charges;

2. All communications between Daniel Cameron and Adam Piper, Executive Director of RAGA, between the dates 11/1/21 and 1/9/21;

3. All communications between the RAGA Executive Committee members, including Daniel Cameron, for the dates 11/1/20-1/9/21, inclusive, which address management of the Rule of Law Defense Fund (RDLF);

4. All communications between the RAGA Executive Committee members on the dates 1/1/21-1/9/21;

5. All communications between RLDF staff and Daniel Cameron for the dates 1/1/21-1/9/21;

6. Any documents reflecting Daniel Cameron's attendance at any RLDF meeting, presentation or fundraising event in 2020 or 2021;

7. All documents reflecting any costs towards preparing, filing or arguing the amicus brief filed with regard to any out of state joinder in election cases for the months August, 2020-January, 2021.

Respectfully submitted
/s/ Anna Stewart Whites /s/

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document was served electronically on Clerk of the House, Speaker Osborne and Minority Leader Jenkins, and on counsel for the Attorney General, Hon. Barry Dunn and Hon. Victor Maddox, 700 Capitol Avenue, Suite 118, Frankfort KY 40601 and Hon. Christopher Thacker, Billings Law Firm PLLC, 145 Constitution Street, Lexington KY 40507, this the 1st day of February, 2021.

/s/ Anna Stewart Whites /s/

Attorney for Petitioners