

COMMONWEALTH OF KENTUCKY
KENTUCKY GENERAL ASSEMBLY
ACTION NO.

IN RE: Attorney General Daniel Cameron

VERIFIED AFFIDAVIT AND PETITION FOR IMPEACHMENT

Come the undersigned Petitioners and Affiants, having been duly sworn, pursuant to KRS 63.020, et seq. and Sections 66 and 68 of the Kentucky Constitution, and move for the IMPEACHMENT of Attorney General Daniel Cameron for engaging in “misdemeanors in office” as defined in the Constitution and as outlined in this document, which shall be considered an Affidavit by the parties, including the following:

- Incitement of insurrection
- Breach of public trust
- Failure to comply with duties imposed on him as the chief law enforcement official;
- Abuse of office and state property, and other misfeasance and malfeasance as outlined herein.

The relevant facts supporting impeachment are as follows:

(1) IMPEDING A CRIMINAL INVESTIGATION AND FALSE STATEMENTS ABOUT A CRIMINAL INVESTIGATION

Statement of Law and Fact

Attorney General Daniel Cameron (“Cameron”) is a public servant and civil officer in the Commonwealth of Kentucky, subject to impeachment under Section 68 of the Kentucky Constitution for any “misdemeanors in office.”

KRS§522.020 states that a “public servant is guilty of official misconduct in the first degree when, with intent to obtain or confer a benefit or to injure another person or to deprive another person of a benefit, he knowingly:...(b) Refrains from performing a duty imposed upon him by law or clearly inherent in the nature of his office.”

After the Kentucky Commonwealth Attorney for Jefferson County recused himself as prosecutor, Cameron, in his capacity as Attorney General assumed the role of prosecutor on behalf of the Commonwealth of Kentucky regarding the death of Breonna Taylor, who was shot to death by Louisville Metro Police Officers on March 13, 2020 in her home in Louisville, Kentucky.

Cameron presented his investigation to a Grand Jury beginning on September 21, 2020 and concluding on or around September 23, 2020.

On Wednesday, September 23, 2020, and immediately following presiding Judge O'Connell's announcement of the Grand Jury's decisions on the various charges, Cameron gave a press conference on announcing that no charges would be filed for the killing of Breonna Taylor. At that press conference, Cameron said his office presented "all of the information" and walked the Grand Jury through "every homicide offense" before the Grand Jury came to its conclusion. *See* "3rd Breonna Taylor Grand Juror: Officers 'got slap on the wrist'", Courier Journal, November 16, 2020

According to three Grand Jurors, neither Cameron nor anyone from his office mentioned any homicide offense to the grand jury. Not only were no homicide offenses presented as alleged, no charges of any kind were presented to the Grand Jury other than the three wanton endangerment charges against Detective Hankinson. *Id.*, ("[The Grand Juror] echoed two other grand jurors' complaints that the panel wasn't allowed to consider additional charges because prosecutors told them the use of force was justified.")

With regard to the murder of Breonna Taylor, a citizen and resident of Louisville, Kentucky, Attorney General Cameron has misled the public and misrepresented the actions of the citizens serving on the Breonna Taylor Grand Jury.

Attorney General Cameron used Ms. Taylor's name in a joking or political manner at the Trump convention, inflicting further severe and permanent emotional distress on her friends and family.

Attorney General Cameron deceived the American people and the citizens of this Commonwealth with regard to his office's handling and involvement in the Breonna Taylor investigation and the resulting legal actions. Attorney General Cameron misled the public during his hour long national press conference in stating that his office's investigation found "...and the grand jury agreed that [police] were justified in the return of deadly fire after having been fired upon...."

When asked if the Grand Jury considered manslaughter, reckless homicide or other charges, AG Cameron stated "[O]ur team walked them through ever homicide offense . . . and then the grand jury was ultimately the one that made the decision about indicting...." In fact, those statements were blatantly false and have been refuted in legal actions and arguments before courts in this Commonwealth.

The Attorney General publicly made many statements about what the Grand Jury heard and decisions that were made based on what certain witnesses said. He further laid those decisions at the feet of the Grand Jury while failing to answer specific questions about the charges and evidence presented.

Attorney General Cameron falsely claimed that certain evidence before the Grand Jury did not exist and gave incorrect and inaccurate versions of the actual factual evidence before the Grand

Jury, thereby diminishing the liability of persons potentially criminally liable for wrongdoing and defaming the name and reputation of Ms. Taylor, her friends and family.

AG Cameron, and his agents and employees, engaged in making false statements and concealing evidence provided to the Grand Jury which was charged with investigating the murder of Breonna Taylor. Kentucky Rule of Professional Conduct Rule SCR 3.130 (3.3) requires an attorney to be honest with courts and juries. Section (1)(a) prohibits a lawyer from making false statements about a case, evidence or proceeding. Legal arguments based on a false misrepresentation of law or facts constitute actionable dishonesty. The lawsuits and motions filed by members of the Grand Jury indicate that false statements and concealment of relevant and material evidence occurred in that case and that they were not even provided the option of charging the parties who murdered Ms. Taylor with the actual offenses committed, but instead were offered only minimal charges to present.

AG Cameron personally made false statements regarding material facts to the public regarding the investigation of Ms. Taylor's murder. SCR 3.130(4.1) requires that statements made by a lawyer to third parties about a case to be truthful. A lawyer "shall not knowingly make a false statement of material fact to a third party." As AG Cameron's press conference regarding the Grand Jury's decision reveals, he knowingly and intentionally made numerous material false statements with regard to the evidence in the case to citizens he is charged with representing ethically and honestly.

AG Cameron acted in violation of the Kentucky Rules of Professional Conduct, specifically, SCR 3.130 (3.8), by consistently attempted to sway public opinion regarding his office's presentation to the Grand Jury while speaking publicly about his opinion of the completeness and accuracy of that presentation when its efficacy is what is in question. He has continued to expose the Grand Jurors to public condemnation by laying responsibility for the proceeding's results at their feet. This is in direct violation of the duties of public office and the express requirements for holding the position he currently does.

While the Supreme Court of Kentucky has ultimate authority over AG Cameron's law license, this body has the duty to remove him from office for violating public trust and the requirements imposed on those who represent the Commonwealth

Misdemeanor in Office: Official Misconduct

Attorney General Daniel Cameron, a public servant and civil officer in the Commonwealth of Kentucky, improperly intended to satisfy his political ambitions, seeking personal and political gain and loyalty from law enforcement officers and their unions, by excluding information from the Grand Jury, generally misleading the Grand Jury, and lying to the public.

Cameron had a duty to present accurate information to and not mislead the Grand Jury, a duty he violated by failing to present homicide charges.

Cameron lied to the public about what he had told the Grand Jury, violating the duty and requirements imposed by his office.

This Verified Petition requests immediate review and impeachment.

This action is brought before the Kentucky House of Representatives as required by Section 66 of the Kentucky Constitution.

Petitioner asks that this Petition be referred for review and investigation by an Impeachment Committee on these charges, that the House act upon it and Order the issuance of articles of impeachment for the Attorney General, and that the Senate affirm that impeachment.

The Petitioner demands that Attorney General Cameron further be disqualified from holding any office of honor, trust or profit under the Constitution of the Commonwealth of Kentucky and that all costs of this proceeding be charged to him, as permitted by KRS 63.070 and KRS 63.075.

(II) INCITEMENT AND SUPPORT OF INSURRECTION AND VIOLENCE

(A) Support For Unlawful Actions on January 6, 2021

Attorney General Cameron permitted and supported RAGA, the National Association of Republican Attorneys General, to recruit, aid and abet persons who went to the Capitol to engage in felonious acts of destruction and violence, resulting in millions of dollars of damages to governmental buildings, and the injury or death of law enforcement officials and others. AG Cameron is a member of the RAGA Executive Committee, which made decisions about use of that organization's resources and political capital, exacerbating the deep political divides and damage that occurred on January 6, 2021, and encouraging illegal and damaging behaviors.

National sources have reported that Alabama A.G. Marshall leads the Republican Attorneys General Association's dark-money nonprofit Rule of Law Defense Fund, which is listed as a participating organization for the March to Save America on the march's website, as are the groups Stop the Steal, Tea Party Patriots and Turning Point Action. RAGA paid for radical robocalls inciting citizens to attend the violent actions in Washington D.C. [See: Robocall text reported in the Atlanta Journal-Constitution on 01/08/21. Attorney General Cameron is a member of RAGA and is involved with its action groups.

<https://www.alreporter.com/2021/01/07/alabama-ag-leads-nonprofit-that-helped-organize-march-at-capitol/>

As a member of RAGA's 9 person Executive Committee AG Cameron supported the efforts to goad, encourage, and fund the attacks on the Capitol and failed and refused to notify the FBI or other authorities who could have prevented the murders and damage had they known of the concerns in advance. These are ongoing breaches of his duty as a Kentucky lawyer and his duties as the state's Attorney General.

Cameron, as a Constitutional Officer, swore an oath of office as required by the Kentucky Constitution Section 228, affirming that he would:

[S]upport the Constitution of the United States and the Constitution of this Commonwealth and be faithful and true to the Commonwealth of Kentucky so long as I continue a citizen thereof, and that I will faithfully execute, to the best of my ability, the office of Attorney General according to law...

The Antiterrorism and Effective Death Penalty Act of 1996, Pub. L. No. 104-132, 110 Stat. 1214 (also known as AEDPA), is an act of the United States Congress signed into law on April 24, 1996. The Act contains "a number of provisions to "deter terrorism, provide justice for victims, ... and for other purposes." Those include changes to criminal law involving terrorist (or explosives) offenses, including increased penalties and criminal procedures changes (Title VII). Kentucky's Attorney General may have participated in activities violating this federal law. Terroristic attacks that resulted in citizen deaths and law enforcement deaths were incited by an organization of which AG Cameron is a leading member. An individual involved in such repugnant behaviors is not fit to serve as a Constitutional Officer in this Commonwealth. AG Cameron must immediately be impeached.

(B) Misuse of Taxpayer Funds

Cameron misspent Kentucky taxpayer funds and created baseless doubt about the 2020 Presidential election by seeking to disenfranchise Pennsylvania voters.

No legitimate reason supports Cameron's attack on the votes in a sister state. This irresponsible action invites other states to challenge Kentucky's voting, thereby endangering this Commonwealth's most basic freedom.

Petitioners allege that Cameron misused his office to promote his own political aspirations and overstepped his authority by supporting failed lawsuits in foreign jurisdictions which attacked American voters.

These highly partisan political activities are inappropriate to the office of Attorney General and serve only to promote personal political ambitions at the expense of Kentucky taxpayers.

This constitutes a breach of Cameron's legal and fiduciary duty to Kentuckians and justifies articles of impeachment.

Prayer for Relief

Attorney General Daniel Cameron lied to the Grand Jury by excluding information and charges available to them, then lied to the public about what he had told the Grand Jury. In the investigation of the death of Breonna Taylor, Attorney General Daniel Cameron failed to perform the duty imposed on him both by law, his oath of office, and the clearly inherent nature of his office. Further, AG Cameron appears to have incited insurrection in our own nation's capitol by funding radical robocalls, and has misused taxpayer money by attacking the vote in sister states where he has no jurisdiction.

The undersigned demand an impeachment inquiry committee of the 2021 Regular Session of the Kentucky General Assembly House of Representatives return Articles of Impeachment against Attorney General Daniel Cameron

WHEREFORE it has been shown that AG Cameron has intentionally and willfully breached that oath of office and betrayed the public trust. The Petitioners, Affiants and supporters request that the AG be promptly impeached.

The Petitioner demands that Attorney General Cameron further be disqualified from holding any office of honor, trust or profit under the Constitution of the Commonwealth of Kentucky and that all costs of this proceeding be charged to him, as permitted by KRS 63.070 and KRS 63.075.

ARTICLE I:



Petitioner/Affiant

Kevin Glogower on behalf of three (3) unnamed former Grand Jurors on the Breonna Taylor Grand Jury

Signed and sworn before me this the 22 day of January, 2021, in the city of LOUISVILLE, county of JEFFERSON, Commonwealth of Kentucky, by Kevin Glogower, attorney for the three Grand Jury Members.



Notary Public

ARTICLE I and II:

Jennifer Smith
Petitioner

Signed and sworn before me this the 21 day of January, 2021, in the city of Paducah,
county of McCracken, Commonwealth of Kentucky, by Jennifer Smith

Stephanie Grubbs
Notary Public



Came on Davis French

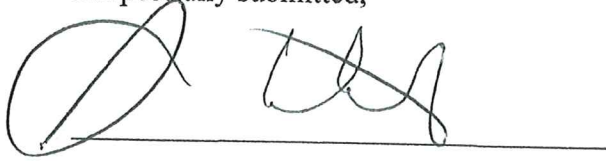
Signed in support

Dash Paul

Tried n support:

Brett Darling

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anna Stewart Whites', written over a horizontal line.

ANNA STEWART WHITES

Attorney at Law
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P.O. Box 4023
Frankfort KY 40601
(502) 352-2373/FAX 352-6860
AnnaWhites@aol.com

CERTIFICATE OF SERVICE:

This is to certify that a true and correct copy of the foregoing was this day served, electronically and via USPS, on the Clerk of the Kentucky House of Representatives, the Speaker of the Kentucky House of Representatives, and the House of Representatives Minority Leader, this the 22nd day of January, 2021.

A handwritten signature in black ink, appearing to read 'Anna Whites', written over a horizontal line.

Anna Whites