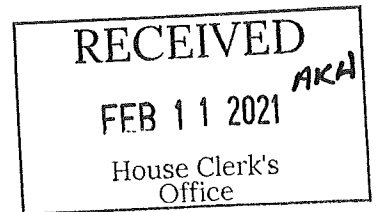


COMMONWEALTH OF KENTUCKY
KENTUCKY GENERAL ASSEMBLY
IN THE HOUSE OF REPRESENTATIVES



**IN RE: IMPEACMENTS OF ATTORNEY GENERAL CAMERON and
REPRESENTATIVE ROBERT GOFORTH**

**PETITIONERS' REQUESTS FOR OPPORTUNITY TO QUESTION THE EXPERT
WITNESS OR PROVIDE QUESTIONS FOR THE WITNESS**

Come the Petitioners in the Impeachment Proceedings against Rep. Robert Goforth and Attorney General Cameron, by counsel, and request the following relief from this Committee:

That counsel for Petitioners be permitted to ask questions of the witness appearing before the Committee today, and other witnesses moving forward; or, in the alternative, that the Committee ask the following questions of today's witness and allow opportunity for the Petitioners or counsel to address questions to future witnesses before the Committee.

Should this Committee vote and determine that Petitioners' counsel may not directly question the witness, the following questions are proposed for the Committee to ask:

1. Was the motion to recuse Chairperson Nemes correctly handled by him, without input from the Committee
2. Should the Impeachment Committee vote on the motion to recuse Jason Nemes
3. Is there a Committee vote in the records on the motions previously addressed by the Committee
4. Who voted on the motions before the Committee
5. Should Nemes have a vote in the motion to recuse him for bias or conflict of interest
6. Have you reviewed the documents in the record for any evidence of bias on the Chairperson's part, or do you plan to do so? Do the documents provide evidence of bias or conflict of interest? Why or why not
7. Are legislators considered statewide elected officials under Kentucky law
8. Have impeachment actions been dismissed on jurisdictional grounds (rather than facial deficiencies) in the past. If so, state which by name/date
9. Have you read the petitions and supporting documents
10. Under Kentucky law, may a party designate a representative to speak for him

11. What statute prohibits the Grand Jurors from designating their counsel as a spokesperson for them
12. Have you reviewed the Grand Jurors' designations held by their attorney for validity
13. Is impeachment separate from any circuit court action, civil or criminal
14. Who retained you as a witness
15. Who signed your contract or letter of engagement or fee agreement
16. What are you being paid to appear here today
17. Who is paying you
18. In impeachment proceedings, does Petitioner or counsel for the Petitioner get to speak/participate/question witnesses. If your answer is in the negative, cite to Kentucky law that denies that right
19. Did you provide an oral or written opinion to anyone on the Committee or counsel for the Committee before appearing today? If so, please provide a copy
20. Will you be providing a written summation or legal opinion as an expert witness following your appearance today
21. For each opinion you give today, please give the state statute or regulation supporting your opinion and list any relevant caselaw in support
22. As there is no Response from Rep. Goforth in the record, how can you determine his position on any of the issues detailed in that Petition or whether the Petition has merit
23. Is it possible that there are any facts which may not be contained in the Petition which would change your opinion
24. Why didn't you ask to speak to Petitioners or their counsel

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 11th day of February, 2021.

/s/ Anna Stewart Whites /s/

Attorney for Petitioners