



COMMONWEALTH OF KENTUCKY
KENTUCKY GENERAL ASSEMBLY
IN THE HOUSE OF REPRESENTATIVES

IN RE: IMPEACMENT OF ATTORNEY GENERAL CAMERON

PETITIONERS' RENEWED REQUEST FOR IMPEACHMENT OR IN THE
ALTERNATIVE, THAT THE IMPEACHMENT COMMITTEE QUESTION THE
ATTORNEY GENERAL'S EMPLOYEES WITH REGARD TO RELEVANT EVIDENCE

Come the Petitioners, by counsel, and request that the Impeachment Committee take the following steps in furtherance of appropriate factual discovery in this matter:

The IC requested certain audio or video evidence from the Office of Attorney General to rebut the factual assertions made by the Grand Jurors. AG Cameron was unable to provide that requested evidence and alleged that his office did not record the charges or instructions given the Grand Jurors. The AG's responses in this matter have been unverified documents expressing anger and making new excuses. Neither the Response to the Petition nor the answer to the IC's request were sworn or attested to by anyone with even passing knowledge of what happened during the grand jury proceedings and those cannot be considered evidence under even the most favorable standards.

The only evidence before the IC, that being the affidavit of the Grand Jurors and their counsel, shows that the AG was not accurate and truthful in his discussions of the Taylor case. Kentucky law, which is crafted by the legislature, holds that "when the time comes to make a factual determination, the residuum rule requires the fact-finder to base a decision on only the competent evidence." *Drummond v. Todd Cty. Bd. of Educ.*, 349 S.W.3d 316, 321 (Ky. App. 2011). That law requires the IC to find that the Petition is supported by the sworn facts in evidence. No further objection to the evidence should be heard from the AG. See also: *Lee v. Tucker*, 365 S.W.2d 849 Ky. 1972), holding that un rebutted factual evidence is conclusive.

The only alternative available to the Committee, should it wish to allow the AG's office one more opportunity to provide evidence, is to demand witness testimony from the special prosecutor in the case, who was and is believed to still be an employee of the Office of Attorney General. That witness will be able to provide her own testimony as to what she recalls about the charges and instructions before the Grand Jury. In addition, that witness can also provide her notes, power point presentations, copies or written charges and recommendations, and the documents, including statutes, which were allegedly "projected on the wall" during her meetings with the Grand Jurors. All such documents are typically used in a criminal grand jury proceeding and should be available to the IC.

Petitioners ask that the IC act in accordance with Kentucky law and principles of fundamental fairness in requiring the AG to provide evidence supporting his defense, just as the IC did with the Office of the Governor when the IC deemed the response insufficient. This Committee is charged with protection of the rights of the citizens of this state, and has already dismissed a serious charge of domestic violence and taken no action thereon. The IC should not take lightly the AG's request that it also dismiss the charges with regard to the death of another young woman.

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 22nd day of February, 2021.

/s/ Anna Stewart Whites /s/

Attorney for Petitioners