



PETITION FOR THE IMPEACHMENT OF JUDGE JULIE GOODMAN,
CIRCUIT COURT JUDGE IN THE 22ND JUDICIAL DISTRICT

Melissa Bybee-Fields, Clerk
Kentucky House of Representatives
700 Capitol Avenue
Frankfort, KY 40601

Dear Madam Clerk:

Section 66 of the Kentucky Constitution allows the submission of a petition for the impeachment of a public official. This is a petition for the impeachment of Judge Julie M. Goodman who currently holds the office of Circuit Judge in the 22nd Judicial District in Fayette County.

Judge Goodman has abused her office to such an extent, and in so many cases, that she has undermined public confidence in the judicial process. These abuses constitute misdemeanors in office under Section 68 of the Kentucky Constitution for which she should be impeached, removed from office and disqualified to hold any office of honor, trust or profit under this Commonwealth.

1. In the case of **Commonwealth v. Cornell Denmark Thomas, II**, 21-CR-00336, Judge Goodman engaged in behavior in office that breached the public trust and constituted "misdemeanors in office" warranting impeachment under Section 68 of the Kentucky Constitution.

On July 3, 2020, Cornell Thomas drove his car into a Leestown Road intersection at 96 miles per hour, ignored a red light, and avoided halted traffic by using the left turn lane to go straight. Thomas struck Tammy Botkins's vehicle as she traversed the intersection. The collision was violent enough to sever Ms. Botkin's torso and eject the upper portion of her body into the roadway.

On March 24, 2021, a Fayette County grand jury indicted Thomas on one count of murder and one count of leaving the scene of an accident involving a death. Nevertheless, Judge Goodman took the highly unusual and totally improper step of dismissing the indictment over the objections of the prosecutor.

Judge Goodman's dismissal was based on her belief that the prosecutor – an African American woman - singled out Thomas for prosecution because he is an African-American. Judge Goodman stated that, based on her "15-year tenure on the bench," there is a clear pattern of unequal charging decisions by the Commonwealth in which white defendants are charged with lesser offenses and given better offers than defendants of color.

The Kentucky Court of Appeals (2024-CA-0023) recently unanimously reversed Judge Goodman's dismissal of the indictment, writing that her "order is **fraught with legal errors and abuses** of both its discretion and its authority." It noted that "**the fallacies the trial court embraces are legion**" and issued a 108-page opinion detailing Judge Goodman's ruling's fallacies, legal errors, and abuses of authority, including the following criticisms:

- “the source of these aberrations from the law is a **basic misapprehension of a trial judge’s role** in the justice system.”
- “the trial court **incautiously failed to stay in its lane**, so to speak, and **improperly invaded** the separate provinces of an independent grand jury, the Executive Branch prosecutor, and the petit jury the trial court had not yet seated.”
- “The trial court’s error here was constitutional in that it **ignored the separation-of-powers** prohibitions and infringed upon the separate powers of the grand jury.”
- “It is **somewhat astounding** that a Kentucky judge would be unaware of a legal concept so universally known. In all English-speaking courts, the accused is obliged to introduce proof if he would overcome the presumption of sanity.”
- “pursuing issues the parties never raised risks an appearance that the trial court assumed an advocacy role. Taking that risk provides grist for **rumor mills** and prompts charges of **judicial activism** negatively affecting the entire Court of Justice.”
- “The trial court in this case conducted a **judicial ambush**.”
- “the court abused its power in a way that **reflects poorly on the judiciary as a whole**.”
- “Absent any reasonable explanation, it would appear the trial court embraces **an animus of unknown origin** toward the Fayette Commonwealth’s Attorney.”

2. In the case of **Commonwealth v. Domonick Donte Jones**, 23-CR-0394, Jones pleaded guilty after being arrested with 75 grams of fentanyl (enough to kill 37,500 people) and 11 grams of cocaine. Judge Goodman ignored the Commonwealth’s recommendation of a 5-year sentence, and sentenced Jones to probation. KRS 218A.1412(3)(d) expressly prohibits probation in cases where the trafficked substance was fentanyl. Judge Goodman’s sentence was illegal because it violated that statute.

3. In **Commonwealth v. James Harvey Hendron**, 18-CR-1084, Judge Goodman reversed the jury’s conviction of a man who shot and killed his 23-year-old son on Father’s Day, claiming prosecutorial misconduct. The Court of Appeals unanimously reversed, holding that Goodman “not only ignored the law on this matter but also impermissibly encroached on the province of the jury as finder of fact when she engaged in an independent review of the case in contravention of our system.”

4. In the case of **Gregory Simpson v. Abigail Caudill, Warden**, 23-C1-02878, Judge Goodman released from prison a felon who had 21 years remaining on a 42-year sentence. The Court of Appeals – again unanimously – reversed Judge Goodman’s order. Judge Goodman attempted to “stay” the effect of the Court of Appeals’ ruling to allow Simpson to remain out of prison. Even more astounding is the fact that the Attorney General was forced to return to the

Court of Appeals twice more to force Judge Goodman to effectuate its ruling and return Simpson to prison.

5. **Kenneth Ain, MD v. University of Kentucky**, 23-CI-03018 involved claims by a doctor the UK had discriminated against him on the bases of age and disability. Following a series of hearings, several of the University's co-defendants (who were its in-house attorneys) filed a motion for Judge Goodman's recusal. They argued that a reasonable observer would conclude that Judge Goodman threatened disqualification of the University's counsel in an improper attempt to pressure the University into choosing between forfeiting important defenses or losing its litigation counsel; as a result, she would then not need to rule on the University's recusal motions, allowing her to stay on the case.

Judge Goodman demonstrated bias against the defendant's attorneys as detailed in the affidavit including by:

- Accusing them of obstructing justice and ignoring the law;
- Accusing them of acting in bad faith;
- Opining that at least one of them had violated federal law;
- Accusing them of improperly influencing witness testimony;
- Accusing them of improperly interfering in the plaintiff's litigation against the University;
- Threatening to turn them into the Commonwealth's Attorney for prosecution; and
- Declaring herself the "sole protector" of the plaintiff.

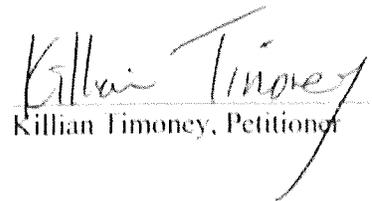
When Judge Goodman declined to recuse herself, the University submitted an affidavit seeking her disqualification to the Chief Justice. Deputy Chief Justice Robert Conley granted the disqualification, ruling that KRS 26A.015 requires disqualification whenever the impartiality of a judge could be reasonably questioned. "Given Judge Goodman's comments regarding her perceived role as the 'sole protector' of the Plaintiff in this matter going forward, such a circumstance has arisen here. Accordingly, Judge Goodman is disqualified from further presiding over this case."

6. In **Caitlin Huff et al. v. University of Kentucky et al.**, 23-CI-001423, Judge Goodman explicitly abandoned the law and ignored legal precedent, ruling that the University of Kentucky hospital was not entitled to be dismissed from the case on the basis of sovereign and governmental immunity. Judge Goodman declared that she was choosing not to follow binding precedent, and verbally stated in the courtroom:

"it's going to have to be a party who then brings it before a court who's willing to, you know, bite the bullet and be the person to get chastised, or get reversed, or get - just so the rest of us know something.... When you have a Supreme Court, like in examples where it was clearly - and just because it's the easiest one for all of us to get our heads around, for 50 years, Roe v. Wade was the law. It was the law of the land. Well, somebody obviously had to say, we don't think it's the law anymore, and take it to a - to a federal lower court, and the federal lower court had to be willing to say, we're ignoring Roe...."

The Court of Appeals (2023-CA-1423) reversed Judge Goodman's denial of governmental immunity, criticizing her abuse of discretion in refusing to follow "not simply the precedent of *Withers*, but more than 50 other opinions of the Court of Appeals and the Supreme Court since 1907"

In conclusion, I believe Judge Goodman should be impeached because her behavior in office, including violations of statutory law, refusal to obey binding legal precedents, outrageous demonstrations of bias, disregard of the separation of powers, and egregious pattern of judicial activism constitute "misdemeanors in office" under Sections 66 and 68 of the Kentucky Constitution."

 1/28/26
Killian Timoney, Petitioner