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LOUISVILLE METRO COUNCIL

COMMONWEALTH OF KENTUCKY
LOUISVILLE METRO GOVERNMENT
JEFFERSON COUNTY KENTUCKY

**IN THE MATTER OF CHARGES AGAINST
DISTRICT 21 COUNCILMAN DAN JOHNSON**

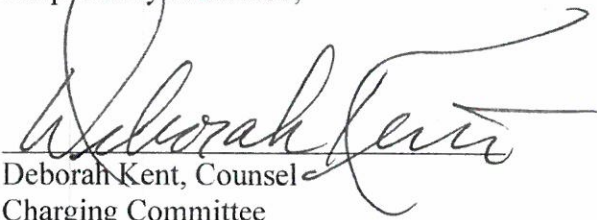
**RESPONSE TO RESPONDENT'S MOTION FOR ADMISSION
OF PHOTOGRAPHIC EVIDENCE**

Comes the Charging Committee, by counsel, and objects to the Respondent's Motion for admission of certain photographic evidence. Their introduction will be irrelevant and will not provide the Council Court with the necessary evidence to decide the charges filed. The proposed evidence will needlessly delay and divert the Council Court from hearing important evidence.

The photographs submitted with the Motion do not prove anything regarding the events at Wyandotte Park except to rebut Respondent's statements in his August 24, 2017 Response to Charges that Councilman Johnson's touching of Jessica Green took place "in front of approximately 1,000 witnesses," and that Respondent's touching occurred as "the group crowded together for a photograph." It is clear in these photos that, at best, a couple dozen witnesses were at Wyandotte Park, and that Councilman Johnson was not part of a crowd of people struggling to fit into a photo.

The Respondent has not met his burden to prove the relevancy and necessity permitting the introduction of the proposed photographic evidence. The Charging Committee respectfully requests that this Motion be overruled.

Respectfully submitted,


Deborah Kent, Counsel
Charging Committee

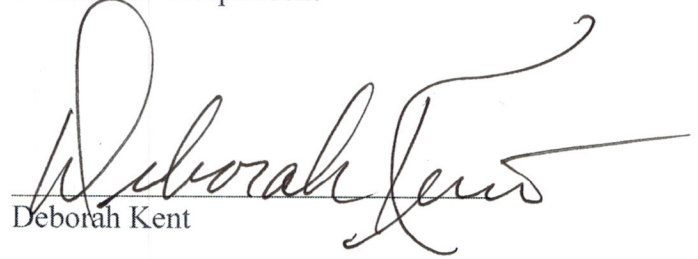
CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing was sent via email to the following on October 20, 2017:

Hon. Stephen Ott
Metro Council Clerk
601 W. Jefferson St.
Louisville, Ky. 40202

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Deborah Kent