

LOUISVILLE METRO COUNCIL

COMMONWEALTH OF KENTUCKY
LOUISVILLE METRO GOVERNMENT
JEFFERSON COUNTY

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

**RESPONSE TO RESPONDENT'S MOTION FOR CENSURE
AND DISMISSAL OF REMOVAL PROCEEDING**

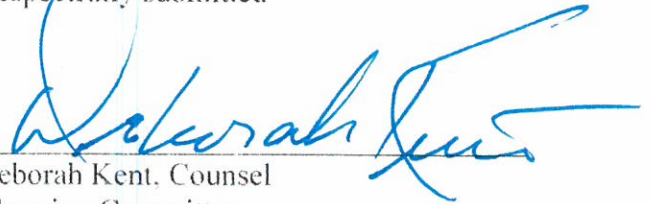
Comes the Charging Committee, by counsel, and responds to the arguments contained in Respondent's proposed Order:

The Charging Committee strongly disagrees this administrative proceeding to remove Councilman Dan Johnson will require "a protracted effort to discover the true nature and basis of the 26 charges brought against Councilman Johnson." We will assist the Respondent by explaining that the charges against the Councilman are based on allegations that his words and deeds in several public incidents are evidence of misconduct, incapacity or willful neglect.

Second, Respondent has not offered the Court any reason to conclude that his misconduct, incapacity and willful neglect are "insignificant," or that publicity surrounding this proceeding has been more damaging or distracting to the Metro Council than the words and actions of the Councilman that brought this proceeding about.

Third, if the Respondent is offering in good faith to accept a letter of censure from the Council in return for a dismissal, Respondent should offer the Court an allocution to bring closure to the proceeding by removing any doubt as to the exact nature of the Respondent's words and deeds constituting misconduct, incapacity and willful neglect.

Respectfully submitted



Deborah Kent, Counsel
Charging Committee

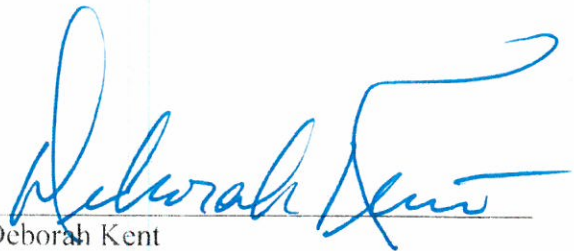
CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing was sent via email and first class mail to the following on September 17, 2017:

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

Hon Mike O'Connell
Jefferson County Attorney
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Hon. Thomas McAdam
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Counsel for Respondent



Deborah Kent