

COMMONWEALTH OF KENTUCKY  
MARSHALL COUNTY CIRCUIT COURT

James T. Jameson

Plaintiff,

v.

Andrea Moore

Defendant.

FILED 12/7/22  
TIFFANY FRALICX GRIFFITH  
CIRCUIT CLERK  
MARSHALL COUNTY  
BY: [Signature] D.C.

Civil Action No. 22-C1-370

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND TO SET  
ASIDE RESULT IN 2022 GENERAL ELECTION RESULT FOR 42<sup>ND</sup> JUDICIAL  
CIRCUIT DIVISION I RACE**

**FACTS & APPLICABLE LAW**

1. Defendant was opponent to Plaintiff in the 2022 general election deciding who would serve a term beginning in 2023 as Circuit Court Judge in Division I of Kentucky's 42<sup>nd</sup> Judicial Circuit.

2. From the first weeks of the campaign, Andrea Moore engaged in unfair, untrue, and misleading tactics to carry out a strategy her a multiple others conspired to carry out during the 2022 primary and general election cycles. Proof of this comes in various forms, including **sworn testimony** from Ky. licensed attorney, Lisa DeRenard during an August 12<sup>th</sup>, 2022 hearing before the Ky. Judicial Conduct Com'n.

3. One of Andrea Moore's coconspirators was public defender Amy Harwood-Jackson, an attorney assigned to Marshall County District and Circuit Courts. This was testified

to by attorney Lisa DeRenard under oath at the forementioned August 12<sup>th</sup>, 2022 hearing. According to this testimony and other evidence, Ms. Harwood-Jackson approached Ms. DeRenard while both were in the Marshall County judicial building while court was being conducted in a witness meeting room located in the Marshall County District Court. Ms. Harwood-Jackson then proceeded to inform Ms. DeRenard of a political plot to misuse the Ky. Judicial Conduct Commission (JCC) to damage the credibility of incumbent James T. (Jamie) Jameson for the purposes of boosting Andrea Moore's chances of defeating the well-liked and heavily supported Judge Jameson.

4. The details of the plot relayed from Ms. Harwood-Jackson to Ms. DeRenard were that multiple individuals, including herself, had agreed on a specific plan to file dozens of complaints against Judge Jameson with the JCC regarding matters going as far back as 2016 (several years prior to any discussion of filing a complaint). Ms. Harwood-Jackson stated that the purpose of the complaints wasn't to actually report legitimate issues to the JCC with the anticipation any complaint or group of complaints would result in the JCC taking action against Judge Jameson in the form of formal proceedings, but for Andrea Moore to be in a position, at a time close to the election, to state, as part of her campaign rhetoric, that Judge Jameson had a high number of complaints filed against him. She then went on to detail how the plan would play out. These details are set out in the previously mentioned testimony of Lisa DeRenard. The plan Ms. Harwood-Jackson laid out to Ms. DeRenard was carried out by multiple elected officials, attorneys, and court of justice employees; a number that, to the plaintiff's knowledge, is at least five people, and likely more. As was revealed early on in 2022, and was also discussed as part of the JCC proceedings very early, the plan was for Andrea Moore to be in a position at a time close to the election, to report on social media and other sources that "\_\_\_\_\_ number of complaints have been filed against Judge Jameson" with the intent of damaging his reputation in the community he served, and, in turn, decreasing his support for re-election.

5. During the August 12<sup>th</sup>, 2022 hearing conducted by the JCC, a member of the panel asked witness Daryl Carr if he had seen any evidence on social media or elsewhere in our community of Andrea Moore's campaign or others making claims of some number of complaints filed against Judge Jameson. The day after that hearing, Andrea Moore posted on social media a post degrading Judge Jameson, stating, *inter alia*, that "45 complaints" had been filed against him, thus carrying out this part of the plan Ms. Harwood-Jackson had discussed with Ms. DeRenard almost a year earlier, and the plan that Judge Jameson and his attorneys had warned the JCC about for several months which they not seemed to want to believe. There is video evidence of the panel member's questioning regarding this. Evidence of Andrea Moore's social media posting is attached in the form of posts printed that were posted on her social media pages. *See*. Appendix A.

6. It is believed that Andrea Moore's campaign may have accepted financial campaign donations from a corporation or partnership of some form. An anonymous report was received stating this. A review of her finance reports reflects donations that could be from such an organization. Such is a violation of KRS 121.025. If accurate, this violation *per se* requires that the results of the subject election be voided by this honorable Court. A report has been made to the Ky. Board of Elections regarding this issue with a result to be provided forthwith.

7. Kentucky law permits the challenging of an election per KRS 120.165, which states: "A contest instituted under KRS 120.155 shall proceed as an equity action... Upon return of the summons properly executed to the office of the circuit clerk, he or she shall immediately docket the case and notify the presiding judge of the court that the contest has been filed. The judge shall proceed to a trial of the cause without delay. In courts having more than one (1) judge, the judge who shall try the case shall be determined by lot. The court shall complete the case as soon as practicable. The action shall have precedence over all other cases.(2) The evidence in chief for

the contestant shall be completed within thirty (30) days after service of summons; the evidence for the contestee shall be completed within twenty-five (25) days after filing of answer, and evidence for contestant in rebuttal shall be completed within seven (7) days after the contestee has concluded; provided that for cause the court may grant a reasonable extension of time to either party. (3) All voting machines, voting equipment, or voting systems, ballots, stub books, and other papers concerning which there is any ground for contest may be removed to the court in which the action is pending. (4) **If it appears from an inspection of the whole record that there has been such fraud, intimidation, bribery, or violence in the conduct of the election that neither contestant nor contestee can be judged to have been fairly elected,** the Circuit Court, or an appellate court, on appeal, may adjudge that there has been no election. In that event the office shall be deemed vacant, with the same legal effect as if the person elected had refused to qualify. If one (1) of the parties is adjudged by the court to be elected to the office, he or she shall, on production of a copy of the final judgment, be permitted to qualify or be commissioned.” [Emphasis added]. Therefore, ANY amount of fraud, intimidation, bribery, or violence in the conduct of the election may be sufficient to set aside the challenged election.

8. Andrea Moore made hundreds of misleading and even patently false statements and representations to voters throughout the 2022 primary and general election cycles that she knew to be inaccurate or untrue. Such, “corrupt practices” are forbidden by KRS 120.155 and other relevant statutes, and are grounds for this Court to void the election as if no election occurred. Plaintiff claims are hereby asserted in compliance with the procedure described in KRS 120.165.

\* \* \*

9. There is some reason to believe Andrea Moore or someone on her behalf may have violated the provisions of KRS 121.055, 121.025, and/or 121.045. Any violation of any of these

statutes requires the Court with jurisdiction (this Court) to void the challenged election. This means if any of the following occurred, voiding the election is required:

a The expending paying, promising, loaning, or becoming liable in any way for money or other thing of value, either directly or indirectly, to any person in consideration of the vote or financial or moral support of that person, or Ms. Moore promising, agreeing, or making a contract (written or oral) with any person to vote for or support in any way, any particular individual (whether Ms. Moore or other person), thing or measure, in consideration for the vote or the financial or moral support of that person in any election, or the requiring of Ms. Moore to make such a promise, agreement or contract;

b Any corporation authorized to do business in this state or in another state, or officer or agent of a corporation on its behalf, contributing, either directly or indirectly, any money, service, or other thing of value towards the nomination or election of any state, county, city, or district officer in this state, or paying, promising, loaning, or becoming liable in any way for any money or other valuable thing on behalf of Andrea Moore, or trading any kind of financial benefit or other thing or act of value for a vote or support of Andrea Moore's candidacy;

c Actions prohibited by KRS 121.045, including (1) Any person and or agent of any person on his behalf, contributing, either directly or indirectly, any money, service, or other thing of value towards the nomination or election of Andrea Moore if that person is, in his or her official capacity, required by law

to perform any duties peculiar to the person not common to the general public, or to supervise, regulate, or control in any manner the affairs of the person, or to perform any duty in assessing the property of the person for taxation; (2) any person, or agent of any person on his or her behalf, paying, promising, loaning, or becoming liable in any way for any money or other valuable thing on behalf of Andrea Moore; (3) An attorney or other person accepting employment and compensation from any person, including Andrea Moore or any other person, with the understanding or agreement, either direct or implied, that he will contribute to any candidate or slate of candidates for any office, or on his behalf, any part or all of his compensation, towards the nomination or election of any candidate or slate of candidates, including Andrea Moore; and,

d (1) coercion or directing of any employee to vote for Andrea Moore, or threatening the discharge of any employee if he or she votes for any candidate, including Judge Jameson, or discharging of an employee on account of their exercise of suffrage, or the giving out or circulation of any statement or report that employees are expected or have been requested or directed by an employer, or by anyone acting for him or her, to vote for any person, group of persons, or measure (including Andrea Moore). No person shall coerce or direct any employee to vote for any political party or candidate for nomination or election to any office in this state, or threaten to discharge any employee if he votes for any candidate, or discharge any employee on account of his exercise of suffrage, or giving out or circulation of any statement or report that employees are expected or have been requested or directed by the employer, or by anyone acting for him or her, to vote for any person, group of persons or measure, or

the influencing or an attempt to influence, by bribe, favor, promise, inducement or otherwise, the vote or suffrage of any candidate, platform, principle or issue in any election held under the laws of this state;

10. Even if it does not ultimately appear that sufficient evidence exists Andrea Moore violated one of the above *per se* sections, subsection (4) of KRS 120.155 clearly states that the election may be challenged as an action in equity by a contestor. The statute sets out deadlines and a requirement of first priority regarding the action.

11. There is no requirement of some high standard of evidence regarding what amounts to a fairness analysis under KRS 120.155. Any evidence that the election was unfair as set out by this statute is sufficient for a challenge. Furthermore, the statute eliminates any motion for summary judgment or dismissal. **Once the challenge is made, the only way the matter may proceed or be resolved is by trial.**

12. Just days before the December 8<sup>th</sup>, 2022 general election in question, Andrea Moore contacted radio station WCBL for the purposing either changing the content of an ad schedule she, through her campaign, had scheduled with WCBL, or initiated or to run a new ad. This information was gathered during a phone call wherein a WCBL employee explained the circumstances under which this radio advertisement came to be and was carried out. According to this employee, the ad in question was ran Monday, December 7<sup>th</sup> and December 8<sup>th</sup>. The language was sent to this employee by Andrea Moore that the employee modified but did not change the intended effect of the ad. This ad was clearly intended to confuse voters and suppress the turnout of Jameson supporters to the ballot box by giving the impression to thousands of Marshall County, and some Calloway County residents, that Judge Jameson had either been removed from the ballot, or otherwise was not eligible to have votes cast on his behalf; a message that was patently false, that Andrea Moore knew was false, as did her supporters that enabled her efforts to defame Judge

Jameson throughout the primary and general campaigns and harass and even threaten his supporters. JCC orders do not go into effect for ten days. As such, any ruling of the JCC would have gone into effect AFTER the election, and this would occur only if Judge Jameson did not appeal that decision. As Ms. Moore already new from media reports, Judge Jameson was appealing the JCC decision. This means the impact of any JCC ruling would not be felt until weeks after the election, if not longer. Further, as any lawyer would know, the ruling of the JCC in its final order went far beyond the bounds of that agency's jurisdiction.

13. Multiple witnesses have provided statements in various forms to Plaintiff that they heard the ad played on WCBL containing the message Andrea Moore dictated to the WCBL employee, and **because of the content of this ad specifically**, they either did not go vote on December 8<sup>th</sup>, 2022, or they otherwise did not cast a vote that would have been cast for Judge Jameson. This includes elected officials and other sophisticated voters.

14. Even though Judge Jameson had won every precinct in Marshall County but one in the 2015 special election for Circuit Court Judge against **two separate well-known, long-time public servants from both Marshall & Calloway Counties**, the results of the December 8<sup>th</sup>, 2022 general election reflect that Judge Jameson won few precincts in Marshall County (the county he was raised in, went to school in, and has thousands of contacts in for various reasons including running a strong grassroots campaign in, the fact that his family is very well-known in Marshall County, and the fact that he had served as Circuit Court judge for this county for seven years, and prior to that served as one of only two Assistant Public Advocates in the county for approximately four years. However, he carried Calloway County, a County he lost by approximately 400 votes in 2015 that he does not reside in and has only one direct family member residing in.

15. Judge Jameson and his family have enjoyed strong reputations in Marshall County for decades, with hundreds of citizens and prior criminal defendants expressing sincere



appreciation for his passion for assisting those who cannot assist themselves due to suffering from addiction and/or mental health impairments. In fact, prior to Andrea Moore's unfathomable negative, misleading, and untrue campaign tactics in the last weeks of the general election, public opinion was very strong in support of Judge Jameson and his family in Marshall County. This was true in spite of efforts by the JCC, beginning in July of 2022, to smear Judge Jameson's reputation during an election year; conduct that has been challenged by appeal to the Ky. Supreme Court claiming violations of Constitutional import. Any harm caused by the JCC's actions significantly back-fired after the Ky. Supreme Court issued a *Writ of Mandamus* stating that the JCC had illegally taken severe action against Judge Jameson, a Constitutional officer that had been elected by what was, by all accounts, an unprecedented majority over two other candidates in 2015, without following its own rules or the requirements of the U.S. or Kentucky Constitutions.

16. During the election cycle in question, Ms. Moore and specific supporters of her campaign, threatened, intimidated, and harassed supporters of Judge Jameson throughout Marshall and Calloway Counties. A sample of this conduct occurred in Draffenville, Ky at a boat repair business wherein Ms. Moore had seen a large campaign sign put up in support of Judge Jameson at this business and asked if she could place a sign as well. When she was informed that she could not because the owners were supporting Judge Jameson for re-election, Ms. Moore became upset. Minutes later, on the same day, two known supporters of Ms. Moore came to that same business and harassed an employee about the matter.

17. A person referenced by the Tribune Courier as Andrea Moore's "campaign manager," operates a business in Marshall County. Multiple individuals have reported to Plaintiff that, upon visiting her office for business purposes, they felt they were inappropriately engaged, if not harassed, by this business owner who told these individuals exaggerated and untrue statements about Judge Jameson in an attempt to damage his reputation and cost him support in the election and gain support for Andrea Moore. Andrea Moore must have been aware of this practice as it

was ongoing for some time and, by all accounts, Andrea Moore and this supporter had very regular contact and campaigned door to door together in both counties frequently.

18. Andrea Moore was very aware of the impropriety of her extraordinarily negative campaign tactics that have never been previously utilized in a court judge race in Marshall or Calloway counties. To the extent this is not obvious from the circumstances, Plaintiff was made aware by one of his supporters of an interaction with this supporter, within weeks of the election, wherein Andrea Moore and the person she apparently considered her campaign manager on some level appeared on the private property of this Jameson supporter and placed a large sign on his family's property without permission. The land owner/manager cut the sign down. After Ms. Moore blamed Judge Jameson in public media for cutting down this sign as a dirty campaign tactic, she drove back to this property with her campaign manager for the purpose of rehanging the sign. However, the property owner/manager met Andrea Moore and her supporter at the location of the cut down sign and inquired why they were on his property. Upon learning of their purpose, the land owner informed Andrea Moore that she would not be putting the sign back up. The owner/manager also gave Andrea Moore advice that she would be better off to run a positive campaign and talk about what she would do if elected, rather than continuously carrying out a horribly negative campaign utilizing exaggerated and untrue information. Andrea Moore responded to the owner/manager that he was the "second person to tell her that, that day." Thus, the fact that she was being unfair in her campaign practices was well known to her. The opinion of this owner/manager was shared by hundreds of people that engaged with Plaintiff, his supporters, and family members. No resident of Calloway or Marshall counties that was aware of the election on any level would contest that Andrea Moore's entire campaign consisted of tearing down Judge Jameson at all costs, no matter how true her statements and representations were.

19. After Judge Jameson was asked by a supporter living on 641 North in Draffenville to put up a large sign on his property there, a core supporter and financial donor to Andrea Moore's

campaign came to the Jameson supporter who owns a small woodworking business and informed him that she did not appreciate the sign being there, particularly since she lived close by (although not to where anyone could confuse her as the person promoting Judge Jameson's candidacy). During this conversation Ms. Moore's supporter/donor became insistent with the Jameson supporter that he should take Jameson's sign down and not support Judge Jameson. The Jameson supporter did not initiate this conversation or any discussion of the circuit court judge race. During this conversation, the witness began to tell the Jameson supporter exaggerated and untrue information about Judge Jameson intended to convince the Jameson supporter to cease his support for Judge Jameson. The Jameson supporter then called Judge Jameson and informed him of the situation very apologetically and in a way that left the Judge with the impression his supporter, who had been a long time very open and robust supporter of Judge Jameson in various ways, felt that, if he did not take the sign down, the Moore supporter would continue to harass him on the matter and likely hold it against him, as this person has a well-known reputation of such. Judge Jameson informed his supporter that he understood and came and picked up the sign. When Judge Jameson came to pick up the sign, he spoke with his supporter who informed the Judge that the neighbor in question, during his previous conversation with her, had attempted to belittle and imply Judge Jameson, as a teenager, had committed conduct that he was never charged for involving a young lady he had dated in high school. Then, the Moore supporter continued to disparage Judge Jameson in this conversation with no evidence to support any of her claims that were over twenty years old. This tactic was used heavily throughout Andrea Moore's campaign, again, for the intentional purpose of damaging Jameson's credibility and suppress voter support for him. As a result of the pressure the Moore supporter intentionally placed on the Jameson supporter and long-time friend of the Judge, the Jameson supporter still wanted, begrudgingly, for Judge Jameson to take the sign in question off of his property. The judge did as his supporter and friend requested. Judge Jameson has known this supporter for many years and has worked with him regarding a

local cable television show on at least two occasions: once with a judge executive, and another with world renowned musician, Josh Williams. The Jameson supporter in question, prior to the Moore supporter's intervention, would have never asked Judge Jameson to remove that sign. This supporter is someone very outgoing who speaks his mind to a fault and has strong opinions. This supporter had communicated with Judge Jameson early in his campaign to make sure the Judge knew this supporter wanted the "biggest" sign available put up on his property, which is located in a very high traffic location. Another relevant factor is that the Moore supporter wasn't even living at home at the time. She had been living in Texas for some time other than perhaps quick trips home before returning to Texas where her husband was receiving medical care. I.e., the Moore supporter would not have even had to see the sign from day to day because she was in Texas. Andrea Moore was no doubt aware of this supporters actions. This conduct amounts to intimidation, harassment, and intentional interference with the Jameson supporters First Amendment rights. As the relevant statutes make clear, even a scintilla of this kind of behavior is a "corrupt practice" requiring this honorable Court void the subject election.

20. Andrea Moore, and her family members and supporters on her behalf, placed hundreds of political signs across both Marshall & Calloway counties. Such is a common tactic in campaigns. However, many of these signs were placed on the property of owners whom had not given anyone permission to do so. There are many examples of this known, and almost certainly many, many more that are not yet known to Plaintiff. While some landowners would simply remove the sign, almost all of the landowners took no action. Judge Jameson has spoken with more than one of these landowners about the situation. During these conversations, a common theme arose. The land owners were intimidated by the placement of the signs in such a bold manner with no attempt to request permission. It was stated to Judge Jameson multiple times that these land owners did not want to "stir things up." Given Andrea Moore's aggressive negative campaign tactics she placed all over social media and otherwise distributed in various ways, the

land owners were truly afraid to speak up to her, including just a phone call to remove a sign, because they believed they could be, on some level or another, “black listed” or otherwise “punished” for their refusal to cooperate with Andrea Moore’s campaign efforts, especially if she won the election.

21. A **major concern** of Plaintiff and his family is the false and exaggerated claims made by Andrea Moore and her supporters, with her knowledge, regarding Judge Jameson being some terrible monster that physically abused every female within reach for over 20 years! Claims were made, not only of Judge Jameson being charged and/or convicted of some domestic violence crime, but also claims that the Judge’s current spouse of twenty-two years must be being abused. These claims are baseless! The only truth here is that Judge Jameson, **when he was barely age 20**, was under the authority of the Marshall County District Court who required him to stay away from a person that sought a court order preventing Plaintiff from having contact with her. **The motion was temporarily granted** until a hearing could be held with both parties and their attorneys present. The Saturday before the hearing that was set, the same person that had asked for a no contact order, contacted Plaintiff at his mother’s home where he was staying. She apologized to him for the situation that existed and asked if Plaintiff would be willing to talk to their preacher the next day after church with her. Plaintiff agreed because he believed, in his early twenties mind, that seeing the preacher in a public place with others around could be a good thing. Plaintiff also felt a spiritual obligation to help this person. Accordingly, the two attended church the next day, had a spiritual counseling session with their pastor, and then went their separate ways as was witnessed by the pastor. The hearing to decide whether there was any reason to actually restrain Plaintiff from having contact with the person in question was conducted the next day. During that hearing, it was stated on the record that Plaintiff and the woman in question had attended church together the previous day. A fact both admitted to, thinking that would be a good thing. As a result, and without waiting for attorneys, the then-judge held both parties in contempt for going to

church in the same building while a temporary order of no contact was in place. The judge did this **even though the Petitioner had stated that Plaintiff never laid a hand on her during the event in question.** Proceeding without attorneys was, of course, a violation of both individuals' Constitutional rights. And, the law did not permit a judge to impose a contempt sentence on someone who requests an order of no contact. However, the judge had both arrested immediately. When the attorneys arrived shortly after this, the judge refused to have another hearing with attorneys present and refused to reconsider his decision even though **both** Plaintiff and the woman involved had **no** history of previous criminal conduct of any kind (other than speeding tickets.)

During the 2022 election timeframe, Andrea Moore was alerted of the above information by one of her supporters connected to the person that became her "campaign manager," and began getting all of the political mileage out of this long-ago incident that occurred prior to Judge Jameson getting married, going to and graduating from Murray State with honors, being accepted to and graduating in the top one-third of one of the best law schools in the Heartland and Kentucky, volunteering for the Ky. Innocence Project in assisting to secure release of wrongly convicted citizens of our Commonwealth, being appointed by a Governor to protect Kentuckians from insurance fraudsters that largely targeted the elderly, working for six years in defense of those who had no resources or anyone to advocate for them, surviving radiation and chemo treatments intended to stop his stage IV head and neck cancer, becoming a father (twice), being elected by a considerable margin to the seat he currently serves, and serving our community to the very best of his ability for over seven years. The point being that, the relationship struggles and drama caused by being immature in his decision-making process regarding matters that **occurred over twenty years ago** that have been greatly misrepresented to the public, are all but absolutely irrelevant to the person Judge Jameson is today. Further, going to church to try and mend a friend and personal relationship simply does not seem that awful, especially when the woman involved made a written statement she turned in to the judge saying she had exaggerated her claim of being "pushed" and,

in fact, what she reported was a verbal argument that occurred days before she filed for a non-contact order (not permitted by law). The same individuals who brought their “information” to the attention of Andrea Moore, also contacted the Tribune Courier during the 2015 election, regarding the same matter in an attempt to damage Judge Jameson’s reputation. This is not new information and, in 2015, blew back in the face of the divulgers/exaggerators, causing Judge Jameson to gain even more support because thousands were aware of his character or personally knew him, and would never believe the lies that were told without viewing all actual proof of what occurred. Such conduct constitutes defamation of Judge Jameson’s character, and caused extraordinary emotional distress for Judge, his wife Jenny, his two small children, and his family and friends. All of this goes far beyond what a judicial candidate in particular is permitted to do in connection with a political campaign. This conduct is the definition of unprofessional and unjudicial.

22. Shortly after December 8<sup>th</sup>, 2022, the day of the 2022 general election *sub judice*, Marshall County Circuit Court Clerk, Tiffany Griffith, reported to Sarah Gibson, the administrative assistance for Judge Jameson’s office, that Andrea Moore had spoken with her (Tiffany) and indicated that she would be bringing in one of the individuals that was part of the political plot Lisa DeRenard testified regarding August 12<sup>th</sup>, 2022 at the above referenced JCC hearing. Ms. Griffith also went on to, either out of sympathy for Ms. Gibson or out of true need of her skills, or both, inquired whether Ms. Gibson would be interested in taking the incoming administrative assistant’s current job with the Marshall County Circuit Court Clerk’s office as a Deputy Circuit Court Clerk (in place of Lacey Cavitt whom Ms. Moore had agreed to hire obviously in exchange for her support of some form.)

Very early in the 2022 primary election, Lacey Cavitt began complaining to Judge Jameson about not forcing criminal defendants to pay their \$25 bond posting fee on the spot any time they

appeared for court. Lacey Cavitt had served as the clerk for the criminal docket of Judge Jameson's court for multiple years. Apparently, when defendants did not pay their bond fees, Ms. Cavitt was of the opinion that this created more work for her that she did not want to do. This is reflected in a statement she provided to the JCC after making a complaint, as part of the referenced plot, against Judge Jameson; a complaint the JCC **outright dismissed** for lack of any substance. To try and get Judge Jameson to collect these bond fees during what is the 7<sup>th</sup> busiest Circuit Court docket load in Kentucky, Ms. Cavitt would speak out where everyone could hear her and say "this person owes a bond fee." Many times, this defendant was someone either there for an accusation of not paying child support or restitution, or was someone looking at several years in prison. Trying to force these individuals to hurry downstairs to the Clerk's office and get their \$25 fee paid, when most don't even have the money on them, is absurd. No clerk this author has ever worked with or seen working has ever done something like this. It simply is not the job of a Deputy Clerk to blurt out in open court during a docket for the purpose of essentially making sure the judge does things the way that Deputy Clerk desires. Ms. Cavitt filed a JCC complaint (as part of her role in the group plot) against Judge Jameson and was outright dismissed by the JCC as having no merit.

Ms. Cavitt, throughout the 2022 primary and general election cycles, made comments at work while on the clock, posted, on social media, negative comments about Judge Jameson and positive comments about Andrea Moore, opened Judge Jameson's private mail that appeared to concern the nonprofit he was an officer of for the purpose of using whatever information was inside to provide to Andrea Moore and provide to the JCC for use in their ongoing proceedings. Ms. Cavitt was **never once** given permission to open Judge Jameson's private mail, and certainly not to provide it to his opponent or the JCC. Photo evidence exists that came to light when the JCC issued a subpoena upon the Ky. Court of Justice to provide documents for their review. The pictures clearly show multiple occasions of Ms. Cavitt first taking pictures of an item of mail, then



opening it, and then taking a picture of the letter, statement, or other document located in the envelope. This conduct is clearly unfair and violates 18 USC Section 1702, making Ms. Cavitt's conduct a federal felony punishable by years in prison.

It is without question that Andrea Moore has spoken with Lacey Cavitt regarding serving as administrative assistant to the 42<sup>nd</sup> Circuit Division I in exchange, on some level, for Ms. Cavitt's support and involvement in the political plot to misuse the JCC for straight out unjustifiable political reasons. This is not permitted by the statutes cited herein.

23. Andrea Moore has repeatedly, without any grounds to believe this is correct, claimed orally and in several written releases that Judge Jameson has never been "lead counsel" on a jury trial and that she has more trial experience that he does. First, Judge Jameson has been lead counsel in multiple jury and bench trials, and not just in two Kentucky Circuits. Judge Jameson has practiced law in urban areas of Kentucky, such as a multi-year assignment handling thousands of cases in Kenton and Campbell counties, home to the third largest city in Kentucky, Covington. In total, Judge Jameson has practiced in fourteen Kentucky counties, handling death penalty cases, dozens of murder cases including trials, trials on sex charges, and the list goes on. Being an employee of the same agency Judge Jameson was employed by as an attorney before becoming Judge, Ms. Moore knew this to be true and lied. Judge Jameson is very qualified. He was even selected and served as part of the faculty that trains new public defenders in Kentucky for multiple years. He has published on multiple subjects, and recently rewrote, at the request of the Ky. Circuit Court Judge's Association in 2020, the complete criminal law section of the Ky. Circuit Court Judge's "Benchbook," a publication published by the Court of Justice for the purpose of providing a day-to-day guide on the law and procedures regarding every type of action a Circuit Court Judge may face. To say it plainly, Judge Jameson "wrote the book" on criminal law that Kentucky's judges rely on to comply with the law. While Ms. Moore has never been a judge of

any kind, Judge Jameson has served as our Circuit Court Judge for seven years, and in that time, handled some of the most difficult and high-profile cases in our nation; and, not one of the criminal cases he presided over has **ever been reversed and remanded** by a higher court. He has also sent almost 2,000 people for addiction treatment. People that changed their lives. A brief look at the posts and comments on Judge Jameson's social media quickly reflects the large magnitude of appreciation for helping others. And with regard to Judge Jameson's work standing up to the challenge, Judge Jameson's appeal success rate is 94%, while the average Kentucky judge, as of 2017, was 75%.

### **JURISDICTION AND VENUE**

16. This Court has jurisdiction and venue over this matter pursuant to the herein cited statutes.

### **THE PARTIES**

18. James T. Jameson, 2022 candidate for re-election to the position of Circuit Court Judge for Kentucky's 42<sup>nd</sup> Judicial Circuit, Division I.

19. Andrea Moore, candidate for election to the position of Circuit Court Judge for Kentucky's 42<sup>nd</sup> Judicial Circuit, Division I.

### **REQUESTED RELIEF**

WHEREFORE, Plaintiff requests this Court:

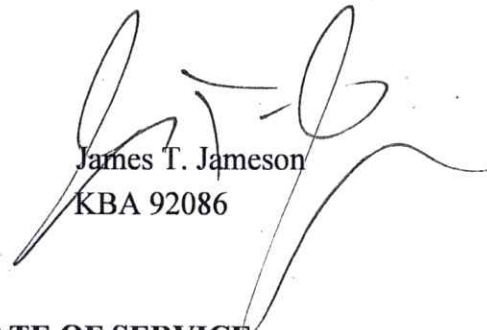
(1) Declare void the election decided December 8<sup>th</sup>, 2022 regarding the contest between Judge James Jameson and Andrea Moore VOID as required by law under appropriate facts;

(2) Order Andrea Moore to comply with the law and canons of judicial ethics throughout the new election;

(3) Enjoin Andrea Moore, her “campaign manager” and other supporters she is aware of, from engaging in any unfair campaigning tactics, including but not limited to, threatening individuals or businesses for supporting Judge Jameson’s candidacy, or falsely reporting any information Ms. Moore either knows to be false, or may recklessly distribute. And enjoin the same from misusing the JCC or any other entity or office for political purposes.

Dated: December 7<sup>th</sup>, 2022.

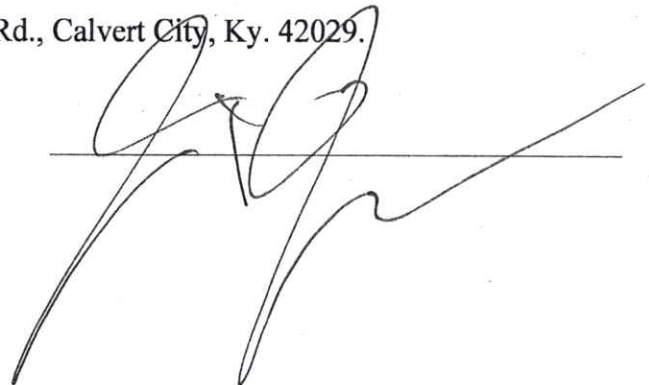
Respectfully submitted,



James T. Jameson  
KBA 92086

**CERTIFICATE OF SERVICE**

I certify that the foregoing complaint will be served as soon as the summons is available upon Defendant at her home address: 5701 Shar Cal Rd., Calvert City, Ky. 42029.





Andrea Moore for J...



Andrea Stephens Moore

Admin · 14h ·

While campaigning yesterday I was asked if I was a part of a conspiracy like Judge Jameson states in the Murray Ledger in regard to why he has been charged with misconduct violations and I want to start sharing with you guys on Facebook some of the questions I am getting on the trail and my answers. My answer to her was no he has been charged due to his actions and his alleged misconduct alone. My decision to run for Circuit Court Judge was not made lightly and was made during the toughest year of my life. In November when I filed to run my father was at the end of his life. He passed this March after fighting colon cancer for 2 years. My decision to file was a personal one and one that my husband and my



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Andrea Moore for J...



My decision to file was a personal one and one that my husband and my parents supported even though we were all facing one of the most heartbreaking moments we had ever faced. Many of you would ask me why I would do such a thing during a time like that. My answer is simple. I was tired of seeing others get mistreated. I was tired of seeing deputy jailers cuffed for doing their job and protecting those at the jail. I wanted to step forward and share my story in regard to how I was humiliated and demeaned in court even though it is still humiliating and hurtful to me. I wanted to make a difference in others lives because I had been in their exact same position. So in my mind anyone that has been mistreated like I was to step forward and state I was also



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Andrea Moore for J...



exact same position. So in my mind anyone that has been mistreated like I was to step forward and state I was also mistreated is someone with great courage and I nor others should be demeaned a second time by this man trying to categorize humiliating treatment as a conspiracy. I am someone that has stepped forward on my own to say to all of those that have been tricked into thinking he treats everyone well that is not the case. I have been a practicing attorney for 15 years, I have way more trial experience than our current Circuit Judge has and I had never been treated so appallingly in court in my life and I expect I never will again unless our current Judge is re-elected. Thank you for reading and listening. This year has been the



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have been a practicing attorney for 10 years, I have way more trial experience than our current Circuit Judge has and I had never been treated so appallingly in court in my life and I expect I never will again unless our current Judge is re-elected. Thank you for reading and listening. This year has been the toughest of my life but also one that I am extremely proud of because win or lose I feel that I have stood up against chronic bullying and humiliation.


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**Andrea Stephens Moore**
⋮
  
 shared a post.



Andrea Stephens

Moore shared a link.

Admin 1h ·

Since the news of Judge Jameson's suspension I have taken the high road and not commented. However I am writing to address the article that was published by the Murray Ledger this morning addressing Judge Jamie Jameson's suspension as a Circuit Court Judge where Judge Jameson misstates what happened on a court video involving myself. In the article it addresses videos played during the JCC suspension hearing where Judge Jameson is alleged to have not acted in an appropriate courtroom manner and they played several videos one video showing where he ordered a deputy jailer cuffed for doing his job and in



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jailer cuffed for doing his job and in another video showing where I was representing my client and he threatens to put me on the jail line for arguing that my clients time should be ran together according to the law. However what Judge Jameson states in the article is false in regard to my actions. He states that he was concerned about my representation and worried about my client because he was facing a lot of time? If that was actually the case then he would have ran the time together like I requested for a shorter sentence instead of also threatening to put me on the jail line and acting as though the sentence should run for a longer period of time. He then later on another video has to come back and run the time



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of time. He then later on another video has to come back and run the time concurrently because he was wrong in his first ruling. He never apologized for threatening my liberty and stating that if I said one more word I would be on the jail line. In my 15 years of practice I have never been treated so appallingly and I am glad others are now learning of his poor behavior towards others. I am extremely disappointed that I was not given an opportunity in the article to respond and let the public know what happened in regard to my actions. However I want to assure all of you in the future that when someone tells blatant lies about my actions I will always respond and I will always keep you updated and informed. Thank you for your time and support. I appreciate



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the future that when someone tells blatant lies about my actions I will always respond and I will always keep you updated and informed. Thank you for your time and support. I appreciate all of you more than you know.



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## Andrea Moore For Judge ·

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Jamie Jameson has spent 45 days in the Marshall County jail for contempt of a domestic violence order in the past according to the Tribune, he is currently facing 45 misconduct violations one involving ordering a law enforcement officer cuffed for doing his job and now Jamie Jameson has been temporarily suspended from his position as Circuit Judge of Marshall and Calloway counties and newspapers as far as MIAMI have his face plastered all over their papers. Marshall and Calloway Counties temperament matters when is



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doing his job and now Jamie Jameson has been temporarily suspended from his position as Circuit Judge of Marshall and Calloway counties and newspapers as far as MIAMI have his face plastered all over their papers. Marshall and Calloway Counties temperament matters when is ENOUGH, ENOUGH! WE DESERVE BETTER! #There is a better course! #There is a better way! VOTE for MOORE RESPECT AND DECENCY! VOTE ANDREA LEE MOORE FOR CIRCUIT COURT JUDGE.



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Lucy Jameson and Justin Lamb



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