

IN RE JUDITH "JUDY" GREEN

APPLICATION FOR SUBPOENAS

Gregg Hovious, counsel for the Charging Committee, respectfully requests the Council Court to issue subpoenas to compel the attendance of the following witnesses and production of the following documents pursuant to Rule 15 of the Louisville Metro Council Removal Hearing Rules and Procedures. Should the Council Court approve this application, proposed subpoenas that are consistent with the application are attached for the signature of the Chair pursuant to Rule 15.

1. **Dr. Judith "Judy" Green** – 749 S. 43rd Street, Louisville, Ky. 40211.

A. Dr. Green is expected to testify regarding allegations of misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with:

- (i) supervising the 2010 Green Clean Team;
- (ii) funding hidden "subgrants" through the 100 Black Men organization.

B. If warranted, Dr. Green is expected to testify concerning allegations of misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with:

- (i) charging over \$25,000 to a credit card in Metro Council Aide Andrea Jackson's name without her knowledge or permission;
- (ii) accepting funds in exchange for forgoing her opposition to the licensing of alcohol;
- (iii) misusing Kroger gift cards purchased with taxpayer funds;
- (iv) requiring Metro Council Aides to perform personal services for Dr. Green, including repaying loans to an individual whom she described as her "loan shark", to run errands, to make phone calls and to babysit Dr. Green's foster children; and
- (v) testimony provided under oath at two Metro Ethics Commission hearings.

The undersigned asks that Dr. Green be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

- A. All tax returns for 2009 and 2010 (see definition of "Family Member" in Standards of Conduct);
- B. All documents evidencing any alleged loan and repayment of loan in connection with the Green Clean Team and any payments, timesheets or receipts regarding the workers;
- C. All emails concerning the Green Clean Team or 100 Black Men;
- D. All photos or awards relating to the Green Clean Team or monies granted to 100 Black Men;
- E. All bills and receipts associated with the credit card issued in Andrea Jackson's name (see attached Exhibit A); and
- F. All documents evidencing the use of Kroger gift cards purchased with taxpayer funds.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

2. **Melody Hill - 9200 Sissone Dr., Louisville, Ky. 40118**

A. Ms. Hill is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards in connection with:

- (i) the 2010 Green Clean Team;
- (ii) funding hidden "subgrants" through the 100 Black Men organization.

B. If warranted, Ms. Hill is expected to testify concerning allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with:

- (i) charging over \$25,000 to a credit card in Metro Council Aide Andrea Jackson's name without her knowledge or permission;
- (ii) accepting funds in exchange for forgoing her opposition to the licensing of alcohol;

- (iii) misusing Kroger gift cards purchased with taxpayer funds;
- (iv) requiring Metro Council Aides to perform personal services for Dr. Green, including repaying loans to an individual whom she described as her "loan shark", to run errands, to make phone calls and to babysit Dr. Green's foster children; and
- (v) testimony provided under oath at two Metro Ethics Commission hearings.

The undersigned asks that Ms. Hill be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

- A. All documents evidencing any alleged loan and repayment of loan in connection with the Green Clean Team and any payments, timesheets or receipts regarding the workers;
- B. All emails concerning the Green Clean Team or 100 Black Men;
- C. All documents evidencing the use of Kroger gift cards purchased with taxpayer funds.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

3. **Andrea Jackson- 8505 Old Boundary Rd., Louisville, Ky. 40291**

A. Ms. Jackson is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards in connection with:

- (i) the 2010 Green Clean Team;
- (ii) funding hidden "subgrants" through the 100 Black Men organization.

B. If warranted, Ms. Jackson is expected to testify concerning allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with:

- (i) charging over \$25,000 to a credit card in Metro Council Aide Andrea Jackson's name without her knowledge or permission;
- (ii) accepting money to support the licensing of alcohol;

- (iii) misusing Kroger gift cards purchased with taxpayer funds;
- (iv) requiring Metro Council Aides to perform personal services for Dr. Green, including repaying loans to an individual whom she described as her "loan shark", to run errands, to make phone calls and to babysit Dr. Green's foster children; and
- (v) testimony provided under oath at two Metro Ethics Commission hearings.

The undersigned asks that Ms. Jackson be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

- A. All documents evidencing any alleged loan and repayment of loan in connection with the Green Clean Team and any payments, timesheets or receipts regarding the workers;
- B. All emails concerning the Green Clean Team or 100 Black Men;
- C. All documents evidencing the use of Kroger gift cards purchased with taxpayer funds.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

4. **Dr. Eddie Woods - CEO, Registered Agent, LIFE Institute, 2525 West Broadway, Louisville, Ky. 40211**

A. Dr. Woods is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with the 2010 Green Clean Team.

B. If warranted, Dr. Woods is expected to testify concerning allegations of misconduct or willful neglect in connection with Dr. Green's testimony at the Metro Ethics Commission hearing regarding the Green Clean Team.

The undersigned asks that Dr. Woods be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

A. All documents relating to the Green Clean Team including but not limited to evidence of any alleged loan by Dr. Green and repayment and any payments, timesheets or receipts regarding the workers; and

B. All correspondence and emails concerning the Green Clean Team.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

5. **Mike Norman - Director of Business Operations, Louisville Science Center, 727 West Main Street, Louisville, KY 40202**

A. Mr. Norman is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in violation of Metro Council Standards of Conduct in connection with the 2010 Green Clean Team.

B. If warranted, Mr. Norman is expected to testify concerning allegations of misconduct or willful neglect in connection with Dr. Green's testimony at the Metro Ethics Commission hearing regarding the Green Clean Team.

The undersigned asks that Mr. Norman be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

A. All documents relating to the Green Clean Team including but not limited to evidence of any alleged loan by Dr. Green and repayment and any payments, timesheets or receipts regarding the workers; and

B. All correspondence and emails concerning the Green Clean Team.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

6. **Charles Alexander - Treasurer, 100 Black Men of Louisville, Inc., 7608 Charron Rd., Louisville, Ky. 40220**

A. Mr. Alexander is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in connection with Dr. Green's violation of Metro Council Standards of Conduct in connection with the 100 Black Men grant.

B. If warranted, Mr. Alexander is expected to testify concerning allegations of misconduct or willful neglect in connection with Dr. Green's testimony at the Metro Ethics Commission hearing regarding the 100 Black Men grant.

The undersigned asks that Mr. Alexander and 100 Black Men be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

A. All documents relating to the 100 Black Men grant applications and expenditures as "subgrants".

B. All correspondence and emails relating to the 100 Black Men grant and expenditures as "subgrants".

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

7. **Rob Jordan - 100 Black Men of Louisville, Inc.,
7608 Charron Rd., Louisville, Ky. 40220**

A. Mr. Jordan is expected to testify regarding allegations of Dr. Green's misconduct or willful neglect in connection with Dr. Green's violation of Metro Council Standards of Conduct in connection with the 100 Black Men grant.

B. If warranted, Mr. Jordan is expected to testify concerning allegations of misconduct or willful neglect in connection with Dr. Green's testimony at the Metro Ethics Commission hearing regarding the 100 Black Men grant.

The undersigned asks that Mr. Jordan and 100 Black Men be required to produce copies of the following documents no later than five days before the hearing that is scheduled to begin on August 22, 2011:

A. All documents relating to the 100 Black Men grant applications and expenditures as “subgrants”.

B. All correspondence and emails relating to the 100 Black Men grant and expenditures as “subgrants”.

This subpoena is needed to support the preferred charges and to rebut Dr. Green’s claims of lack of knowledge, veracity or reputation.

8. Greg Dawson – PNC Bank, 3405 West Broadway, Louisville, Ky. 40202
Megan Baker - PNC Bank, 101 S. Fifth St., Louisville, Ky. 40202

The undersigned asks that Mr. Dawson, Ms. Baker and PNC Bank be required to produce all documents relating to the credit card issued in Andrea Jackson’s name, the image of which is attached here as Exhibit A including, but not limited to, account opening documentation, all charges and all bills.

This subpoena is needed to support the preferred charges and to rebut Dr. Green’s claims of lack of knowledge, veracity or reputation.

9. Ghasson “Gus” Omari - Lorie’s Liquors, 2316 W. Market Street, Louisville, Ky. 40212.

Mr. Omari will be asked whether he gave money to Dr. Green in exchange for her support of an alcohol sales license or ordinance as Andrea Jackson reported Dr. Green told her.

The undersigned asks that Mr. Omari be required to produce copies of all documents relating to his application for an alcohol sales license and the license itself no later than five days before the hearing that is scheduled to begin on August 22, 2011.

This subpoena is needed to support the preferred charges and to rebut Dr. Green’s claims of lack of knowledge, veracity or reputation.

10. **Sandra Fant** – Salsabil, LLC, 2631 West Broadway, Louisville, Ky. 40211

Ms. Fant will be asked whether she gave money to Dr. Green in exchange for her support of an alcohol sales license or ordinance as Andrea Jackson reported Dr. Green told her.

The undersigned asks that Ms. Fant be required to produce copies of all documents relating to her application for an alcohol sales license and the license itself no later than five days before the hearing that is scheduled to begin on August 22, 2011.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

11. **Detective Fritz Graas** - Louisville Metro Police, Professional Integrity Unit, 633 W. Jefferson St., Louisville, Ky. 40202

Detective Graas is expected to testify regarding his investigation of allegations of Dr. Green's misconduct or willful neglect and his ensuing report. He will be asked if Dr. Green cooperated in that investigation.

The undersigned asks that Detective Graas produce copies of his entire file concerning Dr. Green including the audiotape recordings of the sworn testimony of Melody Hill, Andrea Jackson and Dr. Eddie Woods no later than five days before the hearing that is scheduled to begin on August 22, 2011.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

12. **Beth Stenburg** --1713 Creekside Dr., Clarksville, Ind. 47129-9031

Ms. Stenburg is expected to testify concerning the source of her understanding that Judy Green's foster children played for the Flaget Rams.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

13. **Clarence Yancey** -- 104 Fontaine Landing Ct., Louisville, Ky. 40212-2566

Mr. Yancey is expected to testify concerning funds received from the Metro Council through Judy Green for catering various events.

The undersigned asks that Mr. Yancey be required to produce, no later than five days before the hearing that is scheduled to begin on August 22, 2011, all documents that relate to or reflect in any way funds paid to Mr. Yancey by the Metro Council through Judy Green.

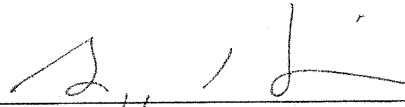
This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

14. Monzella Wells -- (current address to be determined)

Ms. Wells is expected to testify concerning funds received in connection with the Cowboys' Youth Football Banquet and Dr. Green's attendance at that banquet.

This subpoena is needed to support the preferred charges and to rebut Dr. Green's claims of lack of knowledge, veracity or reputation.

Respectfully submitted,




R. Gregg Hovious
Fultz Maddox Hovious & Dickens PLC
101 S. Fifth Street, 27th Floor
Louisville, Kentucky 40202
(502) 588-2000
(502) 588-2020 (facsimile)
Counsel for the Charging Committee

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2011, I served by hand-delivery a copy of the forgoing Application for Subpoenas upon the following:

Derwin Webb
The Webb Law Office
607 W. Main Street, Suite 500
Louisville, Kentucky 40202



R. Gregg Hovious
Counsel for the Charging Committee