

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

Electronically filed

HOPE OF KENTUCKY, LLC, *et al.*,

Plaintiffs

v.

DANIEL CAMERON

Defendant

No. _____
(Removed from Franklin Circuit Court
No. 22-CI-00842)

NOTICE OF REMOVAL

Defendant Daniel Cameron, in his official capacity as Attorney General of the Commonwealth of Kentucky, for his notice of removal of this action from the Franklin Circuit Court to the United States District Court for the Eastern District of Kentucky, Central Division at Frankfort, states as follows:

1. On November 2, 2022, Defendant Daniel Cameron was served with the Plaintiffs' complaint, which was filed in the Franklin Circuit Court as state court case no. 22-CI-00842. Copies of all process and pleadings in the state court action are attached hereto in accordance with 28 U.S.C. § 1446(a).

2. This action is one over which the Court has original jurisdiction under 28 U.S.C. § 1331, and is one the Defendant may remove to this Court under 28 U.S.C.

§ 1441(a), because the Plaintiffs have asserted claims that arise under the Constitution of the United States, including:

a. The Plaintiffs allege that the civil investigative demands issued by the Attorney General violate their rights of free speech and association, as protected by the First Amendment; and

b. The Plaintiffs allege that “the very existence of the [civil investigative demands] calls into question and chills the Plaintiffs’ rights to think, speak and associate freely and without unwarranted governmental intrusion or criticism.”

3. To the extent the Plaintiffs have asserted state-law claims in their complaint, this Court has supplemental jurisdiction over those claims under 28 U.S.C. § 1367(a).

4. This notice of removal is filed within 30 days after Attorney General Daniel Cameron became aware of the removability of this case, as is required by 28 U.S.C. § 1446(b)(1).

Respectfully submitted,

/s/ Christopher L. Thacker
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CERTIFICATE OF SERVICE

I certify that on November 10, 2022, the above document was filed with the CM/ECF filing system and that a true and correct copy was served electronically on the counsel of record and via regular U.S. Mail, postage prepaid, upon the following:

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