

COMMONWEALTH OF KENTUCKY  
FLOYD CIRCUIT COURT  
CASE NO. 24-CR-326

NOT ORIGINAL  
FILED  
DOUGLAS R. HALL  
MAR 27 2025 01:42:14 PM  
KY BROADCASTING  
BY [Signature] CIRCUIT DISTRICT COURT D.C.

COMMONWEALTH OF KENTUCKY,

PLAINTIFF

VS.

COMMONWEALTH'S RESPONSE TO  
DEFENDANT'S MOTION FOR CHANGE OF VENUE

MICHAEL K. MCKINNEY, III,

DEFENDANT

\*\*\* \*\*

COMES the Commonwealth and for its response to the Defendant's Motion for Change of Venue, and states as follows:

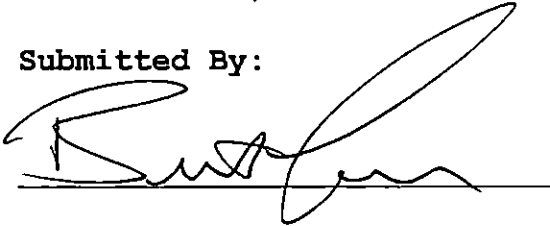
- 1. As we indicated at the previous hearing, the Commonwealth does not object to moving the case out of Floyd County.
- 2. The law would require that the trial be moved to an adjoining county. The Court had suggested a preference for trying the case in Pike County. The Commonwealth does not object to trying the case there and believes that the Defendants could obtain a fair trial.
- 3. As the Court knows, it is not required that a juror has never heard or read about a case to be seated. It is only required that they be able to set aside any information they've read or opinions they've formed and make a decision only on the evidence at trial. Individual voir dire could be conducted on the issue of pretrial publicity to assure that a fair and impartial jury could be seated in Pike County.

ORIGINAL

Respectfully submitted this 27 day of March 2025 03/28/2025 01:42:14 PM  
EKYBROADCASTING

HON. ARNOLD BRENT TURNER  
COMMONWEALTH'S ATTORNEY  
140 SOUTH LAKE DRIVE  
PRESTONSBURG, KY 41653

Submitted By:



**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Motion was e-mailed on this the 27th day of **March**, 2025 to the following:

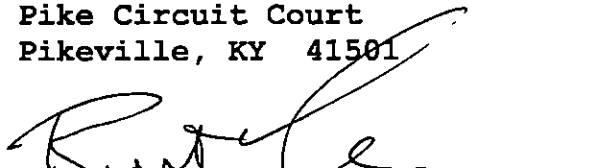
Hon. Terry Jacobs  
P. O. Box 99  
Hindman, KY 41822  
(e-mail: terrydjacobs@hotmail.com)

Hon. Steven R. Romines  
600 West Main Street, Suite 100  
Louisville, KY 40202  
sromines@rominesweisyoung.com

Hon. Randy O'Neal  
P. O. Box 266  
Richmond, KY 40476  
randy@williamsoneal.com

Hon. Whitney Rowe  
300 West Short Street  
Lexington, KY 40507  
whitney@baldanilaw.com

Judge Eddie Coleman  
Pike Circuit Court  
Pikeville, KY 41501



FLOYD COMMONWEALTH'S ATTORNEY