

KENTUCKY COURT OF JUSTICE
FAYETTE DISTRICT COURT
CRIMINAL/TRAFFIC DIVISION
Case No. DI 22-M-00553

)	
COMMONWEALTH OF KENTUCKY)	
)	
plaintiff)	
)	
VS)	MOTION ALLEGING DEFECT
)	IN THE
)	INDICTMENT OR INFORMATION
WILLIAM DOUGLAS EPLING)	
)	
defendant)	

Due to language of the City Ordinance charged in this case, written with erroneous English language clearly indicating LACK OF SPECIFICITY, this MOTION is a petition for this Court to preclude any further prosecution of charges under this fallacious Ordinance.

Based on principles that LAW depends on language and language depends on a mutually agreed upon syntax, semantic, and logic, the same troublesome dependency known since the writing of the Book of Genesis, this MOTION is both to illustrate erroneous English language within the composition of LAW charged in this case as well as to lodge this illustration into the PUBLIC RECORD.

The Lexington-Fayette Urban County Code of Ordinances, in Chapter 4, ARTICLE II, Section 4-12.2(a), reads verbatim as following:

It shall be unlawful for the owner or harbinger of an animal to permit the animal, without cause, to cause physical injury to any human being or domestic animal, or to give any human being the reasonable impression that he or she is in immediate danger of being physically injured by the animal.

That sentence breaks down as following:

1. It shall be unlawful.
2. (various modifiers of the direct object)
3. [TO PERMIT THE ANIMAL] (modifier of the predicate)
4. OR is a coordinating conjunction between alternatives

The English word OR in that sentence is a coordinating conjunction. This coordinating conjunction connects two subordinate clauses that postulate two different propositions. It establishes a logical condition such as black or white, hot or cold. This two pronged postulation causes this ordinance to read in two individual propositions as following:

Proposition A: It shall be unlawful for the owner or harbinger of an animal to permit the animal, without cause, to cause physical injury to any human being or domestic animal.

OR

Proposition B: It shall be unlawful for the owner or harbinger of an animal to permit the animal, without cause, to give any human being the reasonable impression that he or she is in immediate danger of being physically injured by the animal.

Normally, the logical truth between legitimate propositions is that if one or the other or both propositions are true, there is a legitimate OR logic between propositions. This legitimate OR logic looks like the following truth table:

Proposition A	Proposition B	Legitimate OR logic
True	True	True
True	False	True
False	True	True
False	False	False

However, going back to the story of Babel from 3 or 4 thousand years ago, the exact causes or effects of electrical activity between neurons within a person's brain, the locus of IMPRESSION

formation, firstly, never can be encoded or decoded purposefully by any other entity as Proposition B suggests. Secondly, it is FACT that questionably sound attributions or calculations based on brain activity by the brain's own host organism are frequent occurrences.

Therefore, the English comprising Proposition B can never be determinate. It can be at best speculative, if not indefinite. SPECULATION is only sound in THEORY. This makes LAW defined by Proposition B null and void in all circumstances; there is NEVER anything verifiably true or false about Proposition B. So the entire logic of this LAW, only half-formed in English, can NEVER reach a SPECIFICITY necessary to charge this offense.

Respectfully submitted this Tuesday, September 13, 2022

William Douglas Epling
on his own behalf

CERTIFICATION OF SERVICE:

Honorable Mitch Zegafuse
201 E. Main St., Ste 600
Lexington, Kentucky 40507