

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
)	INDICTMENT NO.
v.)	1:10-CR-00134-WSD-LTW-2
)	
DONALD FRANK,)	
Defendant.)	

**MOTION IN LIMINE TO EXCLUDE ANY MENTION OF MR. VERNON
JONES BEING DEFENDANT FRANK’S SUPERVISOR**

COMES NOW Defendant Donald Frank, by and through undersigned counsel, and hereby files this Motion In Limine to Exclude Any Mention of Mr. Vernon Jones Being Defendant Frank’s Supervisor.¹ In support of this Motion, Defendant shows as follows:

1.

Defendant Frank is on trial for allegedly taking bribes from Mr. Amin Budhwani during the years 2008 through 2009.

2.

During most of that relevant period of time, Defendant was Deputy Chief of the DeKalb County Police Department.

¹ Defendant Frank understands that Motions were due to be filed prior to the filing of this Motion. However, this Motion in Limine was just thought of upon final trial preparation. (See Document #63).

3.

The Chief Executive Officer (CEO) of DeKalb County during part of Defendant Frank's tenure as Deputy Chief of Police was Mr. Vernon Jones.

4.

Mr. Vernon Jones, a well-known public official, has a reputation that causes some people to immediately think of corruption in DeKalb County Government.

5.

There are statements of a Government witness in discovery, which reveal alleged statements that Defendant Frank would lose his position as the Deputy Chief of DeKalb County once Mr. Vernon Jones surrendered his position as CEO of DeKalb County.² These statements come from Mr. Amin Budhwani.

6.

Even if Defendant lost his position as Deputy Chief of the DeKalb County Police Department because a new CEO was coming into office, this fact has no relevance to the indicted case at bar and there is potential prejudice to Defendant Frank that somehow Mr. Vernon Jones controlled Defendant Frank's position as Deputy Chief of Police.

² Interestingly, the Government filed a Motion not to introduce evidence that Defendant Frank was terminated from his employment with DeKalb County Police Department. (See Document #67).

WHEREFORE, Defendant Frank respectfully requests a hearing on this Motion In Limine and, at the conclusion of same, asks that this Honorable Court exclude any mention of Mr. Vernon Jones and the fact that he knew Defendant Frank.

This 24th day of February, 2011.

Respectfully submitted,

/s/ Brian Steel
BRIAN STEEL
GA Bar No. 677640
E-mail: thesteellawfirm@msn.com
Counsel for Defendant Frank

/s/ Bruce H. Morris
GA Bar No. 523575
Email: bmorris@fmattorneys.com
Counsel for Defendant Frank

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the within and foregoing **MOTION IN LIMINE TO EXCLUDE ANY MENTION OF MR. VERNON JONES BEING DEFENDANT FRANK'S SUPERVISOR** via **Electronic Filing (E-Filing)**, to the following:

**Susan Coppedge, Esq.
United States Attorney
600 Richard B. Russell Building
75 Spring Street, SW
Atlanta, Georgia 30335**

This 24th day of February, 2011.

Respectfully submitted,

/s/ Brian Steel

BRIAN STEEL
GA Bar No. 677640
E-mail: thesteellawfirm@msn.com
Counsel for Defendant Frank

/s/ Bruce H. Morris

GA Bar No. 523575
Email: bmorris@fmattorneys.com
Counsel for Defendant Frank