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CITY OF SPOKANE ETHICS COMMISSION

JAMIE PENDLETON,

Plaintiff,

vs.

DAVID CONDON, MAYOR,

Defendant

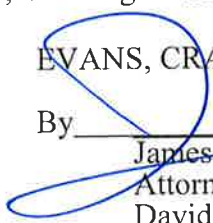
NOTICE OF APPEARANCE FOR
MAYOR DAVID CONDON

TO: Plaintiff, Jamie Pendleton (Pro Se):

YOU WILL PLEASE TAKE NOTICE that the defendant, DAVID CONDON, MAYOR OF SPOKANE CITY herein enters his appearance regarding the Ethics Complaint submitted on or about November 30, 2015 (a copy of the Ethics Complaint is attached) and requests that all further pleadings and papers (except process) be served upon the undersigned attorneys at the address below.

DATED at Spokane, Washington this 3 day of December, 2015.

EVANS, CRAVEN & LACKIE, P.S.

By  James B. King, WSBA #8723
Attorney for Defendant
David Condon

NOTICE OF APPEARANCE- page 1

Evans, Craven & Lackie, P.S.
818 W. Riverside, Suite 250
Spokane, WA 99201-0910
(509) 455-5200; fax (509) 455-3632

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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned hereby certifies under penalty of perjury under the laws of the State of Washington, that on the 3 day of December, 2015, the foregoing was delivered to the following persons in the manner indicated:

Jamie Pendleton
P.O. Box 1888
Veradale, WA 99037

VIA REGULAR MAIL ☒
VIA CERTIFIED MAIL ☐
VIA FACSIMILE ☐
HAND DELIVERED ☐

12-3-15 / Spokane, WA
(Date/Place)



CITY OF SPOKANE ETHICS COMMISSION ETHICS COMPLAINT FORM

Please review the City of Spokane's Code of Ethics – Chapter 1.04A SMC – before completing this complaint form. When you have completed this form, submit it to:

City of Spokane Ethics Commission

Attention: Rebecca Riedinger

Office of the City Attorney

5th Floor Municipal Building

W. 808 Spokane Falls Blvd.

Spokane, WA 99201

or at: riedinger@spokanecity.org

Pursuant to the City of Spokane's Code of Ethics, I am filing a complaint regarding conduct which I believe constitutes a violation of the City's Code of Ethics.

Name, position, and department of person(s) I believe to have violated the Code of Ethics:

Name: **David Condon**

Position/Title: **Mayor**

Nature of Code of Ethics violation:

What specific provision of SMC 1.04A.030 do you believe has been violated?

Section A - General Prohibition Against Conflicts of Interest: ...no current City officer shall have an interest that might be seen as adverse to the interests of the City.

Section N - Commission of Acts of Moral Turpitude or Dishonesty Prohibited.

Describe in as much detail as possible the alleged Code of Ethics violation conduct. Attach additional sheets of paper, if necessary. Please include all documentation you believe demonstrates a violation. Your description should include the date, location and frequency of the alleged violation.

Regarding SMC 1.04A.030 – Section A:

Mayor David Condon knowingly withheld allegations of sexual harassment by former Police Chief Frank Straub against another city employee. This information was not made public until after David Condon had won re-election. The dishonesty by omission of the whole truth while campaigning for re-election constitutes an action adverse to the interests of the City by withholding information pertinent to voters.

The timing of these revelations present a clear conflict of interest since these allegations speak to David Condon's integrity in discharging the duties of the Mayor's Office in the eyes of Spokane's constituency.

Regarding SMC 1.04A.030 – Section N:

In public remarks on September 22 David Condon denied that any complaint of sexual harassment was made. This is blatant dishonesty relevant to Spokane voters in an election.

Names and positions of the persons who may have witnessed the event:

These allegations were made public by the Mayor's Office on Tuesday, November 24th, 2015.

Evidence or documentation

Please list any evidence or documentation that would support your allegation of a Code of Ethics violation. Indicate whether you can personally provide that information.

This evidence is public record in a city publication.

"Condon himself denied that any complaints of sexual harassment had been filed against the former chief when he announced Straub's departure on Sept. 22 [2015]. "The issue that you speak of, there has been no official filings of anything," -Mayor David Condon

<http://www.inlander.com/Bloglander/archives/2015/11/24/alleged-sexual-harassment-public-records-and-mayor-condons-re-election>

Complainant Declaration

I declare under penalty of perjury of the laws of the State of Washington that to the best of my knowledge, information, and belief formed after reasonable reflection, the information in the complaint is true and correct.

JAMIE PENDLETON
Complainant's Signature Date

Date and Place (e.g. City, State)

11/30/2015

SPOKANE, WA

Name (please print):

JAMIE PENDLETON

Address:

P.O. BOX 1988 VERADALE WA 99037

Phone Number(s):

208-918-1045

E-Mail Address:

BABYFACE @ DS BABYFACE .COM