

RECEIVED

FEB 10 2016

OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMITTEE

ALEXANDER J. SHOGAN, JR.
Complainant

DAVID CONDON, MAYOR OF
THE CITY OF SPOKANE,
Respondent

)
) MOTION BY COMPLAINANT SHOGAN
) FOR A CONTINUANCE


COMES NOW ALEXANDER J. SHOGAN, JR., Complainant Herein, and MOVES that the Ethics Committee CONTINUE its February 24, 2016 Hearing of This Matter **until** the **Final Report** of the Independent Commission regarding Similar and/or Related Issues as are contained in his Amended Complaint and Currently before the Commission.

Complainant Bases this Motion on the Fact that the Independent Commission has Advised Key City Hall Personnel, including the following Persons Currently on Complainant's Amended Witness List: Mayor Condon, City Administrator Theresa Sanders, Mayoral Spokesman Brian Coddington, and City Director of Human Resources Heather Lowe, **NOT** to Discuss the Matters contained in Complainant's Amended Complaint with him. Said Action has also been taken by the Independent Commission with regard to the Members of the Spokane City Council, including Council President Ben Stuckart, another Person on Complainant's Amended Witness List.

The Communications Ban resulting from the Actions of the Independent Commission has Deprived the Complainant herein of the Opportunity to Obtain Information, Statements and Affidavits **Crucial** for the Substantiation of his Amended Complaint and his Reply to Respondent's Motion to Dismiss.

Based on All of the Facts stated above, Complainant's Motion for a Continuance of Its February 24, 2016 Hearing **until** the **Final Report** of the Independent Commission investigating Similar and/or Related Issues as are Contained in his Amended Complaint Should be Granted by the Ethics Committee.

DATED at Spokane, Washington, this 9th day of February, 2016.


ALEXANDER J. SHOGAN, JR.
Complainant Herein