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6	CITY OF SPOKANE E	THICS COMMISSION	
7	CDOMANE ADEA NOW		
8	SPOKANE AREA NOW,	DELARATION OF LEROY EADIE	
9	Plaintiff, vs.		
10			
11 12	DAVID CONDON, MAYOR,		
13	Defendant		
14			
15	Leroy Eadie, under the penalty of perjury of	the laws of the State of Washington, states	
16	and declares as follows:	Q	
17			
18	1. I am over 18 years of age and am competent to be a witness herein.		
19	2. The matters set forth in this Declaration are based upon personal knowledge.		
20	3. Lam the current Director of the Parks & Recreation Division of the City of		
21 22	Spokane.		
23	4. I have read the allegations in the National Organization of Women Ethics		
24			
25	Complaint against Mayor David Condon regarding alleged dishonesty by Mayor Condon in		
26	his December 11, 2015, letter to the City Council.		
27	5. In April/May2015, the Parks & Recreation Division had an existing need for a		
28	public relations, public information, marketing and/or branding professional.		
29			
30	DECLARATION OF LEROY EADIE - Page 1	Evans, Eraven & Lackie, P.S. 818 W. Riverside, Suite 250 Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632	

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6.	The need for a person with these qualifications was based upon two factors
First, the Pa	arks & Recreation Division was involved in public outreach, marketing, and
branding eff	forts related to the City of Spokane's Riverfront Park redevelopment program.
Second, the	Community Affairs Coordinator who had some but not all of the previously
described di	uties was on an extended leave.

- 7. At the suggestion of the City Administrator, I interviewed, with my Executive Officer, Jason Connelly, Monique Cotton, to determine if she had the skills, experience and abilities to fill the existing need.
- 8. After the interview and evaluation of Ms. Cotton's skill set, I made the decision to retain her to fill the existing need and to perform the activities previously described in this declaration. The interview took place in April 2015. My decision was made thereafter and she started on May 5, 12015.
- 9. I am not required to obtain Park Board approval for decisions such as the one involving Ms. Cotton.
- 10. I am responsible for managing the Parks & Recreation Division with the assistance of my staff. The Park Board is responsible for setting policy and for budgetary decisions.

DATED at Spokane, Washington this 20 day of January, 2016.

i	CERTIFICATE OF SERVICE	
2	Pursuant to RCW 9A 72 085, the undersigned hereby certifies under namelty of pariury	
3	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 20 day of January 2016, the foregoing	
4	was delivered to the following persons in the manner indicated:	
5		
6	Rick Eichestaedt	VIA REGULAR MAIL 🕞
7	Center for Justice	VIA CERTIFIED MAIL []
8	35 W. Main, Ste. 300 Spokane, WA 99201	VIA FACSIMILE [] HAND DELIVERED []
9	•	VIA EMAIL [🔀
10	,	
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12	/ Spokane, WA	tomas)
13	(Date/Place)	
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30	DECLARATION OF LEROY EADIE - Page 3	Evans, Craven & Lackie, P.S.
		818 W. Riverside, Suite 250 Spokane, WA 99201-0910 (509) 455-5200; fax (509) 455-3632