RECEIVED

SEP 2 1 2016

OFFICE OF THE CITY ATTORNEY

1 2

17 follo

CITY OF SPOKANE ETHICS COM	MISSION
----------------------------	---------

SPOKANE AREA NOW,

Complainant vs.

DAVID CONDON, MAYOR,

Respondent

RESPONDENT CITY OF SPOKANE MAYOR DAVID CONDON'S OBJECTIONS TO NOW'S EXHIBITS

follows:
through his undersigned counsel and objects to Plaintiff Spokane Area NOW's Exhibits as
COMES NOW Respondent David Condon, Mayor of the City of Spokane by and

Exhibit No.	Objection
1. Video Recording of	No Objection.
Press Conference	
2. Transcript of	No Objection.
Interview of Mayor	
Condon	
3. Transcript of April	This information is not relevant to any matter at issue.
27, 2016 Interview of	See, ER 401-403. It is likewise hearsay. ER 801-803.
Teresa Sanders	
4. Copies of Text	This information is not relevant to any fact at issue. It
Messages	is likewise hearsay.
5. Handwritten notes of	This information is not relevant to any fact at issue. It
Ms. Sanders	is likewise hearsay.
6. Statement of Mark	This information is not relevant to any fact at issue. It
Griffiths	is likewise hearsay.

RESPONDENT MAYOR DAVID CONDON'S OBJECTIONS TO EXHIBITS- page 1

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

- 1	
1	7. Letter from Mayor This information is not relevant. The charge
2	David Condon to City Council. concerning Mayor Condon's representations to others, with the exception of the press conference on
	September 22, 2105 have been dismissed.
3	8. Letter from Mayor This information is not relevant. The charge
4	Condon to Ms. Cotton concerning Mayor Condon's representations to others, with the exception of the press conference on
5	September 22, 2105 have been dismissed.
6	9. Letter from Bob This information is not relevant and is hearsay.
7	Dunn to Mayor Condon
8	-1
9	DATED at Spokane, Washington this 21 day of September, 2016.
10	EVANS, CRAVEN & LACKIE, P.S.
11	
12	James B. King WSBA #8723
13	Markus W. Louvier, WSBA #39319 Attorney for Respondent
14	Mayor David Condon

RESPONDENT MAYOR DAVID CONDON'S OBJECTIONS TO EXHIBITS- page 2

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

1 CERTIFICATE OF SERVICE 2 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 Zisday of September 2016, the 3 foregoing was delivered to the following persons in the manner indicated: 4 5 VIA REGULAR MAIL [] 6 Rick Eichstaedt VIA CERTIFIED MAIL [] Center for Justice 7 VIA FACSIMILE [] 35 W. Main, Ste. 300 HAND DELIVERED [] 8 Spokane, WA 99201 VIA EMAIL [] 9 10 11 9-21-16 12 / Spokane, WA (Date/Place) 13 14 15 16 17 18 19 20 21 22 23 24 25 26

RESPONDENT MAYOR DAVID CONDON'S OBJECTIONS TO EXHIBITS- page 3

27

28

29

30

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