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OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMITTEE

ALEXANDER J. SHOGAN, JR.
Complainant

DAVID CONDON, MAYOR OF
THE CITY OF SPOKANE,
Respondent

)
)
) COMPLAINANT'S REPLY TO
) RESPONDENT'S MOTION TO
) DISMISS
)
)
)
)

ALEXANDER J. SHOGAN, JR, Complainant in This Matter, HEREBY ENTERS his
REPLY TO RESPONDENT'S MOTION TO DISMISS as Follows:

A) Complainant's REPLY relies on Facts to be obtained from the Testimony of his Subpoenaed
Witnesses, Including Respondent himself, at the Hearing of This Matter.

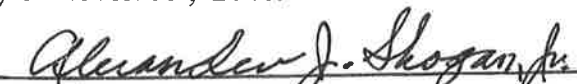
B) Complainant's REPLY requires the Admission of the Spokesman-Review Headline stating:
"CONDON LIED, STUCKART INSISTS" which is the Subject of a MOTION by
Complainant for Reconsideration yet to be Ruled by the Ethics Committee and Incorporated
Fully Herein by Reference.

C) Complainant, in Accordance with Paragraph 2 of the STIPULATION PERMITTING the RE-
FILING of Complainant's COMPLAINT And AMENDED COMPLAINT, Agreed Upon by
Respondent's Counsel James B. King hereby SUBMITS as NEWLY DISCOVERED
EVIDENCE the Following Quotation from the Top of Page 3 of the INVESTIGATIVE
REPORT RE: THE RESIGNATION OF FRANK STRAUB prepared by the SEABOLD
GROUP which reads as follows:

"Based on all of the evidence we considered, we conclude that Mayor Condon, Ms.
Sanders, Mr Coddington, and Ms. Isserlis *intentionally withheld information* from the
City Clerk about the existence of the documents at issue with the intent and purpose of
delaying the production of those records until after the Mayor's election."
(Italics, Bold Print, and Underlines Added Herein for Emphasis),

D) Complainant will NOT rely on, refer to, or utilize Any Statement by or Attributed to CARLY
CORTWRIGHT as Complaint feels Ms Cortwright is an Unreliable Witness.

DATED at Spokane, Washington, this 16 Day of November, 2016.


ALEXANDER J. SHOGAN, JR
Complainant Herein