

DEC 22 2016

OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMISSION

)	
) NO.	
)	CLARIFIED
ALEXANDER J. SHOGAN, JR.)	SWORN COMPLAINT ALLEGING
Complainant)	VIOLATION OF SECTION 01.04.030 of
)	CITY OF SPOKANE CODE OF ETHICS
DAVID CONDON, MAYOR OF)	
THE CITY OF SPOKANE,)	
Respondent)	
)	

STATE OF WASHINGTON)
: ss
County of Spokane)

ALEXANDER J. SHOGAN, JR being duly sworn, on oath,
states as follows:

- A. That he is a Resident of the City of Spokane currently living in the Northwest area of the 3rd Council District and a Registered Voter in that District.
- B. That he has read and is familiar with the City of Spokane Code of Ethics contained in Chapter 01.04A of the Code.
- C. That he is filing this **Clarified** Complaint Alleging Violation of Section 1.04A.030 of the City of Spokane Code of Ethics in Compliance with the Decision of the Ethics Commission on December 21, 2016 that Complainant Provide Clarity to his Complaint in Order to provide the Commission with a Specific Set of Facts to Allow it to Make a Well-Reasoned Decision on whether of not Complainant's Allegations are Sufficient to Permit the Commission to find that it has Jurisdiction and that the Allegations, if Found to be True, would be Sufficient to constitute a Violation of the City of Spokane Code of Ethics.
- D. That the Respondent is the Elected Mayor of the City of Spokane, and as Mayor, Respondent is a Public Official governed by the City of Spokane Code of Ethics. **His Failure to Tell the Truth on Several Occasions** regarding the Claims of Sexual Harassment made by Monique Cotton against then-Police Chief Frank Straub

1 **Constitute a Violation of Section**
2 **01.04A.030 Prohibited Conduct of the Spokane Code of Ethics**
3 as follows:

4 **N. Commission of Acts of Moral Turpitude or Dishonesty**
5 **Prohibited.**

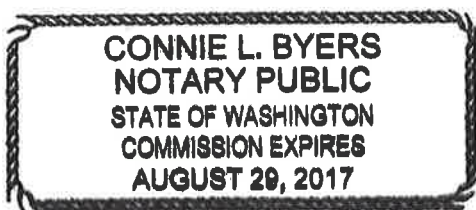
6 E. That, as Mayor, Respondent and the Members of his own
7 Cabinet whom he Personally Selected, were **Dishonest** in their
8 **Communication of the Facts** surrounding the Claim of Sexual
9 Harassment made by Monique Cotton against then-Police
10 Chief Frank Straub to Spokane City Council President
11 Ben Stuckart (refer to **Attachment A** - a copy of a portion
12 of the Front Page of the November 26, 2015 Edition of the
13 Spokesman-Review entitled "Condon Lied, Stuckart Insists".
14 Said **Attachment A** is Included in this **Clarified** Complaint by
15 Reference and Incorporated herein). Such **Dishonest**
16 **Communication by the Respondent to Spokane City Council**
17 **President Ben Stuckart also Constitutes a Violation of**
18 **Section 01.04A.030 Prohibited Conduct of the Spokane Code of**
19 **Ethics** as follows:

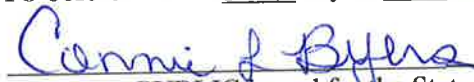
20 **N. Commission of Acts of Moral Turpitude of Dishonesty**
21 **Prohibited.**

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ALEXANDER J. SHOGAN, JR.

SUBSCRIBED AND SWORN TO before me this 22nd day of December, 2016.




NOTARY PUBLIC in and for the State of Washington,
residing at Spokane.
My Commission Expires: 8-29-2017

Happy Thanksgiving

SPOKESMAN-REVIEW

WEDNESDAY, NOVEMBER 26, 2008



MOSTLY SUNNY ▲ 33 ▼ 17

WWW.SPOKESMAN.COM

"blessed. I don't like to leave my home. I like it here."

Bill Church



Church has resisted repeated offers to stay with family members.

COLIN MULVANY colinm@spokesman.com

the blessings
remod h...

Condon lied, Stuckart insists

Sex harassment
claim was kept
quiet for months

By Nicholas Deshens

nichd@spokesman.com
(509) 459-1440

Spokane City Council President Ben Stuckart said he is "severely disappointed" in Mayor David Condon for the handling of allegations of sexual harassment against former police Chief Frank Straub, saying he can't trust Condon or members of his Cabinet after being "lied to."

Stuckart is "working on a draft of a letter with a very long list of questions" for Condon. Some of those questions raise concerns about the timing of records released this week that show that Condon knew in April the police chief had been accused of harassment.

If the mayor doesn't sufficiently answer the questions Stuckart...

RECEIVED

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CITY OF SPOKANE ETHICS COMMISSION

OFFICE OF THE CITY ATTORNEY

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 A. Condon

Position/Title: Mayor of the City of Spokane

Nature of Code of Ethics violation:

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

Section 01.04A.030 (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.

See Clarified Sworn Complaint Alleging
Violation of Section 01.04A.030(N) of the
City of Spokane Code of Ethics -
Commission of Moral Turpitude or
Dishonesty Prohibited.

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

Former Spokane Chief of Police Frank Straub
City Administrator Theresa Sanders
Monique Cotton
Brian Coddington
Spokane City Council President Ben Stuckart
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.

See Clarified Sworn Complaint Alleging Violation
of Section 01.04A.030(N) City of Spokane
Code of Ethics - Commission of Acts of
Moral Turpitude or Dishonesty Prohibited

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.

Alexander J. Shogan, Jr.
Complainant's Signature

December 22, 2016
Date

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

12/22/2016 Spokane, Washington

Name (please print): Alexander J. Shogan, Jr.

Address: 5726 N. Sutherlin Street, Spokane, WA 99205

Phone Number(s): (509) 954-0727

E-Mail Address: joeshoganjr@gmail.com