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DEC 28 2016

OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMISSION

ALEXANDER J. SHOGAN, JR.

Complainant,

vs.

DAVID CONDON, MAYOR OF THE  
CITY OF SPOKANE,

Respondent.

NOTICE OF APPEARANCE FOR  
MAYOR DAVID CONDON

TO: Plaintiff, Alexander J. Shogan, Jr. (Pro Se):

YOU WILL PLEASE TAKE NOTICE that the defendant, DAVID CONDON,  
MAYOR OF THE CITY SPOKANE herein enters his appearance regarding the Ethics  
Complaint submitted on or about December 22, 2016, (a copy of the Ethics Complaint is  
attached) and requests that all further pleadings and papers (except process) be served upon  
the undersigned attorneys at the address below.

DATED at Spokane, Washington this 27 day of December 2016.

EVANS, CRAVEN & LACKIE, P.S.

By

James B. King, WSBA #8723  
Attorney for Respondent  
David Condon

NOTICE OF APPEARANCE- page 1

*Evans, Craven & Lackie, P.S.*

818 W. Riverside, Suite 250  
Spokane, WA 99201-0910  
(509) 455-5200; fax (509) 455-3632

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**CERTIFICATE OF SERVICE**

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 28 day of December, 2016, the foregoing was delivered to the following persons in the manner indicated:

Alexander J. Shogan, Jr.  
5726 N. Sutherlin Street  
Spokane, WA 99205

VIA REGULAR MAIL ☒  
VIA CERTIFIED MAIL ☐  
VIA FACSIMILE ☐  
HAND DELIVERED ☐

12-28-16 / Spokane, WA  
(Date/Place)



DEC 22 2016 1:00

Mr King

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**CITY OF SPOKANE ETHICS COMMISSION**

DEC 22 2016

**ETHICS COMPLAINT FORM**

OFFICE OF THE CITY ATTORNEY

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  
5<sup>th</sup> Floor Municipal Building  
W. 808 Spokane Falls Blvd.  
Spokane, WA 99201

or at: rriedinger@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. Sutherland Street, Spokane, WA 99205

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

E-Mail Address: joeshoganjr@gmail.com

DEC 23 2016

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DEC 23 2016

OFFICE OF THE CITY ATTORNEY

CITY OF SPOKANE ETHICS COMMISSION

ALEXANDER J. SHOGAN, JR.  
Complainant

DAVID CONDON, MAYOR OF  
THE CITY OF SPOKANE,  
Respondent

)  
) NO.  
) **CLARIFIED**  
) SWORN COMPLAINT ALLEGING  
) VIOLATION OF SECTION 01.04A.030  
) CITY OF SPOKANE CODE OF ETHICS  
)  
)  
)  
)  
)

STATE OF WASHINGTON )

: ss

County of Spokane )

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

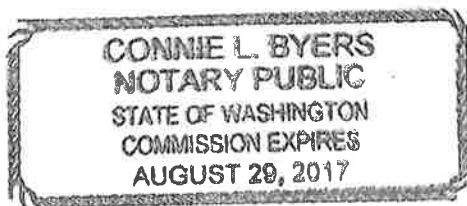
- A. That he is a Resident of the City of Spokane currently living in the Northwest area of the 3rd Council District and a Registered Voter in that District.
- B. That he has read and is familiar with the City of Spokane Code of Ethics contained in Chapter 01.04A of the Code.
- C. That he is filing this **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

N. Commission of Acts of Moral Turpitude or Dishonesty Prohibited.

N. Commission of Acts of Moral Turpitude of Dishonesty Prohibited.

*Alexander J. Shogan, Jr.*  
ALEXANDER J. SHOGAN, JR.

SUBSCRIBED AND SWORN TO before me this 22<sup>nd</sup> day of December, 2016.



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



# SPOKESMAN-REVIEW

WEDNESDAY, NOVEMBER 24, 2010

WWW.SPOKESMAN-REVIEW.COM



COLIN MULVANY colin.mulvany@spokesman-review.com

Church has resisted repeated offers to stay with family members.

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## Condon lied, Stuckart insists

Sex harassment  
claim was kept  
quiet for months

By Nicholas Deshaie

SPokane, Wash. (AP) —

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 Struth, saying he can't trust Condon or members of his Cabinet after being "led 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 said, he