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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.

RESPONDENT'S OBJECTIONS
TO CLARIFIED II COMPLAINT
LIST OF EXHIBITS BY
COMPLAINANT SHOGAN

Respondent, David Condon, Mayor, by and through his undersigned attorneys,
respectfully submits the following objections to the Clarified II Complaint List of Exhibits by
Complainant Shogan served on counsel on April 3, 2018, as follows:

<u>EXH NO.</u>	<u>DESCRIPTION</u>	<u>OBJECTION AND BASIS OF OBJECTION</u>
C-1	Exhibit 12 and 13 of Mayor David Condon Interview by Kris Cappel	No objection
C-2	March 1, 2017, Affidavit of Karen J. Stratton	Objection. Hearsay
C-3	Pages 1, 2, 3 and 104 of Investigative Report re The resignation of Frank Straub by the Seabold Group dated July 25, 2016	Objection. Hearsay, foundation, authentication, irrelevance.

RESPONDENT OBJECTIONS TO COMPLAINANT'S
EXHIBITS- page 1

Evans, Craven & Lackie, P.C.
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Spokane, WA 99201-0910
(509) 455-5200; fax (509) 455-3632

C-4	Re-Done Pages 3 and 104 of the Investigative Report re The resignation of Frank Straub by the Seabold Group dated July 26, 2016	Objection. Hearsay, foundation, authentication, irrelevance
C-5	November 24, 2015, Article in the Spokesman-Review entitled "Mayor David Condon knew of alleged sexual harassment by police chief in April, records how"	Objection. Hearsay, foundation, authentication, irrelevance.
C-6	November 26, 2015, Article in the Spokesman-Review entitled "Stuckert: Mayor Condon lied about sexual harassment Claim"	Objection. Hearsay, foundation, authentication, irrelevance.

DATED at Spokane, Washington this 11 day of April, 2018.

EVANS, CRAVEN & LACKIE, P.S.

By

James B. King, WSBA #8723

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 11 day of April, 2018, the foregoing was delivered to the following persons in the manner indicated:

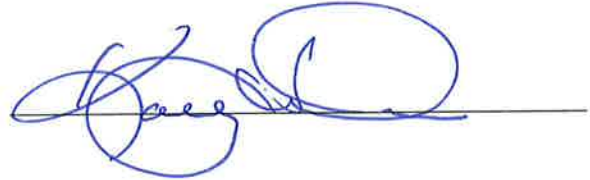
Alexander J. Shogan, Jr.
5726 N. Sutherlin Street
Spokane, WA 99205

VIA REGULAR MAIL []
VIA CERTIFIED MAIL []
VIA FACSIMILE []
HAND DELIVERED ☒
VIA EMAIL ☒

Milton G. Rowland
FOSTER PEPPER PLLC
618 W. Riverside, Suite 300
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4-11-18 / Spokane, WA
(Date/Place)



RESPONDENT OBJECTIONS TO COMPLAINANT'S
EXHIBITS- page 3

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