

CITY OF SPOKANE ETHICS COMMISSION

THOMAS BASSLER,
Complainant,

v.

BREENAN BEGGS,
Respondent,

EC-22-01

COMPLAINANT'S POTENTIAL
WITNESS LIST

Pursuant to Scheduling Order Complainant submits the following list of witnesses likely to be called at the commission hearing:

1. THOMAS BASSLER

c/o Carney Badley Spellman
701 Fifth Avenue, Suite 3600
Seattle, WA 98104
hart@carneylaw.com

Dr. Bassler is expected to testify regarding the reasons for and basis of his Ethics Complaint.

2. BREENAN BEGGS

City Counsel President
(509) 625-6254
bbeggs@spokanecity.org

Council President Beggs is expected to testify regarding all aspects the Ethics Complaint at issue.

3. BEN STUCKART

benstuckart@gmail.com

Mr. Stuckart is expected to testify regarding the role of the CoC Board in the review of the RFP bid proposals at issue in this matter, his financial interest in the bid proposal submitted by Jewels Helping Hands and is role in providing copies of the three bid proposals to Council President Beggs to provide the to the City Councilmembers and their staff.

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Mr. Finch is expected to testify regarding his interaction with Council President Beggs, request to be provided copies of the three RFP bid proposals at issue and regarding the normal process and procedure followed by the City of Spokane regarding the release of confidential bid proposals to the City Council for review.

City of Spokane
Director of Community Housing and Human Services
(509)-625-6263

Ms. Cerecedas is expected to testify regarding the normal process and procedure followed by the City of Spokane regarding the release of confidential bid proposals to the City Council for review, and regarding her release of copies of the bid proposals that were submitted after a new RFP was issued for the shelter project.

Other City of Spokane officials and/or staff may be called to testify regarding the normal process and procedure followed by the City of Spokane regarding the release of confidential bid proposals to the City Council for review

1. The Complainant reserves the right to call any witnesses identified by the Respondent.

3. The Complainant reserves the right to call any person necessary to authenticate any documents offered as evidence in these proceedings.

4. The Complainant reserves the right to call impeachment witnesses as may be necessary.

5. Complainant reserves the right to strike any and/or all of its witnesses prior to the hearing.

Respectfully submitted this 12th day of October, 2022.

CARNEY BADLEY SPELLMAN, P.S.

By Kenneth W. Hart
Kenneth W. Hart, WSBA #15511
Attorneys for Thomas Bassler

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies under penalty of perjury under the laws of the State of
3 Washington that I am an employee at Carney Badley Spellman, P.S., over the age of 18 years,
4 not a party to nor interested in the above-entitled action, and competent to be a witness herein.
5 On the date stated below, I caused to be served a true and correct copy of the foregoing
6 document on the below-listed attorney(s) of record by the method(s) noted:



8 Email, to the following:

9 **Breean Beggs, WSBA #20795**
10 **Paukert & Troppmann PLLC**
11 **522 W. Riverside, Ste. 560**
12 **Spokane, WA 99201**
13 bbeggs@pt-law.com
14 bbeggs@spokanecity.org

15 DATED this 12th day of October, 2022.

16 S/ Rozalynne Weinberg

17 Rozalynne Weinberg, Legal Assistant