

## CITY OF SPOKANE ETHICS COMMISSION

### 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  
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

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.

Shogan / Condon

(See Attached Sworn Complaint Alleging  
Violation of Section 01.04.30 of City of Spokane  
Code of Ethics

**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

**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 Attached Sworn Complaint Alleging Violation  
of Sec 01.04.30 of City of Spokane  
Code of Ethics

## 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 2, 2015  
Date

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

12/2/2015 Spokane, Washington

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

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

Phone Number(s): (509) 934-0727

E-Mail Address: joeshoganjr@gmail.com

CITY OF SPOKANE ETHICS COMMITTEE

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


STATE OF WASHINGTON )  
County of Spokane ) : ss

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

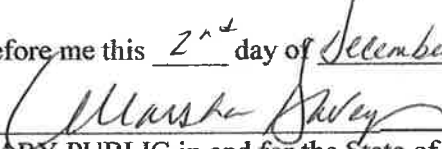
- A. That he is a Resident of the City of Spokane currently living in the Northwest area of the 3rd Council District and a Registered Voter in that District.
- B. That he has read and is familiar with the City of Spokane Code of Ethics contained in Chapter 01.04 of the Code.
- C. That Several Times in the Month of September, 2015, the Respondent stated that, with regard to rumors of Misconduct by then Spokane Police Chief Frank Straub, he had **only** heard of "these issues" in the "last several weeks." In Fact, the Respondent was made aware of Extremely Serious Misconduct - Sexual Harassment- allegations against Chief Straub in April, 2015 during a Confrontation involving himself, City Administrator Theresa Sanders, and Monique Cotton, then Spokesperson for the Spokane Police Department. Cotton reported to the Respondent and Sanders details of sexual harassment of her by Chief Straub. Again, in September of 2015, when Respondent accepted the Resignation of Chief Straub, he was asked at that time whether there were any sexual harassment complaints against Chief Straub and Respondent replied, **"No."**
- D. Since Respondent is Mayor of the City of Spokane, he is a Public Official governed by the City of Spokane Code of

1 Ethics. His **Failure to Tell the Truth** on **Several Occasions**  
2 regarding the Claim of Sexual Harassment made by Monique  
3 Cotton against then Spokane Police Chief Frank Straub  
4 constituted a **Violation of Section 01.04A.030 Prohibited**  
5 **Conduct** of the Spokane City Code of Ethics, as follows:

6 **N. Commission of Acts of Moral Turpitude or Dishonesty**  
7 **Prohibited.**

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ALEXANDER J. SHOGAN, JR.

SUBSCRIBED AND SWORN TO before me this 2<sup>nd</sup> day of December, 2015.

  
NOTARY PUBLIC in and for the State of Washington,  
residing at Spokane.

My Commission expires: 10/14/2017.

Notary Public  
State of Washington  
MARSHA DAVEY  
My Appointment Expires Oct 14, 2017