LAW FIRM OF KELLER W. ALLEN, PC

Keller W. Allen*† kwa@kellerallen.com

Mary M. Palmer* mmp@kellerallen.com

Stephen E. Sennett* ses@kellerallen.com

ATTORNEYS AT LAW

Ben Burr Building 5915 S. Regal, Suite 211 Spokane, WA 99223 Telephone: (509) 777-2211 Facsimile: (509) 777-2215 Website: www.kellerallen.com

> * Admitted in Washington †Admitted in Idaho

April 11, 2017

RECEIVED

APR 1 3 2017

FOSTER PEPPER PLLC

Milton G. Rowland FOSTER PEPPER, PLLC 618 W. Riverside Ave., Suite 300 Spokane, WA 99201

Re: City of Spokane Ethics Commission:

Alexander J. Shogan, Jr. v. David Condon and Theresa Sanders

Dear Mr. Rowland:

Mr. Shogan asked me to forward to the Ethics Commission the enclosed Complainant's Request for Order Dismissing Portions of Complaint Against City Administrator Theresa Sanders in the above-matter.

Will you please make sure the Commission receives it and issues an appropriate order?

Thank you for your assistance and if you have any questions, please feel free to call me.

Very truly yours,

LAW FIRM OF KELLER W. ALLEN, P.C.

Keller W. Allen

KWA:nek Enclosure

cc: Alexander Shogan, Jr.

CITY OF SPOKANE ETHICS COMMISSION

ALEXANDER J. SHOGAN, JR.,

Complainant,

VS.

DAVID CONDON, MAYOR OF THE CITY OF SPOKANE; THERESA SAUNDERS, SPOKANE CITY ADMINISTRATOR,

Respondents.

COMPLAINANT'S REQUEST FOR ORDER DISMISSING PORTIONS OF COMPLAINT AGAINST CITY ADMINISTRATOR THERESA SANDERS

Alexander J. Shogan, Jr., the Complainant in this matter, hereby requests that an order be entered by the City of Spokane Ethics Commission dismissing with prejudice that portion of his SWORN COMPLAINT ALLEGING VIOLATION OF SECTION 01.04A.030 CITY OF SPOKANE CODE OF ETHICS against City Administrator Theresa Sanders filed with the Spokane City Attorney's Office on March 3, 2017, as follows:

Dismissal for res judicata/collateral estoppel reasons any and all allegations and complaint against Ms. Sanders that she knowingly and intentionally withheld information from the public regarding sexual harassment allegations by former City employee Monique Cotton by former City police Chief Frank Straub.

Respectfully submitted.

Slevander L. Shogan, In Alexander J. Shogan, Jr.

<u> April 10, 2017</u> Dave