CITY OF SEATTLE
ETHICS AND ELECTIONS COMMISSION

OCT 24 2007

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APPEAL OF
COMPLAINT FOR VIOLATIONS OF MUNICIPAL CODE AGAINST COUNCIL MEMBER JEAN GODDEN

RE: CASE # 07-2-1012-1 WITH ADDITIONAL EXHIBIT G

TO: SEATTLE ETHICS AND ELECTIONS COMMISSION
FROM: David M Coons, **COMPLAINANT**
REGARDING: COMPLAINT AGAINST CITY COUNCIL MEMBER, JEAN GODDEN, FOR VIOLATIONS OF CHAPTER 2.04 AND CHAPTER 4.16 OF THE SEATTLE MUNICIPAL CODE

I, David M Coons, undersigned, hereby make the following declaration pursuant to RCW 9A.72.085. I certify under penalty of perjury according to said statute of the State of Washington that the information in this complaint is true and correct.

1. I am a registered voter of the City of Seattle.
2. Jean Godden is a currently serving member of the Seattle City Council.
3. I have conducted a review and investigation of documents, records and other information relating to activities of Seattle City Council Member, Jean Godden, and from that I have concluded that the said Jean Godden has committed serious and repeated violations of various provisions of the Municipal Code of the City of Seattle, specifically including, but not limited to the conduct and activities described below.
4. Ms. Godden has violated the provisions of and prohibitions of § 2.04.300 SMC relating to prohibitions against use of public office facilities for political campaign purposes and § 4.16.070 (2) relating to prohibitions of the use of city employees, facilities or property for other than City purposes.
5. Council Member Godden has violated the express provisions of Seattle Municipal Code (SMC) 2.04.300, which prohibits elected officials of the City from using or authorizing the use of any property or facilities of a public office or agency for the purposes of assisting a campaign for election of any person. The cited section also defines facilities of a public office or agency to include "… use of stationery, postage, machines, and equipment, use of

employees of the office or agency during working hours, vehicles, office space and other similar facilities or services.

6. Council Member Godden has violated the express provisions of Seattle SMC 4.16.070, subsection 2. b. which prohibits the use of any persons, funds or property under his or her official control for a purpose which is or would appear to a reasonable person to appear to be for other than a City purpose.
7. Council Member Godden violated these code sections by authorizing City employees under her supervision and control to use their time and City telephones, computers, equipment and other facilities to arrange for and calendar political and election campaign meetings and related events that she attended to further her election campaign. Such appointments and arrangements appear on her calendar during the period from January 1, 2007, through August 29, 2007, a total of at least 58 times.
8. Council Member Godden also utilized the services of City employees under her supervision to schedule and calendar personal business that was not for any City purpose.

9. **RESPONSE TO DISMISSAL**

Where as the simple act of placing an event on the city calendar falls under the provisions of the April 2005 directive . The additional notations on the calendar (such as the coming and goings of Carlo Davis ,campaign manager ,Cathy Allen , political advisor and Mckenna Hartmen ,campaign fundraiser and other items such as the status of fundraising calling relating to the Godden campaign do not fall into the two catagories laid out in the April 2005 directive. (To prevent double booking and to be sure she can be reached.) In fact on Feburary 6th CM Goddens staff did double book her with a campaign event and she failed to attend a budget meeting in order to attend the campaign event. The primary beneficiary of these notations are clearly the reelection campaign. They do not benefit the city in any way and show

that city staff are coordinating with the campaign beyond the stated purpose of the 2005 directive.

10. Attached hereto and incorporated herein is the following additional supporting documentation:

Exhibit G: Listing of entries that fall outside of the 2005 directive.

Date signed: October 23, 2007 Place signed: Seattle, Washington

David M Coons, Complainant

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