

**CITY OF MADISON ETHICS BOARD
COMPLAINT FORM**

1. All complaints must be made in writing. Completion of this form is not required, but this form is designed to assist you in providing the required information. For more information please refer to the Ethics Board Policy Manual and Madison General Ordinance Section 3.35. For additional information, contact The Office of the City Attorney at (608) 266-4511. The Ethics Board Policy Manual is available on the Office of the City Attorney's website.
2. Complaints shall be directed to the attention of the Ethics Board at the City of Madison, c/o City Attorney's Office, 210 Martin Luther King, Jr. Boulevard, Room 401 City-County Building, Madison, WI 53703.
3. The complaint shall be made under oath and may be made on information and belief.¹

COMPLAINANT INFORMATION

YOUR NAME Saul St. John		
ADDRESS 712 Glenview Dr		
CITY Madison	STATE WI	ZIP 53716
HOME PHONE	DAYTIME PHONE (414) 254-8154	EMAIL ADDRESS saul.stjohn@gmail.com

SUBJECT OF COMPLAINT

NAME Madison Equal Opportunities Commission		
ADDRESS (IF KNOWN) 210 Martin Luther King, Jr, Blvd, City-County Building - Room 523		
CITY Madison	STATE WI	ZIP 53703
POSITION/OCCUPATION WITH THE CITY Municipal Body Politic	PHONE (IF KNOWN) (608) 266-4910	

The purpose of the Ethics Board is to see that the Code of Ethics as outlined in Section 3.35 of the Madison General Ordinances is uniformly applied to all City of Madison employees and officials. The areas of responsibility include, but are not limited to: (a) Fair and Equal Treatment, (b) Conflict of Interest, (c) Incompatible Employment, (d) Disclosure of Confidential Information, (e) Gifts and Favors, (f) Political Activity, (g) Campaign Contributions, (h) Disclosure of Economic Interests, and (i) Real Estate Disclosure.

NATURE OF COMPLAINT²

SECTION VIOLATED MGO 3.35(5)(a, b, f), etc	<p>Pursuant to MGO 39.03(10)(d)(3), there are circumstances wherein the members of the Madison Equal Opportunities Commission may be charged with sitting in judgment of City apparatuses, potentially including the MEOC itself.</p> <p>I write to seek the Ethics Board's opinion as to the propriety of that arrangement.</p>
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¹ "Information and Belief" means that, while you may not have firsthand knowledge, you are willing to swear under oath that you have a firm belief that it is true.

² The "Nature of the Complaint" is a short general statement of the alleged breach of ethics. For example, a statement related to a violation of the above-listed areas of responsibility: (a) Fair and Equal Treatment, (b) Conflict of Interest, (c) Incompatible Employment, (d) Disclosure of Confidential Information, (e) Gifts and Favors, (f) Political Activity, (g) Campaign Contributions, (h) Disclosure of Economic Interests, and (i) Real Estate Disclosure, is appropriate.

FACTS

The facts constituting the alleged breach of ethics must be set forth in detail with clearness and certainty. Please reference specific sections within Madison General Ordinance Section 3.35 which you believe to have been violated. Attach additional sheets as required.

(d) The Equal Opportunities Commission shall use the following procedures in acting on complaints of discrimination filed against the City of Madison and the Community Development Authority.

1. Upon the receipt of a written, verified complaint naming the City of Madison or the Community Development Authority as a respondent, a copy of such complaint shall be served on the City Attorney, the Mayor, and the City Clerk.

2. If the Equal Rights Division of the Wisconsin Department of Workforce Development or the U.S. Department of Housing and Urban Development (HUD) has jurisdiction over the complaint, the Equal Opportunities Commission shall take no action, but shall refer the complaint to the Equal Rights Division or HUD for appropriate action as provided by law. If the U.S. Equal Employment Opportunity Commission or HUD has jurisdiction, a copy of the complaint shall be forwarded to that agency. The complainant shall be informed of all such referrals.

3. If state and federal agencies are without jurisdiction, the Equal Opportunities Commission shall follow the procedure provided in Sec. 39.03(10)(c) of this ordinance.

The undersigned, under oath, states that he or she has read the foregoing complaint and that the information contained in it is true and correct based on his or her personal knowledge, except for those matters alleged on information and belief and as to those matters, the undersigned believes them to be true and correct.

Electronically signed and dated at Madison, WI this 26th day of January, 2017.

/s/ Saul St. John