

# 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 Procedures Manual and Madison General Ordinance Section 3.35. For additional information, contact The Office of the City Attorney at (608) 266-4511.
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.

### COMPLAINANT INFORMATION

NAME <b>Davin Pickell</b>		
ADDRESS <b>17 Merrill Crest Dr.</b>		
CITY <b>Madison</b>	STATE <b>WI</b>	ZIP <b>53705</b>
HOME PHONE <b>608-345-9350 (Cell)</b>		BUSINESS PHONE

### SUBJECT OF COMPLAINT

NAME <b>Dave Cieslewicz</b>		
ADDRESS <b>2309 Eton Ridge</b>		
CITY <b>Madison</b>	STATE <b>WI</b>	ZIP <b>53726</b>
POSITION/OCCUPATION <b>Mayor of the City of Madison</b>		PHONE (if known) <b>TEL: (608) 266-4611</b> <b>TTY: 1-866-704-2340</b> <b>FAX: (608) 267-8671</b>

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 COMPLAINT

Section Violated <b>3.35(4)</b>	<b>Responsibility of Public Office</b>

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 3.35 which you believe to have been violated. Please attach additional sheets as required.

Mayor Dave Cieslewicz appointed Dierdre Garton to membership on the Overture Ad Hoc Committee, despite her obvious conflict of interest as the chair of the 201 State St. Foundation, with whom the City was negotiating regarding the outcome of the process she was appointed to evaluate.

Ms. Garton was also one of the donors whose 'generosity' was conditioned on the City being forced to buy the Overture Center for \$1, providing yet another reason why she should not have been appointed to the Overture Ad Hoc Committee, but Mr. Cieslewicz was willing to overlook that disqualifying characteristic, as well.

Mr. Cieslewicz failed to object or make note of the fact that Ms. Garton failed to recuse herself from voting on matters coming before the Overture Ad Hoc Committee with respect to which she had multiple conflicts of interest.

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.

*[Handwritten Signature]*

3-18-11

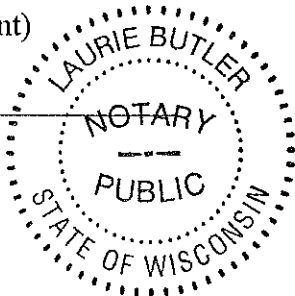
Subscribed and sworn before me  
this 18th day of March 2011.

*[Handwritten Signature]*

Notary Public

My Commission expires (is permanent)

10.5.2014



(seal)

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Mayor Dave Cieslewicz appointed Dierdre Garton to membership on the Overture Ad Hoc Committee, despite her obvious conflict of interest as the chair of the 201 State St. Foundation, with whom the City was negotiating regarding the outcome of the process she was appointed to evaluate.

Ms. Garton was also one of the donors whose 'generosity' was conditioned on the City being forced to buy the Overture Center for \$1, providing yet another reason why she should not have been appointed to the Overture Ad Hoc Committee, but Mr. Cieslewicz was willing to overlook that disqualifying characteristic, as well.

Mr. Cieslewicz failed to object or make note of the fact that Ms. Garton failed to disclose her interests at the beginning of each Overture Ad Hoc Committee meeting, despite his claim to have been watching most of them on CitiCable 12.

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.

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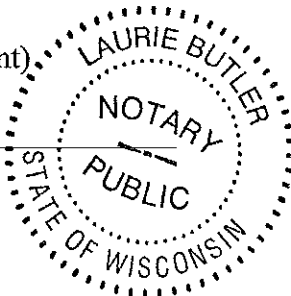
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Apparently Mr. Cieslewicz failed in his responsibility to check Ms. Garton's Statement of Interest to see whether she had honestly filled it out.

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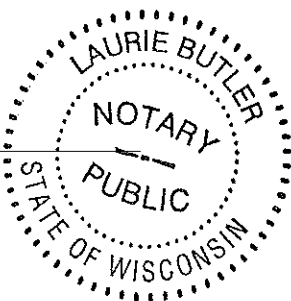
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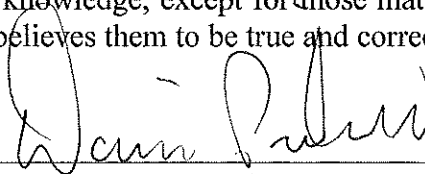
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March 18, 2011

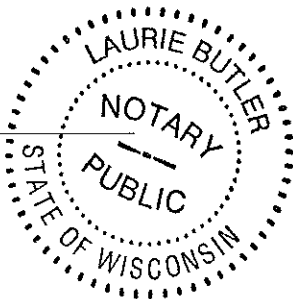
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