

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

<small>YOUR NAME</small> Laura Doherty		
<small>ADDRESS</small> 47 S Huron Drive		
<small>CITY</small> Janesville	<small>STATE</small> WI	<small>ZIP</small> 53545
<small>HOME PHONE</small> 608-931-9592	<small>DAYTIME PHONE</small> Same	<small>EMAIL ADDRESS</small> lauradr1@hotmail.com

SUBJECT OF COMPLAINT

<small>NAME</small> Paul Soglin		
<small>ADDRESS (IF KNOWN)</small> 210 Martin Luther King Jr Blvd (work)		
<small>CITY</small> Madison	<small>STATE</small> WI	<small>ZIP</small> 53703
<small>POSITION/OCCUPATION WITH THE CITY</small> Mayor	<small>PHONE (IF KNOWN)</small> 608-266-4611	

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

<small>SECTION VIOLATED</small> 3.35 (4) & 19.59(1)(b)	Public Interest and Fair and Equal Treatment
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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.

See attached two pages..

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.

Laura Doherty

Subscribed and sworn before me
this 14 day of December 20 2018

Colleen Bero-Lehmann
NOTARY PUBLIC

My Commission expires (is permanent)
permanent (seal)

Additional Pages to Madison Ethics Complaint filed by Laura Doherty 12-13-2018

- Mayor Soglin's policies on commercial property assessment in the City of Madison violates several different sections of ethics codes for local officials - particularly protecting the Public Interest.
- Mayor Soglin and Deputy Mayor Enis Ragland *had been informed (by the City Assessor and the Asst City Assessor/Commercial Supervisor) multiple times in 2016 and 2017 about the inequitable valuation of commercial property assessments* and the poor commercial property assessment practices that had been allowing that to occur. The Mayor's office even provided some funding for the Assessor's office to try to correct the situation.
- The City of Madison's major commercial property developers met with Mayor Soglin on May 8, 2017 (shortly after the higher assessments had been placed) and attempted to exert influence on him to return to the prior poor commercial property assessment practices which greatly benefited them. These same developers are reported to be major contributors to Mayor Soglin's campaigns.
- The Mayor's office, with the assistance of HR personnel and the Attorney's office; instigated a deceptive and inappropriate investigation into the Asst City Assessor/Commercial Supervisor's work just as she was to return from an FMLA leave, in an attempt to find a way to remove her from a position of valuing commercial properties.
- This investigation was represented as coming from her supervisor, the City Assessor, Mark Hanson. Mark Hanson, the City Assessor, stated to Laura Doherty, Asst City Assessor/Commercial Supervisor (after her eventual return in a demoted position), that he did not instigate the investigation even though the paperwork all represented that he did and that he was not involved in the investigation, which is the opposite of how investigations are supposed to proceed at the City. He also stated that I didn't deserve what was happening to me and that it might not have happened if I'd been there to defend the higher values placed on the commercial properties.
- In summary, Mayor Soglin is knowingly allowing and encouraging the undervaluation of commercial property assessments to benefit the major commercial property developers in the City of Madison by demoting the new Asst City Assessor/Commercial Supervisor who follows the statutes regarding assessments and he has been attempting to find a way to remove her from the City's employment altogether.
- His policy of influencing commercial property values by removing the Asst City Assessor/Commercial Supervisor and thus returning to **known** poor past commercial valuation practices is not in the public's best interest and violates the state statutes of valuing all real property at full market value uniformly so that the tax burden is borne equally.

Ethics Codes references, Assessment Laws, Mission Statements Important to this Complaint:

1. **Madison Ethics Code:** By enacting a Code of Ethics, the City recognizes that certain responsibilities accompany public office or public position. These responsibilities address the need for City officials, employees, and appointees to **discharge their duties in the public interest, uphold the U.S. and State Constitutions, and carry out the laws of the nation, state, and municipality with impartiality and fairness and without regard to their private interests.**

2. **Madison Ethics Code 3.35 (4)**

Responsibility of Public Office. Incumbents are **agents of public purpose and hold office for the benefit of the public**. They are **bound to uphold the Constitution of the United States and the Constitution of this State and to carry out impartially the laws of the nation, state, and municipality**. They are **bound to discharge faithfully the duties of their office regardless of personal considerations, recognizing that the public interest must be their primary concern**. Incumbents shall adhere to the rules of work and performance established as the standard for their positions by the appropriate authority. **They shall not exceed their authority or breach the law or ask others to do so**, and shall work in full cooperation with others unless prohibited from so doing by law or by officially recognized confidentiality of their work.

3. **WI SS 19.59 (1)(b)** No person may offer or give to a local public official, directly or indirectly, and no local public official may solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to **influence the local public official's vote, official actions or judgment**, or could reasonably be considered as **a reward for any official action or inaction on the part of the local public official**. This paragraph does not prohibit a local public official from engaging in outside employment.

Assessment Laws:

4. **WI SS 70.32(1) Real Estate, how valued.**

Real property shall be valued by the assessor in the manner specified in the Wisconsin property assessment manual provided under s. [73.03 \(2a\)](#) from actual view or from the best information that the assessor can practicably obtain, **at the full value which could ordinarily be obtained therefor at private sale**.

5. **Article VIII of the Wisconsin Constitution (Uniformity):** 1. For direct taxation of property, under the uniformity rule there can be but one constitutional class. 2. All within that class must be taxed on a basis of equality so far as practicable, and **all property taxed must bear its burden equally on an ad valorem basis**.
6. **Article VII, Section 1, of the Wisconsin Constitution** requires the method of taxing real property to be uniformly applied to all classes of property. **To ensure a uniform method of taxation, assessors are required to assess real estate at its fair market value**, using the best information the assessor can practicably obtain. See Wis. Stat. § 70.32.

Assessment Office Mission Statements:

1. **City of Madison Assessor's Office Mission Statement:**

Mission:

The City Assessor's Office, through the efforts of dedicated employees, will deliver the highest quality services to City taxpayers by **establishing fair and equitable assessments of all taxable real and personal property and maintaining complete and accurate assessment rolls and property records**.

Objectives:

Discover, list and **assess all real property and personal property in the City of Madison at 100% of full value**.