



**CITY OF DALLAS  
ETHICS ADVISORY COMMISSION**

**COMPLAINT FORM**

For Official Use Only

Please type or print legibly in blue or black ink.

**NOTE: FILING A COMPLAINT THAT FALSELY ACCUSES SOMEONE OF A VIOLATION OF THE ETHICS CODE MAY RESULT IN CRIMINAL PROSECUTION OF ANYONE WHO KNOWINGLY MAKES A FALSE ACCUSATION.**

**PART A – COMPLAINANT INFORMATION**

1. Your full name (print) (Identifies you as the Complainant)

AVI S. ADELMAN

Your residence address (Street, City, State and Zip Code)

5715 BELMONT AVENUE, DALLAS TX 75206

County

DALLAS

Your business address (Street, City, State and Zip Code)

5715 BELMONT AVENUE, DALLAS TX 75206

County

DALLAS

Business phone #

Residence phone #

**PART B -- COMPLAINANT DECLARATION**

**I DECLARE I HAVE A COMPLAINT AGAINST:**

2. Full Name of person against whom you are bringing the allegation:

ALEX SALINAS

Appointed Official – Board of Adjustment, Alternate Member, District 1

Residence address (Street, City, State and Zip Code)

County

Not known

Business address (Street, City, State and Zip Code)

County

IBERO ULC  
1905 GREENVILLE AVENUE  
DALLAS TX 75206

180 DEGREES DALLAS  
1917 GREENVILLE AVENUE  
DALLAS TX 75206

---

## **PART C -- DESCRIPTION OF COMPLAINT**

Provide a statement of the facts upon which your complaint is based. Describe the events in the order in which they occurred. Keep dates of events in sequence. Include full names, addresses and phone numbers of all individuals involved, including any witnesses present when alleged violations took place. Be factual; the information you provide in this statement must be based on facts and not on personal conjecture. Try to answer the questions “who”, “what”, “where”, and “when”. Attach extra sheets if more space is needed.

### **STIPULATIONS**

- I am the Vice-President of the Belmont Neighborhood Association (which includes the area bounded by Greenville Avenue, Ross Avenue, Skillman Avenue and Belmont Avenue).
- I am the publisher and editor of the BarkingDogs.org ([www.barkingdogs.org](http://www.barkingdogs.org)) blog, which focuses on the issues and problems caused by illegally operated bars on Lowest Greenville (Belmont to Ross Avenues).
- I am a certified volunteer with the Dallas Police Department, having completed the DPD’s Citizens Police Academy program in Spring 2008.
- On most Saturday evenings, I am out on Greenville Avenue, usually near the DPD’s Command Center at Greenville and Alta Streets, with a video camera, documenting the issues and problems caused by the previously referenced bars.

## DESCRIPTION OF COMPLAINT

At approximately 1:15am, August 2, 2009, I was on Lower Greenville (at the corner of Alta and Greenville) with my video camera, when an incident requiring police intervention occurred approximately in the middle of the 1900 block of Greenville Avenue (west side of the street).

I started to follow the officers when Mr. Salinas called out to me (not sic) “Avi, where are you going, you’re not a police officer?”

I turned to him, and stated (not sic), “You really know better than to ask that question.”

Upon returning to the corner, Mr. Salinas started to yell at me and the Dallas Police Officers present (not sic), “Avi needs to get off this corner. He is harassing me. I have a restraining order against him and he cannot be standing within 500 feet of my business.”

The officers looked at me and asked (not sic), “Do you know anything about a restraining order?” My reply – “I have not been served with any documents like that. I have no idea what he is talking about.”

He said to me, “You don’t have a job. What are you doing out here bothering me?” I replied that I did have a job, and when he asked what it was, I told him it was none of his business.

Mr. Salinas became severely enraged and started yelling at the officers to get me off the corner, again referring to the alleged restraining order. The police officers asked Mr. Salinas if he had any documents to prove this order existed, and he stated (not sic), “I have them in my office somewhere. **I am a city official.** I want him out of here.”

Mr. Salinas reminded the officers (for a third time) he was a **city official** and that I was harassing him with my camera. At this point, I turned on the video camera, which caused Mr. Salinas to retreat behind DPD Sgt. Aaron Bell.

*(DPD Sgt Aaron Bell, Badge #8250, DPD Central Division, 213-670-4413)*

Sgt. Bell and a DPD patrol officer advised Mr. Salinas that since he did not have any documents to prove the existence of a restraining order, he needed to advise his County Constable and file the appropriate documents. This was a civil matter, they noted, not a criminal matter.

Mr. Salinas ignored numerous orders by the officers to return to his bar if he did not want me to videotape him. On the video (included on the attached DVD), Sgt. Bell is seen telling Mr. Salinas I could stand anywhere I wanted. When Mr. Salinas attempted to block the camera with his hand, Sgt. Bell verbally warned him to not touch me.

Mr. Salinas is heard on the tape stating, “Avi, you are messing with the wrong person.”

Sgt. Bell told Mr. Salinas to stop 'dancing' around him and to go back to his bar if he did not want to be videotaped on the public street.

Eventually, Mr. Salinas left the area of his own volition and returned to his business (Ibero ULC)

## **PART D -- CODE VIOLATIONS**

List the sections and paragraphs of the Code of Ethics' provisions you believe have been violated:

### *SEC. 12A-4. UNFAIR ADVANCEMENT OF PRIVATE INTERESTS.*

*(a) General rule. A city official or employee may not use his or her official position to unfairly advance or impede personal interests by granting or securing, or by attempting to grant or secure, for any person (including himself or herself) any form of special consideration, treatment, exemption, or advantage*

By making repeated statements to the Dallas Police Department officer(s) that he was a city official (but failing to mention the exact office), Mr. Salinas attempted to use his official position to unfairly advance his personal interests for special consideration by the police officers, *by trying to force my removal from the public right of way near his bar.*

Mr. Salinas provided false information to the officers, claiming the existence of a restraining order that did not exist.

Mr. Salinas ignore repeated instructions by the police officers to return to the bar.

Mr. Salinas attempted to physically prevent me from videotaping activity on the public right of way, resulting in a warning from the police officer.

## **PART E -- SOURCES OF EVIDENCE**

Identify sources of evidence, if any, that you believe should be considered by the Ethics Advisory Commission. Submit all information that you have; attach photocopies of any pertinent papers or documentation to support your allegation.

Attached – A DVD containing images and (some of the) statements made during this event.

TABC and TX Department of State Documents

Mr. Salinas is the operations manager and owner of the Ibero Ultra Latin Cuisine, located at 1905 Greenville Avenue, Dallas TX 75206, under an agreement with Ali Baba Chicken Inc.

Mr. Salinas is the owner of Avenue Bar & Grill, located at 1917 Greenville Avenue, Dallas TX 75206 (see attached TABC and Texas Secretary of State Franchise documents).

I CERTIFY THAT I HAVE READ THIS COMPLAINT, I FULLY UNDERSTAND ITS CONTENTS, AND I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF TEXAS THAT THE FOREGOING STATEMENTS AND PHOTOCOPIES OF ATTACHED DOCUMENTS ARE TRUE AND CORRECT. I UNDERSTAND THAT A COPY OF THIS COMPLAINT WILL BE SENT TO THE CHAIR OF THE ETHICS ADVISORY COMMISSION AND TO THE INDIVIDUAL CHARGED IN THIS COMPLAINT. ALL PAPERS AND COMMUNICATIONS RELATING TO A COMPLAINT MUST BE TREATED AS CONFIDENTIAL TO THE EXTENT ALLOWED BY LAW.

\_\_\_\_\_  
Signature

Before me the undersigned authority, on the 7th day of August, 2009, personally appeared, AVI STEVEN ADELMAN, known to me to be the person whose name is subscribed hereto, and being duly sworn stated that he/she has personal knowledge of the facts hereinabove and that such facts are true and correct.

\_\_\_\_\_  
Notary Public

<NOTARY SEAL>

\_\_\_\_\_  
County, Texas

My Commission expires:  
\_\_\_\_\_

**Special Note:** Section 3.2 of the Ethics Advisory Commission Rules of Procedure states that, "an amended complaint may only be filed within seven days after the city secretary's receipt of the original complaint"

Should you have any questions concerning this form, please contact the City Secretary's Office, at (214) 671-8970 during regular business hours (8:15am – 5:15pm).

Upon completion of **ALL** sections of the complaint form, please hand deliver or send by certified mail with any attachments to:

Office of the City Secretary  
CITY HALL  
1500 Marilla Avenue – Suite 5DS  
Dallas, TX 75201