

**BOARD OF ETHICS  
OF THE CITY OF PHILADELPHIA**

<b>J. Shane Creamer, Jr.</b>	:	
<b>Executive Director</b>	:	
<b>Board of Ethics</b>	:	
<b>of the City of Philadelphia</b>	:	
1515 Arch Street, 18 <sup>th</sup> Floor	:	
Philadelphia, PA 19102	:	
v.	:	<b>Matter No.: 2106ET19</b>
	:	<b>Date Served: July 15, 2021</b>
<b>Celena Morrison</b>	:	
[REDACTED]	:	
[REDACTED]	:	
	:	
<b>Respondent</b>	:	

**AMENDED NOTICE OF ADMINISTRATIVE  
ENFORCEMENT PROCEEDING**

This Notice serves to amend and replace the Notice of Administrative Enforcement Proceeding served on you on June 9, 2021. The Executive Director is asking the Board to find that you have violated the gift restriction provision of Philadelphia's Ethics Code, Section 20-604(1).

**If you wish to submit a written Response to this Notice, you must do so within 20 days of the date of the Notice. You have the right to request a hearing before the Board. If you wish to request a hearing, you must include the request in your written Response to the Notice. If you fail to request a hearing in a written Response to this notice, you will waive your right to a hearing.**

Board Regulation No. 2 and the Memorandum on Procedures for Administrative Enforcement Proceedings set forth the rules and procedures for administrative enforcement proceedings before the Board. A copy of each is enclosed.

As set forth in Regulation No. 2, administrative enforcement proceedings are confidential, unless you request a public hearing in your Response to this Notice. *See* Board Regulation 2, para. 2.15.

**If you have any questions regarding the procedures for administrative enforcement proceedings before the Board, please contact the Board's General Counsel, Michael Cooke, Esq., at Michael.Cooke@phila.gov or (215) 686-9459.**

**I. RELEVANT LAW**

**Gifts, Loans and Favors to City Personnel: Philadelphia Code Section 20-604(1)**

Philadelphia Code Section 20-604(1) provides that a City officer or employee shall not accept, receive, or solicit monetary “gifts” from any person who is seeking “official action” from that officer or employee, or from any person who has a financial interest, at the time or in close proximity to the time the gift is received, which the officer or employee is able to substantially affect through official action. A “gift” includes any payment, advance, rendering, or deposit of money. Phila. Code § 20-601(10). An “official action” is any act or omission taken by an officer or employee in her official capacity that requires discretion and is not ministerial in nature. Phila. Code § 20-601(17).

A violation of Philadelphia Code Section 20-604(1) is subject to a civil penalty of \$1,000, which may be increased to \$2,000 if an aggravating factor is present. *See* Code §§ 20-612(1); 20-1302. An aggravating factor includes a finding that the violation was committed “knowingly,” meaning that it was “done voluntarily and intentionally, and not because of mistake or accident or other innocent reason.” Phila. Code § 20-1302(1)(b)(i).

**II. PARTIES**

1. J. Shane Creamer, Jr. is the Executive Director of the Board of Ethics.
2. Respondent Celena Morrison is the Executive Director for the Philadelphia Office of LGBT Affairs.

**III. FACTUAL ALLEGATIONS**

3. Ms. Morrison began her City position as Executive Director for the Philadelphia Office of LGBT Affairs on March 2, 2020. Exhibit A (Morrison Dep. at 4, May 3, 2021).
4. As Executive Director, and pursuant to Section 4-2001 of the Home Rule Charter, Ms. Morrison ensures that the Office of LGBT Affairs performs the following functions: (a) develop proposed City policy regarding civil rights issues affecting LGBT people; (b) coordinate the implementation of policies and programs to meet the City's diversity and equality goals as expressed in this Charter, ordinances and Executive Orders; (c) coordinate among City Departments, agencies and offices to improve LGBT access to City services, and to promote equality and safety for LGBT people; (d) support the growth and development of the City's LGBT communities; and (e) serve as liaison between the City's and region's LGBT communities and the City. Exhibit B (Phila. Home Rule Charter Section 4-2001); *see also* Exhibit A at 4-7.
5. Ms. Morrison's duties as Executive Director include exercising discretion over which agencies the Office of LGBT Affairs partners with to promote the functions outlined above in Paragraph 4. *Id.* at 7.
6. Kendall Stephens is a Philadelphia transgender community advocate.
7. For many years, Ms. Morrison and Ms. Stephens were long-time personal friends and both active in the LGBT community. *See id.* at 7.

8. In July and August 2020, Ms. Stephens approached Ms. Morrison about involving Ms. Morrison and the Office of LGBT Affairs with the community organization “Hearts on a Wire,” an advocacy organization working to address the needs of transgender people in Pennsylvania’s prisons. Id. at 9-12

9. In her efforts to involve the Office, Ms. Stephens spoke with Ms. Morrison, sent emails regarding the organization, and attempted to coordinate and facilitate a meeting with Ms. Morrison and other stakeholders throughout August. *See id.* at 16-17. *See also* Exhibit C (Email from Kendall Stephens to Adrian Lowe and Celena Morrison, dated Aug. 10, 2020); Exhibit D (Email chain from Ms. Stephens to Ms. Morrison, *et al.*, dated Aug. 19, 2020).

10. Ms. Stephens’ involvement with Hearts on a Wire was a critical factor for Ms. Morrison in determining whether to involve the Office of LGBT Affairs with Hearts on a Wire. *See* Exhibit A at 11 (stating “The only reason why I was considering meeting to talk about Hearts on a Wire was because my friend Kendall had reached out to me about it.”)

11. On August 24, 2020, Ms. Stephens was physically attacked in her Point Breeze home. The assailants allegedly used transphobic and derogatory slurs when attacking her. This attack received widespread local media coverage as a potential hate crime. *See, e.g.*, Exhibit F (Article, Julie Shaw, “Transgender woman says she was beaten in her Point Breeze home and called slurs,” PHILADELPHIA INQUIRER, Aug. 26, 2020, <https://www.inquirer.com/news/attack-on-transgender-woman-kendall-stephens-point-breeze-20200826.html>).

12. Ms. Morrison was on the phone with Ms. Stephens for a personal call immediately preceding this attack. Exhibit A at 18-20.

13. Immediately following this attack, Ms. Stephens called Ms. Morrison and told her what had occurred. Id. at 20. Ms. Morrison met Ms. Stephens at a Philadelphia police station. Id. at 21.

14. Once there, Ms. Stephens expressed that she felt that the police officers were trivializing the incident due to her transgender status. Ms. Stephens relied on Ms. Morrison, both as a friend and in her position as Executive Director, to interact with police during this time. Ms. Morrison spoke with police officers at the station about both the incident and the City's policies on police interactions with transgender individuals. Id. at 23-24, 29; *see also* Exhibit E (Text Message from Ms. Morrison to Ms. Stephens, Aug. 25, 2020). While Ms. Morrison interacted with police, Ms. Stephens remained in the same room and could see these interactions. Exhibit A at 25.

15. After leaving the police station, Ms. Morrison sent this text message to Ms. Kendall:

“I just want you to know that I love you as a sister and I have your back as my sister and as a member of this community. I have your back in my professional position as well and we will not take this lying down.”

Exhibit G (Text Message from Ms. Morrison to Ms. Stephens, Aug. 25, 2020, 1:50 A.M.).

16. Ms. Morrison explained that she stated this “[b]ecause I wanted to connect Kendall to every resource that was available to her” and agreed that this was part of her job as Executive Director. Exhibit A at 26-27.

17. Ms. Morrison also texted Ms. Stephens that: “I sent [Ms. Stephens’ husband] the email address of the police lgbtq [*sic*] liaison so that he can notify him and I’m going to call on your behalf tomorrow.” Exhibit G.

18. Ms. Morrison acknowledged that this outreach and assistance, detailed in Paragraphs 14-17, was a part of the Executive Director’s and Office of LGBT Affairs’ official duties. Exhibit A at 27-28. Ms. Morrison and her Office can become involved in any case concerning violence against the trans community. Id. (Ms. Morrison stating “...I am notified by the police liaison any time a trans person is assaulted or murdered or any of those. Any time anti-trans violence happens, the police liaison and – we coordinate and talk about it.”).

19. Days after the attack, in early September 2020, Ms. Morrison served as a liaison between Ms. Stephens and the Philadelphia Police Department concerning Ms. Stephens' negative experience with the police officers investigating her attack. Ms. Morrison corresponded with police officials, forwarded and discussed police complaint reporting procedures to Ms. Stephens, and relayed Ms. Stephens' contact information – at her request – to the police official. Exhibit H (Email exchange between Ms. Morrison and Deputy Commissioner Robin Wimberly, Office of Professional Responsibility Philadelphia Police Department, dated Sept. 2, 2020) (from Ms. Morrison: "I spoke with Kendall and she does want to move forward with filing a Complaint Against Police. She asked me to share her contact info with you.").

20. In early September, Ms. Morrison also corresponded and spoke with the District Attorney's office regarding this attack, including forwarding information about the alleged assailant to their office. Exhibit I (Email exchange between Ms. Morrison and ADA/Director of Diversity & Inclusion Adam Geer, Philadelphia District Attorney's Office, dated Sept. 2, 2020). *See also* Exhibit A at 37 (Ms. Morrison referencing the email exchange and explaining "[t]his was information that Kendall wanted me to share, because I believe she sent me...Yes. This information came from Kendall...").

21. Ms. Morrison's actions involving Ms. Stephens following the August 24<sup>th</sup> attack, as outlined in Paragraphs 14-20, fell within her professional duties as Executive Director. Ms. Stephens actively sought and relied upon those actions. *See also* Exhibit J (Email exchange with Ms. Morrison and Mary Groce, dated Sept. 2, 2020) (referencing the attack on Ms. Stephens, Ms. Morrison wrote "I have been working hard with the Police Commissioners and the District Attorney's Office to get all of this taken care of."); Exhibit A at 43-44.

22. In the weeks following the August 24<sup>th</sup> attack, Ms. Stephens raised over \$35,000 through GoFundMe donations to, in part, pay for her medical expenses. *See Exhibit K (“Support to End Violence Toward Black Transwomen,” GOFUNDME,* [\*https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm\\_campaign=p\\_cp\\_url&utm\\_medium=os&utm\\_source=customer\*](https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm_campaign=p_cp_url&utm_medium=os&utm_source=customer)*).*

23. Prior to the August 24<sup>th</sup> attack, from approximately late-July to early-August 2020 (for approximately two-and-a-half weeks), Ms. Morrison lived with Ms. Stephens.

24. During that time, Ms. Morrison discussed borrowing money from Ms. Stephens to obtain new housing. Exhibit A at 45-46. These requests continued throughout August and September, during the events outlined above in Paragraphs 1-23. *Id.* at 50-51. Ms. Morrison estimated that she would need \$4,000 to find a new home. Ms. Morrison subsequently asked Ms. Stephens for \$4,000. *Id.* at 53 (Q. And you came up with that \$4,000 and you asked for that \$4,000? A. Yes.).

25. On September 23, 2020, Ms. Stephens and Ms. Morrison executed a loan agreement that reflected a no-interest loan from Ms. Stephens to Ms. Morrison for \$4,000 and that the amount would be repaid monthly over a twelve-month period beginning on October 23, 2020. Exhibit L (Loan Agreement dated Sept. 23, 2020).

26. Ms. Stephens provided a cashier’s check for \$4,000 to Ms. Morrison that same day. Exhibit M (Copy of Cashier’s Check dated Sept. 23, 2020).

27. On February 25, 2021, Board Enforcement staff received an anonymous complaint alleging that Ms. Morrison had accepted \$4,000 from a constituent. After a preliminary inquiry, the Board initiated an investigation on February 26, 2021, pursuant to Phila. Code Sec. 20-606(1)(g) and Board Regulation 2.4. On March 2, 2021, Board Enforcement Staff contacted Ms. Morrison and notified of her of the investigation.

28. From October 23, 2020 until April 26, 2021, Ms. Morrison made no payments to Ms. Stephens towards her loan obligations.

29. After numerous conversations with Board Enforcement Staff, on April 26, 2021, Ms. Morrison brought a check to the Board of Ethics office to deliver a check for \$4,000 made payable to Kendall Stephens. Exhibit N (Cashier's Check dated Apr. 22, 2021); Exhibit A at 55. Board Enforcement Staff relayed that check to Ms. Stephens on April 28, 2021.

30. On May 18, 2021, Ms. Morrison electronically submitted the Philadelphia Statement of Financial Interests. Exhibit O. Ms. Morrison submitted the similar Statement of Financial Interests with the Department of State on the same day. Exhibit P.

31. Neither Statement disclosed any source of income or the \$4,000 gift received from Ms. Stephens.

32. On June 3, 2021, Board Enforcement Staff contacted Ms. Morrison to notify her of the City Statements' deficiencies and to request that she make necessary amendments. *See Exhibit Q.* Board Enforcement Staff requested that amendments be filed no later than 5:00 pm on June 7, 2021.

33. Ms. Morrison filed an amended Philadelphia Statement of Financial Interests on June 4, 2021. *See Exhibit R.*

#### **IV. ALLEGED VIOLATIONS**

##### **COUNT 1 – PHILADELPHIA’S GIFT LAW, PHILADELPHIA CODE SECTION 20-604(1)**

34. As alleged in paragraphs 1 - 29, Respondent Celena Morrison violated Philadelphia Code § 20-604(1) by soliciting, accepting, and receiving a monetary gift from Kendall Stephens, a person actively seeking official action from Ms. Morrison as Executive Director of the Office of LGBT Affairs.

35. Ms. Morrison solicited, accepted, and received a \$4,000 gift in the form of a cashier's check, pursuant to a no-interest loan executed on September 23, 2020. Exhibits L and M.

36. Ms. Morrison could not solicit, accept, or receive any gifts from Ms. Stephens because she was actively seeking official from Ms. Morrison and the Office of LGBT Affairs in two ways:

37. First, Ms. Stephens solicited and advocated for Ms. Morrison's and the Office of LGBT Affairs' involvement with the organization "Hearts on a Wire" throughout August 2020. As Executive Director, Ms. Morrison had discretion as to whether her office became involved with Hearts on a Wire. Ms. Morrison stated that Ms. Stephens' involvement was critical in her decision to participate in meetings with Hearts on a Wire. *See Exhibit A at 11.* So, Ms. Stephens was actively seeking official action from Ms. Morrison such that Ms. Stephens was a prohibited source for monetary gifts. In soliciting, accepting, and receiving a \$4,000 no-interest loan from Ms. Stephens, Ms. Morrison violated Philadelphia Code § 20-604(1).

38. Second, Ms. Morrison was intrinsically involved with Ms. Stephens' interactions with multiple city officials immediately following the attack and for weeks after. Ms. Stephens sought and reasonably believed that Ms. Morrison would use the power of her office and position as Executive Director to support and advocate for Ms. Stephens, both throughout the criminal prosecution of her attackers and with filing any complaint against the Police Department. And, Ms. Morrison did in fact use her position to assist Ms. Stephens during this time.

39. The Office of LGBT Affairs was specifically designed to: "coordinate among City Departments, agencies and offices to improve LGBT access to City services," "promote equality and safety for LGBT people," "serve as liaison between the City's...LGBT communities and the City." Exhibit B. Ms. Stephens is a member of the community the Office of LGBT Affairs Office was directly created to serve.

40. Following the August 24<sup>th</sup> attack, Ms. Morrison acted within the scope of her professional capacity as Executive Director of the Office of LGBT Affairs in supporting Ms. Stephens in multiple ways:

41. The night of the attack, Ms. Morrison interacted with Philadelphia police, informing them of City policy toward LGBT crime victims. She did this in front of Ms. Stephens, such that Ms. Stephens reasonably inferred that Ms. Morrison could exert the power of her position in this situation and with interactions with Philadelphia police.

42. Ms. Morrison made subsequent promises that she would support Ms. Stephens in a professional capacity. Exhibit G (“I have our back in my professional position...and we will not take this lying down.). So, Ms. Stephens reasonably believed that Ms. Morrison would assist her with this matter moving forward.

43. Ms. Morrison also served as a liaison between Ms. Stephens and the District Attorney’s Office. At Ms. Stephens direction, Ms. Morrison forwarded information regarding the incident to their office. *See Exhibit I.*

44. Lastly, Ms. Morrison served as a liaison between Ms. Stephens and the Police Department to provide information on how to file a complaint against police officers for their alleged treatment of Ms. Stephens based on her LGBT status. *See Exhibit H.*

45. Notwithstanding the personal relationship between Ms. Morrison and Ms. Stephens, Ms. Morrison acknowledges that these actions all fell within her job duties as Executive Director. Exhibit A at 36; 40-42. These actions clearly fall within the scope of her authority and discretion under the Home Rule Charter. Exhibit B. And, none of these actions were ministerial in nature.

46. Ms. Morrison solicited and accepted this monetary gift at a time when Ms. Stephens was particularly vulnerable: a victim of a violent attack who continued to suffer from physical injuries.

47. Ms. Stephens reasonably relied on and actively sought Ms. Morrison's support, advocacy, and action in this matter, not only as a friend, but specifically as the Executive Director of the Office of LGBT Affairs.

48. Moreover, because of Ms. Morrison's involvement in the criminal matter and the proximity in time to the execution of the no-interest loan, Ms. Stephens was afraid to pursue repayment from Ms. Morrison for fear of the influence she could have on Ms. Stephens' pending criminal matter and career in the LGBT advocacy community.

49. Therefore, Ms. Stephens was actively seeking official action from Ms. Morrison such that Ms. Stephens was a prohibited source for monetary gifts. In soliciting, accepting, and receiving a \$4,000 no-interest loan from Ms. Stephens, Ms. Morrison violated Philadelphia Code § 20-604(1).

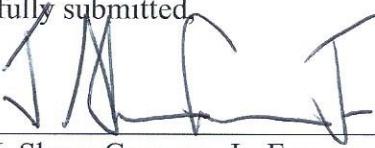
50. Respondent Celena Morrison acted knowingly, that is voluntarily and intentionally, and not because of mistake or accident when she requested, accepted, and received the monetary no-interest loan from Ms. Stephens.

51. Her knowing action is an aggravating factor under Philadelphia Code Section 20-1302(1)(b)(i).

**WHEREFORE**, the Executive Director seeks a maximum civil monetary penalty of \$2,000 for this alleged violation of Philadelphia Code Section 20-604(1).

Date: July 15, 2021

Respectfully submitted,



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J. Shane Creamer, Jr. Esq.  
*Executive Director*

Caroline Curley, Esq.  
*Staff Attorney*

City of Philadelphia Board of Ethics  
1515 Arch Street, 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
Phone: (215) 686-9450  
Fax: (215) 686-9453

**BOARD OF ETHICS  
OF THE CITY OF PHILADELPHIA**

<b>J. Shane Creamer, Jr.</b>	:	
<b>Executive Director</b>	:	
<b>Board of Ethics</b>	:	
<b>of the City of Philadelphia</b>	:	
1515 Arch Street, 18 <sup>th</sup> Floor	:	
Philadelphia, PA 19102	:	
v.	:	<b>Matter No.: 2106ET19</b>
	:	<b>Date Served: June 9, 2021</b>
<b>Celena Morrison</b>	:	
[REDACTED]	:	
[REDACTED]	:	
	:	
<b>Respondent</b>	:	

**EXHIBITS IN SUPPORT OF NOTICE OF ADMINISTRATIVE  
ENFORCEMENT PROCEEDING**

- |           |  |
|-----------|--|
| Exhibit A | Deposition of Celena Morrison, May 3, 2021   |
| Exhibit B | Philadelphia Home Rule Charter Section 4-2001  |
| Exhibit C | Email from Kendall Stephens to Adrian Lowe and Celena Morrison, dated August 10, 2020  |
| Exhibit D | Email chain from Ms. Stephens to Ms. Morrison, <i>et al</i> , dated August 19, 2020  |
| Exhibit E | Text Message from Ms. Morrison to Ms. Stephens, August 25, 2020  |
| Exhibit F | Article, Julie Shaw, "Transgender woman says she was beaten in her Point Breeze home and called slurs," PHILADELPHIA INQUIRER, Aug. 26, 2020,<br><a href="https://www.inquirer.com/news/attack-on-transgender-woman-kendall-stephens-point-breeze-20200826.html">https://www.inquirer.com/news/attack-on-transgender-woman-kendall-stephens-point-breeze-20200826.html</a> |
| Exhibit G | Text Message from Ms. Morrison to Ms. Stephens, August 25, 2020, 1:50 A.M.   |
| Exhibit H | Email exchange between Ms. Morrison and Deputy Commissioner Robin Wimberly, Office of Professional Responsibility Philadelphia Police Department, dated September 2, 2020  |
| Exhibit I | Email exchange between Ms. Morrison and to ADA/Director of Diversity & Inclusion Adam Geer, Philadelphia District Attorney's Office, dated September 2, 2020   |
| Exhibit J | Email exchange with Ms. Morrison and Mary Groce, dated September 2, 2020   |

- Exhibit K "Support to End Violence Toward Black Transwomen," GoFUNDME,  
[https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm\\_campaign=p\\_cp\\_url&utm\\_medium=os&utm\\_source=customer](https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm_campaign=p_cp_url&utm_medium=os&utm_source=customer)
- Exhibit L Loan Agreement dated September 23, 2020
- Exhibit M Copy of Cashier's Check dated September 23, 2020
- Exhibit N Cashier's Check dated April 22, 2021
- Exhibit O City Statement of Financial Internet, Celena Morrison, May 18, 2021
- Exhibit P State Statement of Financial Internet, Celena Morrison, May 18, 2021
- Exhibit Q Email to Ms. Morrison and from Board Enforcement Staff Attorney Caroline Curley, dated June 3, 2021
- Exhibit R Amended City Statement of Financial Internet, Celena Morrison, June 4, 2021

# Exhibit A

BOARD OF ETHICS

J. SHANE CREAMER, JR., ) DEPOSITION UPON  
EXECUTIVE DIRECTOR of the) ORAL EXAMINATION  
PHILADELPHIA BOARD OF )  
ETHICS )  
 ) OF  
- vs - )  
 ) CELENA MORRISON  
CELENA MORRISON )  
-----)

TRANSCRIPT OF DEPOSITION, taken  
by and before KATHLEEN M. RIGBY, Professional  
Reporter and Notary Public, via Zoom  
Teleconference, Philadelphia, Pennsylvania, on  
Monday, May 3, 2021, commencing at 10:19 a.m.

ERSA COURT REPORTERS  
30 South 17th Street  
United Plaza - Suite 1520  
Philadelphia, PA 19103  
(215) 564-1233

CELENA MORRISON

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A P P E A R A N C E S:

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3

CITY OF PHILADELPHIA  
4 BOARD OF ETHICS  
BY: CAROLINE CURLEY, ESQUIRE  
(via zoom)  
5 1515 Arch Street  
6 18th Floor  
7 Philadelphia, PA 19102

8 -- Representing the Board of Ethics

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CELENA MORRISON

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## I N D E X

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## E X A M I N A T I O N

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	WITNESS	PAGE
4	CELENA MORRISON	
	By Ms. Curley:	4

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## E X H I B I T S

7

	EXHIBITS	DESCRIPTION	MARKED
8	BOE-1	8/10/20 E-MAIL	55
9	BOE-2	8/11/20 E-MAIL	55
10	BOE-3	8/12/20 E-MAIL	55
11	BOE-4	8/19/20 E-MAIL	55
12	BOE-5	8/24/20 E-MAIL	55
13	BOE-6	TEXT MESSAGES	55
14	BOE-7	TEXT MESSAGES	55
15	BOE-8	8/28/20 E-MAIL	55
16	BOE-9	9/2/20 E-MAIL	55
17	BOE-10	9/2/20 E-MAIL	55
18	BOE-11	9/2/20 E-MAIL	55
19	BOE-12	9/3/20 E-MAIL	55
20	BOE-13	LOAN AGREEMENT	55
21	BOE-14	CASHIER'S CHECK	55
22	BOE-15	COPY OF CHECK	55

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1 PROCEEDINGS

2 CELENA MORRISON, after having  
3 first been duly sworn, was examined and  
4 testified as follows:

5 EXAMINATION

6 BY MS. CURLEY:

7 Q. Ms. Morrison, can you state your name for  
8 the record.

9 A. Celena Morrison.

10 Q. And what is your current position for  
11 employment?

12 A. The Executive Director of Mayor's Office  
13 of LGBT Affairs.

14 Q. And how long have you held that position?

15 A. Since March 2nd of last year.

16 Q. So March 2, 2020?

17 A. Yes.

18 Q. And you're a Philadelphia City employee;  
19 correct?

20 A. Yes.

21 Q. So what are some of the job duties that  
22 you have as the Executive Director?

23 A. To review all City policies and revise  
24 those policies to ensure that we are being very

1 inclusive with our policies pertaining to the  
2 LGBT+ -- LGBTQ+ community.

3 Q. Sorry. You froze for me. I don't know if  
4 you froze for Kathleen. The last thing I heard was  
5 revise policies to ensure. Could you go back  
6 and --

7 A. That we are being inclusive of our LGBTQ+  
8 communities.

9 Q. Would you agree that your job duties  
10 include developing proposed City policies regarding  
11 civil rights issues affecting LGBT people within  
12 the City?

13 A. Yes.

14 Q. Would you agree that your job duties  
15 include coordinating the implementation of policies  
16 and programs to meet the City's diversity and  
17 equality goals as expressed in the Home Rule  
18 Charter?

19 A. Yes.

20 Q. Would agree that your job duties include  
21 coordinating among other City departments,  
22 agencies, and offices to improve LGBT access to  
23 these services and to promote equality and safety  
24 for LGBT people?

1 A. Yes.

2 Q. Would you agree that your job duties  
3 include supporting the growth and development of  
4 the City's LGBT communities?

5 A. Yes.

6 Did someone else just join?

7 COURT REPORTER: Yes.

8 MR. ROCKEY: I apologize. This  
9 is John. I'm the tech with Ersa Court  
10 Reporting. I'm just assigning post  
11 capabilities.

12 I'm off now. Have a good day.

13 BY MS. CURLEY:

14 Q. I'm sorry, one more time. Would you agree  
15 that your job duties include supporting the growth  
16 and development of the City's LGBT communities?

17 A. Yes.

18 Q. And would you agree that your job duties  
19 include serving as liaison between the City's and  
20 region's LGBT communities and the City?

21 A. Yes.

22 Q. And as part of your job duties as  
23 Executive Director, do you have discretion about  
24 which agencies the City can interact with to

1 promote those missions?

2 A. Wait. Excuse me, could you say that  
3 again?

4 Q. Yes.

5 So as the Executive Director, do you have  
6 a say in which agencies or communities in the City  
7 that you partner with --

8 A. Yes.

9 Q. -- to promote the missions that we just  
10 outlined?

11 A. Yes.

12 Q. And do your job duties also include  
13 answering e-mails, doing administrative tasks --

14 A. Yes.

15 Q. Are you familiar with the individual  
16 Kendall Stephens?

17 A. Yes.

18 Q. How are you familiar with her?

19 A. She is a friend of mine. I've known her  
20 for several years personally. We've been friends  
21 for a really long time.

22 Q. Could you approximate when you first met?

23 A. It was probably -- let me think. I want  
24 to say maybe -- this is '21. I'm going to say

1 maybe -- I think I'm going to say maybe 2014, '15  
2 maybe. It may have been a little longer than that,  
3 yeah.

4 Q. Okay. And you said you were personally  
5 friends. Can you elaborate on that?

6 A. I mean, I've actually lived in her house,  
7 yeah.

8 Q. Fair to say that when you took on this  
9 role as the Executive Director in March of 2020,  
10 Ms. Stephens was aware that you acquired that  
11 position?

12 A. Yes, absolutely.

13 Q. And she knew throughout the time since  
14 March of 2020? She's known throughout that entire  
15 time that you've held that job?

16 A. Yes.

17 Q. And are you familiar with the organization  
18 Hearts on a Wire?

19 A. Yes.

20 Q. And what was your office's involvement  
21 with Hearts on a Wire?

22 A. We didn't have any involvement with Hearts  
23 on a Wire.

24 Q. Did Hearts on a Wire ever approach your

1 office about becoming involved in their  
2 organization?

3 A. Because of this investigation, I was  
4 reminded of a time that Kendall had reached out to  
5 me about doing some -- I don't even remember what  
6 it was, but she reached out to me about doing  
7 something with Hearts on a Wire. But because of my  
8 prior knowledge of working at William Way and  
9 knowing who's affiliated with Hearts on a Wire and  
10 there's a lack of, you know, the work that happens  
11 there. Because I used to be the program director  
12 at William Way, so I had no intentions of working  
13 with Hearts on a Wire.

14 Q. Let me figure out how to share my screen.  
15 Can you see my screen?

16 A. Yes.

17 MS. CURLEY: So I'm going to  
18 ask -- this has been premarked, but I just  
19 ask that this be marked as Board  
20 Exhibit-1.

21 BY MS. CURLEY:

22 Q. And, Ms. Morrison, do you recognize this  
23 document?

24 A. Yes.

1 Q. And do you see the from e-mail address is  
2 marked as Kendall Stephens?

3 A. Uh-huh.

4 Q. And do you see where it's cc'd -- you're  
5 cc'd on this e-mail?

6 A. Yes.

7 Q. Do you recognize your name there?

8 A. Yes, absolutely.

9 Q. And do you see in the body of the e-mail  
10 it just says -- and this is from August 10th of  
11 2020. You agree that that e-mail was sent to you  
12 on August 10th of 2020 or cc'd to you?

13 A. Uh-huh.

14 Q. And do you see where it says -- Ms.  
15 Stephens indicates in the first line that she spoke  
16 with you, identified your title, regarding a  
17 meeting on Hearts on a Wire concerning our  
18 incarcerated sisters, brothers, and others. And  
19 she is excited to participate in a virtual meeting  
20 with her team and Hearts on a Wire, etcetera?

21 A. Uh-huh.

22 Q. Do you agree that you received this  
23 e-mail?

24 A. Yes.

1 Q. Do you recall this conversation with Ms.

2 Stephens?

3 A. The only reason -- at that time -- when I  
4 said that I had no intentions of working with  
5 Hearts on a Wire, the only reason why I was -- I  
6 spoke to -- that was prior to this. The only  
7 reason why I was considering meeting to talk about  
8 Hearts on a Wire was because my friend Kendall had  
9 reached out to me about it.

10 Prior to that, I knew about Hearts on a  
11 Wire, so I had no intentions of working with Hearts  
12 on a Wire. Kendall did ask me about it, but  
13 because, once again, Hearts on a Wire does not  
14 follow through with anything, nothing ever came of  
15 this either.

16 Q. But at this time, to clarify, when Ms.  
17 Stephens reached out to you --

18 A. Uh-huh.

19 Q. -- to become involved, you then did  
20 consider whether your office would become involved?

21 A. Yes, because I had actually -- Kelly  
22 Burkhardt had already -- had also asked me, who is  
23 another friend of mine. So because of their  
24 involvement -- which Kelly had not been involved

1 prior to that with Hearts on a Wire. If she had,  
2 it was not to my knowledge. But because it was  
3 those two -- because the person who actually  
4 oversees -- overseen, I don't know if they still  
5 do, oversaw Hearts on a Wire, I would never work  
6 with that person.

7 Q. And just to go back, what is Kelly  
8 Burkhardt's position?

9 A. Kelly Burkhardt worked with the District  
10 Attorney's Office.

11 Q. In like an official capacity; correct?

12 A. Yes, absolutely.

13 Q. And so would you agree that because  
14 Kendall was involved at this time and was asking  
15 for your involvement, that made you want to  
16 consider working with Hearts on a Wire?

17 A. Yes. Yes.

18 Q. So both Kelly and Ms. Stephens'  
19 involvement was an important component when you  
20 were considering whether to work with them?

21 A. Yes.

22 MS. CURLEY: This is premarked,  
23 and I'm just going to ask that it be  
24 marked again as Board of Ethics Exhibit-2.

1 BY MS. CURLEY:

2 Q. And, Ms. Morrison, do you recognize this  
3 e-mail?

4 A. This is the same one; right?

5 Q. This is now dated August 11th and is  
6 from --

7 A. Not what I'm looking at.

8 Q. Shoot. What does it say? Does it say  
9 Board Exhibit-2 on the top?

10 A. No. I see the same e-mail that I was  
11 looking at, the Kendall Stephens, August 10.

12 Q. Okay. Hold on. Give me one second. I'll  
13 try that one more time.

14 How about now?

15 A. Yes.

16 Q. So this is Board of Ethics Exhibit-2. Do  
17 you recognize this document?

18 A. Yes.

19 Q. And who is Adrian Lowe?

20 A. I don't remember.

21 Q. But you recall receiving this e-mail from  
22 this individual regarding Hearts on a Wire?

23 A. Basically if you have it, I'm not  
24 disputing that I received it. I don't remember if

1 I read it or not.

2 Q. Okay. But you would acknowledge that you  
3 did receive it?

4 A. It's addressed to me.

5 Q. And can you now see the Board Exhibit-3?

6 A. Yes.

7 Q. And, again, you are cc'd on this August  
8 12th document sent from Ms. --

9 A. Are we going to see any responses to me  
10 actually responding to any of these e-mails?

11 Q. Yes.

12 Do you acknowledge receiving this e-mail?

13 A. If it's addressed to me, I'm going to  
14 acknowledge it.

15 MS. CURLEY: This has been  
16 premarked, I'm just asking that it be  
17 marked again.

18 BY MS. CURLEY:

19 Q. And moving on to Exhibit-4. Do you see  
20 this e-mail?

21 A. Yes.

22 Q. And it indicates that you have -- I can  
23 scroll down.

24 A. Yes.

1 Q. This says from Ms. Burkhardt regarding --  
2 I'll give you a minute to read it, but it's about  
3 setting up a meeting.

4 A. Okay.

5 Q. And this is from Ms. Sanchez --

6 A. Yes. I saw that one.

7 Q. You recognize that, setting up a meeting.  
8 And then this is your response to that  
9 setting up a meeting?

10 A. Is that it? Is that that whole chain?

11 Q. This is the very first one, which I think  
12 we've already seen, from Ms. Stephens. This is  
13 another one from -- this is from Ms. Sanchez.

14 A. Okay.

15 Q. Let me know when you're ready for me to  
16 scroll up.

17 A. Okay. Uh-huh. Okay. And that I have  
18 availability.

19 Q. Do you recall when this meeting was set  
20 up?

21 A. I don't -- I didn't have the meeting. I  
22 don't -- I don't --

23 Q. The meeting did not occur?

24 A. I wasn't there.

1 Q. When you sent this, was it your indication  
2 to join -- was it your intention to join that  
3 meeting regarding Hearts on a Wire?

4 A. Yes.

5 Q. And, again, is that because of the reasons  
6 we've talked about, about Ms. Stephens --

7 A. Yes.

8 Q. -- and Ms. Burkhardt's involvement?

9 A. If I -- when I sent this e-mail, if I said  
10 that I had some availability, that was my intent.

11 Q. And what were your discussions -- when you  
12 were considering having the office become involved  
13 with this organization, what were your discussions  
14 with Ms. Stephens?

15 A. I don't remember. I don't remember. I  
16 don't remember what they were.

17 Q. Do you believe --

18 A. I don't even remember what she -- what the  
19 specific ask was. I don't recall that.

20 Q. Would it refresh your recollection -- do  
21 you have any understanding at all what your  
22 involvement was going to be?

23 A. Well, not really. We hadn't really  
24 discussed that. But I know what type of work that

1       Hearts on a Wire does. And it's around  
2       incarcerated trans and gender non-conforming folks.

3                 Actually, my understanding was this  
4       meeting was to talk about, which is what a lot of  
5       the meetings at my office has with -- we meet with  
6       tons of groups and organizations on a daily to talk  
7       about ways that our office can support the work.

8                 So what was talked -- I don't recall  
9       exactly what the ask was, because we are asked to  
10      be in everything from support groups to softball  
11      games.

12     Q.           So you would agree at some level this was  
13      about how your office could possibly get involved  
14      with Hearts on a Wire --

15     A.           Yes.

16     Q.           -- and support them and be involved in  
17      their mission in some way?

18     A.           Yes. Yes.

19                 MS. CURLEY: And, again, this  
20      was premarked as Board of Ethics  
21      Exhibit-5. I just ask that it be marked  
22      again.

23     BY MS. CURLEY:

24     Q.           And, again, this is an e-mail to you -- or

1 from Ms. Stephens, cc'd to you. And just at the  
2 last -- I think it's the third from the bottom, it  
3 indicates -- Ms. Stephens writes, third line from  
4 the bottom at the very end of the line, Celena  
5 Morrison has availability any time after 1:00 p.m.  
6 on Friday.

7           Would you agree that you may have  
8 discussed with Ms. Stephens your availability or  
9 your involvement?

10 A.       The availability was clearly printed in  
11 the e-mail that I sent, so that's obviously what  
12 she's referencing.

13 Q.       But you would acknowledge that you got  
14 this e-mail.

15           Now, I'm going to move on to -- do you  
16 recall Ms. Stephens being attacked in August 2020?

17 A.       Yes.

18 Q.       Were you involved with that -- not  
19 involved with the attack obviously, but how did you  
20 come to be aware of that incident?

21 A.       I was on the phone with her when it  
22 happened.

23 Q.       Can you tell me a little bit more about  
24 that?

1 A. We were just on the phone like we always  
2 were. She's my friend -- well, she was my friend.  
3 We were talking on the phone, joking and laughing.  
4 I don't remember exactly what we were talking  
5 about. But I remember it was after dark and we  
6 were on the phone. And I remember her getting  
7 really quiet and then she said they're fighting  
8 outside of my house. And I was like what? And I  
9 heard her shuffling. I had -- the only reason  
10 why -- I had just moved out of her house, stopped  
11 living at her house a couple weeks prior to this.  
12 This is why I know -- I could tell when she got up,  
13 she started making her way through the house, I  
14 could hear it. I could also hear when the kids  
15 joined and they made their way through the house to  
16 the front door where everything was happening. I  
17 was on the phone through all of that, so that's  
18 originally how I know.

19 Q. And when did you -- had the attack started  
20 while you were still on the phone or --

21 A. When she opened the door and said  
22 something to the people while I was on the phone,  
23 and I said, Kendall, be careful. Call me -- call  
24 me back, because I heard -- when she opened the

1 door, I heard someone say, yell out, oh, my God, he  
2 punched me in the face. And I knew that at that  
3 moment that that was really a situation that she  
4 should not be entering. And whatever the case, I  
5 need to let her get off of the phone. And I told  
6 her to call me back and let me know that everything  
7 was okay.

8 Q. If I said this was on August 24, 2020,  
9 would that sound right?

10 A. I'm sure she remembers the date more than  
11 I do. So if that's what she told you, then that's  
12 what it was.

13 Q. So what happened next? What was the next  
14 thing that happened?

15 A. I was getting into bed -- well, actually,  
16 I was already in bed as we were talking on the  
17 phone. So I went to sleep. And it was maybe 20,  
18 30 minutes later she called me back screaming and  
19 yelling on the phone that they had come in her  
20 house and beat her up and stuff.

21 Q. And then what happened?

22 A. And then I hung up my phone and jumped out  
23 of bed and jumped into my car to go be with my  
24 friend.

1 Q. And where did you go?

2 A. I went to her house.

3 Q. Then what happened?

4 A. She was -- she was gone when I got there.

5 She was at the police station already.

6 Q. So what did you do next?

7 A. I immediately went to the police station.

8 Q. How did you know what police station to go

9 to?

10 A. I was on the phone with her husband.

11 Q. And who is that individual? What's his

12 name?

13 A. I'm --

14 Q. You can take a minute. Just let me know

15 when you're ready.

16 A. I forgot his name. I don't remember. I'm

17 drawing a blank. I know him so well.

18 Q. Just take a minute. That's fine. Take as

19 much time as you need.

20 A. Well, I just want to move on. I don't

21 remember his name.

22 Q. Okay. You were on the phone with him, you

23 went to the police station. What happened next?

24 A. I remember walking in and Kendall was

1 yelling and screaming at the officer. And he was  
2 trying to talk to her. So I asked her -- Avery,  
3 his name is Avery.

4 Q. The husband?

5 A. Yes. I asked Avery to pull her to the  
6 side. And I walked up to the counter and I just --  
7 I asked -- well, I asked Kendall first, I believe,  
8 what the issue was. And she said that they weren't  
9 listening to her and they were laughing at her.  
10 And the officer just was like I've been trying to  
11 talk to her. She won't stop screaming at me.

12 And I asked Kendall to be quiet -- she was  
13 yelling behind me -- to give the officer an  
14 opportunity to explain what was going on. And that  
15 was pretty much it.

16 My part was I asked Kendall was she okay.  
17 And I actually -- there wasn't anything else that I  
18 could do, so I left and went back home. And I told  
19 her to call me if she needed anything, to document  
20 everything. I told her, you know, always document  
21 everything, make sure you get all the names of  
22 everyone, everything.

23 And a lot of it I talked to her husband,  
24 because I knew -- I knew them both very well prior

1 to them being together. So, yeah.

2 Q. Did you speak with any of the officers  
3 while you were there?

4 A. Yes. I did just through the glass. I  
5 stepped up and the officer was explaining to me  
6 that they took a report. He just said that he  
7 already explained to her that it wasn't -- they  
8 aren't able to label it a hate crime or something.  
9 I think that's what her concern was at the time.  
10 And he explained that to me and that was it.

11 Q. Did at any point you speak to the officers  
12 about Directive 4.15?

13 A. At that time, no. I don't recall  
14 making -- I may have, but I don't recall there  
15 being a reason for me to mention it. I may have  
16 had, but I don't know. It was a lot that night.  
17 But I do try to make it a habit of mentioning that,  
18 because even my friends that are police officers,  
19 any time I mention that, it's just mind boggling  
20 that not -- I have not encountered one police  
21 officer that actually knows what that directive is.

22 Q. I know it also falls under your job duty,  
23 you know, educating with City agencies; correct?

24 A. Well, not just as my job, but as a black

1 trans woman. Even before I was doing this job, I  
2 did that same thing, because it involves me, you  
3 know. It's something personal to me. It's about  
4 even my -- because I have a history of having  
5 really horrible experiences when it comes to  
6 dealing with law enforcement. So when I'm  
7 advocating like that, it has nothing to do with  
8 this job, because I've been doing this long before  
9 this job.

10 Q. Well, you would agree --

11 A. This is about -- when I talk about asking  
12 officers about -- I've never had the opportunity to  
13 meet with officers in this capacity at this job and  
14 they know who I am to have those conversations with  
15 them.

16 Any time that I've had that conversation  
17 with an officer, it's because they don't know who I  
18 am and I ask them those questions. And then some  
19 of them I know personally.

20 Q. But you would agree, even though it is  
21 clearly something you're passionate about  
22 personally, it is also your job; right?

23 A. Yeah. But I would have asked those  
24 questions even if I were not in this role.

1 Q. Was Kendall always present when you were  
2 speaking with the police officers? At any point  
3 were you separated?

4 A. Well, she was kind of over to the side a  
5 little ways. Because she wouldn't stop yelling, so  
6 her husband was kind of pulling her to the side.

7 Q. But she could see and hear you  
8 interacting?

9 A. I can't -- I'm sure she could see, but I  
10 can't attest to what she could hear.

11 Q. But you weren't in separate locations; you  
12 guys were relatively together?

13 A. We were in like the same room, but we were  
14 not standing together. She was on the other side  
15 of the room with her husband clearly upset.

16 Q. So afterwards you left the police station.  
17 Did you text or correspond with Kendall afterwards?

18 A. I'm sure I probably did, because she was  
19 my friend and I was concerned.

20 Q. I'm going to go to down to -- can you see  
21 this screen? It's marked as BOE Exhibit-7. Can  
22 you see this?

23 A. So can I ask you why it's important for  
24 you to show my text messages that I sent to her out

1 of support for my friend? And how these text  
2 messages of me being a friend to someone are being  
3 used against me?

4 Q. I just want to clarify --

5 A. I don't need to see them. I know they  
6 exist.

7 Q. So you acknowledge then that this is a  
8 text message you sent Kendall?

9 A. Yes.

10 MS. CURLEY: So I just ask --  
11 was premarked Board Exhibit-7. I just ask  
12 that this be marked again.

13 BY MS. CURLEY:

14 Q. I just want to ask one clarifying  
15 statement on this particular text message. It  
16 should say in the second screen, "I just want you  
17 to know that I love you as a sister and I have your  
18 back as my sister and as a member of this  
19 community. I have your back in my professional  
20 position as well. And we will not take this lying  
21 down."

22 What did you mean when you said I have  
23 your back in a professional position?

24 A. Because I wanted to connect Kendall to

1 every resource that was available to her.

2 Q. And you would agree that that is also part  
3 of your job?

4 A. Yes.

5 Q. Whether Kendall Stephens was a friend of  
6 yours or not, you would have done this for any  
7 victim; correct?

8 A. For any victim, yes.

9 Q. And I took it down already, but it said,  
10 you know, I sent Avery, whom you've identified as  
11 Ms. Stephens' husband, the e-mail address of the  
12 police LGBTQ liaison so that he can notify him.  
13 And I'm going to call on your behalf tomorrow.

14 And was that your intention?

15 A. Uh-huh.

16 Q. And, again, you would have done this for  
17 any victim of --

18 A. I do that because I am notified by the  
19 police liaison any time a trans person is assaulted  
20 or murdered or any of those. Any time anti-trans  
21 violence happens, the police liaison and -- we  
22 coordinate and talk about it.

23 Q. So this was not only part of -- you were  
24 involved because you were personally friends with

1 Ms. Stephens, but you would agree that this kind of  
2 reach out or this kind of assistance would be part  
3 of the Executive Director's role?

4 A. Yes. Yeah. I would say it's part of the  
5 office's role.

6 Q. The office, correct. So someone from your  
7 staff --

8 A. Yes.

9 Q. Even if it wasn't you personally, someone  
10 on your staff who you oversee would participate in  
11 this if --

12 A. If we're notified and we are -- and we  
13 have knowledge of it and we are contacted.

14 This is not something that is -- this is  
15 not a standard policy or there's not a  
16 communication pipeline in place, which is something  
17 that I'm working on now. But we try to stay in  
18 contact to let folks know to contact us at some  
19 point.

20 Q. And so if you can, you will --

21 A. Yes.

22 Q. -- is that fair to say?

23 MS. CURLEY: And just for  
24 purposes of -- so this one is marked as

1                   Board of Ethics Exhibit-6. So I just ask  
2                   that this be marked and moved in.

3 BY MS. CURLEY:

4 Q.               And, again, this just refers -- we already  
5 talked about this with Directive 4.15. If you --  
6 you know, it sounds like you would have told  
7 them --

8 A.               Yes.

9 Q.               Even if you don't remember, you probably  
10 would have told them?

11 A.               Yes, I did. And I'm glad I did, because  
12 that means I'm doing my job.

13 Q.               Correct.

14 A.               And that's my job as a black woman and my  
15 job as the Director.

16 Q.               Now, following this incident, what  
17 happened afterwards? What was kind of the  
18 aftermath for you?

19 A.               Well, a lot of meet -- Kendall has a  
20 tendency to want to be in the news a lot. And so  
21 she reached out to every platform there was about  
22 this, and it became a huge story.

23                   Because of some of -- I knew that Kendall  
24 was actually starting to add things on to the

1 story. Everything that she was saying was not  
2 fact. And I didn't want to make any statements  
3 about it, so I had already contacted my supervisor  
4 in the comm department, because I didn't want to  
5 make any comments to the press, because -- and I  
6 sent you the e-mails, I think, where I was saying  
7 that I did not want to make any comments because I  
8 was not there in my professional capacity, I was  
9 there to support my friend, and it was not my story  
10 to tell.

11 Because I knew that -- after everything, I  
12 knew that Kendall had this open case with the girl  
13 who -- one of the girls who was now being charged  
14 with her attack.

15 And at sometime following that, a trans  
16 woman was murdered. And the District Attorney's  
17 Office reached out to me about doing a press  
18 conference about anti-trans violence and the  
19 murders and hate crimes. And so we did that.

20 And he asked -- the District Attorney's  
21 Office asked me to find someone who was working  
22 with the trans community to be a part of this press  
23 conference. And I reached out to Tatiana Waters  
24 (ph), who is someone who works in the community.

1               Once Kendall found out about that, she was  
2   furious. She was furious with me. She texted me  
3   and cursed me out and she called me and cursed me  
4   out. She said that she couldn't believe that I did  
5   not invite her as a survivor of a hate crime, and  
6   she should have been a part of that.

7               And she didn't even give me a chance to  
8   explain to her that not only did they not ask about  
9   someone who was a survivor, they said that's not  
10   what they requested, we were talking about someone  
11   who lost their life. And I couldn't believe that  
12   she was just like going off on me about this,  
13   because she made this whole situation where this  
14   woman lost her life about her. And that was when  
15   our friendship completely changed.

16   Q.           And this press conference, when  
17   approximately was that?

18   A.           I don't remember.

19   Q.           If I said late October, would that sound  
20   correct?

21   A.           Possibly. I've had so much going on this  
22   year. This was my first year in this role.  
23   Everything started to run together. Dealing with  
24   the pandemic. It was a lot.

1 Q. Immediately after the incident, did you at  
2 any point talk to anyone in the police department  
3 that you recall?

4 A. Well, Kendall -- Kendall had said that her  
5 experience with the police was problematic and she  
6 talked about a couple things. I can't remember  
7 specifically what she said they didn't do or what  
8 they did do. I can't remember what it was.

9 So because I know that that has been an  
10 issue for even myself, I connected -- I spoke to  
11 the police commissioner. And they -- I believe  
12 they may have -- one of them may have reached out  
13 to me first. But I did speak to one or both of the  
14 police commissioners. I think I spoke to one, and  
15 then one contacted me and I told them that I had  
16 already spoken with another.

17 And she asked me to forward her  
18 information to Kendall if Kendall wanted to make a  
19 formal complaint. And I just passed on the  
20 information to Kendall. I don't know if she ever  
21 actually did or not, but...

22 Q. I'm going to show you a couple of e-mails.  
23 And the same thing, we'll just acknowledge -- we'll  
24 get them marked and moved.

1                   Can you see these marked as BOE Exhibit-8?

2   A.            Uh-huh.

3   Q.            That's not legible.

4   A.            But that's -- that's from Adam Greer --

5   Geer, Adam Geer. That's the District Attorney's

6   Office. That's not the police department.

7   Q.            Correct. But you did get this information  
8   from Mr. Geer --

9   A.            Yes.

10   Q.           -- who's indicated as Director of  
11   Diversity & Inclusion, wants to speak with you  
12   about the Kendall Stephens matter. And you said  
13   yes, you will call?

14   A.           Yes. He -- that's the situation where he  
15   reached out to me. I know in the community that a  
16   lot of people knew of Kendall and my personal  
17   relationship.

18   Q.           Was this meeting in a professional -- with  
19   Mr. Geer, was this conversation in a professional  
20   capacity?

21   A.           Yes. Yes.

22   Q.           You don't have to get into specifics about  
23   it, but was it just about the incident or what was  
24   the topic of discussion?

1 A. I don't remember. I'm not sure. I don't  
2 remember what the conversation was about or what  
3 information we shared.

4 Q. Something about the Kendall situation?

5 A. Yes. It was definitely about the Kendall  
6 situation.

7 One of the things -- I had just did a  
8 training for the entire District Attorney's Office.  
9 And we -- this came right after having these  
10 conversations about how to better respond to these  
11 types of incidents.

12 MS. CURLEY: This is marked as  
13 Board of Ethics Exhibit-9. Just asking  
14 that to be marked and moved in as well.

15 BY MS. CURLEY:

16 Q. This is identified from Melvin Singleton,  
17 First Deputy Commissioner in the Field Operations  
18 for the Philadelphia Police Department, sent to you  
19 on September 2, 2020. Subject line, 17th District  
20 experience.

21 Do you acknowledge receiving this e-mail?

22 A. Yeah.

23 Q. And do you recall -- this is in line with  
24 what you said how the police department reached out

1 to you about your experience and Ms. Stephens'  
2 experience. Would you agree?

3 A. Yeah.

4 Q. Moving back to Exhibit-10. This is now a  
5 follow-up e-mail on September 2nd from Deputy  
6 Commissioner Robin Wimberly, who is the Office of  
7 Professional Responsibility for the police  
8 department, reaching out to you on September 2,  
9 2020.

10 Do you acknowledge receiving this e-mail?

11 A. Yeah. Just as I said, I was contacted by  
12 one or both of the commissioners, police  
13 commissioners.

14 Q. This indicates it's ensuring Kendall  
15 Stephens understands the complaint against police  
16 process?

17 A. Yes.

18 Q. And this one is marked Board of Ethics  
19 Exhibit-11. I ask --

20 A. They wanted to get -- I guess relay or  
21 have an opportunity to tell, to show or inform  
22 Kendall of the process. I don't know the process.  
23 They didn't tell me. It wasn't like they gave me  
24 the information about the process and I relayed it

1 to her. This was just about me connecting her to  
2 them so that they can --

3 Q. Kind of serving as a --

4 A. Yes.

5 Q. As Executive Director, your job is not  
6 to --

7 A. Yes.

8 Q. -- file complaints against the police  
9 department?

10 A. Yeah, absolutely not.

11 Q. But you would agree even if it wasn't Ms.  
12 Stephens, you would have provided the same -- you  
13 would have acted as the same liaison or conduit for  
14 the police department for any victim of a potential  
15 violence against --

16 A. Possibly. I will say that this was the  
17 first time that I've had to -- well, actually, it  
18 was the only time that I've had to connect someone  
19 to someone other than the police liaison within law  
20 enforcement.

21 Q. Because it was elevated?

22 A. Not on my -- well, I guess so, yes.

23 Someone felt the need to elevate it. And I think  
24 it was because of the uptake in the cases that we

1 have seen and how much violence had been happening  
2 around the world, not just in Philly. So I believe  
3 that is partially why it was such a different  
4 response this time.

5 MS. CURLEY: This one is marked  
6 as Board of Ethics Exhibit-11. I'm asking  
7 that to be remarked and moved in.

8 BY MS. CURLEY:

9 Q. And in this one there's your e-mail to Mr.  
10 Geer again where you're sharing information about  
11 the attack, that's on September 2nd, down here, if  
12 you can see.

13 I guess why did you feel -- why was this  
14 information shared, if you recall?

15 A. This was information that Kendall wanted  
16 me to share, because I believe she sent me -- oh,  
17 yes. Yes. This information came from Kendall,  
18 because I remember that I had not -- I had no idea  
19 who the girl was. I really hadn't been on social  
20 media that much. And Kendall sent me --

21 Q. When you say "who the girl was," who are  
22 you referring to?

23 A. I'm not sure what her name is. It was the  
24 young lady that was charged with Kendall's attack.

1 Q. So the alleged attacker?

2 A. Yes.

3 Q. Okay. I'm sorry, you can continue.

4 A. So Kendall sent me a video that she did --  
5 an interview she did about the incident with some  
6 blogger.

7 Q. And why were you forwarding this  
8 information?

9 A. Kendall asked me to forward it to him. I  
10 don't remember if her and -- if Adam and Kendall  
11 had been connected at that point.

12 My understanding was -- I really didn't  
13 understand if Kendall should be connected and  
14 directly working along with the District Attorney's  
15 Office or not. I'm not sure how that worked, which  
16 is another reason why I didn't ask her to be a part  
17 of that press conference. I wasn't sure if that  
18 was in violation -- I don't know. I didn't know.  
19 Being that she had that case with the young lady, I  
20 wasn't sure how that would affect her.

21 Q. And I guess why did you feel that your  
22 office should be the one to provide it then?

23 A. I didn't feel that I should be. Kendall  
24 asked me to provide it. It's not that I felt an

1 obligation to. She asked me just to share that  
2 information with the District Attorney's Office,  
3 and I did.

4 Q. I mean, I guess it was sent from your  
5 Philadelphia Government e-mail address versus your  
6 personal address. So why --

7 A. Well, I didn't communicate with -- I don't  
8 think you'll note that any of these e-mails are  
9 sent to my personal e-mail address.

10 Q. Correct. They're all sent to your  
11 official --

12 A. Why would you expect me to send this from  
13 my personal e-mail address? I'm not sure -- I'm  
14 not understanding where you're going with that.

15 Q. Well, if you're sending an e-mail address  
16 with your -- from your City Government e-mail  
17 address that has your position and title, it seems  
18 to come from your office; no?

19 A. Okay. And I'm not disputing that. But  
20 I'm not understanding why you're -- what are you  
21 asking me?

22 Q. I'm asking why the decision was -- if  
23 there was any decision process about why this had  
24 to come from the City's e-mail address?

1 A. There was never a time -- because she sent  
2 it to my City -- when I got the information from  
3 her, it came to my City e-mail address.

4 Q. So Ms. Stephens sent it to your City  
5 e-mail address and then you sent the information --  
6 you sent a new e-mail, because I guess this isn't  
7 forwarded, it's a new e-mail to Mr. Geer?

8 A. Yes. Yes.

9 There was never a time where I thought,  
10 oh, is this a personal issue or is this -- it was  
11 not that type of situation where it required that  
12 much thought because someone had been attacked  
13 violently.

14 I'm not sure how you respond to those  
15 types of things when your friends are attacked  
16 violently, but I was only trying to help my friend  
17 and get the information that she wanted me to share  
18 to the people who it needed to go to -- that she  
19 felt it needed to go to. I don't know, I don't  
20 make those types of decisions.

21 That video coming to me would have been  
22 worthless. I don't work with the detectives and I  
23 don't work with the police. So my job was to do  
24 what she asked me to do as her friend or however

1 you want to put it, in my professional capacity.  
2 It doesn't matter. The only thing that mattered at  
3 that time is that that information got to where it  
4 needed to go.

5 Whether you feel like I was doing it as a  
6 friend or in my professional capacity, at the time  
7 that did not matter to me. And if it happened to  
8 you, it wouldn't matter to me.

9 Q. You would agree that even if it hadn't  
10 been Ms. Stephens, if it had been anybody, you  
11 would have -- you would have considered it -- you  
12 would have done it the same?

13 A. Maybe. I can't say that it would be  
14 anybody. Because if you were to send me that, the  
15 way that I've been treated, I can't say that I  
16 would do that for you.

17 Q. Sounds fair.

18 But a potential victim of LGBT violence  
19 perhaps, something that would fall under your  
20 office's role?

21 A. Or someone that falls into my community.

22 Q. And you would agree that maybe in this  
23 circumstance you're doing it for Ms. Stephens for  
24 both, it's personal and related to your office?

1 A. Uh-huh.

2 MS. CURLEY: I'm going to move  
3 to -- this is marked as Board of Ethics  
4 Exhibit-12. I'm just going to ask that  
5 that be remarked in line with that.

6 BY MS. CURLEY:

7 Q. This is an e-mail from -- let me scroll  
8 down so you can see the first e-mail -- September  
9 2nd from a Ms. Mary Grace, I presume, to you asking  
10 how you're doing about Kendall after the incident.

11 Do you recall these e-mails?

12 A. Who's that from?

13 Q. This says Mary Grace.

14 A. I don't know who that is.

15 Q. You would acknowledge that that's your  
16 e-mail address, though?

17 A. Oh, yes, I do know who that is. I do know  
18 who that is.

19 Q. Okay. And so you recognize this e-mail  
20 and getting it?

21 A. Yeah. I do know who that is. She's from  
22 John C. Anderson.

23 Q. Then I just want to direct your attention  
24 to September 2nd, your response. And I want to ask

1 about the second paragraph.

2 First off, do you recall sending this  
3 e-mail or recognize it?

4 A. What a terrible e-mail that is. I look  
5 like such a horrible person.

6 Q. So you acknowledge sending it?

7 A. (Witness nods head.)

8 Q. That was a yes?

9 A. You have it right there. It comes from my  
10 e-mail address.

11 I'm not understanding. What are we doing  
12 here?

13 Q. I just need -- I'm just asking the  
14 questions to make sure it's clear for the record,  
15 because this is being recorded. So we're going to  
16 get a transcript afterwards, so I just want to make  
17 sure it's -- the transcript is not going to be able  
18 to capture if you're nodding your head or anything  
19 like that. So I just want to make sure that when  
20 you nod your head yes, you mean yes.

21 A. Yes.

22 Q. So in the second paragraph it says, I've  
23 been working hard with the police commissioners and  
24 District Attorney's Office to get all this,

1 referring to Ms. Stephens' attack, taken care of.

2 What were you referring to in this e-mail?

3 A. Having her connected to the District  
4 Attorney's Office and -- well, at that time the  
5 District Attorney's Office had victim services. So  
6 that's mainly what -- she was being connected to  
7 victims services, who is also another friend of  
8 ours, who happens to be the other person that was  
9 in the other e-mails, Kelly Burkhardt. So she  
10 played a part in this as well, because she works  
11 along with Adam Geer.

12 So this was about connecting her, just as  
13 I said before, connecting her to those resources.

14 And the other was about the attack and the  
15 other was about her interactions with the police  
16 following the attack.

17 MS. CURLEY: So now I'm going to  
18 move to this. This is marked as Board of  
19 Ethics Exhibit-13. I'm asking that to be  
20 remarked.

21 BY MS. CURLEY:

22 Q. Do you recognize this document?

23 A. Yes.

24 Q. And what is this?

1 A. The loan agreement.

2 Q. And this is the loan agreement executed  
3 between yourself and Ms. Stephens?

4 A. Uh-huh.

5 Q. And it's dated September 23, 2020. Does  
6 that date sound right to you?

7 A. Yes.

8 Q. Can you explain to me how this loan  
9 agreement came about?

10 A. Like I said before, I was -- that's before  
11 she was attacked. I was in a really bad  
12 relationship and I had to leave. And I stayed with  
13 Kendall.

14 And at that time -- during that time that  
15 I was at her house, Kendall showed me over \$200,000  
16 cash hidden in her closet. And because she knew  
17 that I was looking for a new place, she offered to  
18 loan me -- first she asked me about how much would  
19 I need to move into a new place. And I told her  
20 about \$4,000, because it was going to be first  
21 month, last month, deposit, and all that stuff to  
22 move in. And we agreed at that time while I was  
23 still staying in her house that she offered to loan  
24 me the \$4,000, and I said okay.

1           At the time her husband was still living  
2 there. Because he was going to law school, he was  
3 supposed to draw up the loan agreement. So he was  
4 very well aware of when we first had this  
5 discussion, which was way before the date you see  
6 on the agreement, which was prior to her attack.

7 Q.           When approximately were you living with  
8 Ms. Stephens?

9 A.           I'm going to say I had probably been gone  
10 maybe a week or two prior to the attack. I'm  
11 trying to think, because [REDACTED] August  
12 16th, and I was back at home, I think, before [REDACTED]  
13 [REDACTED].

14 Q.           Approximately how long had you been living  
15 with Ms. Stephens?

16 A.           I stayed at her house for a few weeks, but  
17 I did not stay long, because she made it extremely  
18 difficult to keep my work life and personal life  
19 separate. So I made an agreement with my partner  
20 that I would come back home so that I could work  
21 and look for a place, continue to look for a place.

22 Q.           So that sounds like maybe two to three  
23 weeks?

24 A.           Yes. It probably wasn't three weeks.

1      Probably maybe two and a half weeks.

2      Q.           So less than three weeks, but probably  
3           more than like a week?

4      A.           Oh, yes, definitely.

5      Q.           So sometime either end of July or  
6           beginning of August?

7      A.           Yeah.

8      Q.           And you said it was difficult for you to  
9           keep your work and personal life separate while you  
10          were living with Ms. Stephens?

11       A.          Yeah.

12       Q.          What do you mean by that?

13       A.          Because I would be in meetings sometimes  
14          in the back room, because, of course, everything  
15          was happening virtually, and I was there staying at  
16          my friend's house who was supporting me, and it  
17          was -- what I was dealing with in my personal life  
18          was really private to me. And me being in a  
19          situation where I needed to be at Kendall's house  
20          with private too.

21                  And there were times where she would be in  
22          her room in a meeting and she would just randomly  
23          be like, oh, well, you know, Celena Morrison is --  
24          and try to incorporate me into whatever they were

1 talking about. And then she would come into the  
2 back room all of a sudden and be like, oh, she's  
3 here right now and have her laptop in her hand and  
4 like putting me on camera like here she is, she's  
5 here right now.

6 And that -- it was really uncomfortable  
7 for me, because I was already uncomfortable being  
8 away from my room.

9 Q. Okay. So then these discussions --  
10 obviously it sounds like you were trying to find --  
11 you didn't want to go back to your original home,  
12 you wanted to find a new home; is that correct?

13 A. Yes.

14 Q. And so what was that process like? How  
15 did you go about finding a new place?

16 A. Just the usual, online, riding around.

17 And then it got really difficult because I  
18 was in a car accident. So I was looking for a  
19 house and a car at the same time.

20 But everyone -- even my boss knew that I  
21 was displaced. And I was open with them about I  
22 was staying at my friend's house. She knew at the  
23 time that I was staying at Kendall's house. I  
24 talked to my boss about returning back home for a

1       little while trying to find my own place.

2                 And when I finally did find a place -- I  
3       actually got the money from Kendall because I found  
4       a place, but then I had to back out of that place.

5                 I didn't actually find a place until  
6       October. I was actually supposed to move in the  
7       1st of November, but because of the situation and I  
8       needed to get out of that house, they allowed me to  
9       move in, I think, a week early.

10      Q.            Okay. I want to back up. The loan  
11       agreement, how did you come up with the \$4,000?

12      A.            That was just approximately the price  
13       range of the houses that I was looking in.

14      Q.            So when that number came up, you didn't  
15       have a specific house, you didn't know the --

16      A.            No. No.

17      Q.            You didn't know exactly what --

18      A.            No, not at all.

19      Q.            And you came up with that estimation?

20      A.            Yes.

21      Q.            And were there any other discussions  
22       with --

23      A.            We actually had that discussion a few  
24       times. And she just kept -- she actually even had

1       that discussion -- I'm like -- Kendall has a big  
2       mouth. And I later -- my assumption was that we  
3       were the only ones that knew about this agreement  
4       and me accepting a loan from her. But apparently  
5       she had already called my girlfriend in California  
6       and said, oh, yeah, you know Celena is my girl. I  
7       had to loan her some money. She said Kendall never  
8       told her how much money it was, but she did tell  
9       her that she loaned me the money.

10      Q.       It sounds like these conversations started  
11     when you were living with Ms. Stephens?

12      A.       Yes.

13      Q.       Did they continue after -- regarding the  
14     loan and the money --

15      A.       Oh, yeah.

16      Q.       -- they continued after you left?

17      A.       Yeah. Yeah. It was clear that -- because  
18     we talked about Avery drawing up the loan  
19     agreement.

20           One thing I do want to say is the document  
21     that you shared with me continuously stated that I  
22     requested money from Kendall Stephens. And that is  
23     not the case.

24           I never would have requested that amount

1 of money from Kendall, because I never -- Kendall  
2 has always been on the system. She's always  
3 utilized all the programs, all the resources in the  
4 community. I would have never thought that Kendall  
5 had \$4,000 to loan me until she showed me that  
6 \$200,000 cash that she had hidden in her closet.  
7 So there was no reason for me to ever even request  
8 that amount of money from her, because Kendall  
9 doesn't have a job. I would have never thought she  
10 had that amount of money.

11 So you keep saying that I requested it,  
12 and I want to clarify that that is not the case.  
13 She --

14 Q. So let's clarify that. So you became  
15 aware that -- Ms. Stephens made you aware that she  
16 had this large sum of money?

17 A. Yes.

18 Q. You did independent research about how  
19 much you thought you needed a down payment for?

20 A. Yes, because she said how much do you  
21 need, and I said I'll let you know. And I went to  
22 the back room. I knew about how much I could  
23 afford to pay for rent and multiply it by three.

24 Q. Ms. Stephens obviously knew you were in a

1 bad situation --

2 A. Yes.

3 Q. -- correct?

4 A. Because we talked about -- yes, she knew  
5 exactly my situation, because we were friends. We  
6 talked about my situation all the time.

7 Q. Talked about your situation. She knew  
8 about your job. She knew about all the  
9 responsibilities you had and all the ways you were  
10 involved in the community; correct?

11 A. She knew my -- she knew about my -- well,  
12 I can't really talk about what she knew about my  
13 job duties. But she knows -- the entire community  
14 knows about this office. The Office of LGBT  
15 Affairs is one of the most commonly known Mayor  
16 offices of them all. No one gets contacted as much  
17 as our office does. No one is -- no Mayor's office  
18 is as visible other than the Office of I think  
19 Public Engagement, and that's questionable.

20 Q. So then you did all the independent  
21 research about exactly how much you needed. And  
22 then you asked for that amount?

23 A. Well, she asked me how much did I need,  
24 and I simply multiplied. It wasn't research. It

1 was math. I thought about how much I could afford,  
2 and I multiplied it by three, and just told her  
3 that.

4 Q. Okay. And you came up with that \$4,000  
5 and you asked for that \$4,000?

6 A. Yes.

7 Q. You would agree you asked for that  
8 specific amount?

9 A. No, I didn't ask for it. I told her what  
10 it would take for me to get a new place. She asked  
11 me how much would it take for me to move into a  
12 place, and I told her \$4,000, that's what I'm  
13 saying.

14 Q. And then why was this done as a loan  
15 instead of any other process?

16 A. Because I told her that I was going to pay  
17 her back.

18 Q. Okay. And so you wanted to memorialize  
19 that, put it in writing?

20 A. Yes.

21 Q. And that's this document that we see  
22 executed here?

23 A. Uh-huh.

24 Q. And you agree that, in fact, you did get

1 the \$4,000?

2 A. Uh-huh.

3 MS. CURLEY: And that's  
4 reflected -- and this is marked as Board  
5 Exhibit-14. I'm asking that to be  
6 remarked.

7 BY MS. CURLEY:

8 Q. That's the check you received?

9 A. Yes.

10 Q. I think I have a copy of the purchaser's  
11 copy.

12 And just to clarify, [REDACTED] Morrison is  
13 your legal name, but not the name you go by; is  
14 that correct?

15 A. Why --

16 Q. Because it says "pay to the order of," and  
17 I just want to clarify.

18 A. Well, that's the check. Yes, that's the  
19 check out to me.

20 Q. And you received that check?

21 A. I just said that.

22 Q. And then subsequently cashed it is my  
23 follow up?

24 A. Yes.

1 Q. All right. And then last exhibit is Board  
2 Exhibit -- is marked as Board of Ethics Exhibit-15.  
3 This is the \$4,000 check. Do you recognize this  
4 document?

5 A. Yes.

6 Q. This is the document you returned -- you  
7 brought to our office?

8 A. Uh-huh.

9 Q. And it's dated April 22, 2021.

10 And why did you bring this document to our  
11 office?

12 A. To deliver it to Ms. Stephens.

13 Q. And that was to repay the loan  
14 agreement --

15 A. Uh-huh.

16 Q. -- correct?

17 A. Yes.

18 MS. CURLEY: I don't have any  
19 other questions at this time.

20 THE WITNESS: Okay.

21 (At this time, documents were  
22 marked for identification as BOE-1 through  
23 BOE-15.)

24 (Witness was excused.)

(Deposition concluded at 11:25

CELENA MORRISON

1

C E R T I F I C A T I O N

2

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3

4                 I hereby certify that the proceedings  
5                 and evidence noted are contained fully and  
6                 accurately in the notes taken by me on the  
7                 deposition of the above matter, and that  
8                 this is a correct transcript of the same.

9

10

11

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12                 Kathleen M. Rigby,  
13                 Court Reporter

14                 - - -

15

16

17                 (The foregoing certification of this  
18                 transcript does not apply to any  
19                 reproduction of the same by any means,  
20                 unless under the direct control and/or  
21                 supervision of the certifying reporter.)

22

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	<b>Y</b> <b>yeah</b> 8:3,7 23:1 24:23 28:4 34:22 35:3,11 36:10 42:21 47:7,11 50:6,15,17,17 <b>year</b> 4:15 31:22,22 <b>years</b> 7:20 <b>yell</b> 20:1 <b>yelling</b> 20:19 22:1,13 25:5 <b>young</b> 37:24 38:19	<b>4</b> <b>4</b> 3:4 <b>4,000</b> 45:20,24 49:11 51:5 53:4,5,12 54:1 55:3 <b>4.15</b> 23:12 29:5
	<b>Z</b> <b>zoom</b> 1:10 2:5	<b>5</b> <b>55</b> 3:8,8,9,9,10,10,11,11,12 3:12,13,13,14,14,15 <b>564-1233</b> 1:23
	<b>0</b>	

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8/10/20 3:8

8/11/20 3:8

8/12/20 3:9

8/19/20 3:9

8/24/20 3:10

8/28/20 3:11

9

9/2/20 3:12,12,13

9/3/20 3:13

# Exhibit B

## CHAPTER 20

### OFFICE OF LGBT AFFAIRS 123

---

#### Notes

123 Added by approval of the voters at the election held on November 3, 2015, and certified on November 23, 2015. See Bill No. [150216](#) (approved June 2, 2015); Resolution No. [150225](#) (adopted May 14, 2015). See Charter subsection [A-200\(13\)](#) for effective date. Enrolled resolution numbered this as Chapter 18; renumbered by Code editor.

#### § 4-2000. Creation. 124

The Office of Lesbian, Gay, Bisexual and Transgender (LGBT) Affairs is hereby created in the Office of the Mayor, headed by the Director of LGBT Affairs.

---

#### Notes

124 Enrolled resolution numbered this as Section 4-1800; renumbered by Code editor.

#### § 4-2001. Powers and Duties. 125

The Office of LGBT Affairs shall have the power and its duty shall be to perform the following functions:

- (a) Develop proposed City policy regarding civil rights issues affecting LGBT people;
  - (b) Coordinate the implementation of policies and programs to meet the City's diversity and equality goals as expressed in this Charter, ordinances and Executive Orders;
  - (c) Coordinate among City Departments, agencies and offices to improve LGBT access to City services, and to promote equality and safety for LGBT people;
  - (d) Support the growth and development of the City's LGBT communities; and
  - (e) Serve as liaison between the City's and region's LGBT communities and the City.
- 

---

#### Notes

125 Enrolled resolution numbered this as Section 4-1801; renumbered by Code editor.

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# Exhibit C

**Caroline Curley**

---

**From:** kendall stephens [REDACTED]  
**Sent:** Monday, August 10, 2020 7:49 PM  
**To:** Adrian Lowe  
**Cc:** Celena Morrison  
**Subject:** Re: [heartsonawire] submissions

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---

Hello friends,

I spoke to Celena Morrison, who is the Director of LGBTQ Affairs with the Mayor's Office regarding a meeting with Hearts on a Wire concerning our incarcerated sisters, brothers, and others. She is excited to participate in a virtual meeting with her team and Hearts on a Wire ASAP, as such a meeting is already on her docket. Our meetings run from 530 to about 730 on Monday evenings, so hopefully the Mayor's Office can accommodate that timeframe, though we can be flexible if need be. Celena has been in communication with Kelly Burkhardt, who she considers an ally and a friend to build strong support in our cause. Let us continue this important dialogue and make this meeting happen very soon. Thank you!

Best,

Kendall Stephens

On Aug 10, 2020 at 4:21 PM, Adrian Lowe [REDACTED] wrote:

Hearts on a Wire:

I am new to transition and seeking advice and support. My relationship was separated by the facility. Now we're so far apart and I am breaking up emotionally and mentally. BJL I love you to the moon and back. I miss you dearly and you'll never lose me.

Yours,

~ Alexandria Fierro Rosealita

---

Hello.

We spent a week locked down fully when the protests started. I worry about a backlash. And I worry about people losing sight of holding police accountable. People get distracted by the Dukes of Hazzard, Gone with the Wind, or who doesn't become vocal or uses the wrong word or phrase. I believe in the right to protest and speak out, even if I disagree with what is being said. I am happy that people stand up to the jackbooted thugs, but hope they don't lose focus. The Police need to change, the Laws, the Court, Sentencing. So let's stay safe and focused and together.

~ Viktoria Petersburg

---

HOAW:

Each and every contributor inspires me, lifts my spirits and puts smiles upon my face! The system is finally changing here in Kentucky and I am proud of everyone's unity. HRT is now accessible, cosmetics and gender-appropriate clothes, and surgery requests are available! We fought for so long!

Never accept "NO" from our flawed system! Let George Floyd's soul shine down and pave the way for equality and an end to our corrupt system!

xoxo

Princess <3

Robert Baldwin [REDACTED]  
[REDACTED]

---

Brothers and Sisters of the HOAW family:

I have finally started my hormones! After a year long battle, and it feels amazing! People I never would have thought would accept, understand, and even care, have shown otherwise. Though the struggle with my mental health has continued to be constant, it has become easier to handle. *Jayme Elliott Patton*: I hope you are able to succeed in your battles with ADCRR soon. *Harley Quinn*: You're definitely not alone. BDP is cruel, but there are people here for you. I have BPD as well, so I get it. Keep your head up. *DeDe*: I'm sorry to hear all you're going through. Your words had an impact on me truly, about looking in the mirror and facing our fears. I hope you stay well, and remember that you're not alone. I continue to hope and pray that everyone stays safe with all the injustice and craziness amongst the COVID>

Until next time.

~ Jace C. Bonham

---

Waiting or the Breakdown

Fighting to keep up my head

never seemed this hard before

Everything around me

wants only to settle the score

This way and that way

the tattered emotions pull

Another day yet again

behind the fake mask is dull

All the growth i've done

Seems to start to fall apart

Since yet again I rely on this

Mask over myself just to get a start

My skin starts to crawl

when it begins to grow silent now

the voices in my head stop

Until I start to show them how

How now I can thrive

Instead of giving in once more

My proof now that i can

Be my true self down to my core

by Jace C. Bonham

*written on the anniversary of a friend's suicide. Rest in Peace, my sweet Sadie.*

---

--  
You received this message because you are subscribed to the Google Groups "hearts on a wire" group.

To unsubscribe from this group and stop receiving emails from it, send an email to

[heartsonawire+unsubscribe@googlegroups.com](mailto:heartsonawire+unsubscribe@googlegroups.com).

To view this discussion on the web visit

[https://groups.google.com/d/msgid/heartsonawire/CAPL9CU%3DUmk2H1O4ZfM%2Bq3yLPmH2cktLGRmt\\_ir0L9m31NNE1JA%40mail.gmail.com](https://groups.google.com/d/msgid/heartsonawire/CAPL9CU%3DUmk2H1O4ZfM%2Bq3yLPmH2cktLGRmt_ir0L9m31NNE1JA%40mail.gmail.com).

# Exhibit D

**Caroline Curley**

---

**From:** Celena Morrison  
**Sent:** Wednesday, August 19, 2020 12:08 AM  
**To:** Naiymah Sanchez;Kelly Burkhardt;kstephens [REDACTED]  
**Cc:** Sayeeda Rashid;Erik Larson;Adrian Lowe;Naiymah Sanchez  
**Subject:** Re: Hearts on a Wire: Making Connections

I have some availability on Friday, August 28 after 1pm.

**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
*Pronouns: she/her/hers*



---

**From:** Naiymah Sanchez [REDACTED]  
**Sent:** Tuesday, August 18, 2020 10:47 AM  
**To:** Kelly Burkhardt [REDACTED]  
**Cc:** kstephens [REDACTED]; Adrian Lowe [REDACTED]; Naiymah Sanchez <[nsanchez@aclupa.org](mailto:nsanchez@aclupa.org)>; Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** Re: Hearts on a Wire: Making Connections

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---

Good morning All,

Thanks for your reply Kelly, I am Able to jump on a call whenever. Please send me over the details when available.

Talk soon,

**Naiymah A. Sanchez (she/her)**  
Community Activist

***"Our lives begin to end the day we become silent about things that matter."***  
**-Dr. Martin Luther King jr.**

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On Aug 18, 2020, at 9:54 AM, Kelly Burkhardt [REDACTED] wrote:

Hi everyone,

Please forgive my delayed reply from being on vacation last week. I believe there are a lot of opportunities to do work with the DOC because Amber and the Office of LGBTQ Affairs did some work regarding the wellness and safety of trans folks who are incarcerated. I am wondering if Sayeeda or Erik have any information surrounding this initiative because they were interning with Amber on some of these initiatives. It's best to not reinvent the wheel; rather, identify what was working or not and then create a plan from there.

Let's set up a call next week to start the process. The only day/times I am not available is Monday after 1pm and all day Tuesday.

Thank you and looking forward to speaking with you all!

Kelly

Kelly A. Burkhardt

[REDACTED]  
[REDACTED]

Follow: @kabukhardt

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On Thu, Aug 13, 2020 at 11:20 AM Naiymah Sanchez [REDACTED] wrote:

Good morning Kendall,

Thank you for your email and I hope you are doing well during these trying times.

As I expressed on our call, I would like to contribute in any capacity towards not just making prisons safer but reducing the numbers of those impacted by the criminal justice system as a whole. It is factual that there are race, ethnicity, and gender disparities within ALL channels of the Criminal justice system starting with law enforcement and ending with incarceration/ Monitoring. I would like to join this upcoming meeting at Hearts on the Wire to hear Kelly Burkhardt's presentation to see where I would be needed in this process. I have only one follow up question regarding data on incarcerated LGBT people, Is the Department of Correction collecting this information and if so, how?

Talk soon,

**Naiymah A. Sanchez (she/her)  
Community Activist**

*“Our lives begin to end the day we become silent about things that matter.”*  
*-Dr. Martin Luther King jr.*

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On Wed, Aug 12, 2020 at 1:49 PM [kstephens](#) [REDACTED] wrote:

Hello,

I am writing the response letter now. I spoke with Kelly Burkhardt and she would like to speak with Hearts on a Wire either this upcoming Monday or the next in regard to how she can assist our needs. She has some great ideas surrounding prison reform and establishing accountability structures in correctional facilities for the LGBTQ community. I also had a meeting with Celena and Naiymah and they are also interested in being involved in any capacity we feel they would be best utilized. At some point, I hope we can all get together and coordinate our efforts to end the oppressive tactics inherent in jail culture and provide LGBTQ services to the incarcerated community, as well as comprehensive trainings for correctional officers and staff. Also, I am working with Kelly to retrieve data from the

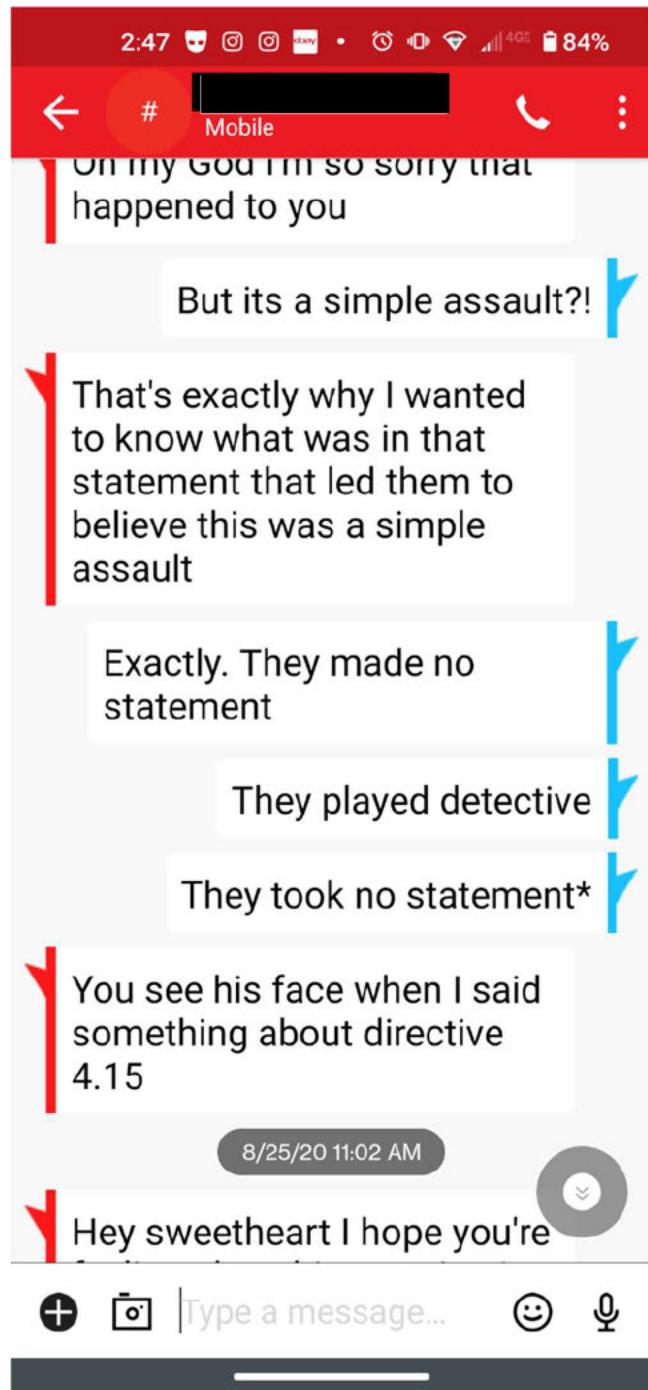
DOC on the total number of LGBTQ people (especially trans and nonbinary identified individuals) that have been and are currently incarcerated. Please let me know how else I can be of assistance.

Best,

Kendall Stephens

On Aug 11, 2020 at 10:19 AM, Adrian Lowe [REDACTED] wrote:

# Exhibit E



# Exhibit F

Friday, May 28, 2021

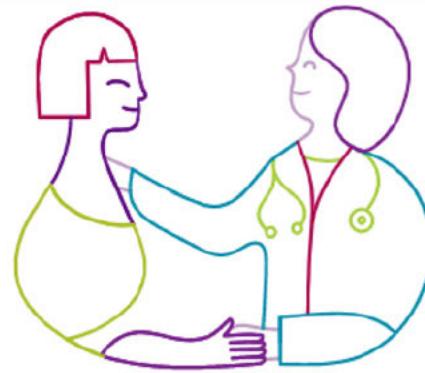
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News 

# Transgender woman says she was beaten in her Point Breeze home and called slurs

Kendall Stephens says what happened to her was a hate crime. While Philadelphia recognizes attacks on LGBTQ people as hate crimes, the state of Pennsylvania does not.



ADVERTISEMENT

Kendall Stephens stands near her Point Breeze home on Wednesday. Stephens, a transgender woman, said she was beaten inside her home Monday night by a group of women a ... [Read more](#)  
JOSE F. MORENO / Staff Photographer



by Julie Shaw

Published Aug 26, 2020

On Monday night, Kendall Stephens opened the door of her Point Breeze home after hearing a ruckus outside and saw about 25 people standing around watching as a man and woman fought, she said.

She told the crowd she was going to call the police and one woman cursed at her, then “just charges at me and just starts swinging at me with closed fists,” Stephens, a transgender woman, recalled Wednesday.

“She pushed her way into my home, then men and women started coming in, beating me,” said Stephens, 34.

“During this assault, they were screaming transphobic slurs to me,” she said of the group of about nine people who burst into her home. “They were calling me a [expletive] ‘tranny.’”



• • •

Courtesy Kendall Stephens

Ring doorbell video shows the moment Kendall Stephens says she was beaten inside of her home by a group of people who also called her transphobic slurs.

“This is a hate crime,” said Stephens. “For someone to come into your home and hurl transphobic slurs, that shows hateful intent.”

One of the women in the attack, which started about 10:15 p.m. picked up a square wooden planter in Stephens’ home and beat her in the head and face with it, Stephens said. Some women also pulled some of her hair out, she said.

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As she was being beaten, her two goddaughters, 12 and 16, looked on in horror, she recalled. Stephens said she was able to escape into her basement and lock the door. Seconds later, she said, one of her goddaughters told her the group had left.

Officer Miguel Torres, a Philadelphia police spokesperson, said Wednesday that detectives with the South Detective Division are investigating the reported assault.

Deja Lynn Alvarez, an advocate in the transgender community who serves as a liaison to the police, said Wednesday that the attack on Stephens underscores the lack of protection for LGBTQ people in Pennsylvania's hate-crime law.

In 2014, Philadelphia passed legislation that recognizes attacks based on gender identity or sexual orientation as hate crimes. That allows a crime targeting LGBTQ people in Philadelphia to be charged as a summary offense, said Jane Roh, spokesperson for Philadelphia District Attorney Larry Krasner.

Krasner supports expanding hate-crimes protection to LGBTQ people in state law, and urges the Pennsylvania legislature to do so, said Roh.

In Pennsylvania, a person can be charged with **ethnic intimidation** if an offense was committed with malicious intention toward a person based on race, color, religion, or national origin.

Stephens, a Temple University student who transferred from the Community College of Philadelphia, said after the assailants left her house, she went to her front door and saw the first woman who had punched her get into the back of a car. "We're coming back to finish the job," Stephens said the woman told her before the car left.

Meanwhile, she said the woman who had hit her with a wooden planter was standing outside a home about five doors down from hers "laughing" after the attack.

She was treated at Jefferson Health's Methodist Hospital for various injuries — including a broken nose, cuts to her gums, mouth, and lips, and facial swelling.

She said she and her goddaughters feel traumatized.

"I don't understand why this would happen to me," she said. "This is very frightening."

Published Aug. 26, 2020



**Julie Shaw** [✉](#) [Twitter](#)

I cover crime and courts, with a focus on Philadelphia and South Jersey.

---

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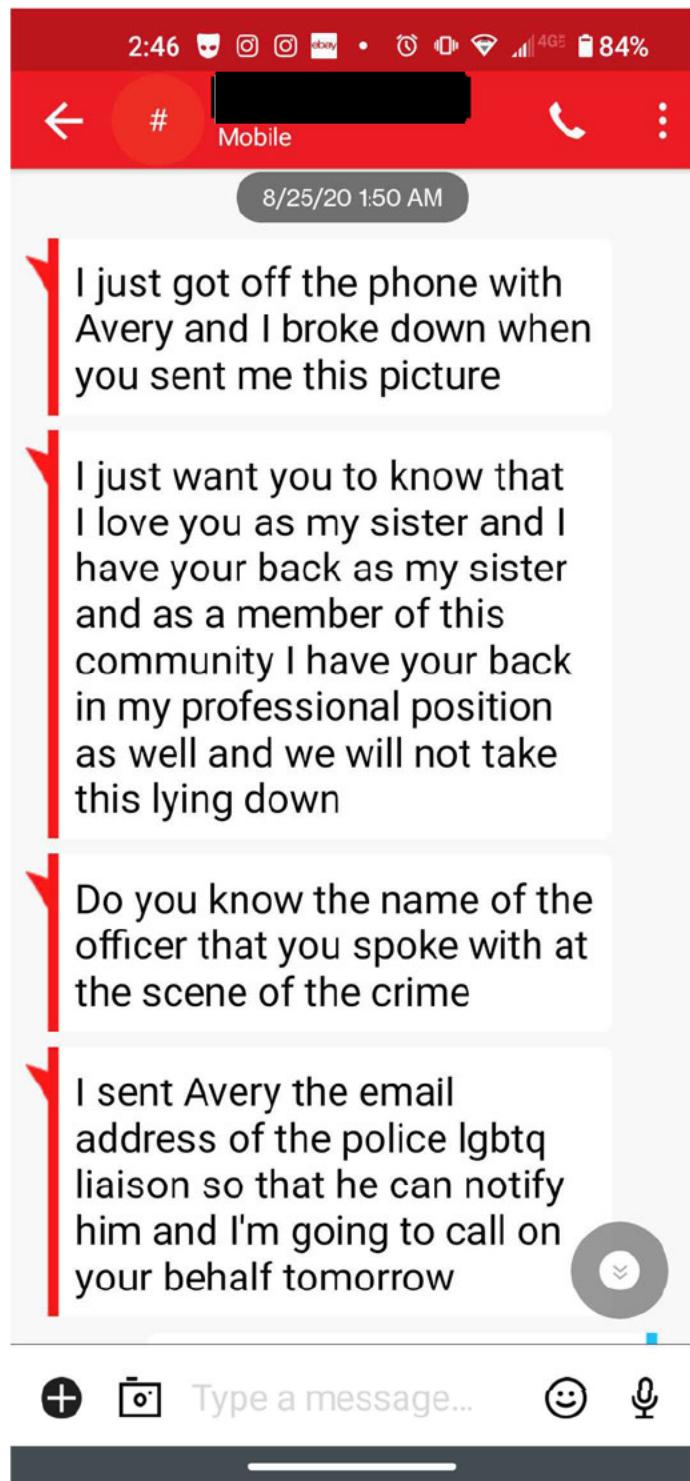
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# Exhibit G



# Exhibit H

**Caroline Curley**

---

**From:** Robin Wimberly  
**Sent:** Wednesday, September 2, 2020 11:46 AM  
**To:** Celena Morrison  
**Subject:** Kendall

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Good morning,

I am reaching out to you concerning the incident that occurred at the 17<sup>th</sup> District with Kendall. I want to ensure Kendall understands the Complaint Against Police process is available. Please call me on my cell at 215-823-9551.

Thank you,

Deputy Commissioner Robin M. Wimberly

Office of Professional Responsibility

Philadelphia Police Department

Police Headquarters-Room 310A

750 Race Street

Philadelphia, PA. 19106

Phone: 215-686-1277

Fax: 215-925-0738

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**Caroline Curley**

---

**From:** Robin Wimberly  
**Sent:** Tuesday, September 15, 2020 2:08 PM  
**To:** Celena Morrison  
**Subject:** RE: Kendall

Hi,

I just spoke with Kendall and walked her thru the process. Again thank you for your help.

RMW

---

**From:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Sent:** Thursday, September 10, 2020 11:15 PM  
**To:** Robin Wimberly <[Robin.Wimberly@phila.gov](mailto:Robin.Wimberly@phila.gov)>  
**Subject:** Re: Kendall

Hello ,

Thank you so much for following up. I spoke with Kendall and she does want to move forward with filing a Complaint Against Police.

She asked me to share her contact info with you. Her cell number is [REDACTED]

Let me know if there is anything else that I can do.

Warm regards,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
*Pronouns: she/her/hers*



---

**From:** Robin Wimberly <[Robin.Wimberly@phila.gov](mailto:Robin.Wimberly@phila.gov)>  
**Sent:** Wednesday, September 9, 2020 3:01 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** Kendall

Good afternoon,

Circling back, has Kendall changed her mind regarding filing a Complaint Against Police? Please let me know if I can be of service any manner.

Thanks,

Deputy Commissioner Robin M. Wimberly  
Office of Professional Responsibility  
Philadelphia Police Department  
Police Headquarters-Room 310A  
750 Race Street  
Philadelphia, PA. 19106  
Phone: 215-686-1277  
Fax: 215-925-0738

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# Exhibit I

**Caroline Curley**

---

**From:** Adam Geer [REDACTED]  
**Sent:** Wednesday, September 2, 2020 12:28 PM  
**To:** Celena Morrison  
**Cc:** Sayeeda Rashid; Erik Larson  
**Subject:** Re: Kendall Stephens Matter

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Thanks very much. I am aware of this info and I forwarded it to the assigned detective yesterday. I will keep updated and please continue to reach out to me with any new information.

Also, let me know if you and your team have a few dates to offer for that training!

Thanks!  
Adam

Adam N. Geer

On Sep 2, 2020, at 12:15 PM, Celena Morrison <Celena.Morrison@phila.gov> wrote:

Hello Adam,

I wanted to share some information that I was able to get. See the attached screenshots of the woman that was Kendall's main attacker. I am also including a link to an interview that she recently did with a local Instagram blogger. That video can be seen [here](#).

Let me know if you need any further information.

Thank you,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
*Pronouns: she/her/hers*



---

**From:** Adam Geer [REDACTED]  
**Sent:** Friday, August 28, 2020 2:37 PM

**Caroline Curley**

---

**From:** Adam Geer [REDACTED]  
**Sent:** Friday, August 28, 2020 2:37 PM  
**To:** Celena Morrison  
**Cc:** Sayeeda Rashid;Erik Larson;Adam Geer  
**Subject:** Re: Kendall Stephens Matter

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---

Yes. Just call.

Adam N. Geer

On Aug 28, 2020, at 2:27 PM, Celena Morrison <Celena.Morrison@phila.gov> wrote:

Hello Adam,

I have some availability at 3pm. Will that work?

Sent via the Samsung Galaxy Note10, an AT&T 5G Evolution capable smartphone  
Get [Outlook for Android](#)

---

**From:** Adam Geer <Adam.Geer@Phila.gov>  
**Sent:** Friday, August 28, 2020 2:25:28 PM  
**To:** Celena Morrison <Celena.Morrison@Phila.gov>; Sayeeda Rashid <Sayeeda.Rashid@Phila.gov>; Erik Larson <Erik.Larson@Phila.gov>  
**Subject:** Kendall Stephens Matter

Good afternoon Ms. Morrison,

I hope you are well. When you get a minute, can you call my cell so I can discuss the Kendall Stephens matter with you?

Thanks,  
Adam  
518-339-0100

**Adam N. Geer**  
Director of Diversity & Inclusion  
Assistant District Attorney  
Homicide Unit  
Philadelphia District Attorney's Office  
3 South Penn Square  
Philadelphia, PA 19107  
c: 518-339-0100

# Exhibit J

**Caroline Curley**

---

**From:** Mary Groce [REDACTED]  
**Sent:** Thursday, September 3, 2020 3:54 PM  
**To:** Celena Morrison  
**Cc:** Susan A  
**Subject:** Re: September JCAA Newsletter

**External Email Notice.** This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

---

Thank you, Celena.

You take care and stay safe too—and yes, we're looking forward to those better days!!

Mary & Suz

On Sep 2, 2020, at 11:13 PM, Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)> wrote:

Hello There Dear,

I hope that you are well and staying safe. Thank you again for sharing the Newsletter and the write up on Kendall was great. She is an amazing person and I would jump out of bed a thousand times to support her, you or any of the folks in this community. No one deserves to be treated so unfairly.

I have been working hard with the Police Commissioners and the District Attorneys Office to get all of this taken care of.

Take care and stay safe, better days are yet to come!

Warm regards,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
*Pronouns: she/her/hers*



**From:** Mary Groce [REDACTED]  
**Sent:** Wednesday, September 2, 2020 5:05 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** September JCAA Newsletter

**External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.**

Hi Celena,

How are you doing? I understand you were there to help Kendall after she was attacked. Thank you for the work you do!

I mentioned you in this latest newsletter (front page article).

Sending hugs,

Mary

Mary Groce  
[REDACTED]  
[MaryGroce.com](http://MaryGroce.com)  
[EmoryConradMalick.com](http://EmoryConradMalick.com)  
[REDACTED]  
GroceM@si.edu

# Exhibit K

[Search](#)[How it works](#)[Start a GoFundMe](#)[Sign in](#)[Share](#)[Donate](#)

# Support to End Violence Toward Black Transwomen



Kendall Stephens is organizing this fundraiser.

Transgender woman brutally beaten b



I am a black transwoman living below the poverty line who was recently brutally attacked inside of my own home. I was attacked by about 8 people who pushed themselves into my home and violently attacked me with wooden blocks, closed fists and their feet. Adding insult to injury, they stole my ring camera, which has now left me vulnerable to future

**\$36,173** raised of  
\$35,000 goal

**1K** donors   **1.9K** shares   **1.1K** followers

[Share](#)[Donate now](#)

Alexa Brady  
**\$25** • 2 mos



Annie Alfstad  
**\$20** • 3 mos



James Curry  
**\$25** • 6 mos

[See all](#)[See top donations](#)

attacks without a way to record any further transgressions. I am proud that I have thrived both personally and academically despite my circumstances, however (like most transwomen everywhere) danger always lurks around every corner of our lives. I want 50 % of the proceeds to go the William Way LGBTQ Center, a safe social community space for people to safely and confidently explore their identities in an affirming environment. William Way also connects vulnerable at-risk individuals with life-saving and life-sustaining resources. You may also donate to them directly as well. They just opened a Trans Resource Center and would like a significant portion to go toward resources dedicated to that space. I have serious damage to my face and right ribs, and needless to say I am very traumatized by the entire ordeal. Sadly, two children witnessed the ordeal are also traumatized by the ordeal. Currently, I am navigating my convalescence one day at a time. I am currently a student at Temple University and hope that I am not forced to drop out as a result of my injuries. I appreciate you so much. Each and every one of you!

Best, Kendall S.

How funds will be used: Half of the money will go to the operational costs associated with William Ways LGBT Community Center's trans Resource center and board member dues associated with my volunteering there. They do tremendous work within the LGBTQ community and have helped me and countless others, throughout my journey of self-discovery. The other half will go to establishing and updating security in my house, moving/relocation expenses, and medical, travel-related, and other miscellaneous expenses associated with my road to recovery. The plan: Though the funds will be sent directly to me, I will send 50% of the donations to

William Way in the form of a certified check.

Director of William Way, Chris Bartlett, is aware of my intention to donate half of all donation proceedings.

## Updates (4)

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**NOVEMBER 24, 2020** by Kendall Stephens, Organizer

Thank you for your donations. A donation is being made to the William Way LGBTQ Community Center - Trans Resource Center.

[See older updates](#)

**Donate**

**Share**

## Organizer

---



Kendall Stephens  
Organizer  
Philadelphia, PA

**Contact**

## Comments (33)

---



Chris Bell donated **\$10**

I wanted to support Kendall.

8 mos



Lars Stephenson donated **\$50**

You are beautiful. Thank you for your  
braveness. I wish you health and roses.

# Exhibit L

Loan Agreement

Date: 9/23/2020

Loan Amount: Four Thousand Dollars and Zero Cents

For the above value received by Celena Morrison (The Borrower), agrees to pay Kendall Stephens (The Lender).

It is agreed between the parties that payment of the loan amount will be made in monthly

payments over a 12 month period. The first payment will be due on 10/23/20 in the amount of \$150.00 and subsequent payments will be in the amount of \$350 paid on the 23<sup>rd</sup> day of each month ending on 10/23/21.

Borrower Signature: Celena Morrison

Date: 9/23/2020

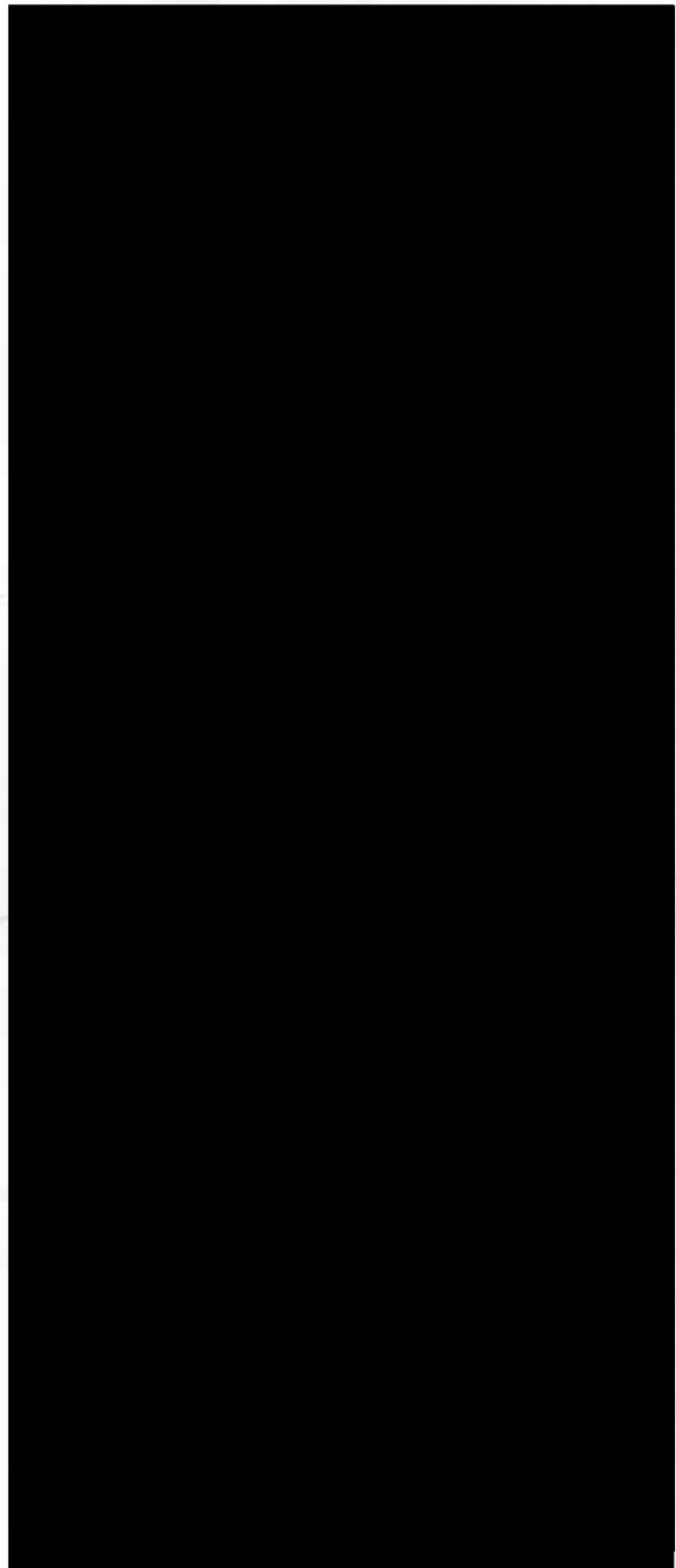
Lender Signature: Kendall Stephens

Date: 9/23/2020

# **Exhibit M**



# Exhibit N



# Exhibit O

CITY OF PHILADELPHIA  
**STATEMENT OF  
 FINANCIAL INTERESTS**

PHILADELPHIA BOARD OF ETHICS  
 DEPARTMENT OF RECORDS  
 ROOM 156, CITY HALL  
 PHILADELPHIA, PA 19107

All Statements of Financial Interests shall  
 be made available for public inspection  
 and copying during regular office hours.

AMENDED  
 STATEMENT

**INSTRUCTIONS:** Complete the entire form. Type or print in ink. Clearly enter your name in the space provided.  
 Attach the additional 8-1/2" x 11" sheets if necessary, identifying each item by number.  
 This form may be completed on line at <https://financial-disclosure.phila.gov>

1. LAST NAME	FIRST NAME	MI	SUFFIX
Morrison	Celena		
2. STREET ADDRESS	CITY	STATE	ZIP CODE
CITY DEPARTMENT / AGENCY / COMMISSION / BOARD Mayors Office		3. TELEPHONE NUMBER	
4. NAME OF PUBLIC POSITION OR PUBLIC OFFICE YOU HOLD/HELD Executive Director (Currently Holding)	5. OCCUPATION OR PROFESSION		
<b>REMEMBER:</b> Items 6 THROUGH 12 - All information concerns the PRIOR CALENDAR YEAR. NO DOLLAR AMOUNTS are required except in Item 9. If answer is NONE, check the box where indicated. Information must be included for the filer only and not family members.			
6. REAL ESTATE INTERESTS: List any direct or indirect interest in any real estate as described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
ADDRESS	NATURE OF INTEREST		
7. CREDITORS: List each loan or debt over \$5,000 and the interest rate thereon as described in the attached Instructions. If none, check: <input checked="" type="checkbox"/>			
CREDITOR	ADDRESS	INTEREST RATE	
8. DIRECT OR INDIRECT SOURCES OF INCOME: List all sources of \$500 or more in the aggregate as described in the attached Instructions. If City is a source, list City. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF INCOME	ADDRESS		
<hr/> <hr/> <hr/>			
9. GIFTS: List sources of gifts with an aggregate value of \$200 or more as described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF GIFT	ADDRESS		
VALUE OF GIFT	CIRCUMSTANCES OF GIFT		
10. HONORARIA: List sources over \$100 described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF HONORARIUM	ADDRESS OF SOURCE		
11. OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS ENTITY. If none, check: <input checked="" type="checkbox"/>			
BUSINESS	POSITION HELD		
12. FINANCIAL INTEREST IN ANY BUSINESS ORGANIZED FOR PROFIT: (See attached Instructions.) If none, check: <input checked="" type="checkbox"/>			
<b>THIS FORM MUST BE SIGNED AND DATED IN ORDER TO BE ACCEPTED.</b>			
Information represents disclosure for the prior calendar year <u>2020</u> . False statements made herein are punishable as authorized by Section 20-612 of the Philadelphia Code and are subject to the penalties prescribed for perjury set forth in 18 Pa. C.S. § 4904.			
Signature <u>COMPLETED AND SIGNED ELECTRONICALLY</u> Date <u>05/18/2021</u>			

Celena

Morrison

---

Positions continuation

Public Position: member

Affiliation Status: Held in Past

Governmental Entity: Comm Human Relations

Profession:

Address:

# Exhibit P

STATEMENT OF FINANCIAL INTERESTS  
PLEASE PRINT NEATLY

01	LAST NAME	M o r r i s o n	FIRST NAME	C e l e n a	MI	SUFFIX
----	-----------	-----------------	------------	-------------	----	--------

02	ADDRESS office (business or governmental) or home	City	State	Zip Code	Area Code ( )	Phone
----	---	------	-------	----------	---------------	-------

NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBERS.

03	<b>STATUS</b>	Check applicable block or blocks, more than one block may be marked. (See instructions on page 2)				<input type="checkbox"/> Check this block if you are amending an original filing
A	<input type="checkbox"/> Candidate (including write-in)	<input type="checkbox"/> C Public Official (Current)	<input checked="" type="checkbox"/> D Public Employee (Current)	<input type="checkbox"/> E Check this block if you are filing as a solicitor		
B	<input type="checkbox"/> Nominee	<input type="checkbox"/> C Public Official (Former)	<input type="checkbox"/> D Public Employee (Former)			

04	PUBLIC POSITION OR PUBLIC OFFICE (administrator, member, Commissioner, job title, etc.)	<input type="checkbox"/> seeking	<input checked="" type="checkbox"/> hold	<input type="checkbox"/> held
A	E x e c u t i v e D i r e c t o r	<input type="checkbox"/> seeking	<input type="checkbox"/> hold	<input checked="" type="checkbox"/> held

B	m e m b e r	<input type="checkbox"/> seeking	<input type="checkbox"/> hold	<input checked="" type="checkbox"/> held
---	-------------	----------------------------------	-------------------------------	--

05 GOVERNMENTAL ENTITY in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept, agency, authority, borough, board, commission, county, school district, twp, etc.)

A	M a y o r s O f f i c e
---	-------------------------

B	C o m m H u m a n R e l a t i o n s
---	-------------------------------------

06	OCCUPATION OR PROFESSION (This may be the same as block 4)	07	YEAR SEE INSTRUCTIONS. Information in Blocks 8 -15 represents disclosure for the calendar year listed here:	2 0 2 0
----	--	----	--	---------

08 REAL ESTATE INTERESTS (See instructions on page 2) If NONE, check this box. 

09	CREDITORS (See instructions on page 2). Creditor (Name and Address)	If NONE, check this box. <input checked="" type="checkbox"/>	Interest Rate
	Name: _____	Address: _____	

10	DIRECT OR INDIRECT SOURCES OF INCOME including (but not limited to) all employment. (See instructions on pg. 2)	ONLY IF NONE, check this block. <input checked="" type="checkbox"/>	(OFFICIAL USE ONLY)
	Name: _____	Address: _____	

11	GIFTS (See instructions on page 2) If NONE, check this box. <input checked="" type="checkbox"/>	Value of Gift
	Source of Gift	_____ . _____
	Address of Source of Gift	Circumstances (including description) of Gift

12	TRANSPORTATION, LODGING, HOSPITALITY (See instructions on page 2) If NONE, check this box. <input checked="" type="checkbox"/>	Value
	Source (Name and Address)	_____ . _____

13	OFFICE, DIRECTORSHIP, OR EMPLOYMENT IN ANY BUSINESS (See instructions on page 2) If NONE, check this box. <input checked="" type="checkbox"/>	Position Held (i.e., officer, director, employee, etc.)
	Business Entity (Name and Address)	_____
	Name: _____	Address: _____

14	FINANCIAL INTEREST IN ANY LEGAL ENTITY IN BUSINESS FOR PROFIT (See instructions on page 2) If NONE, check this box. <input checked="" type="checkbox"/>	Interest Held (i.e., 5%, 10%, etc.)
	Name and Address of Business	_____

15	BUSINESS INTERESTS TRANSFERRED TO IMMEDIATE FAMILY MEMBER (See instructions on page 2) If NONE, check this box. <input checked="" type="checkbox"/>	Interest Held Relationship Date Transferred
	Business (Name and Address)	_____
	Transferee (Name and Address)	_____

The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief, said affirmation being made subject to the penalties prescribed by 18 Pa.C.S. §4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. §1109(b).

Signature COMPLETED AND SIGNED ELECTRONICALLY Enter Current Date 05/18/2021

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

# Exhibit Q

**Caroline Curley**

---

**From:** Caroline Curley  
**Sent:** Thursday, June 3, 2021 1:52 PM  
**To:** Celena Morrison  
**Cc:** Bryan McHale; Shane Creamer  
**Subject:** Board of Ethics - Financial Disclosure Statement Corrections Needed by June 7  
**Attachments:** CelenaMorrison\_2020Info\_State\_5.18.21.pdf; CelenaMorrison\_2020Info\_City\_5.18.21.pdf; FDS City Form & Instructions.pdf

**Importance:** High

Good afternoon Ms. Morrison:

Our office has reviewed your Financial Disclosure Statement filed with the City. We have found two omissions in need of correction:

- First, you failed to include your City salary as a source of income. You must report the name of any individual or entity from whom you directly or indirectly received \$500 or more in income in the reporting year (including the City of Philadelphia). (See Item 8 in the attached FDS City form instructions.)
- Second, you must report the name of each individual or entity that gave you gifts totaling \$200 or more in value in the reporting year. This would include the monetary gift received from Ms. Stephens (even though this gift was repaid). (See Item 9 in the attached FDS City form instructions.)

Please review the attached Financial Disclosure System Instructions for further reference on any other sources of income/creditors you may need to report. As always, you can contact us with any additional questions.

Please file an amended Financial Disclosure Statement no later than **5:00 pm on Monday, June 7, 2021**. Amendments can be filed through the same electronic filing system at: <https://financial-disclosure.phila.gov/>. Please do not use Internet Explorer to access this website; any other browser should work.

Please be aware that inaccurate or incomplete disclosures, or failing to file before the deadline, are violations of the City's Ethics Code. Failure to file before close of business on Monday will result in additional enforcement action and an additional civil penalty of up to \$2,000 per violation. As a reminder, when you submit the City Form, you certify that the information is true and correct under Pennsylvania's criminal provisions on unsworn falsification (18 Pa. C.S. § 4904).

Thank you,  
Caroline

--  
**Caroline B. Curley**

Staff Attorney  
Board of Ethics  
One Parkway Building  
1515 Arch Street, 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 686-9460  
Cell Phone During Quarantine: (845) 527-0189

# Exhibit R

CITY OF PHILADELPHIA  
**STATEMENT OF  
 FINANCIAL INTERESTS**

PHILADELPHIA BOARD OF ETHICS  
 DEPARTMENT OF RECORDS  
 ROOM 156, CITY HALL  
 PHILADELPHIA, PA 19107

All Statements of Financial Interests shall  
 be made available for public inspection  
 and copying during regular office hours.

AMENDED  
 STATEMENT

**INSTRUCTIONS:** Complete the entire form. Type or print in ink. Clearly enter your name in the space provided.  
 Attach the additional 8-1/2" x 11" sheets if necessary, identifying each item by number.  
 This form may be completed on line at <https://financial-disclosure.phila.gov>

1. LAST NAME	FIRST NAME	MI	SUFFIX
Morrison	Celinea		
2. STREET ADDRESS	CITY	STATE	ZIP CODE
XXXXXXXXXX	XXXXXXXXXX	XX	XXXXXX
CITY DEPARTMENT / AGENCY / COMMISSION / BOARD	3. TELEPHONE NUMBER		
Mayors Office	XXXXXXXXXXXX		
4. NAME OF PUBLIC POSITION OR PUBLIC OFFICE YOU HOLD/HELD	5. OCCUPATION OR PROFESSION		
Executive Director (Currently Holding)			
<b>REMEMBER:</b> Items 6 THROUGH 12 - All information concerns the PRIOR CALENDAR YEAR. NO DOLLAR AMOUNTS are required except in Item 9. If answer is NONE, check the box where indicated. Information must be included for the filer only and not family members.			
6. REAL ESTATE INTERESTS: List any direct or indirect interest in any real estate as described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
ADDRESS	NATURE OF INTEREST		
7. CREDITORS: List each loan or debt over \$5,000 and the interest rate thereon as described in the attached Instructions. If none, check: <input type="checkbox"/>			
CREDITOR	ADDRESS	INTEREST RATE	
1st National Bank		11.7%	
8. DIRECT OR INDIRECT SOURCES OF INCOME: List all sources of \$500 or more in the aggregate as described in the attached Instructions. If City is a source, list City. If none, check: <input type="checkbox"/>			
SOURCE OF INCOME	ADDRESS		
City of Philadelphia	1400 John F Kennedy Blvd, Philadelphia, PA - 19107		
9. GIFTS: List sources of gifts with an aggregate value of \$200 or more as described in attached Instructions. If none, check: <input type="checkbox"/>			
SOURCE OF GIFT	ADDRESS		
Mr. Kendall Stephans	, Philadelphia, PA		
VALUE OF GIFT	CIRCUMSTANCES OF GIFT		
\$4000	Loan   Loan		
10. HONORARIA: List sources over \$100 described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF HONORARIUM	ADDRESS OF SOURCE		
11. OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS ENTITY. If none, check: <input checked="" type="checkbox"/>			
BUSINESS	POSITION HELD		
12. FINANCIAL INTEREST IN ANY BUSINESS ORGANIZED FOR PROFIT: (See attached Instructions.) If none, check: <input checked="" type="checkbox"/>			
<b>THIS FORM MUST BE SIGNED AND DATED IN ORDER TO BE ACCEPTED.</b>			
Information represents disclosure for the prior calendar year <b>2020</b> . False statements made herein are punishable as authorized by Section 20-612 of the Philadelphia Code and are subject to the penalties prescribed for perjury set forth in 18 Pa. C.S. § 4904.			
Signature <b>COMPLETED AND SIGNED ELECTRONICALLY</b> Date <b>06/04/2021</b>			

Celena

Morrison

---

Positions continuation

Public Position: member

Affiliation Status: Held in Past

Governmental Entity: Comm Human Relations

Profession:

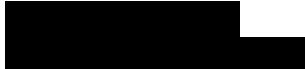
Address:

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above-captioned Notice of Administrative Enforcement Proceeding and Exhibits in Support of Notice of Administrative Enforcement Proceeding was served upon the following as indicated:

**By Email:**

**Respondent Celena Morrison**



(Celena.Morrison@phila.gov)

**By Email:**

**Michael Cooke, Esq.**

General Counsel

City of Philadelphia Board of Ethics  
1515 Arch Street, 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
(Michael.Cooke@phila.gov)

Date: July 15, 2021

/s/ Caroline Curley

Caroline Curley, Esq.

*Staff Attorney, City of Philadelphia Board of Ethics*