

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

J. Shane Creamer, Jr.
Executive Director
Board of Ethics
of the City of Philadelphia
1515 Arch Street, 18th Floor
Philadelphia, PA 19102

v.

Celena Morrison
[REDACTED]
[REDACTED]

Respondent

Matter No.: 2106ET19

**I. MOTION IN LIMINE TO PRECLUDE EMAIL EXCHANGE BETWEEN
CELENA MORRISON AND LAUREN COX**

The Executive Director of the Board of Ethics, J. Shane Creamer, Jr., and Respondent Celena Morrison, submits the following Motion in Limine to Preclude the introduction of an email exchange between Respondent Morrison and Lauren Cox, Deputy Communications Director, Office of the Mayor, attached as Exhibit 1 to Respondent's Answer to the Amended Notice of Administrative Enforcement Proceeding at the Hearing of this matter and in support thereof alleges the following:

1. As of the preparation of this Motion, the Executive Director has not received a list of Respondent's proposed list of exhibits that she intends to introduce at the Hearing of this matter, however, it is anticipated that she will attempt to introduce the email exchange dated August 25, 2020 she had with Lauren Cox, Deputy Communications Director, Office of the

Mayor, attached as Exhibit 1 to Respondent's Answer to the Amended Notice of Administrative Enforcement Proceeding at the Hearing of this matter.

2. The Executive Director objects to the introduction of this email exchange because it includes hearsay statements from Ms. Cox.
3. The Executive Director further objects to the introduction of this email exchange because it contains a legal conclusion by Ms. Cox.

Wherefore, the Executive Director respectfully requests that Respondent Morrison be precluded from introducing the August 25, 2020 email exchange between Respondent Morrison and Lauren Cox, Deputy Communications Director, Office of the Mayor, attached as Exhibit 1 to Respondent's Answer to the Amended Notice of Administrative Enforcement Proceeding at the Hearing of this matter because it contains hearsay and a legal conclusion from Ms. Cox.

Date: December 3, 2021

Respectfully submitted,

/s/ J. Shane Creamer Jr.

J. Shane Creamer, Jr. Esq.
Executive Director

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