

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

<hr/> <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	:	
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v.	:	<b>Matter No.:</b> 2106ET19
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<b>Celena Morrison</b>	:	
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<hr/> Respondent	:	

**PRE-HEARING STIPULATIONS OF THE PARTIES**

The Executive Director of the Board of Ethics, J. Shane Creamer, Jr., and Respondent Celena Morrison, enter into the following Stipulations of Facts in advance of the Administrative Adjudication of the above-referenced matter, currently scheduled for Hearing on December 15, 2021.

**I.     STIPULATIONS OF FACTS**

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.
3.     Ms. Morrison began her City position as Executive Director for the Philadelphia Office of LGBT Affairs on March 2, 2020.
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.

5. Kendall Stephens is a Philadelphia transgender community advocate.

6. For many years, Ms. Morrison and Ms. Stephens were long-time personal friends and both active in the LGBT community.

7. In her efforts to involve the Office of LGBT Affairs with the community organization Heart on a Wire, 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.

8. 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.

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

10. At the Philadelphia police station, Ms. Stephens expressed that she felt that the police officers were trivializing the incident due to her transgender status.

11. 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.”

12. 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.

13. 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.”

14. Ms. Morrison acknowledged that this outreach and assistance, detailed in Paragraphs 14-17 of the Amended Notice of Administrative Enforcement Proceeding, was a part of the Executive Director’s and Office of LGBT Affairs’ official duties. Ms. Morrison and her Office can become involved in any case concerning violence against the trans community. Ms. Morrison also acknowledged that she took these steps because she was Ms. Stephen’s friend.

15. 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. Ms. Morrison served as a liaison after being contacted by “one or both of the ... police commissioners.” The matter of Ms. Stephens attack had been escalated by someone other than Ms. Morrison. Ms. Morrison relayed the information as requested.

16. 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. The District Attorney's Office contacted Ms. Morrison seeking information and Ms. Morrison relayed the information as requested.

17. 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. Ms. Morrison had no role in the GoFundMe campaign.

18. 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.

19. Ms. Stephens provided a cashier's check for \$4,000 to Ms. Morrison that same day.

20. 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 her of the investigation.

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

22. 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. Board Enforcement Staff requested that amendments be filed no later than 5:00 pm on June 7, 2021.

23. Ms. Morrison filed an amended Philadelphia Statement of Financial Interests on June 4, 2021.

Date: December 3, 2021

Respectfully submitted,

/s/ J. Shane Creamer Jr.

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*Executive Director*

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/s/ Gaetan J. Alfano

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above-captioned Pre-Hearing Stipulations of the Parties was served upon the following as indicated:

**By Email**

***Hearing Officer***

**Professor Louis Rulli**  
University of Pennsylvania Carey Law School  
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Philadelphia, PA 19104

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Date: December 3, 2021

/s/ Gaetan J. Alfano  
Gaetan J. Alfano, Esq.  
*Attorney for Respondent,*  
*Celena Morrison*