

**Diana Lin**

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**Subject:** Notice of Administrative Enforcement Proceeding - Tracey Gordon  
**Attachments:** 12.12.Introductory.Letter.1412MU14.PDF

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**From:** Elizabeth Downey  
**Sent:** Friday, December 12, 2014 5:35 PM  
**To:** MICHAEL COARD  
**Cc:** Shane Creamer; Jordan Segall; Maya Nayak; Michael Cooke  
**Subject:** RE: Notice of Administrative Enforcement Proceeding - Tracey Gordon

Dear Mr. Coard:

I have attached a letter concerning the Administrative Enforcement Proceeding initiated by yesterday's Notice. I will be sending this letter to you by first class mail on Monday morning.

Sincerely,

Elizabeth W. Downey  
Associate General Counsel  
Philadelphia Board of Ethics  
[www.phila.gov/ethics](http://www.phila.gov/ethics)  
(215) 686-9450

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**From:** Maya Nayak  
**Sent:** Friday, December 12, 2014 8:38 AM  
**To:** Michael Cooke  
**Cc:** MICHAEL COARD; Shane Creamer; Jordan Segall; Elizabeth Downey  
**Subject:** RE: Notice of Administrative Enforcement Proceeding - Tracey Gordon

I am writing to confirm I received the Notice filed yesterday in matter #1412MU14.

Maya Nayak  
General Counsel  
City of Philadelphia Board of Ethics  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
215-686-9450 (ph); 215-686-9453 (f)  
[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)

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**From:** Michael Cooke  
**Sent:** Thursday, December 11, 2014 3:13 PM  
**To:** Maya Nayak  
**Cc:** MICHAEL COARD; Shane Creamer; Jordan Segall  
**Subject:** Notice of Administrative Enforcement Proceeding - Tracey Gordon

Maya -

Attached, please find a Notice of Administrative Enforcement Proceeding for the matter Creamer v Gordon, 1412MU14, and related Exhibits.

Ms. Gordon is represented by Michael Coard, Esq. He is cc'd on this email.  
His address information is on the Certification of Service.

Thank you,

Michael J. Cooke, Esq.  
Director of Enforcement  
Board of Ethics  
of the City of Philadelphia  
1515 Arch St., 18th Floor  
Philadelphia, PA 19102  
(215) 686-9459  
(f) (215) 686-9453



## CITY OF PHILADELPHIA

BOARD OF ETHICS  
ONE PARKWAY BUILDING  
1515 Arch Street  
18<sup>TH</sup> Floor  
Philadelphia, PA 19102-1504  
(215) 686 – 9450  
FAX 686 – 9453

*Confidential*

December 12, 2014

*Via first class mail and email*

Michael Coard  
One Liberty Place  
1650 Market Street, Suite 3652  
Philadelphia, PA 19103  
michaelcoard@msn.com

**Re: Administrative Adjudication Matter #1412MU14**

Dear Mr. Coard:

As counsel to the Board of Ethics, I write regarding the administrative enforcement proceeding that the Board's Executive Director Shane Creamer initiated against Tracey Gordon on December 11, 2014. I understand that you represent Ms. Gordon in this matter. Please include the number that has been assigned to this administrative enforcement matter, #1412MU14, on all filings and communications related to this matter.

Ms. Gordon may file a written Response to the allegations of violations in the Notice of Administrative Enforcement Proceeding (the "Notice") and may request a hearing to contest the allegations. The Board must receive Ms. Gordon's Response by December 31, 2014. If more time is required to respond to the Notice, Ms. Gordon must apply for and be granted an extension. Ms. Gordon will waive her right to a hearing if she does not file a Response to the Notice or if she does not request a hearing in her timely Response. Please note that unless Ms. Gordon consents in writing to a public proceeding, the Board's pending administrative enforcement proceedings, including filings and a hearing, are confidential.

If Ms. Gordon does not file a written response to the Notice, the Executive Director may submit to the Board a brief in support of the Notice. Ms. Gordon would have the opportunity to respond to the brief. If the Executive Director does not file a

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cc (via email): Maya Nayak, General Counsel  
Shane Creamer, Executive Director  
Michael Cooke, Director of Enforcement