

**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, 18 th Floor	:	
Philadelphia, PA 19102	:	
v.	:	Matter No.: 2106ET19
	:	Date Served: June 9, 2021
Celena Morrison	:	
[REDACTED]	:	
	:	
Respondent	:	

NOTICE OF ADMINISTRATIVE ENFORCEMENT PROCEEDING

By serving this Notice on you, the Executive Director of the Philadelphia Board of Ethics initiates an administrative enforcement proceeding against you. 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).

Statement of Financial Interests: Philadelphia Code Section 20-610

Philadelphia Code Section 20-610 requires that certain City employees, including the Executive Director of the Office of LGBT Affairs, file an annual City Statement of Financial Interests that contains financial information related to the previous calendar year.¹ In 2021, the Philadelphia Statement was due by June 1, 2021.²

Among the information required to be disclosed in the City Statement, a City officer must disclose both: (1) the name of any individual or entity that the City officer directly or indirectly received \$500 or more in income in the reporting year; and (2) the name and address of each individual or entity that provided gifts to the officer totaling \$200 or more in value in the reporting year, and the value and the circumstances of each gift. Phila. Code § 20-610(e), (f) (respectively). As with the gift provision in Section 20-604, a “gift” includes any payment, advance, rendering, or deposit of money. Phila. Code § 20-601(10).

Upon submission of the City Statement of Financial Interests, the officer certifies that the information is true and correct under Pennsylvania’s criminal provisions on unsworn falsification, 18 Pa. C.S. § 4904.

Each violation of Philadelphia Code Section 20-610 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).

¹ In addition to the Statement required by Code Section 20-610, the State Ethics Act requires all City officers and employees file a similar Statement with the Department of Records.

² This deadline was extended from May 1, 2021 to June 1, 2021 by a Resolution of the Board of Ethics passed on April 9, 2021.

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 24th 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 24th 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 24th 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. No response was received prior to the requested deadline.

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 action 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 24th 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).

COUNT 2 – FAILURE TO DISCLOSE GIFTS & SOURCES OF INCOME IN THE PHILADELPHIA STATEMENT OF FINANCIAL INTERESTS, PHILADELPHIA CODE SECTION 20-610

52. As alleged in paragraphs 30 - 33, Respondent Celena Morrison violated Philadelphia Code Section 20-610 by failing to disclose gifts and sources of income in the Philadelphia Statement of Financial Interests.

53. On May 18, 2021, Ms. Morrison electronically submitted the Philadelphia Statement of Financial Interests.

54. The Statement failed to disclose any sources of income as required under violated Philadelphia Code Section 20-610(e).

55. The Statement failed to disclose the \$4,000 gift received from Ms. Stephens under violated Philadelphia Code Section 20-610(f).

56. Ms. Morrison failed to amend her Statement to correct this information despite Board requests.

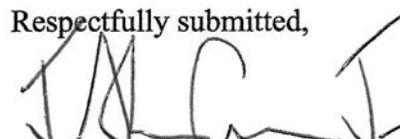
57. Ms. Morrison's failure to disclose or amend this information constitutes a knowing violation of Philadelphia Code Section 20-610.

58. 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 \$4,000 for these two alleged violations of Philadelphia Code Section 20-610.

Date: June 9, 2021

Respectfully submitted,



J. Shane Creamer, Jr. Esq.
Executive Director

Caroline Curley, Esq.
Staff Attorney

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

**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, 18 th Floor	:	
Philadelphia, PA 19102	:	
v.	:	Matter No.: 2106ET19
	:	Date Served: June 9, 2021
Celena Morrison	:	
[REDACTED]	:	
[REDACTED]	:	
	:	
Respondent	:	

**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,
https://www.inquirer.com/news/attack-on-transgender-woman-kendall-stephens-point-breeze-20200826.html |
| 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
- 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 A

BOARD OF ETHICS

J. SHANE CREAMER, JR.,) DEPOSITION UPON
EXECUTIVE DIRECTOR of the)
PHILADELPHIA BOARD OF) ORAL EXAMINATION
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

1

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

2

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

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

CELENA MORRISON

1

I N D E X

2

E X A M I N A T I O N

3

	WITNESS	PAGE
4	CELENA MORRISON	
	By Ms. Curley:	4

5

6

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

16

17

18

19

20

21

22

23

24

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

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

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

23 - - -

24

call 19:23,23 20:6 22:19 27:13 33:13	comm 30:4 commencing 1:12 comments 30:5,7 commissioner 32:11 34:17 35:6	copy 3:15 54:10,11 correct 4:19 12:11 23:23 27:7 28:6 29:13 31:20 33:7 39:10 48:12 52:3,10 54:14 55:16 57:8
called 20:18 31:3 50:5	commissioners 32:14 35:12 35:13 43:23	correspond 25:17
camera 48:4	commonly 52:15	counter 22:6
capabilities 6:11	communicate 39:7	couple 19:11 32:6,22
capacity 12:11 24:13 30:8 33:20 41:1,6	communication 28:16	course 47:14
capture 43:18	communities 5:8 6:4,16,20 7:6	Court 1:19 6:7,9 57:12
car 20:23 48:18,19	community 5:2 26:19 30:22 30:24 33:15 41:21 51:4 52:10,13	CREAMER 1:2
care 44:1	complaint 32:19 35:15	crime 23:8 31:5
careful 19:23	complaints 36:8	crimes 30:19
CAROLINE 2:4	completely 31:15	Curley 2:4 3:4 4:6 6:13 9:17 9:21 12:22 13:1 14:15,18 17:19,23 26:10,13 28:23 29:3 34:12,15 37:5,8 42:2,6 44:17,21 54:3,7 55:18
case 20:4 30:12 38:19 50:23 51:12	component 12:19	current 4:10
cases 36:24	concern 23:9	cursed 31:3,3
cash 45:16 51:6	concerned 25:19	D
cashed 54:22	concerning 10:17	D 3:1
CASHIER'S 3:14	concluded 56:1	daily 17:6
cc'd 10:4,5,12 14:7 18:1	conduit 36:13	dark 19:5
Celena 1:5,5 3:4 4:2,9 18:4 47:23 50:6	conference 30:18,23 31:16 38:17	date 20:10 45:6 46:5
certification 57:17	connect 26:24 36:18	dated 13:5 45:5 55:9
certify 57:4	connected 32:10 38:11,13 44:3,6	day 6:12
certifying 57:21	connecting 36:1 44:12,13	dealing 24:6 31:23 47:17
chain 15:10	consider 11:20 12:16	decision 39:22,23
chance 31:7	considered 41:11	decisions 40:20
changed 31:15	considering 11:7 12:20 16:12	definitely 34:5 47:4
charged 30:13 37:24	contact 28:18,18	deliver 55:12
Charter 5:18	contacted 28:13 30:3 32:15 35:11 52:16	department 30:4 32:2 33:6 34:18,24 35:8 36:9,14
check 3:14,15 54:8,18,19,20 55:3	contained 57:5	departments 5:21
circumstance 41:23	continue 38:3 46:21 50:13	deposit 45:21
City 2:3 4:18,23 5:10,12,21 6:20,24 7:6 23:23 39:16 40:2,3,4	continued 50:16	deposition 1:2,8 56:1 57:7
City's 5:16 6:4,16,19 39:24	continuously 50:21	Deputy 34:17 35:5
civil 5:11	control 57:20	DESCRIPTION 3:7
clarify 11:16 26:4 51:12,14 54:12,17	conversation 11:1 24:16 33:19 34:2	detectives 40:22
clarifying 26:14	conversations 24:14 34:10 50:10	developing 5:10
clear 43:14 50:17	coordinate 27:22	development 6:3,16
clearly 18:10 24:21 25:15	coordinating 5:15,21	different 37:3
closet 45:16 51:6		difficult 46:18 47:8 48:17
come 18:20 20:19 39:18,24 46:20 48:1 49:11		direct 42:23 57:20
comes 24:5 43:9		directive 23:12,21 29:5
coming 40:21		

directly 38:14
director 1:2 4:12,22 6:23 7:5
 8:9 9:11 29:15 33:10 36:5
Director's 28:3
discretion 6:23
discussed 16:24 18:8
discussion 33:24 46:5 49:23
 50:1
discussions 16:11,13 48:9
 49:21
displaced 48:21
disputing 13:24 39:19
District 12:9 30:16,20 33:5
 34:8,19 38:14 39:2 43:24
 44:3,5
diversity 5:16 33:11
document 9:23 13:17 14:8
 22:19,20 44:22 50:20 53:21
 55:4,6,10
documents 55:21
doing 7:13 9:5,6 24:1,8 29:12
 30:17 41:5,23 42:10 43:11
door 19:16,21 20:1
draw 46:3
drawing 21:17 50:18
duly 4:3
duties 4:21 5:9,14,20 6:2,15
 6:18,22 7:12 52:13
duty 23:22

E

E 2:1,1 3:1,2,6 57:1
e-mail 3:8,8,9,9,10,11,12,12
 3:13,13 10:1,5,9,11,23 13:3
 13:10,21 14:12,20 16:9
 17:24 18:11,14 27:11 34:21
 35:5,10 37:9 39:5,9,13,15
 39:16,24 40:3,5,6,7 42:7,8
 42:16,19 43:3,4,10 44:2
e-mails 7:13 14:10 30:6 32:22
 39:8 42:11 44:9
early 49:9
educating 23:23
either 11:15 47:5
elaborate 8:5
elevate 36:23
elevated 36:21

employee 4:18
employment 4:11
encountered 23:20
enforcement 24:6 36:20
Engagement 52:19
ensure 4:24 5:5
ensuring 35:14
entering 20:4
entire 8:14 34:8 52:13
equality 5:17,23
Ersa 1:19 6:9
ESQUIRE 2:4
estimation 49:19
etcetera 10:20
Ethics 1:1,3 2:4,7 12:24
 13:16 17:20 29:1 34:13
 35:18 37:6 42:3 44:19 55:2
evidence 57:5
exactly 17:9 19:4 49:17 52:5
 52:21
EXAMINATION 1:3 4:5
examined 4:3
excited 10:19
Excuse 7:2
excused 55:24
executed 45:2 53:22
Executive 1:2 4:12,22 6:23
 7:5 8:9 28:3 36:5
exhibit 55:1,2
Exhibit-1 9:20
Exhibit-10 35:4
Exhibit-11 35:19 37:6
Exhibit-12 42:4
Exhibit-13 44:19
Exhibit-14 54:5
Exhibit-15 55:2
Exhibit-2 12:24 13:9,16
Exhibit-3 14:5
Exhibit-4 14:19
Exhibit-5 17:21
Exhibit-6 29:1
Exhibit-7 25:21 26:11
Exhibit-8 33:1
Exhibit-9 34:13
EXHIBITS 3:7
exist 26:6
expect 39:12

experience 32:5 34:20 35:1,2
experiences 24:5
explain 22:14 31:8 45:8
explained 23:7,10
explaining 23:5
expressed 5:17
extremely 46:17

F

F 57:1
face 20:2
fact 30:2 53:24
fair 8:8 28:22 41:17
fall 41:19
falls 23:22 41:21
familiar 7:15,18 8:17
feel 37:13 38:21,23 41:5
felt 36:23 38:24 40:19
Field 34:17
fighting 19:7
figure 9:14
file 36:8
finally 49:2
find 30:21 48:10,12 49:1,2,5
finding 48:15
fine 21:18
first 4:3 7:22 10:15 15:11
 22:7 31:22 32:13 34:17
 36:17 42:8 43:2 45:18,20
 46:4
Floor 2:6
folks 17:2 28:18
follow 11:14 54:23
follow-up 35:5
following 29:16 30:15 44:16
follows 4:4
foregoing 57:17
forgot 21:16
formal 32:19
forward 32:17 38:9
forwarded 40:7
forwarding 38:7
found 31:1 49:3
Friday 18:6
friend 7:19 11:8,23 19:2,2
 20:24 25:19 26:1,2 27:5
 30:9 40:16,24 41:6 44:7

friend's 47:16 48:22
friends 7:20 8:5 23:18 27:24
 40:15 52:5

friendship 31:15
front 19:16
froze 5:3,4
fully 57:5
furious 31:2,2

G

games 17:11
Geer 33:5,5,8,19 37:10 40:7
 44:11
gender 17:2
getting 19:6 20:15 42:20
girl 30:12 37:19,21 50:6
girlfriend 50:5
girls 30:13
give 13:12 15:2 22:13 31:7
glad 29:11
glass 23:4
go 5:5 12:7 20:23 21:1,8
 25:20 40:18,19 41:4 48:11
 48:15 54:13
goals 5:17
God 20:1
going 7:24 8:1 9:17 12:23
 14:9,13 16:22 18:15 22:14
 25:20 27:13 31:12,21 32:22
 39:14 42:2,4 43:15,17 44:17
 45:20 46:2,9 53:16
good 6:12
Government 39:5,16
Grace 42:9,13
Greer 33:4
groups 17:6,10
growth 6:3,15
guess 35:20 36:22 37:13
 38:21 39:4 40:6
guys 25:12

H

H 3:6
habit 23:17
half 47:1
hand 48:3
happened 18:22 20:13,14,21

21:3,23 29:17 41:7
happening 19:16 37:1 47:15
happens 9:10 27:21 44:8
hard 43:23
hate 23:8 30:19 31:5
head 43:7,18,20
hear 19:14,14 25:7,10
heard 5:4 19:9,24 20:1
Hearts 8:18,21,22,24 9:7,9,13
 10:17,20 11:5,8,10,11,13
 12:1,5,16 13:22 16:3 17:1
 17:14

held 4:14 8:15
help 40:16
hidden 45:16 51:6
history 24:4
Hold 13:12
home 5:17 22:18 46:12,20
 48:11,12,24
horrible 24:5 43:5
house 8:6 19:8,10,11,13,15
 20:20 21:2 45:15,23 46:16
 47:16,19 48:19,22,23 49:8
 49:15
houses 49:13
huge 29:22
hung 20:22
husband 21:10 22:4,23 25:6
 25:15 27:11 46:1

I

idea 37:18
identification 55:22
identified 10:16 27:10 34:16
immediately 21:7 32:1
implementation 5:15
important 12:19 25:23
improve 5:22
incarcerated 10:18 17:2
incident 18:20 29:16 32:1
 33:23 38:5 42:10
incidents 34:11
include 5:10,15,20 6:3,15,19
 7:12
Inclusion 33:11
inclusive 5:1,7
incorporate 47:24

independent 51:18 52:20
indicated 33:10
indicates 10:15 14:22 18:3
 35:14
indication 16:1
individual 7:15 13:22 21:11
inform 35:21
information 32:18,20 33:7
 34:3 35:24 37:10,14,15,17
 38:8 39:2 40:2,5,17 41:3
intent 16:10
intention 16:2 27:14
intentions 9:12 11:4,11
interact 6:24
interacting 25:8
interactions 44:15
interview 38:5
investigation 9:3
invite 31:5
involved 9:1 11:19,20,24
 12:14 16:12 17:13,16 18:18
 18:19 27:24 52:10
involvement 8:20,22 11:24
 12:15,19 16:8,22 18:9
involves 24:2
issue 22:8 32:10 40:10
issues 5:11

J

J 1:2
job 4:21 5:9,14,20 6:2,15,18
 6:22 7:12 8:15 23:22,24
 24:1,8,9,13,22 27:3 29:12
 29:14,15 36:5 40:23 51:9
 52:8,13
John 6:9 42:22
join 6:6 16:2,2
joined 19:15
joking 19:3
JR 1:2
July 47:5
jumped 20:22,23

K

Kathleen 1:9 5:4 57:11
keep 46:18 47:9 51:11
Kelly 11:21,24 12:7,9,18 44:9

Kendall 7:16 9:4 10:2 11:8 11:12 12:14 13:11 19:23 21:24 22:7,12,16 25:1,17 26:8,24 27:5 29:19,23 30:12 31:1 32:4,4,18,18,20 33:12 33:16 34:4,5 35:14,22 37:15 37:17,20 38:4,9,10,13,23 42:10 45:13,15 49:3 50:1,7 50:22 51:1,1,4,8 Kendall's 37:24 47:19 48:23 kept 49:24 kids 19:14 kind 25:4,6 28:1,2 29:17 36:3 knew 8:13 11:10 20:2 22:24 22:24 29:23 30:11,12 33:16 45:16 48:20,22 50:3 51:22 51:24 52:4,7,8,11,11,12 know 5:3 9:10 12:4 15:15 16:24 19:12,18 20:6 21:8,14 21:17 22:20 23:16,22,23 24:3,14,17,19 26:5,17 27:10 28:18 29:6 32:9,20 33:15 35:22 38:18,18 40:19 42:14 42:17,17,21 47:23 49:15,17 50:6 51:21 knowing 9:9 knowledge 9:8 12:2 28:13 known 7:19 8:14 52:15 knows 23:21 52:13,14	6:16,20 41:18 52:14 LGBTQ 5:2,7 27:12 liaison 6:19 27:12,19,21 36:13,19 life 31:11,14 46:18,18 47:9,17 line 10:15 18:3,4 34:19,23 42:5 listening 22:9 little 8:2 18:23 25:5 49:1 lived 8:6 living 19:11 46:1,7,14 47:10 50:11 loan 3:14 45:1,2,8,18,23 46:3 49:10 50:4,7,14,18 51:5 53:14 55:13 loaned 50:9 locations 25:11 long 4:14 7:21 24:8 46:14,17 longer 8:2 look 43:4 46:21,21 looking 13:7,11 45:17 48:18 49:13 lost 31:11,14 lot 17:4 22:23 23:16 29:19,20 31:24 33:16 love 26:17 Lowe 13:19 lying 26:20	media 37:20 meet 5:16 17:5 24:13 29:19 meeting 10:17,19 11:7 15:3,7 15:9,19,21,23 16:3 17:4 33:18 47:22 meetings 17:5 47:13 Melvin 34:16 member 26:18 memorialize 53:18 mention 23:15,19 mentioning 23:17 message 26:8,15 messages 3:10,11 25:24 26:2 met 7:22 mind 23:19 mine 7:19 11:23 minute 15:2 21:14,18 minutes 20:18 mission 17:17 missions 7:1,9 moment 20:3 Monday 1:12 money 49:3 50:7,8,9,14,22 51:1,8,10,16 month 45:21,21 Morrison 1:5,5 3:4 4:2,7,9 9:22 13:2 18:5 47:23 54:12 mouth 50:2 move 18:15 21:20 42:2 44:18 45:19,22 49:6,9 53:11 moved 19:10 29:2 32:24 34:14 37:7 moving 14:19 35:4 multiplied 52:24 53:2 multiply 51:23 murdered 27:20 30:16 murders 30:19
L L 54:12 label 23:8 lack 9:10 lady 37:24 38:19 laptop 48:3 large 51:16 late 31:19 laughing 19:3 22:9 law 24:6 36:19 46:2 leave 45:12 left 22:18 25:16 50:16 legal 54:13 legible 33:3 let's 51:14 level 17:12 LGBT 4:13 5:2,11,22,24 6:4	M M 1:9 3:2 57:11 making 19:13 23:14 March 4:15,16 8:9,14 marked 3:7 9:19 10:2 12:24 14:17 17:21 25:21 26:12 28:24 29:2 32:24 33:1 34:12,14 35:18 37:5 42:3 44:18 54:4 55:2,22 Mary 42:9,13 math 53:1 matter 33:12 41:2,7,8 57:7 mattered 41:2 Mayor 52:15 Mayor's 4:12 52:17 mean 8:6 26:22 39:4 43:20 47:12 means 29:12 57:19	N N 2:1 3:1,2,2 57:1 name 4:7 10:7 21:12,16,21 22:3 37:23 54:13,13 names 22:21 need 20:5 21:19 26:5 36:23 43:13 45:19 51:21 52:23 needed 22:19 40:18,19 41:4 47:19 49:8 51:19 52:21

never 12:5 24:12 40:1,9 50:7
50:24 51:1,4,9
new 40:6,7 45:17,19 48:12,15
53:10
news 29:20
night 23:16
nod 43:20
nodding 43:18
nods 43:7
non-conforming 17:2
Notary 1:10
note 39:8
noted 57:5
notes 57:6
notified 27:18 28:12
notify 27:12
November 49:7
number 49:14

O

O 3:2 57:1
obligation 39:1
obviously 18:11,19 48:10
51:24
occur 15:23
October 31:19 49:6
offered 45:17,23
office 4:12 9:1 11:20 12:10
16:12 17:5,7,13 28:6 30:17
30:21 33:6 34:8 35:6 38:15
38:22 39:2,18 41:24 43:24
44:4,5 52:14,14,17,17,18
55:7,11
office's 8:20 28:5 41:20
officer 22:1,10,13 23:5,21
24:17
officers 23:2,11,18 24:12,13
25:2
offices 5:22 52:16
official 12:11 39:11
oh 20:1 37:16 40:10 42:17
47:4,23 48:2 50:6,15
okay 8:4 13:12 14:2 15:4,14
15:17,17 20:7 21:22 22:16
38:3 39:19 42:19 45:24
48:9 49:10 53:4,18 55:20
once 11:13 31:1

ones 50:3
online 48:16
open 30:12 48:21
opened 19:21,24
Operations 34:17
opportunity 22:14 24:12
35:21
ORAL 1:3
order 54:16
organization 8:17 9:2 16:13
organizations 17:6
original 48:11
originally 19:18
outlined 7:10
outside 19:8
oversaw 12:5
oversee 28:10
overseen 12:4
oversees 12:4

P

P 2:1,1
p.m 18:5
PA 1:22 2:6
PAGE 3:3
pandemic 31:24
paragraph 43:1,22
part 6:22 22:16 27:2,23 28:2
28:4 30:22 31:6 38:16
44:10
partially 37:3
participate 10:19 28:10
particular 26:15
partner 7:7 46:19
passed 32:19
passionate 24:21
pay 51:23 53:16 54:16
payment 51:19
Pennsylvania 1:11
people 5:11,24 19:22 33:16
40:18
person 12:3,6 27:19 43:5
44:8
personal 24:3 33:16 39:6,9
39:13 40:10 41:24 46:18
47:9,17
personally 7:20 8:4 24:19,22

27:24 28:9
pertaining 5:1
ph 30:24
Philadelphia 1:3,11,22 2:3,6
4:18 34:18 39:5
Philly 37:2
phone 18:21 19:1,3,6,17,20
19:22 20:5,17,19,22 21:10
21:22
pipeline 28:16
place 28:16 45:17,19 46:21
46:21 48:15 49:1,2,4,4,5
53:10,12
platform 29:21
played 44:10
Plaza 1:21
point 23:11 25:2 28:19 32:2
38:11
police 21:5,7,8,23 23:18,20
25:2,16 27:12,19,21 32:2,5
32:11,14 33:6 34:18,24 35:7
35:12,15 36:8,14,19 40:23
43:23 44:15
policies 4:23,24 5:1,5,10,15
policy 28:15
position 4:10,14 8:11 12:8
26:20,23 39:17
possibly 17:13 31:21 36:16
post 6:10
potential 36:14 41:18
premarked 9:18 12:22 14:16
17:20 26:11
present 25:1
press 30:5,17,22 31:16 38:17
presume 42:9
pretty 22:15
price 49:12
printed 18:10
prior 9:8 11:6,10 12:1 19:11
22:24 46:6,10
private 47:18,20
probably 7:23 25:18 29:9
46:9,24 47:1,2
problematic 32:5
proceedings 4:1 57:4
process 35:16,22,22,24 39:23
48:14 53:15

professional 1:9 26:19,23
30:8 33:18,19 35:7 41:1,6
program 9:11
programs 5:16 51:3
promote 5:23 7:1,9
proposed 5:10
provide 38:22,24
provided 36:12
Public 1:10 52:19
pull 22:5
pulling 25:6
punched 20:2
purchaser's 54:10
purposes 28:24
put 41:1 53:19
putting 48:4

Q**questionable** 52:19**questions** 24:18,24 43:14
55:19**quiet** 19:7 22:12**R****R** 2:1 57:1**randomly** 47:22**range** 49:13**reach** 28:2**reached** 9:4,6 11:9,17 29:21
30:17,23 32:12 33:15 34:24**reaching** 35:8**read** 14:1 15:2**ready** 15:15 21:15**really** 7:21 16:23,23 19:7
20:3 24:5 37:19 38:12
45:11 47:18 48:6,17 52:12**reason** 11:3,5,7 19:9 23:15
38:16 51:7**reasons** 16:5**recall** 11:1 13:21 15:19 16:19
17:8 18:16 23:13,14 32:3
34:23 37:14 42:11 43:2**receive** 14:3**received** 10:22 13:24 54:8,20**receiving** 13:21 14:12 34:21
35:10**recognize** 9:22 10:7 13:2,17

15:7 42:19 43:3 44:22 55:3

recollection 16:20**record** 4:8 43:14**recorded** 43:15**referencing** 18:12**referring** 37:22 44:1,2**refers** 29:4**reflected** 54:4**refresh** 16:20**regarding** 5:10 10:16 13:22

15:1 16:3 50:13

region's 6:20**related** 41:24**relationship** 33:17 45:12**relatively** 25:12**relay** 35:20**relayed** 35:24**remarked** 37:7 42:5 44:20

54:6

remember 9:5 13:20,24

16:15,15,16,18 19:4,5,6

21:16,21,24 29:9 31:18 32:6

32:8 34:1,2 37:18 38:10

remembers 20:10**reminded** 9:4**rent** 51:23**repay** 55:13**report** 23:6**reporter** 1:10 6:7 57:12,21**REPORTERS** 1:19**Reporting** 6:10**Representing** 2:7**reproduction** 57:19**request** 51:7**requested** 31:10 50:22,24

51:11

required 40:11**research** 51:18 52:21,24**resource** 27:1**resources** 44:13 51:3**respond** 34:10 40:14**responding** 14:10**response** 15:8 37:4 42:24**responses** 14:9**responsibilities** 52:9**Responsibility** 35:7**returned** 55:6**returning** 48:24**review** 4:23**revise** 4:23 5:5**riding** 48:16**Rigby** 1:9 57:11**right** 13:4 20:9 24:22 34:9

43:9 45:6 48:3,5 55:1

rights 5:11**Robin** 35:6**ROCKEY** 6:8**role** 8:9 24:24 28:3,5 31:22

41:20

room 25:13,15 47:14,22 48:2

48:8 51:22

Rule 5:17**run** 31:23**S****S** 2:1 3:6**safety** 5:23**Sanchez** 15:5,13**saw** 15:6**saying** 30:1,6 51:11 53:13**says** 10:10,14 15:1 42:13

43:22 54:16

school 46:2**screaming** 20:18 22:1,11**screen** 9:14,15 25:21 26:16**scroll** 14:23 15:16 42:7**second** 13:12 26:16 43:1,22**see** 9:15 10:1,4,9,14 13:10

14:5,9,19 25:7,9,20,22 26:5

33:1 37:12 42:8 46:5 53:21

seen 15:12 37:1**send** 39:12 41:14**sending** 39:15 43:2,6**sent** 10:11 14:8 16:1,9 18:11

25:24 26:8 27:10 30:6

34:18 37:16,20 38:4 39:4,9

39:10 40:1,4,5,6

separate 25:11 46:19 47:9**separated** 25:3**September** 34:19 35:5,8

37:11 42:8,24 45:5

services 5:23 44:5,7**serving** 6:19 36:3**set** 15:19

setting 15:3,7,9	35:15 36:12 40:4 41:10,23	terrible 43:4
SHANE 1:2	45:3 46:8,15 47:10 50:11,22	testified 4:4
share 9:14 37:16 39:1 40:17	51:15,24 55:12	text 3:10,11 25:17,24 26:1,8
shared 34:3 37:14 50:21	Stephens' 12:18 27:11 35:1	26:15
sharing 37:10	44:1	texted 31:2
Shoot 13:8	stepped 23:5	thing 5:4 20:14 24:2 32:23
show 25:24 32:22 35:21	stop 22:11 25:5	41:2 50:20
showed 45:15 51:5	stopped 19:10	things 29:24 32:6 34:7 40:15
shuffling 19:9	story 29:22 30:1,9	think 7:23 8:1 15:11 18:2
side 22:6 25:4,6,14	Street 1:20 2:5	23:9 30:6 32:14 36:23 39:8
simply 52:24	stuff 20:20 45:21	46:11,12 49:9 52:18 54:10
Singleton 34:16	Subject 34:19	third 18:2,3
sister 26:17,18	subsequently 54:22	thought 40:9,12 51:4,9,19
sisters 10:18	sudden 48:2	53:1
situation 20:3 31:13 33:14	Suite 1:21	three 46:22,24 47:2 51:23
34:4,6 40:11 47:19 49:7	sum 51:16	53:2
52:1,5,6,7	supervision 57:21	time 6:14 7:21 8:13,15 9:4
sleep 20:17	supervisor 30:3	11:3,16 12:14 13:13 18:5
social 37:19	support 17:7,10,16 26:1 30:9	21:19 23:9,13,19 24:16
softball 17:10	supporting 6:3,15 47:16	27:19,20 36:17,18 37:4 40:1
sorry 5:3 6:14 38:3	supposed 46:3 49:6	40:9 41:3,6 44:4 45:14,14
sound 20:9 31:19 45:6	sure 20:10 22:21 25:9,18 34:1	45:22 46:1 48:19,23 52:6
sounds 29:6 41:17 46:22	37:23 38:15,17,20 39:13	55:19,21
48:10 50:10	40:14 43:14,17,19	times 47:21 49:24
South 1:20	survivor 31:5,9	title 10:16 39:17
speak 23:2,11 32:13 33:11	sworn 4:3	told 20:5,11 22:18,20 29:6,10
speaking 25:2	system 51:2	32:15 45:19 50:8 53:2,9,12
specific 16:19 49:15 53:8	<hr/>	53:16
specifically 32:7	T	tomorrow 27:13
specifies 33:22	T 3:2,6 57:1,1	tons 17:6
spoke 10:15 11:6 32:10,14,16	take 21:14,18,18 26:20 53:10	top 13:9
staff 28:7,10	53:11	topic 33:24
standard 28:15	taken 1:8 44:1 57:6	training 34:8
standing 25:14	talk 11:7 17:4,6 22:2,11	trans 17:2 24:1 27:19 30:15
started 19:13,19 31:23 50:10	24:11 27:22 32:2 52:12	30:22
starting 29:24	talked 16:6 17:8 22:23 29:5	transcript 1:8 43:16,17 57:8
state 4:7	32:6 48:24 50:18 52:4,6,7	57:18
stated 50:21	talking 19:3,4 20:16 31:10	treated 41:15
statement 26:15	48:1	try 13:13 23:17 28:17 47:24
statements 30:2	tasks 7:13	trying 22:2,10 40:16 46:11
station 21:5,7,8,23 25:16	Tatiana 30:23	48:10 49:1
stay 28:17 46:17	team 10:20	two 12:3 46:10,22 47:1
stayed 45:12 46:16	tech 6:9	type 16:24 40:11
staying 45:23 47:15 48:22,23	Teleconference 1:11	types 34:11 40:15,20
Stephens 7:16 8:10 10:2,15	tell 18:23 19:12 30:10 35:21	<hr/>
11:2,17 13:11 15:12 16:6,14	35:23 50:8	U
18:1,3,8,16 27:5 28:1 33:12	tendency 29:20	Uh-huh 10:3,13,21 11:18

15:17 27:15 33:2 42:1 45:4 53:23 54:2 55:8,15 uncomfortable 48:6,7 understand 38:13 understanding 16:21 17:3 38:12 39:14,20 43:11 understands 35:15 United 1:21 upset 25:15 uptake 36:24 usual 48:16 utilized 51:3	we'll 32:23,23 we're 28:12 43:15 we've 7:20 15:12 16:6 week 46:10 47:3 49:9 weeks 19:11 46:16,23,24 47:1 47:2 went 20:17 21:2,7,23 22:18 51:21 weren't 22:8 25:11 William 9:8,12 Wimberly 35:6 Wire 8:18,21,23,24 9:7,9,13 10:17,20 11:5,8,11,12,13 12:1,5,16 13:22 16:3 17:1 17:14 Witness 3:3 43:7 55:20,24 woman 24:1 29:14 30:16 31:14 work 9:10 12:5,20 16:24 17:7 40:22,23 46:18,20 47:9 worked 12:9 38:15 working 9:8,12 11:4,11 12:16 28:17 30:21 38:14 43:23 works 30:24 44:10 world 37:2 worthless 40:22 wouldn't 25:5 41:8 writes 18:3 writing 53:19	1 1:00 18:5 10 13:11 10:19 1:12 10th 10:10,12 11:25 56:1 11th 13:5 12th 14:8 15 8:1 1515 2:5 1520 1:21 16th 46:12 17th 1:20 34:19 18th 2:6 19102 2:6 19103 1:22 1st 49:7
versus 39:5 victim 27:7,8,17 36:14 41:18 44:5 victims 44:7 video 38:4 40:21 violation 38:18 violence 27:21 30:18 36:15 37:1 41:18 violently 40:13,16 virtual 10:19 virtually 47:15 visible 52:18 vs 1:4	work 9:10 12:5,20 16:24 17:7 40:22,23 46:18,20 47:9 worked 12:9 38:15 working 9:8,12 11:4,11 12:16 28:17 30:21 38:14 43:23 works 30:24 44:10 world 37:2 worthless 40:22 wouldn't 25:5 41:8 writes 18:3 writing 53:19	2 2 4:16 34:19 35:8 20 20:17 200,000 45:15 51:6 2014 8:1 2020 4:16 8:9,14 10:11,12 18:16 20:8 34:19 35:9 45:5 2021 1:12 55:9 21 7:24 215 1:23 22 55:9 23 45:5 24 20:8 2nd 4:15 35:5 37:11 42:9,24
Wait 7:2 walked 22:6 walking 21:24 want 7:23 12:15 21:20 26:4 26:14,16 29:20 30:2,4,7 41:1 42:23,24 43:16,19 48:11 49:10 50:20 51:12 54:17 wanted 26:24 32:18 35:20 37:15 40:17 48:12 53:18 wants 33:11 wasn't 15:24 22:17 23:7 28:9 35:23 36:11 38:17,20 46:24 52:24 Waters 30:23 way 9:8,12 17:17 19:13,15 41:15 46:5 ways 17:7 25:5 52:9	X X 3:1,2,6	3 3 1:12 30 1:20 20:18
	Y yeah 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 year 4:15 31:22,22 years 7:20 yell 20:1 yelling 20:19 22:1,13 25:5 young 37:24 38:19	4 4 3:4 4,000 45:20,24 49:11 51:5 53:4,5,12 54:1 55:3 4.15 23:12 29:5
	Z zoom 1:10 2:5	5 55 3:8,8,9,9,10,10,11,11,12 3:12,13,13,14,14,15 564-1233 1:23
	0	

6

7

8

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.

Disclaimer: This Code of Ordinances and/or any other documents that appear on this site may not reflect the most current legislation adopted by the Municipality. American Legal Publishing Corporation provides these documents for informational purposes only. These documents should not be relied upon as the definitive authority for local legislation. Additionally, the formatting and pagination of the posted documents varies from the formatting and pagination of the official copy. The official printed copy of a Code of Ordinances should be consulted prior to any action being taken.

For further information regarding the official version of any of this Code of Ordinances or other documents posted on this site, please contact the Municipality directly or contact American Legal Publishing toll-free at 800-445-5588.

Hosted by: American Legal Publishing Corporation

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

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

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.

To view this discussion on the web visit

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>; Celena Morrison <Celena.Morrison@Phila.gov>
Subject: Re: Hearts on a Wire: Making Connections

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

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.

Connect with me on social media.

[Facebook](#) [LinkedIn](#) [Twitter](#)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

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

[LinkedIn Profile](#)

[IMDB Profile](#)

Notice: This email and any attachment may contain material that is confidential, privileged and/or a work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

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.

Connect with me on social media.

Facebook LinkedIn Twitter

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

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

Matter No. 2106E19 Document 1-5 Page 5 of 5

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

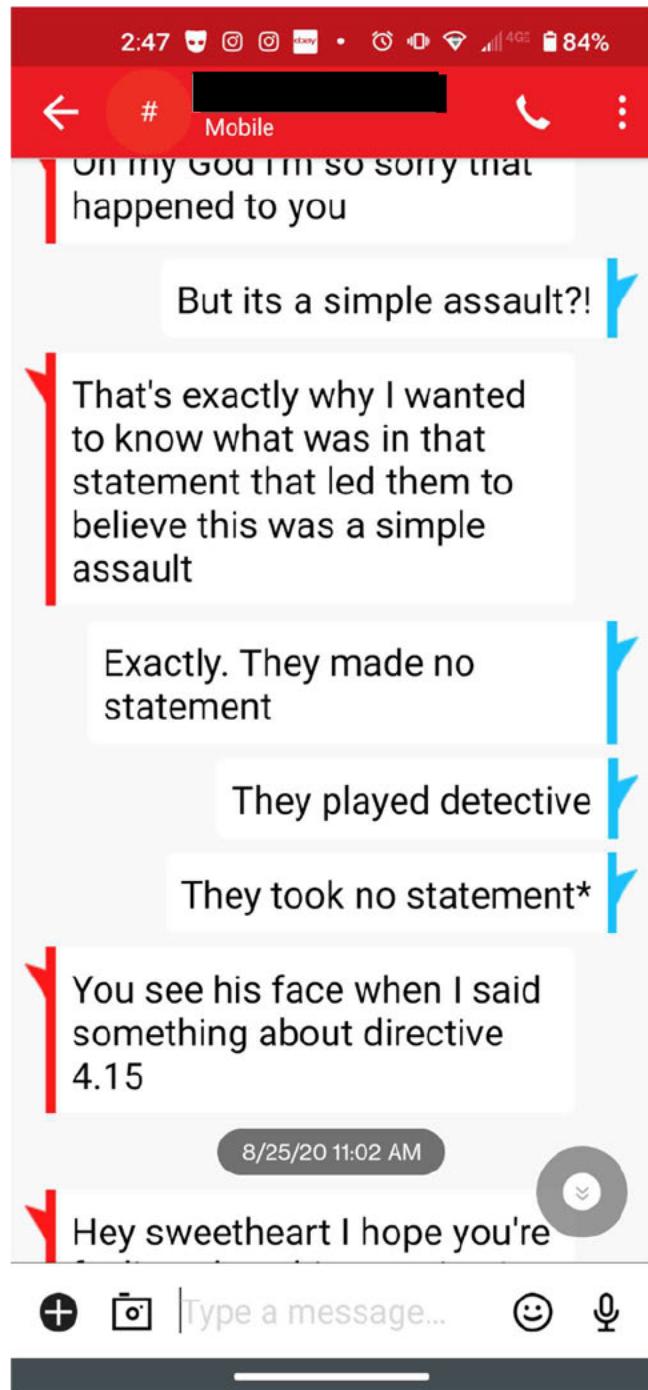


Exhibit F

Friday, May 28, 2021

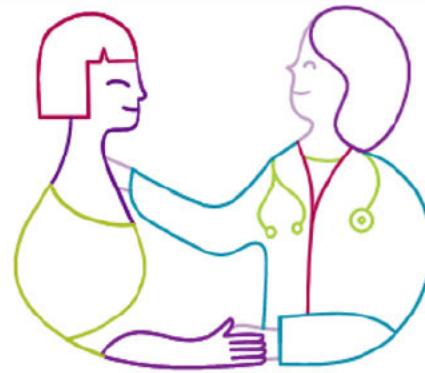
Today's Paper   

NEWS SPORTS BUSINESS OPINION POLITICS ENTERTAINMENT LIFE FOOD HEALTH

[SIGN IN / SIGN UP](#)[Subscribe](#) | [Support Local News](#)
[SIGN IN / SIGN UP](#)

ADVERTISEMENT

City of Philadelphia:



AdChoices ▾


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

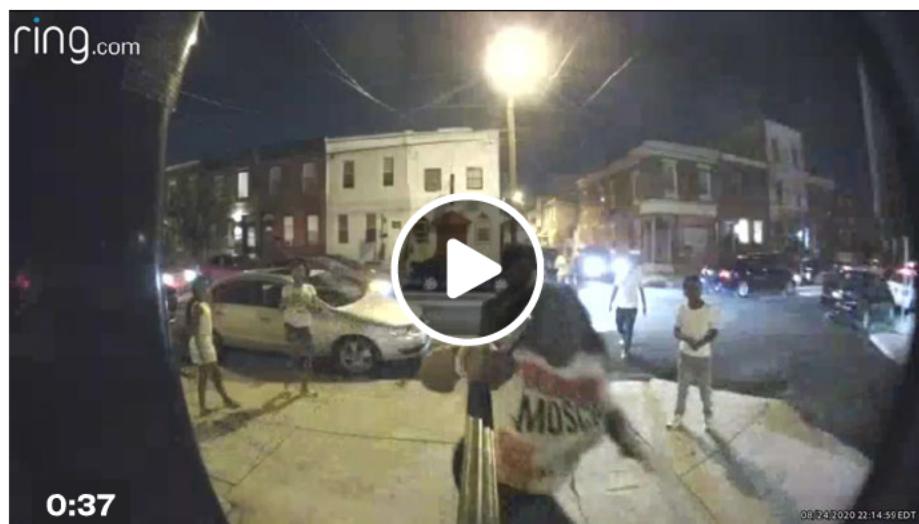
Published Aug 26, 2020

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.

ADVERTISEMENT

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.

About Us

[About The Inquirer](#)

[Advertise](#)

[Contact Us](#)

[Licensing & Permissions](#)

[Photo Reprints](#)

[Newspapers in Education](#)

[Jobs & Internships](#)

[Inquirer Events](#)

News & Info

[News](#)

[Sports](#)

[Entertainment](#)

[Business](#)

[Health](#)

[Food](#)

[Life](#)

[Opinion](#)

Marketplace

[Subscribe](#)

[Inquirer Store](#)

[Job Listings](#)

[All Classifieds](#)

[Gift Subscriptions](#)

e-Editions

[The Inquirer](#)

[The Daily News](#)

Mobile Apps

[Apple iOS](#)

[Google Android](#)

© 2021 The Philadelphia Inquirer, LLC

[Terms of Use](#) / [Privacy Policy](#) / [Cancellation Policy](#) / [California Notice](#) / [California residents do not sell my data request](#)

[California residents do not sell my data request](#)



Exhibit G

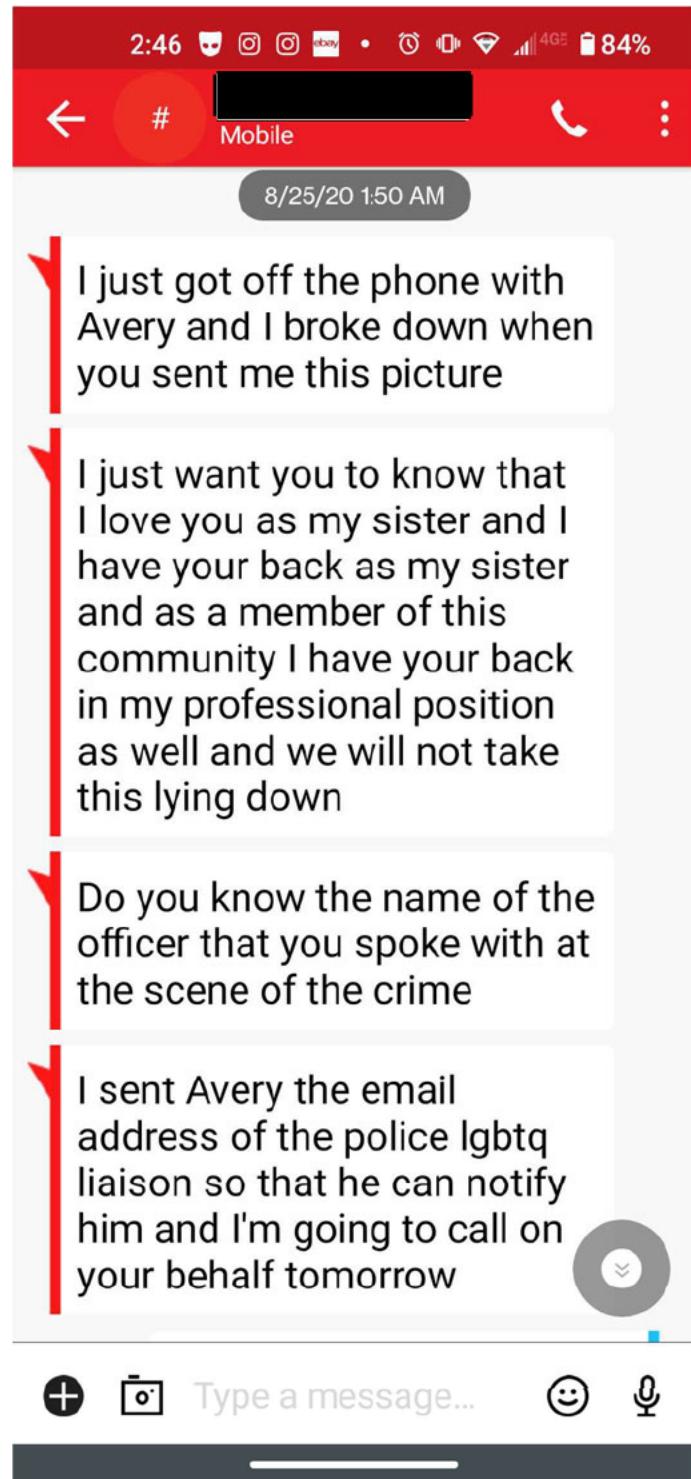


Exhibit H

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 17th 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

The materials in this e-mail are private and may contain sensitive law enforcement information. Please note that e-mail is not necessarily confidential or secure. Your use of e-mail constitutes your acknowledgment of these confidentiality and security limitations. If you are not the intended recipient, be advised that any unauthorized use, disclosure, copying, distribution, or the taking of any action in reliance on the contents of this information is strictly prohibited as covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. If you have received this e-mail in error, please immediately notify the sender via telephone or return e-mail. Thank you.

Please consider the environment before printing this email.

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>
Sent: Thursday, September 10, 2020 11:15 PM
To: Robin Wimberly <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>
Sent: Wednesday, September 9, 2020 3:01 PM
To: Celena Morrison <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

The materials in this e-mail are private and may contain sensitive law enforcement information. Please note that e-mail is not necessarily confidential or secure. Your use of e-mail constitutes your acknowledgment of these confidentiality and security limitations. If you are not the intended recipient, be advised that any unauthorized use, disclosure, copying, distribution, or the taking of any action in reliance on the contents of this information is strictly prohibited as covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. If you have received this e-mail in error, please immediately notify the sender via telephone or return e-mail. Thank you.

Please consider the environment before printing this email.

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

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

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

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

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> 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>
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
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)

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 23rd
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

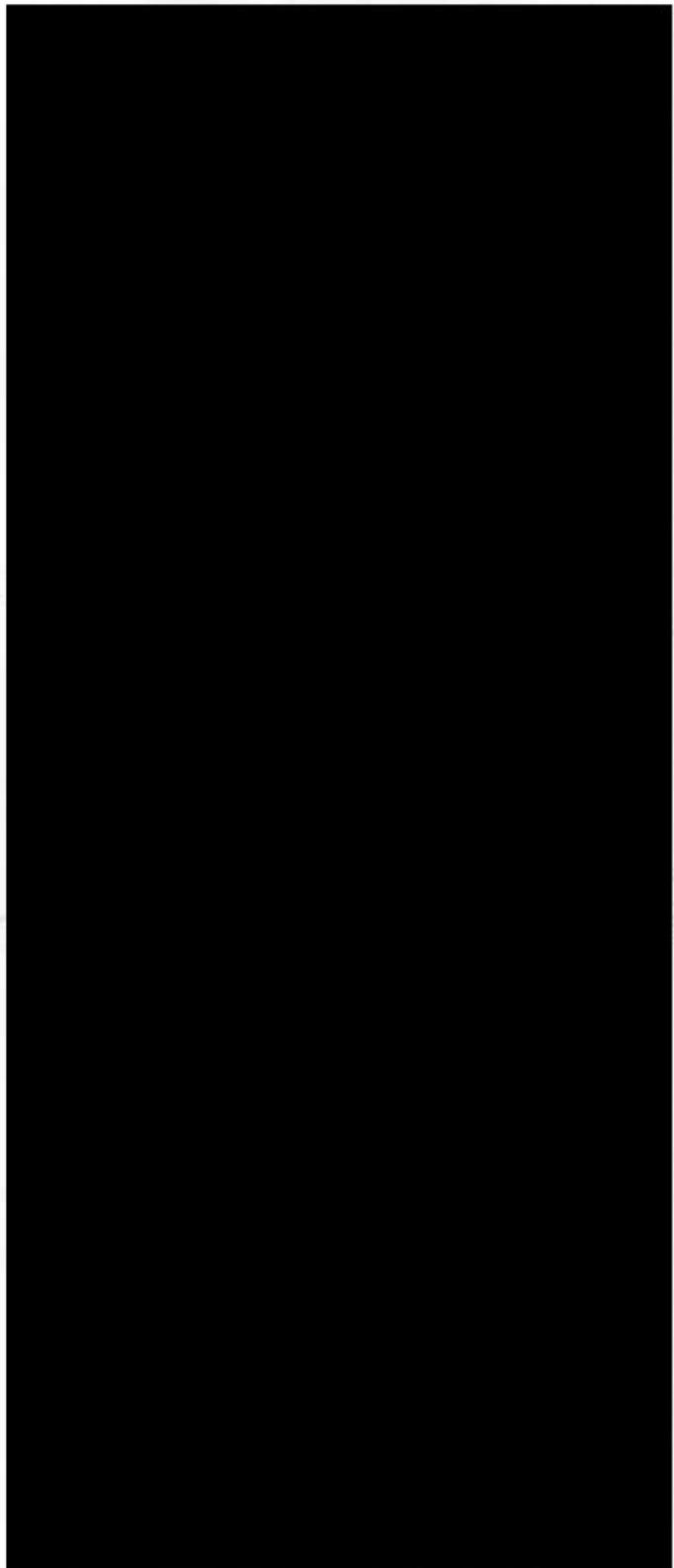


Exhibit O

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		
REMEMBER: 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"/>			
THIS FORM MUST BE SIGNED AND DATED IN ORDER TO BE ACCEPTED.			
Information represents disclosure for the prior calendar year 2020 . 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 COMPLETED AND SIGNED ELECTRONICALLY Date 05/18/2021			

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	STATUS	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, 18th Floor
Philadelphia, PA 19102
(215) 686-9460
Cell Phone During Quarantine: (845) 527-0189

PHILADELPHIA BOARD OF ETHICS
REGULATION NO. 2
INVESTIGATIONS AND ENFORCEMENT PROCEEDINGS.

Table of Contents

Subpart A. Scope; Definitions.....	pg. 2
Subpart B. Separation of Functions	pg. 3
Subpart C. Investigations	pg. 3
Subpart D. Confidentiality of Complaints and Investigations	pg. 6
Subpart E. Administrative Enforcement.....	pg. 8
Subpart F. Judicial Enforcement	pg. 13
Subpart G. Settlement and Conciliation.....	pg. 14
Subpart G. Penalties	pg. 14

SUBPART A. SCOPE; DEFINITIONS.

2.0 Scope. This Regulation is promulgated by the Board pursuant to its authority under §§ 4-1100 and 8-407 of the Home Rule Charter and § 20-606(1) of the Philadelphia Code and interprets Code §§ 20-606(1)(f)-(k) and 20-606(2) regarding complaints, investigations enforcement proceedings, confidentiality, and related matters.

2.1 Definitions. As used herein, the following words and phrases shall have the meanings indicated.

- a. **Board.** The Board of Ethics and its individual members.
- b. **Board Staff.** Employees of the Board of Ethics.
- c. **Complainant.** A person who has submitted a complaint to the Board.
- d. **Complaint.** A written document submitted to the Board for the purpose of initiating a Board investigation or enforcement action.
- e. **Executive Director.** The Executive Director of the Board and his or her designees.
- f. **General Counsel.** The General Counsel of the Board and his or her designees.
- g. **Investigation.** The Board's inquiry into an alleged violation of the Public Integrity Laws.
- h. **Person.** A business, individual, corporation, non-profit, union, association, firm, partnership, committee, political committee, club, or other organization or group of persons.
- i. **Public Integrity Laws.** Chapters 20-600, 20-1000, and 20-1200 of the Philadelphia Code and Sections 10-100, 10-102, 10-105, and 10-107 of the Philadelphia Home Rule Charter, and any other matters assigned to the Board by ordinance.
- j. **Referral.** Information that a City department or a federal, state, or local governmental entity with civil or criminal enforcement powers, or an employee or representative of any of the foregoing, provides to the Board or Board Staff so they may determine whether a potential violation of the Public Integrity Laws has occurred.
- k. **Respondent.** A person against whom the Executive Director has instituted an administrative enforcement proceeding or against whom the Board has instituted a judicial enforcement proceeding.
- l. **Subject.** A person who is identified in a complaint, referral, investigation, or preliminary inquiry as having potentially violated the Public Integrity Laws.

SUBPART B. SEPARATION OF FUNCTIONS.

2.2 As required by law, in the context of administrative enforcement proceedings and related investigations the Board shall maintain a separation between the adjudicative functions and the investigatory or prosecutorial functions. In this regard, the individual members of the Board, any Hearing Officer in a particular case, and the General Counsel shall be considered to be part of the “adjudicative function,” and the Executive Director and professional staff or consultants directed by the Executive Director shall be considered to be part of the “investigatory” or “prosecutorial” function.

SUBPART C. INVESTIGATIONS.

2.3 Preliminary Inquiry. The Executive Director may, at his or her discretion, conduct a preliminary inquiry to determine if there is reason to believe a violation of the Public Integrity Laws has occurred. Board and Board staff shall keep preliminary inquiries confidential as required by this Regulation. A preliminary inquiry is not an investigation and is not subject to the disclosure limitations of Paragraph 2.11(a) or the notice provisions of Paragraph 2.6(e).

2.4 Initiation of Investigations. The Executive Director shall have the authority to initiate an investigation upon:

- a. Receipt of a complaint that meets the requirements of Paragraph 2.5;
- b. Receipt of a referral from another government and/or law enforcement agency, if the referral describes a potential violation of the Public Integrity Laws; or
- c. Determining, through a preliminary inquiry, that there is reason to believe a violation of the Public Integrity Laws may have occurred.

An investigation that is not initiated in response to a complaint shall not be subject to the requirements of Paragraph 2.5.

2.5 Complaints.

- a. Any person who believes a violation of the Public Integrity Laws has occurred may submit a written complaint to the Executive Director. A complaint shall:
 - i. Provide the full name and address of the complainant, and identify as the subject of the complaint the person or persons who is alleged to have committed violations of the Public Integrity Laws, including their names and addresses if known; and
 - ii. Contain facts that describe a violation of the Public Integrity Laws and shall include relevant times, places, and names of witnesses, if known.

- b. **Initial Review.** Upon receipt of a complaint, the Executive Director shall review the complaint for substantial compliance with the requirements of Paragraph 2.5(a). If the complaint is in compliance, the Executive Director shall notify the complainant that the complaint has been accepted. If a complaint does not comply with Paragraph 2.5(a), the Executive Director shall dismiss the complaint and shall notify the complainant of dismissal and the reasons therefore.
- c. **De Minimis Complaints.** The Executive Director may dismiss or suspend further processing of a complaint or other investigation if, in his or her judgment, the alleged violation is trivial, typographical or clerical, or in other respects a *de minimis* violation; provided, however, that the Executive Director shall report regularly to the Board on the number and nature of complaints dismissed or suspended under this Paragraph.
- d. **Frivolous Complaints prohibited.** No person shall submit a false or frivolous complaint to the Board. If the Executive Director receives information that a complaint is false or frivolous, he or she may initiate an investigation into the circumstances surrounding the drafting and filing of the complaint.

2.6 Conduct of an Investigation.

- a. **Purpose.** The purpose of an investigation is to determine whether there is probable cause to believe that a violation of the Public Integrity Laws has occurred. An investigation ends when the Executive Director either makes a finding of probable cause or terminates the investigation pursuant to Paragraph 2.6(e) or when the matter is resolved by a settlement agreement approved pursuant to Subpart G.
- b. **General.** An investigation may include, but is not limited to, field investigations and inspections, the issuance of subpoenas, the taking of sworn testimony, requests for the production of documents, interrogatories, requests for admissions, the review of public filings, and other methods of information gathering.
- c. **Subpoenas and Subpoenas Duces Tecum.** The Executive Director or the Board Chair shall have the authority to issue subpoenas and subpoenas duces tecum on behalf of the Board in connection to any investigation conducted pursuant to this Regulation. If any person refuses to comply with a subpoena issued under this Paragraph, or while appearing pursuant to it, refuses to answer any question or produce any records or materials, the Board, by majority vote, may direct the Executive Director to apply for the enforcement of the subpoena in the appropriate Court of Common Pleas.
- d. **Testimony.** The Executive Director shall have the authority to administer oaths and affirmations on behalf of the Board and to take testimony from any person in connection to any investigation conducted pursuant to this Regulation.

e. **Termination.** The Executive Director shall have discretion to terminate an investigation upon reasonable notice to the Board. If the investigation is based on a complaint meeting the requirements of Paragraph 2.5(a), the Executive Director shall notify the complainant of the termination and the reasons therefore.

If the Executive Director knows that the subject of an investigation was aware of the investigation, he or she shall notify the subject of the termination and the reasons therefore. When notifying a complainant or subject of an investigation of the termination of an investigation, the Executive Director shall inform them that they are no longer bound by the disclosure prohibition of Paragraph 2.11(a).

The Executive Director may notify persons who have provided testimony or other information to the Board during the course of an investigation that the investigation has been terminated and that they are no longer bound by such disclosure prohibitions.

f. **Referring matters to other government agencies.** The Board or Executive Director may refer any matter related to, or discovered in, an investigation to any other governmental or law enforcement agency as the Board or Executive Director deems appropriate. If the Board deems a potential violation by an officer or employee to be too minor to warrant enforcement by the Board, it may refer the matter to the head of the officer's or employee's agency to take appropriate disciplinary action.

2.7 Retaliation Prohibited. No officer or employee shall discharge, change the official rank, grade or compensation, or deny a promotion of an officer or employee, or threaten to do so, for filing a complaint with or providing information to the Board or Board staff, or for testifying in any Board proceeding.

2.8 Mandatory Cooperation with the Board. All City officers and employees shall cooperate fully with any request of the Board or Board staff made pursuant to the execution of the Board's powers and duties. Failure to cooperate with the Board or Board staff includes:

- a. Refusal to meet with Board staff to provide information related to an investigation or preliminary inquiry;
- b. Responding untruthfully to questions Board staff ask regarding an investigation or preliminary inquiry;
- c. Telling another person not to meet with Board staff or answer questions relating to an investigation or preliminary inquiry;
- d. Directing or suggesting that another person provide false information to the Board or Board staff; or
- e. Destroying evidence related to an investigation or preliminary inquiry.

SUBPART D. CONFIDENTIALITY OF COMPLAINTS AND INVESTIGATIONS

2.9 Board records, reports, memoranda, or files related to a complaint, preliminary inquiry, or investigation shall be confidential and shall not be disclosed, except as provided by this Subpart.

2.10 Confidentiality of complaints and referrals.

- a. **Disclosures by persons other than the Board or Board staff.** A person may disclose his or her intention to file a complaint or make a referral, the fact that he or she has filed a complaint or made a referral, or the substance of the complaint or referral itself.
- b. **Disclosures by the Board or Board staff.** The Board and Board staff shall not disclose the identity of a complainant or the complaint itself unless compelled to do so by court order. The Board and Board Staff may disclose the source of a referral in an approved settlement agreement or in the course of a judicial or administrative enforcement proceeding, appeal, or other legal proceeding, or in a public announcement concerning any of the foregoing.

2.11 Confidentiality of Investigations.

- a. **Disclosures by persons other than the Board or Board staff.** While an investigation is ongoing, a person may not disclose any information or documents related to that investigation that he or she has learned or obtained solely from the Board or Board staff, including the fact that an investigation is ongoing, except as follows:
 - i. A disclosure made for the purpose of seeking the advice of legal counsel;
 - ii. A disclosure made in the course of a judicial proceeding;
 - iii. A disclosure made to a law enforcement official or agency for the purpose of initiating, participating in or responding to an investigation or prosecution by the law enforcement official or agency;
 - iv. A disclosure made in testimony under oath before a governmental body or court; and
 - v. A disclosure required by law.

A person may disclose information or documents related to an investigation that he or she has obtained from a source other than the Board or Board staff, including the content of any statements he or she has made to the Board or Board staff. Once an investigation has ended, a person may disclose any information about that investigation.

- b. **Disclosures by the Board or Board staff.** The Board and Board Staff shall not disclose or acknowledge at any time any information or documents related to a preliminary inquiry or investigation except as necessary to fulfill their duties or if otherwise required by law. The following are examples of permissible disclosures:
- i. A disclosure made for the purpose of seeking the advice of legal counsel;
 - ii. A disclosure made to a law enforcement official or agency for the purpose of initiating, participating in or responding to an investigation or prosecution by the law enforcement official or agency;
 - iii. A disclosure made in a referral by the Board to a government agency, as provided in Paragraph 2.6(f);
 - iv. A disclosure made in testimony under oath before a governmental body or court;
 - v. A disclosure made to a complainant, source of a referral, or subject of a complaint, investigation, or preliminary inquiry or his or her legal counsel or agent;
 - vi. A disclosure made to a witness in a preliminary inquiry or investigation or his or her legal counsel or agent;
 - vii. A disclosure made in order to initiate or pursue a judicial enforcement proceeding or in a public announcement concerning a judicial enforcement proceeding; and
 - viii. A disclosure made in an approved settlement agreement or in a public announcement concerning such settlement agreement.

SUBPART E. ADMINISTRATIVE ENFORCEMENT.

2.12 Initiation of an Administrative Enforcement Proceeding. If the Executive Director finds there is probable cause to believe that a violation of the Public Integrity Laws has occurred, and that the matter is appropriate for an administrative adjudication by the Board, the Executive Director shall initiate an administrative enforcement proceeding. The Executive Director shall not engage in any *ex parte* communications with the Board, its General Counsel, or any Hearing Officer appointed by the Board, with respect to a pending administrative enforcement proceeding.

2.13 Notice of Administrative Enforcement Proceeding. To commence the enforcement proceeding, the Executive Director shall serve a Notice of Administrative Enforcement Proceeding (“Notice”) on each respondent whom he or she alleges has violated the Public Integrity Laws.

- a. **Contents.** The Notice shall contain the following: (i) a description of the acts and/or omissions of the respondent that form the basis for each alleged violation; (ii) the applicable provisions of law that are alleged to be violated; and (iii) the deadline for the respondent’s response required under Paragraph 2.14. The Notice shall inform the respondent of his or her right to request a hearing. The Notice shall also inform respondent that a request for a hearing shall be made in his or her written response to the Notice and that a respondent’s failure to request a hearing is a waiver of the right to a hearing as set forth in Paragraph 2.14(c).
- b. **Service.** The Executive Director shall serve the Notice on each respondent by personal service, certified mail, or any other method that provides proof of delivery. The Executive Director may serve a respondent whose address is unknown either by personally delivering the Notice to such respondent, or his or her attorney or agent, or by any means of substituted or constructive service authorized by Pennsylvania statute or civil rule. The Executive Director shall serve a copy of the Notice on the General Counsel.

2.14 Opportunity to Respond. The respondent has the right to respond in writing to the Notice of Administrative Enforcement Proceeding. The response is due within twenty (20) days of the date of service of the Notice, unless, for exigent circumstances, the Board or its Hearing Officer shall fix a shorter time. Upon the request of the respondent, the Board its designee may grant an extension of time to respond to the Notice. A request for an extension shall be in writing and shall set forth the basis for the request.

- a. **Appearance before Board.** If the respondent wishes to appear before the Board to contest the allegations in the Notice, the respondent shall timely request a hearing in his or her response to the Notice. The respondent may be represented by counsel, and may call witnesses and present evidence in his or her defense at such hearing.
- b. **Representation.** If the respondent is represented by counsel, he or she shall so notify the Board and shall provide the General Counsel with counsel’s name, address, e-mail address, telephone number, and attorney number.

c. **Waiver.** A respondent's failure to request a hearing in his or her written response to the Notice is a waiver of the right to a hearing. A respondent's failure to respond in writing to the Notice by the deadline set forth in this Paragraph is a waiver of the right to a hearing. The Board may grant an untimely request for a hearing if such request is made before the Board votes to approve its final determination in the matter as provided in Paragraph 2.20.

2.15 Confidentiality of Administrative Enforcement Proceedings.

- a. The Board's administrative enforcement proceedings shall be confidential with closed hearings, unless the respondent has provided written consent to a public proceeding.
- b. Unless a respondent requests a public proceeding:
 - i. The Board and Board staff shall not make the proceeding public or disclose any information about it except as necessary to carry out their duties. Only persons who are necessary for the proceeding may be present during a hearing.
 - ii. Respondent and respondent's counsel may make such disclosures as are necessary to participate in the proceeding and to seek or provide legal advice or representation. In addition, respondent and counsel may disclose information related to a proceeding that they have obtained from a source other than the Board, Board staff, or the proceeding.
 - iii. A witness may make such disclosures as are necessary to participate in the proceeding or seek legal advice. In addition, a witness may disclose information related to a proceeding that he or she has obtained from a source other than the Board, Board staff, or the proceeding.
- c. If a respondent provides written consent to a public proceeding, it may not be withdrawn. If a respondent consents to a public proceeding, the Board will make all filings in the proceeding public while it is pending and will hold a public hearing.
- d. Once the Board has served notice of its final determination on the respondent, the adjudication is no longer pending and the Board and Board staff, respondents, respondents' counsel, and witnesses may disclose any information about the proceeding. However, the Board and Board staff shall not disclose the identity of a complainant or the complaint itself unless compelled to do so by court order.

2.16 Administrative Enforcement Hearings. The Board may conduct hearings to adjudicate alleged violations of the Public Integrity Laws. A quorum of Board members need not be present for a hearing to proceed. One or more Board members shall preside over all such hearings, and determine the conduct and order of the proceeding. The Board may, however, appoint a Hearing Officer to oversee pre-hearing disclosures, preside over a hearing, and prepare Findings of Fact and Conclusions of Law for the Board's consideration. Respondents to an enforcement proceeding will be afforded a full and fair opportunity to be heard, as set forth below.

- a. **Notice of Hearing.** The Board shall notify the parties of the date and time of the hearing in advance of the hearing. All hearings shall be held at the offices of the Board of Ethics, unless otherwise specified by the Board.
- b. **Oaths and Affirmations.** The Board and its designees shall have the power to administer oaths and take testimony on any matter relevant to the alleged violations that are the subject of the hearing.
- c. **Subpoenas.** The Board and its designees shall have the power pursuant to Charter § 8-409 to issue subpoenas to compel the attendance of witnesses and the production of documents and materials relevant to the alleged violations that are the subject of the hearing. After the Board issues subpoenas for administrative adjudication hearings, the Executive Director and respondents shall have the authority to apply for enforcement of the subpoenas in the appropriate Court of Common Pleas if any person refuses to comply with any such subpoena, or while appearing pursuant to it, refuses to answer any question or produce any records or materials.
- d. **Ex parte communications.** No party shall engage in a substantive *ex parte* communication with any member of the Board (including, for purposes of this subparagraph, the General Counsel and any Hearing Officer) concerning the administrative enforcement proceeding. Communicating with the General Counsel regarding issues such as scheduling is not a substantive *ex parte* communication.
- e. **Resolution of Pre-hearing Matters.** The Board may designate a single Board member or a Hearing Officer to resolve matters related to pre-hearing disclosures and submissions.
- f. **Maintenance of Order.** The Board, or its Hearing Officer, may exclude an individual from a hearing or limit the number of persons attending a hearing as necessary to limit disruption and maintain an orderly and efficient hearing.
- g. **Additional Procedures.**^{*} The Board may approve additional procedures for the conduct and management of administrative enforcement proceedings. Any additional procedures approved by the Board will be provided to the parties in advance of a hearing.

* On November 19, 2014, the Board approved the additional procedures that are described in the document titled "Procedures for Administrative Enforcement Proceedings that Supplement Regulation No. 2," which immediately follows the last page of this copy of the Regulation.

2.17 Discovery.

- a. **Pre-hearing exchange and submission of information.**
 - i. At least 21 days prior to the hearing, the Executive Director and the respondent shall exchange the names and addresses of witnesses they plan to call to testify and copies of any documents they intend to offer as evidence.
 - ii. At least 14 days prior to the hearing, the Executive Director and respondent shall submit to the Board the names of any witnesses they plan to call to testify and copies of any documents they intend to offer as evidence.
 - iii. The Board may approve additional requirements for the pre-hearing submission of information to the Board. Any additional requirements approved by the Board will be provided to the parties in advance of a hearing.
 - iv. The Board or its Hearing Officer may, for exigent circumstances, fix a shorter time for the exchange and submission of information described in this Paragraph.
 - v. The Executive Director and the respondent shall not offer any contested evidence at the hearing other than from witnesses and documents identified as required by this Paragraph, provided that the Board or its Hearing Officer may grant exceptions for good cause shown.
- b. **No other discovery.** Except for the exchanges of information described in this Paragraph, there shall be no other discovery, unless voluntarily agreed to by the Executive Director and the respondent.

2.18 Examination and Cross-Examination. Witnesses shall testify under oath or affirmation, and shall be subject to reasonable examination and cross-examination. Witnesses shall appear on behalf of or at the invitation or subpoena of the Board or on behalf of the parties to the proceeding.

- a. **Written Testimony.** The Board, or its Hearing Officer, may allow any party or witness to offer testimony in written form. Such written testimony shall be received in evidence with the same force and effect as though it were stated orally at the hearing by the party or witness who has given the evidence, provided that such testimony is sworn under penalty of perjury, and the party or witness is available to appear at the hearing for cross examination as requested by any party to the proceeding.
- b. **Examination of Witnesses by the Board.** Board members, or the Board's Hearing Officer, may ask questions of witnesses at any time.
- c. **Limitation of Witnesses and Examination.** The Board, or its Hearing Officer, may limit the testimony of witnesses whose testimony is cumulative or similar. The Board, or its Hearing Officer, may limit the time to be spent on the direct or cross-examination of a witness or of a party's overall examination and cross examination of witnesses.

2.19 Evidence. The Board, or its Hearing Officer, shall not be bound by technical rules of evidence in administrative enforcement proceedings, and all relevant evidence of reasonably probative value may be received.

- a. **Official Notice.** The Board, or its Hearing Officer, may take official notice of relevant laws, official regulations and transcripts of prior administrative enforcement proceedings; and of judicially cognizable facts, facts of common public knowledge, and physical, technical or scientific facts within the Board's specialized knowledge.
- b. **Documentary Evidence.** The Board, or its Hearing Officer, may accept, at its discretion, copies and excerpts of documents and other records if the original is not in the possession of a party or readily available.

2.20 Final Board Determinations.

- a. After providing the respondent with an opportunity to respond to the Notice of Administrative Enforcement Proceeding and to contest any alleged violations at a hearing conducted pursuant to this Regulation, the Board shall deliberate on the evidence and determine, by a preponderance of the evidence, whether a violation of applicable law has occurred, and whether to assess penalties for any such violations. A determination to find a violation and assess a penalty requires a majority vote of Board members present and voting. A quorum of Board members must participate in the vote on a final determination. The decision of the Board shall be the final agency action.
- b. If the respondent does not request a hearing, the Board may make its final determination based on:
 - i. Undisputed allegations in the Executive Director's Notice of Administrative Enforcement Proceeding; or
 - ii. Evidence submitted by the Executive Director in support of the Notice of Administrative Enforcement Proceeding, including but not limited to deposition transcripts, documents, and affidavits or declarations.
- c. The Board shall serve notice of the final determination on the respondent by any method identified in Paragraph 2.13(b).

2.21 Publication of Final Determinations. The Board shall make its final determination public, including all adjudication filings and the hearing transcript. The Board shall not make public internal documents concerning the adjudication, such as internal legal memoranda drafted by General Counsel staff for the Board or by Enforcement staff for the Executive Director. The Board and Board staff shall not disclose the identity of a complainant or the complaint itself unless compelled to do so by court order.

SUBPART F. JUDICIAL ENFORCEMENT

2.22 Scope. This Subpart shall apply to enforcement actions initiated by the Board in the Court of Common Pleas.

2.23 Request for Authorization of Judicial Enforcement. If the Executive Director finds there is probable cause to believe that a violation of the Public Integrity Laws has occurred, and that the matter is appropriate for judicial enforcement, then the Executive Director shall present the Board with the allegations and an explanation of his or her finding of probable cause and request authorization from the Board to initiate judicial enforcement.

2.24 Opportunity to Address the Board. The Executive Director shall notify the subject of the finding of probable cause by the Executive Director and shall provide him or her with the allegations submitted to the Board pursuant to Paragraph 2.23. The Executive Director shall inform the subject that he or she may appear at the next public meeting of the Board to address the Board and respond to the allegations.

The provisions of Paragraph 2.24 shall not apply to actions to enforce a subpoena issued by the Board or to actions seeking emergency relief.

2.25 Board Action on Request for Authorization of Judicial Enforcement. After reviewing the allegations submitted by the Executive Director and considering the information, if any, provided by the subject, the Board shall:

- a. Reject the Executive Director's finding of probable cause and direct that the matter be dismissed;
- b. Direct the Executive Director to initiate judicial enforcement; or
- c. Determine that the matter is appropriate for administrative enforcement and direct the Executive Director to proceed under Subpart E of this Regulation, but only if the subject consents, in writing, to the matter being so resolved and agrees to waive any due process challenge based on the commingling of adjudicatory and prosecutorial functions arising from prior consideration of or exposure by any member of the Board or its staff to the relevant facts, allegations, or legal theories.

The Board shall notify the subject of its decision regarding the Executive Director's request for authorization of judicial enforcement.

SUBPART G. SETTLEMENT AND CONCILIATION

2.26 Settlement negotiations. At any time, the Executive Director may seek to settle a matter that is the subject of an investigation or enforcement proceeding.

2.27 Settlement Agreement. The Board and a subject of an investigation or a respondent to administrative or judicial enforcement may agree to enter into a written settlement agreement resolving violations of the Public Integrity Laws. The Executive Director shall submit a proposed settlement agreement to the Board in writing with a copy provided to the subject of the investigation or the respondent to the administrative or judicial enforcement. A proposed settlement agreement must be signed by both the Executive Director and the subject or respondent before being submitted to the Board for approval. The adoption of a settlement agreement is entirely within the discretion of the Board. A settlement agreement is not binding until it is signed by the subject or respondent and the Executive Director and approved by a majority vote of the Board. All approved settlement agreements shall be made available to the public.

SUBPART H.PENALTIES

2.28 Any person who does not comply with Subpart D or Paragraphs 2.5(d), 2.7, 2.8, or 2.15 of this Regulation shall be subject to a civil penalty of \$1,000, which may be increased \$2,000 if aggravating factors are present or decreased to \$250 mitigating factors are present, as set forth in Code Chapter 20-1300.

Initially approved for public comment by Board on April 17, 2007

Public Hearing held on June 19, 2007

Adopted by Board, with modifications on June 26, 2007

Effective July 12, 2007

Proposed amendments approved for public comment by the Board on December 16, 2009

Public Hearings held on January 20, 2010 and February 17, 2010

Adopted by Board, with modifications on February 17, 2010

Effective February 28, 2010

Proposed amendments approved for public comment by the Board on May 21, 2014

Posted at Department of Records on May 27, 2014

Public Hearing held on July 16, 2014

Adopted by Board, with modifications on August 6, 2014

Effective August 18, 2014



CITY OF PHILADELPHIA

BOARD OF ETHICS
One Parkway Building
1515 Arch Street
18th Floor
Philadelphia, PA 19102
(215) 686 – 9450 (t)
(215) 686 – 9453 (f)

Procedures for Administrative Enforcement Proceedings that Supplement Board Regulation No.2

The following procedures for Board of Ethics administrative enforcement proceedings supplement the requirements and procedures described in Board Regulation No. 2 (“Investigations and Enforcement Proceedings”) at Subpart E. These additional procedures have been approved by the Board pursuant to Regulation No. 2 Paragraphs 2.16(g) and 2.17(a)(iii). The terms used here have the same meaning as in Regulation No. 2, and the Executive Director and respondent are referred to as the parties. To understand the procedures required for Board of Ethics administrative enforcement proceedings, it is important to read Regulation No. 2 Subpart E as well as this memo. Please contact the Board’s General Counsel with questions regarding these procedures.

1. Submission of Filings to the Board. Filings shall be submitted to the Board as follows:

- i. By email as a PDF less than fifteen megabytes in size to BOEGCStaff@phila.gov; or
- ii. By mail to Acting General Counsel Michael Cooke, City of Philadelphia Board of Ethics, 1515 Arch Street, 18th floor, Philadelphia, PA 19102.

Filings shall be received by the Board (not merely be postmarked) by the date due. All filings submitted to the Board must simultaneously be served on the opposing party. Filings shall include a signed certificate of service that indicates the date and method of service on the opposing party. Service may be made upon opposing counsel by email. The parties shall not send filings directly to individual Board members.

2. Requests for Extension of Time. A party may be granted an initial extension for the submission of a filing upon written request that alleges good cause for an extension and that is filed at least four days prior to a deadline. A Hearing Officer or the General Counsel (if a Hearing Officer has not been appointed) may grant an initial extension of up to 30 days to a party for good cause shown. The Board Chair may grant further extension if extraordinary circumstances are demonstrated by a party in a written request that is filed at least four days prior to the extended deadline. Extensions granted will correspondingly advance other administrative enforcement proceeding deadlines.

3. Format of Notice of Administrative Enforcement Proceeding. The allegations in the Notice of Administrative Enforcement Proceeding (the “Notice”) shall be set forth in consecutively numbered paragraphs.

4. Format of Response to Notice of Administrative Enforcement Proceeding. A Response to the Notice of Administrative Enforcement Proceeding shall be set forth in consecutively numbered paragraphs that admit or deny each allegation in the corresponding numbered paragraphs of the Notice. A respondent may provide any additional facts that are relevant to the respondent's defense.

5. Briefs by the Executive Director and Respondent. If a respondent does not request a hearing, the Executive Director may file a brief in support of the Notice of Administrative Enforcement Proceeding. The Executive Director may attach to the brief exhibits such as deposition transcripts, documents, affidavits or declarations. The Executive Director's brief shall be filed within 14 days of the date that respondent's Response to the Notice was due. A respondent may file a brief in response within 14 days of service of the Executive Director's brief.

6. Scheduling and Pre-Hearing Orders. Within 14 days of the date that Respondent's Response to the Notice is filed, the Hearing Officer or the General Counsel (if a Hearing Officer has not been appointed) shall issue a Scheduling and Pre-Hearing Order setting forth the dates and instructions for:

- i. the exchange of witness lists and exhibits;
- ii. the filing of pre-hearing statements and motions;
- iii. the issuance of subpoenas;
- iv. the order of the parties' presentations at hearing;
- v. the distribution of hearing transcripts;
- vi. and the submission of post-hearing briefs.

The Hearing Officer or the General Counsel (if a Hearing Officer has not been appointed), shall also have the discretion to schedule such pre-hearing conferences and issue amended or supplemental orders as are necessary for the fair and expeditious adjudication of the case.

The Board's Administrative Enforcement Proceedings Are Confidential. The City Code requires that the Board's administrative enforcement proceedings, including filings and testimony, are confidential while pending unless the respondent provides written consent to a public proceeding. Paragraph 2.15 of Regulation 2 describes the confidentiality requirements with which the Board, the parties, and all witnesses must comply.

Approved by the Board on: June 19, 2019

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 Personal Service, Certified Mail, and/or Email:

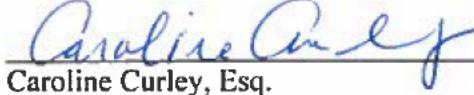
Respondent Celena Morrison

[REDACTED]
(Celena.Morrison@phila.gov)

By Email:

Michael Cooke, Esq.
General Counsel
City of Philadelphia Board of Ethics
1515 Arch Street, 18th Floor
Philadelphia, PA 19102
(Michael.Cooke@phila.gov)

Date: June 9th, 2021



Caroline Curley, Esq.
Staff Attorney, City of Philadelphia Board of Ethics

CERTIFICATION OF SERVICE

County: Philadelphia

State: Pennsylvania

I, Marcus Bonner
(Name of Process Server) affirm and attest that I am a
competent adult not a party to this matter, and that on June 9th 2021
(Date)
at 2:25 (Time) a.m. p.m., I personally served a true and correct attested copy of:

Notice of Administrative Enforcement Hearing & Exhibits

on

Celena Morrison

at the following address:



Celena Morrison

(Name of Person Served)

I make this statement subject to the penalties set forth in 18 Pa.C.S. § 4904 relating to unsworn falsifications to authorities.

Date:

6/9/2021

Server:

A handwritten signature in blue ink, appearing to read "M. Bonner".

Inquiries concerning this Certificate of Service should be addressed to:

Caroline Curley, Esq., Staff Attorney, Board of Ethics

1515 Arch Street, 18th Floor, Philadelphia, PA 19102

(215) 686-9460 • caroline.curley@phila.gov