



CITY OF PHILADELPHIA

BOARD OF ETHICS

ONE PARKWAY BUILDING  
1515 Arch Street, 18<sup>th</sup> Floor  
Philadelphia, PA 19102

July 13, 2021

Professor Louis S. Rulli, Esq.  
Hearing Officer

**Re: Creamer v. Morrison, Matter No. 2106ET19**

Dear Professor Rulli:

I am respectfully seeking leave to file an Amended Notice of Administrative Enforcement Proceeding. The purpose of the amendment is to remove Count 2, and subsequent corresponding paragraphs 52-58, that are related to the claim for Respondent's Failure to Disclose Gifts & Sources of Income in the Philadelphia Statement of Financial Interests.

Yesterday, July 12, 2021, I learned that the Respondent Celena Morrison filed an amended Statement of Financial Interest on June 4, 2021. This was not discovered prior to filing the June 9, 2021 Notice. When a City employee submits a Statement of Financial Interest, the Statement is first received and redacted by the Philadelphia Department of Records before becoming publicly available. Only two Enforcement Staff employees have access to these nonpublic submissions. Unfortunately, these staff members were unavailable from June 4-June 9, 2021 and my office was not otherwise notified that the Amended Statement had been filed.

The public form did not become available until mid-June. My office became aware of this due to internal discussions yesterday. I believe this Amendment is necessary to promptly correct the Notice.

At your earliest convenience, please advise whether this Amended Notice is permissible and any changes to the Respondent's response deadline. I would support and believe an extension of time for the Respondent's Response of 20 days from the date of service of the Amended Notice is legally appropriate due to this Amended Notice. I look forward to your response.

If there are any necessary clarifications, please do not hesitate to contact our office.

Thank you,

A handwritten signature in black ink, appearing to read 'Shane Creamer'.

Shane Creamer, Esq.  
*Executive Director*

cc: Celena Morrison (Respondent)  
Caroline Curley, Esq. (Enforcement Staff Attorney)  
Michael Cooke (General Counsel)  
Jordana Greenwald, Esq. (Associate General Counsel)  
Thomas Klemm, Esq. (Senior General Counsel)