

# CITY OF PHILADELPHIA

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

December 18, 2015

***Via hand delivery***

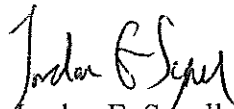
Maya Nayak  
General Counsel  
Board of Ethics  
1515 Arch St., 18<sup>th</sup> Floor  
Philadelphia, PA 19102

***Re: Creamer v. Marnie Aument-Loughrey for Change et. al., Matter No. 1510CF16***

Dear Maya:

Enclosed please find the Executive Director's Brief in Support of the Notice of Administrative Enforcement Proceeding and the Appendix of Exhibits in Support of the Brief in the above captioned matter.

Sincerely,

  
Jordan E. Segall  
Staff Attorney

Enclosures

cc Marnie Aument-Loughrey for Change  
Donna Aument  
(via hand delivery and certified mail)

**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<sup>th</sup> Floor  
Philadelphia, PA 19102

**Matter No. 1510CF16**

**Date of Notice:** October 29, 2015

v.

**Marnie Aument-Loughrey for Change**  
720 E. Willard Street  
Philadelphia, PA 19134

**Donna Aument**  
**Treasurer, Marnie Aument-Loughrey**  
**For Change**  
720 E. Willard Street  
Philadelphia, PA 19134

Respondents

**BRIEF IN SUPPORT OF EXECUTIVE DIRECTOR'S  
NOTICE OF ADMINISTRATIVE ENFORCEMENT PROCEEDING**

**I. Procedural History**

This matter was initiated on October 29, 2015 when the Executive Director served a Notice of Administrative Enforcement Proceeding ("Notice") on Respondents. *See* App. Ex. 1 (Notice of Administrative Enforcement Proceeding and Exhibits); App. Ex. 2 (October 29, 2015 Certification of Service). On November 2, 2015, the Board's General Counsel informed Respondents that they had until November 18, 2015 to file a written Response to the Notice and to request a hearing if they wished to contest the allegations in the Notice. *See* App. Ex. 3 (November 2, 2015 email).

Respondents did not file a Response or request a hearing by November 18, 2015 nor did they request an extension of time to file a Response. *See App. Ex. 4* (November 24, 2015 email). As a result, the Board ruled on November 24, 2015 that Respondents had waived the right to a hearing to contest the allegations in the Notice. *See id.* The Board further informed the Executive Director that he could submit to the Board a brief in support of the Notice by December 2, 2015, if he wished to do so. *See id.*

On November 24, 2015, the Executive Director asked the Board to extend from December 2, 2015 to December 18, 2015 the deadline to file a brief in support of the Notice. *See App. Ex. 5* (November 24, 2015 email). On November 25, 2015, the Board granted the Executive Director's request and set December 18, 2015 as the new deadline for the Executive Director to file a brief in support of the Notice. *See App. Ex. 6* (November 25, 2015 email). The Board further provided that Respondents would have 14 days after service of the Executive Director's brief to file a brief in response, if they wished to do so. *See id.*

## **II. Facts**

Because Respondents did not submit a Response to the Notice, they have not disputed the allegations made therein by the Executive Director. Pursuant to Board Regulation No. 2, Paragraph 2.20(b)(i), the Board may rely upon undisputed allegations in a Notice of Administrative Enforcement Proceeding in making a Final Determination. Accordingly, the Executive Director incorporates by reference the undisputed facts as alleged in the Notice, and the supporting Exhibits attached thereto, as if fully set forth herein.

In addition, the Executive Director supports the undisputed allegations in the Notice with the Affidavit of Peter Anderson, attached hereto as App. Ex. 7, and the Declaration of Stephen Morrissey attached hereto as App. Ex. 8.

### **III. Argument**

The Pennsylvania Election Code (25 P.S. § 3241, *et seq.*) requires candidate political committees to file campaign finance reports at regular intervals, known as filing cycles, throughout the calendar year. *See* 25 P.S. § 3246. Each calendar year is divided into seven filing cycles.

Under the City's Campaign Finance Law, whenever the candidate committee of a City candidate files, or should file, a campaign finance report with the City Commissioners, the committee must electronically file a copy of that report with the Board. *See* Philadelphia Code § 20-1006(1)(a) and Board of Ethics Regulation No. 1, Paragraph 1.19(b).<sup>1</sup> Philadelphia Code Section 20-1006(4) provides that the failure to file a campaign finance report with the Board is a violation of the City's Campaign Finance Law that is subject to enforcement and the imposition of civil monetary penalties (Philadelphia Code § 20-1300, *et seq.*).

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<sup>1</sup> In mid-2015, City Council amended the City's Campaign Finance Law. The amendment took effect on July 1, 2015 and replaced the section previously codified as Section 20-1006(1)(a) with current Sections 20-1006(1)(a)(.1) & (.2). The amendment changed the wording and format of Section 20-1006(1)(a), but not its legal effect. The requirement that candidate committees electronically file reports with the Board anytime they file such reports with the City Commissioners is the same under both the previous and current versions of the City's Campaign Finance Law.

**a. Respondents violated the City's Campaign Finance Law by failing to file a 2015 Cycle 3 Campaign Finance Report with the Board**

Under the State Election Code, candidate committees of City candidates on the ballot for the 2015 Philadelphia Primary Election were required to file a thirty day post-primary (Cycle 3) campaign finance report with the City Commissioners by June 18, 2015. *See* 25 P.S. § 3246(e). The Cycle 3 report covers the time period of May 5, 2015 to June 8, 2015. *See id.* Pursuant to the City's Campaign Finance Law, a City candidate committee must electronically file with the Board a copy of any Cycle 3 report it files, or should file, with the City Commissioners. *See* Philadelphia Code § 20-1006(1)(a).

As alleged in the Notice, Marnie Aument-Loughrey was on the ballot for the 2015 Philadelphia Primary Election as a candidate for a City Council At-Large seat.<sup>2</sup> On April 30, 2015, Ms. Aument-Loughrey informed the Board that she intended to use the committee Marnie Aument-Loughrey for Change as her candidate political committee for her campaign for a City Council At-Large seat. As such, Respondents were required to file a 2015 Cycle 3 campaign finance report for Marnie Aument-Loughrey for Change with both the City Commissioners and the Board. However, Respondents did not file a 2015 Cycle 3 campaign finance report with the Board.

Respondents' failure to file a 2015 Cycle 3 report, as required by Philadelphia Code Section 20-1006(1)(a), violated Philadelphia Code Section 20-1006(4) and thus pursuant to Philadelphia Code Section 20-1301(2), the Board should impose a civil monetary penalty of \$250 for each day the report is not filed with a maximum penalty of

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<sup>2</sup> As discussed in Section II, above, because Respondents did not submit a response to the Notice, they have not disputed the allegations made therein. Pursuant to Board Regulation No. 2, Paragraph 2.20(b)(i), the Board may rely upon undisputed allegations in a Notice of Administrative Enforcement Proceeding in making a Final Determination.

\$2,000 for the first 30 days the report remains unfiled plus a \$1,000 penalty for each additional 30 day period, or part thereof, the report remains unfiled, for which Respondents should be held jointly and severally liable. In calculating the amount of penalty that has accrued, the Executive Director respectfully submits that the Board should use either the date he served the Notice on Respondents or the date that the Board issues its Final Determination. The amount of penalty for the failure to file the 2015 Cycle 3 campaign finance report that had accrued at the date of service of the Notice was \$6,000.

**b. Respondents violated the City's Campaign Finance Law by failing to file a 24 Hour Campaign Finance Report with the Board**

Under the Pennsylvania Election Code, if, in the two weeks preceding an election, a candidate committee of a City candidate accepts a contribution of \$500 or more, it must, within 24 hours of receipt, file a campaign finance report with the City Commissioners disclosing that contribution. *See* 25 P.S. § 3248. For the 2015 Philadelphia Primary Election, the 24 hour reporting period was from May 5, 2015 through May 19, 2015. *See id.* Pursuant to the City's Campaign Finance Law, a City candidate committee must electronically file with the Board a copy of any 24 hour report it files, or should file, with the City Commissioners. *See* Philadelphia Code § 20-1006(1)(a).

As alleged in the Notice, on or about May 13, 2015, the Laborers District Council PAC made a contribution of \$6,500 to Marnie Aument-Loughrey for Change. Because this contribution was in excess of \$500 and was made between May 5, 2015 and May 19, 2015, Respondents were required to file a 24 hour report disclosing this contribution to

Marnie Aument-Loughrey for Change with both the City Commissioners and the Board. However, Respondents did not file a 24 hour campaign finance report with the Board.

Respondents' failure to file a 24 hour report with the Board disclosing a May 13, 2015 \$6,500 contribution from Laborers District Council PAC, as required by Philadelphia Code Section 20-1006(1)(a), violated Philadelphia Code Section 20-1006(4) and thus pursuant to Philadelphia Code Section 20-1301(2), the Board should impose civil monetary penalty of \$250 for each day the report is not filed with a maximum of \$2,000 for the first 30 days the report remains unfiled plus \$1,000 for each additional 30 day period, or part thereof, the report remains unfiled, for which Respondents should be held jointly and severally liable. In calculating the amount of penalty that has accrued, the Executive Director respectfully submits that the Board should use either the date he served the Notice on Respondents or the date that the Board issues its Final Determination. The amount of penalty for the failure to file the 24 hour report that had accrued at the date of service of the Notice was \$7,000.

#### **IV. Conclusion**

Based on the foregoing, the Executive Director respectfully requests that the Board make the following findings:

1. As alleged in Count 1 of the Notice, Respondents violated Philadelphia Code Section 20-1006(4) when they failed to file a 2015 Cycle 3 campaign finance report with the Board as required by Philadelphia Code Section 20-1006(1)(a) *and* pursuant to Philadelphia Code Section 20-1301(2) Respondents should therefore be jointly and severally subject to a civil monetary penalty of \$250 for each day the report is not filed with a maximum penalty of \$2,000 for the first 30 days the report remains unfiled plus a

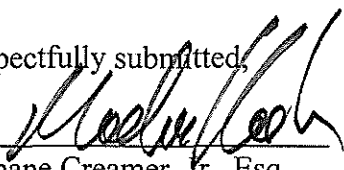
\$1,000 penalty for each additional 30 day period, or part thereof. In calculating the amount of penalty that has accrued, the Executive Director respectfully submits that the Board should use either the date he served the Notice on Respondents or the date that the Board issues its Final Determination. The amount of penalty for the failure to file the 2015 Cycle 3 campaign finance report that had accrued at the date of service of the Notice was \$6,000.

2. As alleged in Count 2 of the Notice, Respondents violated Philadelphia Code Section 20-1006(4) when they failed to file a 24 hour campaign finance report with the Board disclosing a May 13, 2015 contribution of \$6,500 from the Laborers District Council PAC as required by Philadelphia Code Section 20-1006(1)(a) *and* pursuant to Philadelphia Code Section 20-1301(2) Respondents should therefore be jointly and severally subject to a civil monetary penalty of \$250 for each day the report is not filed with a maximum penalty of \$2,000 for the first 30 days the report remains unfiled plus a \$1,000 penalty for each additional 30 day period, or part thereof. In calculating the amount of penalty that has accrued, the Executive Director respectfully submits that the Board should use either the date he served the Notice on Respondents or the date that the Board issues its Final Determination. The amount of penalty for the failure to file the 24 hour report that had accrued at the date of service of the Notice was \$7,000.



Date: December 18, 2015

Respectfully submitted,



J. Shane Creamer, Jr., Esq.  
Executive Director

Michael J. Cooke, Esq.  
Director of Enforcement

Jordan E. Segall, Esq.  
Staff Attorney

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

**CERTIFICATION OF SERVICE**

I, Jordan E. Segall, hereby certify that on this date I caused a true and correct copy of the foregoing Brief in Support of the Executive Director's Notice of Administrative Enforcement Proceeding and supporting Appendix, to be served upon the following:

By hand delivery and certified mail:

**Marnie Aument-Loughrey for Change**  
c/o Donna Aument, Treasurer  
720 E. Willard Street  
Philadelphia, PA 19134

**Donna Aument**  
**Treasurer, Marnie Aument-Loughrey for Change:**  
720 E. Willard Street  
Philadelphia, PA 19134

By hand delivery:

Maya Nayak  
General Counsel  
Board of Ethics  
1515 Arch St., 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
[Maya.nayak@phila.gov](mailto:Maya.nayak@phila.gov)

Date: December 18, 2015

A handwritten signature in black ink, appearing to read "Jordan E. Segall", is written over a horizontal line.

**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<sup>th</sup> Floor  
Philadelphia, PA 19102

**Matter No. 1510CF16**

**Date of Notice:** October 29, 2015

v.

**Marnie Aument-Loughrey for Change**  
720 E. Willard Street  
Philadelphia, PA 19134

**Donna Aument**  
**Treasurer, Marnie Aument-Loughrey**  
**For Change**  
720 E. Willard Street  
Philadelphia, PA 19134

Respondents

**APPENDIX TO EXECUTIVE DIRECTOR'S BRIEF IN SUPPORT OF NOTICE OF  
ADMINISTRATIVE ENFORCEMENT PROCEEDING**

1. October 29, 2015 Notice of Administrative Enforcement Proceeding and Exhibits in  
Support of Notice of Administrative Enforcement Proceeding: Creamer v. Marnie  
Aument Loughrey for Change and Donna Aument
2. October 29, 2015 Certification of Service: Notice of Administrative Enforcement  
Proceeding and Exhibits in Support of Notice of Administrative Enforcement Proceeding:  
Creamer v. Marnie Aument Loughrey for Change and Donna Aument
3. November 2, 2015 email, with attachments: Diana Lin, [marnie65@verizon.net](mailto:marnie65@verizon.net), J. Shane  
Creamer, Jr., Maya Nayak, Michael Cooke, and Jordan Segall

4. November 24, 2015 email, with attachment: Diana Lin, [marnie65@verizon.net](mailto:marnie65@verizon.net), J. Shane Creamer, Jr., Maya Nayak, Michael Cooke, and Jordan Segall
5. November 24, 2015 email: Jordan Segall, Diana Lin, [marnie65@verizon.net](mailto:marnie65@verizon.net), J. Shane Creamer, Jr., Maya Nayak, and Michael Cooke
6. November 25, 2015 email: Maya Nayak, [marnie65@verizon.net](mailto:marnie65@verizon.net), J. Shane Creamer, Jr., Michael Cooke, and Jordan Segall
7. December 16, 2015 Affidavit: Peter Anderson
8. December 17, 2015 Declaration: Stephen Morrissey

Date: December 18, 2015

# Exhibit 1

**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<sup>th</sup> Floor  
Philadelphia, PA 19102

**Matter No. 1510CF16**

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**Marnie Aument-Loughrey for Change**  
720 E. Willard Street  
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**Donna Aument**  
**Treasurer, Marnie Aument-Loughrey**  
**For Change**  
720 E. Willard Street  
Philadelphia, PA 19134

Respondents

**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 Philadelphia's Campaign Finance Law and to impose a civil monetary penalty on you.

**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 Board's 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, ¶2.15.

If you have any questions regarding the procedures for administrative enforcement proceedings before the Board, you should contact the Board's General Counsel, Maya Nayak, at 215-686-9450 or maya.nayak@phila.gov.

#### **I. RELEVANT LAW**

Pursuant to Philadelphia Code § 20-1006(1)(a)(i) and Board of Ethics Regulation No. 1, Paragraph 1.19(b), whenever a candidate political committee files, or should file, a campaign finance report with the City Commissioners, the committee must electronically file a copy of that report with the Board.

The Pennsylvania Election Code (25 P.S. § 3241, *et seq.*) requires candidate political committees to file campaign finance reports disclosing their contributions and expenditures at regular intervals, known as filing cycles, throughout the calendar year. Each calendar year is divided into seven filing cycles.

Candidate political committees of candidates on the ballot for the 2015 Philadelphia Primary Election were required to file a Cycle 3 (thirty day post-primary) campaign finance report by June 18, 2015. The Cycle 3 report covered the time period of May 5, 2015 and June 8, 2015.

In addition, from May 5 through May 19, 2015, if a candidate political committee accepted a contribution of \$500 or more, it was required to file, within 24 hours, a campaign finance report disclosing that contribution.

The failure to file a required campaign finance report with the Board violates Philadelphia Code Section 20-1006(4) and, pursuant to Code Section 20-1301(2), is subject to a civil monetary penalty of \$250 for each day the report is not filed with a maximum of \$2,000 for the first 30 days the report remains unfiled plus \$1,000 for each additional 30 day period, or part thereof, the report remains unfiled.

## **II. PARTIES**

1. J. Shane Creamer, Jr. is the Executive Director of the Board of Ethics.
2. Marnie Aument-Loughrey for Change is the candidate political committee of former City Council candidate Marnie Aument-Loughrey. The committee is registered with the Philadelphia City Commissioners.
3. Donna Aument is the treasurer of Marnie Aument-Loughrey for Change.



### **III. FACTUAL ALLEGATIONS**

4. In the May 19, 2015 Philadelphia Primary Election, Marnie Aument-Loughrey was on the ballot as a candidate for a City Council At-Large seat.
5. Marnie Aument-Loughrey authorized the political committee Marnie Aument-Loughrey for Change to accept contributions on her behalf.
6. On April 30, 2015, Ms. Aument-Loughrey notified the Board that Marnie Aument-Loughrey for Change was the political committee she intended to use to accept contributions and make expenditures for her campaign for a City Council At-Large seat. *See Exhibit A (Email exchange between Board enforcement staff and Ms. Loughrey).*
7. Because Ms. Aument-Loughrey was a candidate for City office in the May 2015 Primary Election, Marnie Aument-Loughrey for Change should have filed a Cycle 3 campaign finance report with both the City Commissioners and the Board by June 18, 2015.
8. However, Marnie Aument-Loughrey for Change did not file a Cycle 3 report with either the City Commissioners or the Board.
9. Additionally, on or around May 13, 2015, Marnie Aument-Loughrey for Change received a contribution of \$6,500 from Laborers District Council PAC. *See Exhibit B at Page 14 (Laborers District Council PAC 2015 Cycle 3 report).*
10. Because the May 13, 2015 Laborers District Council PAC contribution exceeded \$500 and was received between May 5 and May 19, 2015, Respondents within 24 hours of receipt should have filed a report disclosing that contribution with both the City Commissioners and the Board.

11. Marnie Aument-Loughrey for Change did not file any 24 hour reports with either the City Commissioners or the Board.

12. On June 23, 2015, Board enforcement staff sent Respondent Aument a letter via certified mail informing her of Respondents' failure to electronically file required campaign finance reports with the Board. Board enforcement staff sent a copy of the letter to Ms. Aument-Loughrey by email at [marnie65@verizon.net](mailto:marnie65@verizon.net). *See* Exhibit C (June 23, 2015 certified letter and email).

13. The email address [marnie65@verizon.net](mailto:marnie65@verizon.net) was also the email address that Ms. Aument-Loughrey provided to the Board on April 30, 2015 for her Treasurer, Respondent Aument.

14. On July 24, 2015, Board enforcement staff called Respondents and Ms. Aument-Loughrey at the telephone number (215) 425-2165 regarding Respondents' failure to electronically file required campaign finance reports with the Board. Board enforcement staff left a detailed voicemail message, which Respondents and Ms. Aument-Loughrey did not return.

15. The telephone number (215) 425-2165 was the telephone number that Ms. Aument-Loughrey provided to the Board on April 30, 2015 for her Treasurer, Respondent Aument.

16. On July 24, 2015, Board enforcement staff also sent an email to Ms. Aument-Loughrey at [marnie65@verizon.net](mailto:marnie65@verizon.net) regarding Respondents' failure to electronically file required campaign finance reports with the Board. Board enforcement staff attached to the email a copy of the June 23, 2015 letter sent to Ms. Aument. *See* Exhibit D (June 24, 2015 email).

17. On October 16, 2015, Board enforcement staff sent Respondent Aument a letter via hand delivery and email (to [marnie65@verizon.net](mailto:marnie65@verizon.net)) regarding Respondents' failure to electronically file required campaign finance reports with the Board. Board enforcement staff sent a copy of the letter to Ms. Aument-Loughrey via certified mail. *See* Exhibit E (October 16, 2015 correspondence).

18. Neither Respondents nor Ms. Aument-Loughrey have responded to any communications from Board enforcement staff.

### **III. ALLEGED VIOLATION OF PHILADELPHIA'S CAMPAIGN FINANCE LAW**

#### **COUNT 1 –VIOLATION OF PHILADELPHIA CODE SECTION 20-1006(A)**

19. As alleged in paragraphs 1 – 18, by failing to file a 2015 cycle 3 campaign finance report with the Board, Respondents Marnie Aument-Loughrey for Change and Donna Aument violated Philadelphia Code §20-1006(1)(a)(i).

WHEREFORE, for this alleged violation of Code §20-1006(1)(a)(i), the Executive Director seeks a maximum civil penalty of \$250 for each day the report is not filed with maximum total penalties of \$2,000 for the first 30 days the report remains unfiled plus \$1,000 for each additional 30 day period, or part thereof, the report remains unfiled, which as of the date of this Notice is \$6,000.

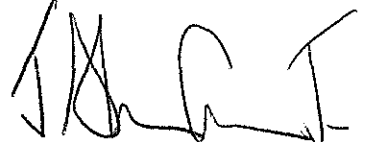
#### **COUNT 2 –VIOLATION OF PHILADELPHIA CODE SECTION 20-1006(A)**

20. As alleged in paragraphs 1 – 18, by failing to file with the Board a 24 hour report disclosing a May 13, 2015 contribution of \$6,500 from Laborers District Council PAC, Respondents Marnie Aument-Loughrey for Change and Donna Aument violated Philadelphia Code §20-1006(1)(a)(i).

WHEREFORE, for this alleged violation of Code §20-1006(1)(a)(i), the Executive Director seeks a maximum civil penalty of \$250 for each day the report is not filed with maximum total penalties of \$2,000 for the first 30 days the report remains unfiled plus \$1,000 for each additional 30 day period, or part thereof, the report remains unfiled, which as of the date of this Notice is \$7,000.

Date: October 29, 2015

Respectfully submitted,



J. Shane Creamer, Jr., Esq.  
Executive Director

Michael J. Cooke, Esq.  
Director of Enforcement

Jordan E. Segall, Esq.  
Staff Attorney

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

**CERTIFICATION OF SERVICE**

I, Jordan E. Segall, hereby certify that on this date I caused a true and correct copy of the foregoing Notice of Administrative Enforcement Proceeding and Exhibits in Support of Notice of Administrative Enforcement Proceeding to be served upon the following:

By hand delivery and email:

**Marnie Aument-Loughrey for Change**

720 E. Willard Street  
Philadelphia, PA 19134

**Donna Aument**

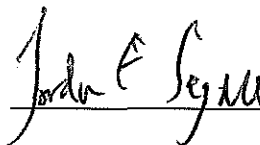
**Treasurer, Marnie Aument-Loughrey for Change:**

720 E. Willard Street  
Philadelphia, PA 19134  
[marnie65@verizon.net](mailto:marnie65@verizon.net)

By email:

Maya Nayak  
General Counsel  
Board of Ethics  
1515 Arch St., 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
[Maya.nayak@phila.gov](mailto:Maya.nayak@phila.gov)

Date: October 29, 2015

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

<b>J. Shane Creamer, Jr.</b>	:	
<b>Executive Director</b>	:	
<b>Board of Ethics</b>	:	
<b>of the City of Philadelphia</b>	:	
1515 Arch Street, 18 <sup>th</sup> Floor	:	
Philadelphia, PA 19102	:	
	:	Matter No. 1510CF16
v.	:	
	:	
<b>Marnie Aument-Loughrey for Change</b>	:	
720 E. Willard Street	:	
Philadelphia, PA 19134	:	
	:	
<b>Donna Aument</b>	:	
<b>Treasurer, Marnie Aument-Loughrey</b>	:	
<b>For Change</b>	:	
720 E. Willard Street	:	
Philadelphia, PA 19134	:	
	:	
<u>Respondents,</u>	:	

**EXHIBITS IN SUPPORT OF NOTICE OF ADMINISTRATIVE ENFORCEMENT  
PROCEEDING**

Exhibit A	Email Exchange with Marnie Aument-Loughrey from April 24, 2015 through April 30, 2015
Exhibit B	2015 Cycle 3 reports filed with the Board of Ethics: Laborers District Council PAC
Exhibit C	Certified Letter and Email to Donna Aument and Marnie Aument-Loughrey: June 23, 2015 (with certified mail receipt)
Exhibit D	Email to Donna Aument and Marnie Aument-Loughrey: July 24, 2015
Exhibit E	Email and Letter to Donna Aument and Marnie Aument-Loughrey: October 16, 2015 (with hand delivery receipt and certified mail tracking slip)

# **EXHIBIT A**

**RE: City of Philadelphia Board of Ethics: Required Candidate Committee Information**

marnie65 [marnie65@verizon.net]

Sent: Thursday, April 30, 2015 11:06 AM

To: Jordan Segall

Her email o the same as mine

Sent from my Kyocera DuraForce, an AT&T 4G LTE smartphone

On Apr 30, 2015 10:23 AM, Jordan Segall <Jordan.Segall@phila.gov> wrote:

Marnie,

Thank you very much for this information and your response. It is greatly appreciated. Is your treasurer's email contact your email address? Please confirm or provide Donna Aument's email.

Thanks,  
Jordan

Jordan E. Segall

Staff Attorney

**City of Philadelphia Board of Ethics**

One Parkway Building, 18th Floor

1515 Arch Street

Philadelphia, PA 19102

Office: 215-686-9457

Mobile: 215-821-4328

Fax: 215-686-9453

[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)

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**From:** marnie65@verizon.net [marnie65@verizon.net]

**Sent:** Thursday, April 30, 2015 10:17 AM

**To:** Jordan Segall

**Subject:** Re: City of Philadelphia Board of Ethics: Required Candidate Committee Information

Jordan,

here is the information

Marnie Aument-Loughrey for Change

720 E. Willard Street

Philadelphia, PA 19134

Treasurer Donna Aument

720 e. Willard Street

215-425-2165

my email [marnie65@Verizon.net](mailto:marnie65@Verizon.net)

Police & Fire Federal Credit Union

I received my confirmation from the records room for my campaign on Monday, April 27th at 3:04 pm

Sorry they did not give you a copy

Marnie

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On 04/30/15, Jordan Segall<Jordan.Segall@phila.gov> wrote:

Dear Ms. Loughrey,

Please provide me with the below information by reply email as soon as possible.

1. Committee name



2. Committee's street address
3. Treasurer name, street address, telephone number, and email address
4. Bank where committee's checking account is held

If you are acting as the Treasurer please provide us with your information for item #3.

Thank you for your time and prompt attention and cooperation with this matter.

Sincerely,  
Jordan E. Segall  
Staff Attorney  
**City of Philadelphia Board of Ethics**  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
Office: 215-686-9457  
Mobile: 215-821-4328  
Fax: 215-686-9453  
[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)

**From:** Jordan Segall  
**Sent:** Friday, April 24, 2015 2:56 PM  
**To:** [marnie65@verizon.net](mailto:marnie65@verizon.net)  
**Subject:** City of Philadelphia Board of Ethics: Required Candidate Committee Information

Dear Ms. Loughrey,  
It was a pleasure speaking with you this afternoon by telephone. As I mentioned, the City's Campaign Finance Law requires every candidate for City office to provide the Board of Ethics with certain information about his or her candidate committee.

Please provide the below information to me via reply email as soon as possible:

1. Committee name
2. Committee's street address
3. Treasurer name, street address, telephone number, and email address
4. Bank where committee's checking account is held

If you are acting as the Treasurer please provide us with your information for item #3.

Additionally, as I mentioned, you will need to ensure this committee is appropriately registered with the City Commissioners for your City Council At Large race by contacting Tim Dowling at 215-686-3469.

Attached please find additional information about the campaign finance law including:

- Frequently Asked Questions about the City's Campaign Finance Law;
  - A Guide to the City's Campaign Finance Law;
  - Ethics Board Regulation No. 1 (Campaign Finance), which provides detailed guidance on the City's campaign finance law; and
  - A registration form for the City's online campaign finance database to file campaign finance reports.
- The first report (the Cycle 2 2015 report) must be filed with the City by May 8, 2015. The**

required software to complete the electronic filing is called SmartClient and can be downloaded here: <http://philadox.phila-records.com/cfsc/>

We will also add your email address to our campaign finance list so you will receive notice of relevant City campaign finance related matters.

Please do not hesitate to contact me by email or telephone if you have any questions or concerns. Thank you for your time and prompt attention to this matter.

Have a nice weekend.

Best,  
Jordan

---  
Jordan E. Segall  
Staff Attorney  
**City of Philadelphia Board of Ethics**  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
Office: 215-686-9457  
Mobile: 215-821-4328  
Fax: 215-686-9453  
[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)

## **EXHIBIT B**

# Campaign Finance Report

(Note: This report must be clear and legible. It may be typed or printed in blue or black ink.)

Page 1 of 25

Filer Identification Number:	9100189	Report Filed By:	CANDIDATE	1.	COMMITTEES	2.	X	LOBBYIST	3.
Name of Filing Committee, Candidate or Lobbyist: LABORERS DISTRICT COUNCIL PAC									
Street Address: 665 N BROAD STREET 665 N BROAD STREET									
City: PHILADELPHIA					State: PA		Zip Code: 19123		
TYPE OF REPORT	1st Tuesday Pre-Primary	1.	2nd Friday Pre-Primary	2.	30 Day Post-Primary	3.	X	Amendment Report?	YES
	6th Tuesday Election	4.	2nd Friday Post-Election	5.	30 Day Post-Election	6.		Termination Report?	YES
	Annual Report	7.	YEAR		2015				
Name of Office Sought by Candidate:				DATE OF ELECTION		District Number:	Office Code:	Party Code:	County Code:
				MO. DAY YEAR					
Summary of Receipts and Expenditures from:				MO. DAY YEAR		FOR OFFICE USE ONLY			
To				MO. DAY YEAR					
A. Amount Brought Forward From Last Report						\$ 161,231.22			
B. Total Monetary Contributions and Receipts (From Schedule I)						\$ 117,724.70			
C. Total Funds Available (Sum of Lines A and B)						\$ 278,955.92			
D. Total Expenditures (From Schedule III)						\$ 206,983.27			
E. Ending Cash Balance (Subtract Line D from Line C)						\$ 71,972.65			
F. Value of In-Kind Contributions Received (From Schedule II)						\$ -			
G. Unpaid Debts and Obligations (From Schedule IV)						\$ -			
<b>AFFIDAVIT SECTION</b>									
PART I - If this is a Committee report, (Candidate on AS-6, If this is a Candidate report, candidate and date)									
I swear (or affirm) that this report, including the attached schedules, on paper or computer diskette, are to the best of my knowledge and belief true, correct and complete.									
Sworn to and subscribed before me this									
_____ day of _____ 20____				Signature of Person Submitting Report					
Signature				Printed Name					
My commission expires				Area Code					
MO. DAY YEAR				Daytime Telephone Number					
PART II - If this is a report of a Candidate's Authorized Committee, candidate will sign here.									
I swear (or affirm) that to the best of my knowledge and belief this political committee has not violated any provisions of the Act of June 3, 1937 (P.L. 1333, No 320) as amended.									
Sworn to and subscribed before me this									
_____ day of _____ 20____				Signature of Candidate					
Signature				Printed Name					
My commission expires				Area Code					
MO. DAY YEAR				Daytime Telephone Number					

SCHEDULE I  
**Contributions And Receipts**

Detailed Summary Page

Name of Filing Committee or Candidate  <b>LABORERS DISTRICT COUNCIL PAC</b>	Reporting Period From _____ To _____
---	---

<b>1. UNITEMIZED CONTRIBUTIONS AND RECEIPTS - \$50.00 OR LESS PER CONTRIBUTOR</b>	
TOTAL for the Reporting Period (1)	\$ 117,649.57

<b>2. CONTRIBUTIONS \$50.01 TO \$250.00 (FROM PART A AND PART B)</b>	
Contributions Received from Political Committees (Part A)	\$ -
All Other Contributions (Part B)	\$ -
TOTAL for the Reporting Period (2)	\$ 0

<b>3. CONTRIBUTIONS OVER \$250.00 (FROM PART C AND PART D)</b>	
Contributions Received from Political Committees (Part C)	\$ -
All Other Contributions (Part D)	\$ -
TOTAL for the Reporting Period (3)	\$ 0

<b>4. OTHER RECEIPTS, REFUNDS, INTEREST EARNED, RETURNED CHECKS, ETC. (FROM PART E)</b>	
TOTAL for the Reporting Period (4)	\$ 75.13

<b>TOTAL MONETARY CONTRIBUTIONS AND RECEIPTS DURING THIS REPORTING PERIOD</b> (Add and enter amount totals from Boxes 1, 2, 3 and 4; also enter this amount on Page 1, Report Cover Page, Item B.)	<b>\$ 117,724.70</b>
--	----------------------

## Part A

## Contributions Received From Political Committees

\$50.01 TO \$250.00

Use this Part to itemize only contributions received from political committees with an aggregate value from \$50.01 to \$250.00 in the reporting period.

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			MO DAY YEAR		\$ -
Mailing Address					
City	State	Zip Code (Plus 4)			
Enter Grand Total of Part A on Schedule I, Detailed Summary Page, Section 2.					Part A Total \$ -

## Part B

**All Other Contributions**

\$50.01 TO \$250.00

Use this Part to itemize all other contributions with an aggregate value from \$50.01 to \$250.00 in the reporting period.

(Exclude contributions from political committees reported in Part A.)

Name of Filing Committee or Candidate			Reporting Period		
LABORERS DISTRICT COUNCIL PAC			From _____ To _____		
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributor			MO. DAY YEAR \$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Enter Grand Total of Part B on Schedule I, Detailed Summary Page, Section 2.			Part B Total \$ -		

## Part C

## Contributions Received From Political Committees

OVER \$250.00

Use this Part to itemize only contributions received from political committees with an aggregate value over \$250.00 in the reporting period.

Name of Filing Committee or Candidate			Reporting Period	
LABORERS DISTRICT COUNCIL PAC			From	To
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Full Name of Contributing Committee			MO	DAY YEAR
Mailing Address			\$ -	
City	State	Zip Code (Plus 4)		
Enter Grand Total of Part C on Schedule I, Detailed Summary Page, Section 3.			Part C Total \$ -	



## Part D

**All Other Contributions**

OVER \$250.00

Use this Part to itemize all other contributions with an aggregate value of over  
\$250.00 in the reporting period.

(Exclude contributions from political committees reported in Part C.)

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer Name			Occupation	
Employer Mailing Address/Principal Place of Business				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer Name			Occupation	
Employer Mailing Address/Principal Place of Business				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer Name			Occupation	
Employer Mailing Address/Principal Place of Business				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer Name			Occupation	
Employer Mailing Address/Principal Place of Business				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer Name			Occupation	
Employer Mailing Address/Principal Place of Business				
Enter Grand Total of Part D on Schedule I, Detailed Summary Page, Section 3.			Part D Total \$ -	

**Part E**  
**Other Receipts**

REFUNDS, INTEREST INCOME, RETURNED CHECKS, ETC.

Use this Part to report refunds received, interest earned, returned checks and prior expenditures that were returned to the filer.

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
Full Name REPUBLIC BANK			MO 5	DAY 31	YEAR 2015	\$ 6.13
Mailing Address 50 S 16TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19102				
Receipt Description INTEREST INCOME						
Full Name SAMUEL STATEN JR			MO 5	DAY 31	YEAR 2015	\$ 69.00
Mailing Address 665 N BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Receipt Description REIMBURSEMENT - CONFERENCE EXPENSE						
Full Name			MO	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Full Name			MO	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Full Name			MO	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Enter Grand Total of Part E on Schedule I, Detailed Summary Page, Section 4.						Part E Total \$ 75.13

## SCHEDULE II

**In-Kind Contributions And Valuable Things Received**

USE THIS SCHEDULE TO REPORT ALL IN-KIND CONTRIBUTIONS OF VALUABLE THINGS  
DURING THE REPORTING PERIOD.

Detailed Summary Page

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC		Reporting Period From _____ To _____	
<b>1. UNITEMIZED IN-KIND CONTRIBUTIONS RECEIVED - VALUE OF \$50.00 OR LESS PER CONTRIBUTOR</b>			
TOTAL for the Reporting Period (1)			\$ -
<b>2. IN-KIND CONTRIBUTIONS RECEIVED - VALUE OF \$50.01 TO \$250.00 (FROM PART F)</b>			
TOTAL for the Reporting Period (2)			\$ -
<b>3. IN-KIND CONTRIBUTION RECEIVED - VALUE OVER \$250 (FROM PART G)</b>			
TOTAL for the Reporting Period (3)			\$ -
TOTAL VALUE OF IN-KIND CONTRIBUTIONS DURING THIS REPORTING PERIOD (Add and enter amount totals from Boxes 1, 2 and 3; also enter this amount on Page 1, Report Cover Page, Item F.			\$ 0

## SCHEDULE II

## Part F

## In-kind Contributions Received

VALUE OF \$50.01 TO \$250.00

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Description of Contribution				
Enter Grand Total of Part F on Schedule II, In-Kind Contributions Detailed Summary Page, Section 2.			Part F Total \$ -	

## SCHEDULE II

## Part G

**In-kind Contributions Received**

VALUE OVER \$250.00

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Full Name of Contributor			MO DAY YEAR \$ -	
Mailing Address				
City	State	Zip Code (Plus 4)		
Employer of Contributor			Occupation	
Employer Mailing Address/Principal Place of Business			Description of Contribution	
Enter Grand Total of Part G on Schedule II, In-Kind Contributions Detailed on Primary Page, Section 3.			Part G Total \$ -	

SCHEDULE III  
Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid FRIENDS OF DAINE GREY JR			MO 5	DAY 5	YEAR 2015	\$ 2,500.00
Mailing Address PO BOX 17603						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19135				
Description of Expenditure CONTRIBUTION						
To Whom Paid PERRY W. BLACKMAN CPA			MO 5	DAY 6	YEAR 2015	\$ 2,125.00
Mailing Address 506 CORPORATE DRIVE WEST						
City LANGHORNE	State PA	Zip Code (Plus 4) 19047				
Description of Expenditure ACCOUNTING FEES						
To Whom Paid LABORERS DISTRICT COUNCIL			MO 5	DAY 6	YEAR 2015	\$ 101.18
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURSE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO 5	DAY 6	YEAR 2015	\$ 506.43
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURSE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO 5	DAY 6	YEAR 2015	\$ 94.53
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURSE - INSURANCE EXPENSE						
To Whom Paid CHARLES TABOURN			MO 5	DAY 6	YEAR 2015	\$ 25.00
Mailing Address 246 ROSS ROAD						
City KING OF PRUSSIA	State PA	Zip Code (Plus 4) 19406				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate			Reporting Period		
LABORERS DISTRICT COUNCIL PAC			From _____ To _____		
To Whom Paid			MO	DAY	YEAR
CITIZENS FOR KENYATTA JOHNSON			5	7	2015
Mailing Address			\$ 11,500.00		
PO BOX 7466					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19101			
Description of Expenditure					
CONTRIBUTION					
To Whom Paid			MO	DAY	YEAR
FRIENDS OF CURTIS JONES JR			5	7	2015
Mailing Address			\$ 11,500.00		
100 S BROAD STREET SUITE 1530					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19110			
Description of Expenditure					
CONTRIBUTION					
To Whom Paid			MO	DAY	YEAR
ERIC OREE			5	7	2015
Mailing Address			\$ 125.00		
4114 DUNGAN STREET					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19124			
Description of Expenditure					
CNC COORDINATOR					
To Whom Paid			MO	DAY	YEAR
PHILLY FIRST PAC			5	7	2015
Mailing Address			\$ 10,000.00		
6123 VINE STREET					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19139			
Description of Expenditure					
CONTRIBUTION					
To Whom Paid			MO	DAY	YEAR
WOMEN FOR CHANGE			5	7	2015
Mailing Address			\$ 1,000.00		
495 OSCEOLA AVENUE					
City	State	Zip Code (Plus 4)			
ELKINS PARK	PA	19027			
Description of Expenditure					
CONTRIBUTION					
To Whom Paid			MO	DAY	YEAR
REGIONAL PRIORITIES PAC			5	13	2015
Mailing Address			\$ 22,500.00		
2048 ROWAN STREET					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19140			
Description of Expenditure					
CONTRIBUTION					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid EATIBLE DELIGHTS CATERING			MO 5	DAY 13	YEAR 2015	\$ 1,050.00
Mailing Address 2338 RIDGE AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19121				
Description of Expenditure CATERING EXPENSE						
To Whom Paid JAMES HARPER JR			MO 5	DAY 13	YEAR 2015	\$ 218.73
Mailing Address 4004 FOX MILL DRIVE						
City BOOTHWYN	State PA	Zip Code (Plus 4) 19061				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						
To Whom Paid LIUNA PENSION FUND			MO 5	DAY 13	YEAR 2015	\$ 1,636.44
Mailing Address 905 16TH STREET NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20006				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid LABORERS INDUSTRIAL PENSION PLAN			MO 5	DAY 13	YEAR 2015	\$ 1,000.00
Mailing Address 500 N 6TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid LABORERS INDUSTRIAL PENSION PLAN			MO 5	DAY 13	YEAR 2015	\$ 600.00
Mailing Address 500 N 6TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid ERIC OREE			MO 5	DAY 13	YEAR 2015	\$ 34.00
Mailing Address 4114 DUNGAN STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19124				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						



## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid PNC BANK			MO. 5	DAY 13	YEAR 2015	\$ 2,738.00
Mailing Address PO BOX 822713						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19182				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid SABR ENTERPRISES			MO. 5	DAY 13	YEAR 2015	\$ 9,990.00
Mailing Address 6244 CLEARVIEW STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19138				
Description of Expenditure PRINTING EXPENSE						
To Whom Paid KENNETH WASHINGTON			MO. 5	DAY 13	YEAR 2015	\$ 26.96
Mailing Address 3010 W COLONA STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19132				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						
To Whom Paid MARNIE AUMENT LOUGHREY			MO. 5	DAY 13	YEAR 2015	\$ 6,500.00
Mailing Address 720 E WILLARD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19134				
Description of Expenditure CONTRIBUTION						
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 13	YEAR 2015	\$ 1,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 13	YEAR 2015	\$ 2,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate			Reporting Period		
LABORERS DISTRICT COUNCIL PAC			From _____ To _____		
To Whom Paid			MO	DAY	YEAR
NEWMANS GRILL			5	14	2015
Mailing Address			\$ 1,134.00		
5946 GERMANTOWN AVENUE					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19144			
Description of Expenditure					
CATERING EXPENSE					
To Whom Paid			MO	DAY	YEAR
BROWN KITCHENS			5	14	2015
Mailing Address			\$ 2,750.00		
1601 CECIL B MOORE AVE					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19121			
Description of Expenditure					
CATERING EXPENSE					
To Whom Paid			MO	DAY	YEAR
GIORGIOS CATERERS			5	14	2015
Mailing Address			\$ 1,269.00		
14002 MCNULTY ROAD					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19154			
Description of Expenditure					
CATERING EXPENSE					
To Whom Paid			MO	DAY	YEAR
NEWMANS GRILL			5	14	2015
Mailing Address			\$ 324.00		
5946 GERMANTOWN AVENUE					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19144			
Description of Expenditure					
CATERING EXPENSE					
To Whom Paid			MO	DAY	YEAR
THOMPSON'S TASTE CATERING LLC			5	14	2015
Mailing Address			\$ 3,500.00		
422 SOUTH 60TH STREET					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19143			
Description of Expenditure					
CATERING EXPENSE					
To Whom Paid			MO	DAY	YEAR
FRIENDS OF MARIA QUINONES SANCHEZ			5	18	2015
Mailing Address			\$ 6,500.00		
PO BOX 60811					
City	State	Zip Code (Plus 4)			
PHILADELPHIA	PA	19133			
Description of Expenditure					
CONTRIBUTION					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid AFRICAN AMERICANS FOR GOOD GOVERNMENT			MO. 5	DAY 18	YEAR 2015	\$ 10,000.00
Mailing Address PO BOX 5035						
City PITTSBURGH	State PA	Zip Code (Plus 4) 15206				
Description of Expenditure CONTRIBUTION						
To Whom Paid AMIRS			MO. 5	DAY 18	YEAR 2015	\$ 1,100.00
Mailing Address 607 WELSH STREET						
City CHESTER	State PA	Zip Code (Plus 4) 19013				
Description of Expenditure CATERING EXPENSE						
To Whom Paid COMCAST CABLE AREA ONE			MO. 5	DAY 18	YEAR 2015	\$ 91.40
Mailing Address PO BOX 3006						
City SOUTHEASTERN	State PA	Zip Code (Plus 4) 19398				
Description of Expenditure OFFICE EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 18	YEAR 2015	\$ 649.31
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure RENT						
To Whom Paid MID ATLANTIC LPL			MO. 5	DAY 18	YEAR 2015	\$ 7,500.00
Mailing Address 12355 SUNRISE VALLEY DRIVE						
City RESTON	State VA	Zip Code (Plus 4) 20191				
Description of Expenditure CONTRIBUTION						
To Whom Paid UNIQUE CATERING			MO. 5	DAY 18	YEAR 2015	\$ 300.00
Mailing Address 30 PARKWAY						
City COATESVILLE	State PA	Zip Code (Plus 4) 19320				
Description of Expenditure CATERING						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid TRACY HARDY			MO. 5	DAY 20	YEAR 2015	\$ 2,275.00
Mailing Address 4674 CANTON STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19127				
Description of Expenditure PRINTING EXPENSE						
To Whom Paid ANTHONY MOSS			MO. 5	DAY 20	YEAR 2015	\$ 125.00
Mailing Address 3104 OPAL COURT						
City WILMINGTON	State DE	Zip Code (Plus 4) 19810				
Description of Expenditure PAC COORDINATOR						
To Whom Paid VERIZON			MO. 5	DAY 20	YEAR 2015	\$ 659.18
Mailing Address PO BOX 28000						
City LEHIGH VALLEY	State PA	Zip Code (Plus 4) 18002				
Description of Expenditure TELEPHONE						
To Whom Paid KENNETH WASHINGTON			MO. 5	DAY 20	YEAR 2015	\$ 49.34
Mailing Address 3010 W COLONA STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19132				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						
To Whom Paid CHRISTOPHER GUEST			MO. 5	DAY 21	YEAR 2015	\$ 125.00
Mailing Address 3535 W WESSEX LANE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114				
Description of Expenditure PAC COORDINATOR						
To Whom Paid CHRISTOPHER GUEST			MO. 5	DAY 21	YEAR 2015	\$ 125.00
Mailing Address 3535 W WESSEX LANE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114				
Description of Expenditure PAC COORDINATOR						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid CHRISTOPHER GUEST			MO. 5	DAY 21	YEAR 2015	\$ 125.00
Mailing Address 3535 W WESSEX LANE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114				
Description of Expenditure PAC COORDINATOR						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 28	YEAR 2015	\$ 139.95
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 28	YEAR 2015	\$ 506.43
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 28	YEAR 2015	\$ 94.53
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURE - INSURANCE EXPENSE						
To Whom Paid CLEARY, JOSEM & TRIGIANI, LLP			MO. 5	DAY 28	YEAR 2015	\$ 1,920.00
Mailing Address 325 CHESTNUT STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19106				
Description of Expenditure LEGAL FEES						
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 29	YEAR 2015	\$ 2,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 29	YEAR 2015	\$ 1,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						
To Whom Paid LANDMARK AMERICANA			MO. 5	DAY 8	YEAR 2015	\$ 62.33
Mailing Address 2481 N 54TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19131				
Description of Expenditure MEETING EXPENSE						
To Whom Paid LOVE PARK			MO. 5	DAY 13	YEAR 2015	\$ 14.00
Mailing Address 1501 JFK BLVD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid MCCORMICK & SCHMICK			MO. 5	DAY 20	YEAR 2015	\$ 59.40
Mailing Address 1 SOUTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure MEETING EXPENSE						
To Whom Paid 12TH ST PARKING			MO. 5	DAY 20	YEAR 2015	\$ 2.50
Mailing Address 123 S 12TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure PARKING FEES						
To Whom Paid ALESSANDROS			MO. 5	DAY 20	YEAR 2015	\$ 48.15
Mailing Address 655 NORTH BROAD ST						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure MEETING EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC		Reporting Period From _____ To _____	
To Whom Paid 12TH ST PARKING		MO. 5	DAY 20
		YEAR 2015	\$ 2.25
Mailing Address 123 S 12TH STREET			
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107	
Description of Expenditure PARKING FEES			
To Whom Paid FRONT PAGE		MO. 5	DAY 21
		YEAR 2015	\$ 44.40
Mailing Address 1333 NEW HAMPSHIRE AVE NW			
City WASHINGTON	State DC	Zip Code (Plus 4) 20036	
Description of Expenditure CONFERENCE MEALS			
To Whom Paid RUTHS CHRIS		MO. 5	DAY 21
		YEAR 2015	\$ 100.98
Mailing Address 1801 CONNECTICUT N			
City WASHINGTON	State DC	Zip Code (Plus 4) 20009	
Description of Expenditure CONFERENCE MEALS			
To Whom Paid BEN'S NEXT DOOR		MO. 5	DAY 22
		YEAR 2015	\$ 111.50
Mailing Address 1211 U ST NW			
City WASHINGTON	State DC	Zip Code (Plus 4) 20009	
Description of Expenditure CONFERENCE MEALS			
To Whom Paid BIG FISH		MO. 5	DAY 22
		YEAR 2015	\$ 64.85
Mailing Address 720 JUSTISON ST			
City WILMINGTON	State DE	Zip Code (Plus 4) 19801	
Description of Expenditure CONFERENCE MEALS			
To Whom Paid EMBASSY SUITES - CHEVY CHASE		MO. 5	DAY 22
		YEAR 2015	\$ 379.81
Mailing Address 4300 MILITARY RD NW			
City WASHINGTON	State DC	Zip Code (Plus 4) 20015	
Description of Expenditure CONFERENCE LODGING			

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid 1616 SANSOM			MO 5	DAY 23	YEAR 2015	\$ 26.00
Mailing Address 1616 SANSOM STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid THE HAPPY ROOSTER			MO 5	DAY 23	YEAR 2015	\$ 90.06
Mailing Address 118 S 16TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19102				
Description of Expenditure MEETING EXPENSE						
To Whom Paid HILTON TDL			MO 5	DAY 23	YEAR 2015	\$ 93.04
Mailing Address 1919 CONNECTICUT AVE NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20009				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid PESCE			MO 5	DAY 23	YEAR 2015	\$ 132.00
Mailing Address 2002 P ST NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20036				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid EMBASSY SUITES - CHEVY CHASE			MO 5	DAY 24	YEAR 2015	\$ 1,681.18
Mailing Address 4300 MILITARY RD NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20015				
Description of Expenditure CONFERENCE LODGING						
To Whom Paid EMBASSY SUITES - CHEVY CHASE			MO 5	DAY 24	YEAR 2015	\$ 1,228.65
Mailing Address 4300 MILITARY RD NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20015				
Description of Expenditure CONFERENCE LODGING						



## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid RADNOR			MO. 5	DAY 27	YEAR 2015	\$ 70.94
Mailing Address 593 E LANCASTER AVE						
City ST DAVIDS	State PA	Zip Code (Plus 4) 19087				
Description of Expenditure MEETING EXPENSE						
To Whom Paid REGIONAL PRIORITIES PAC			MO. 5	DAY 13	YEAR 2015	\$ 60,000.00
Mailing Address 2048 ROWAN STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19140				
Description of Expenditure CONTRIBUTION						
To Whom Paid PAYCHEX			MO. 5	DAY 31	YEAR 2015	\$ 3,108.01
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure PAYROLL - MAY						
To Whom Paid PAYCHEX			MO. 6	DAY 4	YEAR 2015	\$ 777.00
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure NET PAYROLL - JUNE						
To Whom Paid PAYCHEX			MO. 5	DAY 31	YEAR 2015	\$ 2,092.63
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure PAYROLL TAXES WITHHELD & PAYROLL TAX EXPENSE						
To Whom Paid PAYCHEX			MO. 6	DAY 4	YEAR 2015	\$ 523.16
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure PAYROLL TAXES WITHHELD AND PAYROLL TAX EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid PAYCHEX			MO. 5	DAY 6	YEAR 2015	\$ 243.72
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure PAYROLL PROCESSING FEES						
To Whom Paid PAYCHEX			MO. 5	DAY 31	YEAR 2015	\$ 300.40
Mailing Address 1100 ADAMS AVENUE						
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403				
Description of Expenditure PAYROLL PROCESSING FEES						
To Whom Paid CROWNE PLAZA			MO. 5	DAY 9	YEAR 2015	\$ 38.91
Mailing Address 4100 PRESIDENTIAL						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19131				
Description of Expenditure MEETING EXPENSE						
To Whom Paid LOVE PARK			MO. 5	DAY 9	YEAR 2015	\$ 18.00
Mailing Address 1501 JFK BLVD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid NEWMANS GRILL			MO. 5	DAY 9	YEAR 2015	\$ 356.00
Mailing Address 5946 GERMANTOWN AVENUE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19144				
Description of Expenditure MEETING EXPENSE						
To Whom Paid MELROSE DINER			MO. 5	DAY 9	YEAR 2015	\$ 80.56
Mailing Address 1501 SNYDER AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19145				
Description of Expenditure MEETING EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid LITTLE PETE'S			MO 5	DAY 13	YEAR 2015	\$ 63.95
Mailing Address 2401 PENNSYLVANIA AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19130				
Description of Expenditure MEETING EXPENSE						
To Whom Paid LOVE PARK			MO 5	DAY 19	YEAR 2015	\$ 15.00
Mailing Address 1501 JFK BLVD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid MCCORMICK & SCHMICK			MO 5	DAY 29	YEAR 2015	\$ 96.50
Mailing Address 1 SOUTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure MEETING EXPENSE						
To Whom Paid THE GOLD STANDARD CAFE			MO 5	DAY 29	YEAR 2015	\$ 23.98
Mailing Address 4800 BALTIMORE AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19143				
Description of Expenditure MEETING EXPENSE						
Enter Grand Total of Expenditures on Page 1, Report Cover Page, Item D.						Schedule III Total \$ 206,983.27

## SCHEDULE IV

## Statement Of Unpaid Debts

Use this Section to itemize all unpaid debts and obligations which are outstanding at the end of the reporting period.

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Enter Grand Total of Unpaid Debts on Page 1, Report Cover Page, Item G.					Schedule IV Total \$ -

## EXHIBIT C



## CITY OF PHILADELPHIA

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

June 23, 2015

*Via certified mail*

Donna Aument  
Treasurer  
Marnie Aument-Loughery for Change  
720 E. Willard St.  
Philadelphia, PA 19134

***Re: Failure to electronically file 2015 cycle 3 campaign finance report with Board of Ethics***

Dear Ms. Aument:

Based on our review of campaign finance filings, Marnie Aument-Loughery for Change did not electronically file a 2015 cycle 3 campaign finance report with the Philadelphia Board of Ethics. The deadline for filing a 2015 cycle 3 campaign finance report with the Ethics Board was June 18, 2015.

The failure to file a required report with the Board is a violation of the City's campaign finance law and is subject to a civil penalty of \$250 for each day the report is late. The maximum penalty that may be imposed is \$2,000 for the first thirty days the report is not filed, plus \$1,000 for each additional thirty-day period or part thereof the report is not filed.

You should file your report with the Board as soon as possible to stop the amount of penalty from increasing. If you need technical assistance with filing the report, please contact [campaign.finance@phila.gov](mailto:campaign.finance@phila.gov).

Please contact me as soon as possible in order to resolve the penalties that your committee owes. I can be reached 215 686-9459.

Thank you for your anticipated cooperation.

Sincerely,

Michael J. Cooke  
Director of Enforcement

cc Marnie Aument-Loughery, via email to [marnie65@Verizon.net](mailto:marnie65@Verizon.net)

**late filing of cycle 3 report**

Michael Cooke

**Sent:** Tuesday, June 23, 2015 2:02 PM

**To:** marnie65@verizon.net

Marnie,  
Attached, please find a letter from me.  
Regards,

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



## CITY OF PHILADELPHIA

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

June 23, 2015

*Via certified mail*

Donna Aument  
Treasurer  
Marnie Aument-Loughery for Change  
720 E. Willard St.  
Philadelphia, PA 19134

***Re: Failure to electronically file 2015 cycle 3 campaign finance report with Board of Ethics***

Dear Ms. Aument:

Based on our review of campaign finance filings, Marnie Aument-Loughery for Change did not electronically file a 2015 cycle 3 campaign finance report with the Philadelphia Board of Ethics. The deadline for filing a 2015 cycle 3 campaign finance report with the Ethics Board was June 18, 2015.

The failure to file a required report with the Board is a violation of the City's campaign finance law and is subject to a civil penalty of \$250 for each day the report is late. The maximum penalty that may be imposed is \$2,000 for the first thirty days the report is not filed, plus \$1,000 for each additional thirty-day period or part thereof the report is not filed.

You should file your report with the Board as soon as possible to stop the amount of penalty from increasing. If you need technical assistance with filing the report, please contact [campaign.finance@phila.gov](mailto:campaign.finance@phila.gov).

Please contact me as soon as possible in order to resolve the penalties that your committee owes. I can be reached 215 686-9459.

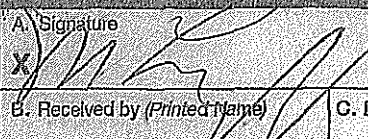
Thank you for your anticipated cooperation.


Sincerely,

Michael J. Cooke  
Director of Enforcement

cc Marnie Aument-Loughery, via email to [marnie65@Verizon.net](mailto:marnie65@Verizon.net)



SENDER, COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature 	
1. Article Addressed to:  <div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>Donna Aument</b>  <b>Treasurer</b>  <b>Marnie Aument-Loughery for Change</b>  <b>720 E. Willard Street</b>  <b>Philadelphia, PA 19134</b> </div>		B. Received by (Printed Name)  	C. Date of Delivery  
2. Article Number (Transfer from service label)		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
3. Service Type <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 2013		Domestic Return Receipt	

UNITED STATES POSTAL SERVICE PHILADELPHIA PA 191 27 JUN '15 PM 10:1		First-Class Mail Postage & Fees Paid USPS Permit No. G-10
<div style="border: 1px solid black; padding: 10px; text-align: center;"> <p>• Sender: Please print your name, address, and ZIP+4® in this box •</p> <div style="border: 1px solid black; padding: 10px; margin: 10px auto; width: 80%;"> <p><b>CITY OF PHILADELPHIA</b>  <b>BOARD OF ETHICS</b>  <b>ONE PARKWAY BUILDING</b>  <b>1515 Arch Street, 18<sup>th</sup> Floor</b>  <b>Philadelphia, PA 19102-1504</b></p> </div> </div>		

## **EXHIBIT D**

## Board of Ethics: Marnie Aument-Loughrey for Change

Jordan Segall

**Sent:** Friday, July 24, 2015 10:18 AM

**To:** marnie65@Verizon.net

**Importance:** High

**Attachments:** Aument, 6-23-2015.PDF (31 KB)

Dear Marnie,

As referenced in my voicemail that I left today, on June 23, 2015 the attached certified letter was sent to your attention and the attention of Donna Aument, the Treasurer of your candidate committee Marnie Aument-Loughrey for Change. To date the City of Philadelphia Board of Ethics has received no response from you or Donna Aument regarding the failure of Marnie Aument-Loughrey for Change to file a 2015 Cycle 3 campaign finance report with the Board. The failure to file this report is a violation of the City of Philadelphia Campaign Finance Law subject to the civil monetary penalties outlined in the attached letter.

Additionally, it appears from our review of campaign finance records that your campaign failed to file at least two 24 hour reports with the Board for receiving contributions in excess of \$500 between May 5, 2015 and May 19, 2015. These contributions are listed below.

1. Liberty Square PAC- 5/5/2015- \$2,000
2. Laborers District Council PAC- 5/13/15- \$6,500

Continued failure by Marnie Aument-Loughrey for Change to file the appropriate 24 hour reports and a 2015 Cycle 3 campaign finance report with the Board will result in an administrative enforcement action being initiated against the committee and Donna Aument. **Please contact me as soon as possible to resolve these issues. If I do not hear back from you by July 31, 2015, I will assume that you do not wish to comply with the City's Campaign Finance Law and begin the process of initiating an administrative enforcement action.**

Thank you for your prompt attention to this matter.

Sincerely,

Jordan E. Segall

Staff Attorney

**City of Philadelphia Board of Ethics**

One Parkway Building, 18th Floor

1515 Arch Street

Philadelphia, PA 19102

Office: 215-686-9457

Mobile: 215-821-4328

Fax: 215-686-9453

[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)



# CITY OF PHILADELPHIA

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

June 23, 2015

*Via certified mail*

Donna Aument  
Treasurer  
Marnie Aument-Loughery for Change  
720 E. Willard St.  
Philadelphia, PA 19134

***Re: Failure to electronically file 2015 cycle 3 campaign finance report with Board of Ethics***

Dear Ms. Aument:

Based on our review of campaign finance filings, Marnie Aument-Loughery for Change did not electronically file a 2015 cycle 3 campaign finance report with the Philadelphia Board of Ethics. The deadline for filing a 2015 cycle 3 campaign finance report with the Ethics Board was June 18, 2015.

The failure to file a required report with the Board is a violation of the City's campaign finance law and is subject to a civil penalty of \$250 for each day the report is late. The maximum penalty that may be imposed is \$2,000 for the first thirty days the report is not filed, plus \$1,000 for each additional thirty-day period or part thereof the report is not filed.

**You should file your report with the Board as soon as possible to stop the amount of penalty from increasing. If you need technical assistance with filing the report, please contact [campaign.finance@phila.gov](mailto:campaign.finance@phila.gov).**

**Please contact me as soon as possible in order to resolve the penalties that your committee owes. I can be reached 215 686-9459.**

Thank you for your anticipated cooperation.

Sincerely,

Michael J. Cooke  
Director of Enforcement

cc Marnie Aument-Loughery, via email to [marnie65@Verizon.net](mailto:marnie65@Verizon.net)

# **EXHIBIT E**



# CITY OF PHILADELPHIA

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

October 16, 2015

*Via hand delivery and email*

Donna Aument  
Treasurer, Marnie Aument-Loughrey for Change  
720 E. Willard Street  
Philadelphia, PA 19134  
marnie65@verizon.net

***Re: Failure to file 2015 cycle 3 campaign finance report and a 24 hour report with Board of Ethics***

Dear Ms. Aument:

We are preparing to initiate an administrative enforcement proceeding against you and the political committee Marnie Aument-Loughrey for Change because of your failure to file a 2015 cycle 3 campaign finance report and a 24 hour report with the Board of Ethics. Enclosed, you will find a draft Notice of Administrative Enforcement Proceeding.

Marnie Aument-Loughrey for Change was required to electronically file a 2015 cycle 3 campaign finance report with the Board because Marnie Aument-Loughrey was a candidate for City elective office in the May, 2015 primary election. The deadline for filing a 2015 cycle 3 campaign finance report with the Board was June 18, 2015. The committee was required to file a 24 hour report because it received a contribution of \$6,500 on or around May 14, 2015. Despite numerous warnings and reminders from our office, to date, you have failed to file these required reports.

The failure to file a required report with the Board is a violation of the City's Campaign Finance Law and is subject to a civil penalty of \$250 for each day the report is late. The maximum penalty that may be imposed is \$2,000 for the first thirty days the report is not filed, plus \$1,000 for each additional thirty-day period or part thereof the report is not filed.

**If we do not hear from you by October 23, 2015, we will initiate an administrative enforcement proceeding against you.** You will note in the enclosed draft Notice that we will be seeking a civil monetary penalty of \$13,000.

We are, of course, willing to resolve this matter for a lower amount by settlement rather than enforcement. If you are interested in pursuing a settlement agreement, we must hear from you by **October 23, 2015.**

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

Michael J. Cooke, Esq.  
Director of Enforcement

Enclosure

cc Marnie Aument-Loughrey (via certified mail, with enclosure)

## Michael Cooke

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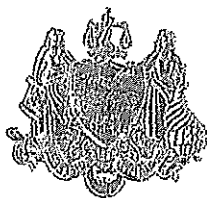
**From:** Michael Cooke  
**nt:** Friday, October 16, 2015 12:13 PM  
**nt:** 'marnie65@verizon.net'  
**Subject:** Correspondence  
**Attachments:** Aument, 10-16-2015.PDF

Donna,  
Attached, please find a letter from me.  
Regards,

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

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

CITY OF PHILADELPHIA



October 16, 2015

*Via hand delivery and email*

Donna Aument  
Treasurer, Marnie Aument-Loughrey for Change  
720 E. Willard Street  
Philadelphia, PA 19134  
marnie65@verizon.net

***Re: Failure to file 2015 cycle 3 campaign finance report and a 24 hour report with Board of Ethics***

Dear Ms. Aument:

We are preparing to initiate an administrative enforcement proceeding against you and the political committee Marnie Aument-Loughrey for Change because of your failure to file a 2015 cycle 3 campaign finance report and a 24 hour report with the Board of Ethics. Enclosed, you will find a draft Notice of Administrative Enforcement Proceeding.

Marnie Aument-Loughrey for Change was required to electronically file a 2015 cycle 3 campaign finance report with the Board because Marnie Aument-Loughrey was a candidate for City elective office in the May, 2015 primary election. The deadline for filing a 2015 cycle 3 campaign finance report with the Board was June 18, 2015. The committee was required to file a 24 hour report because it received a contribution of \$6,500 on or around May 14, 2015. Despite numerous warnings and reminders from our office, to date, you have failed to file these required reports.

The failure to file a required report with the Board is a violation of the City's Campaign Finance Law and is subject to a civil penalty of \$250 for each day the report is late. The maximum penalty that may be imposed is \$2,000 for the first thirty days the report is not filed, plus \$1,000 for each additional thirty-day period or part thereof the report is not filed.

**If we do not hear from you by October 23, 2015, we will initiate an administrative enforcement proceeding against you.** You will note in the enclosed draft Notice that we will be seeking a civil monetary penalty of \$13,000.

We are, of course, willing to resolve this matter for a lower amount by settlement rather than enforcement. If you are interested in pursuing a settlement agreement, we must hear from you by **October 23, 2015**.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Cooke".

Michael J. Cooke, Esq.  
Director of Enforcement

Enclosure

cc Marnie Aument-Loughrey (via certified mail, with enclosure)





To: Donna Aument

Received by: Toni Mear  
(please print)

Signature: Toni Mear

Date/Time: 10/16/15 1:55pm

Delivered by: EZRA EDWARDS  
(please print)

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Sent To

Marnie Aument-Loughrey

Street, Apt.  
or PO Box

Marnie Aument-Loughrey for Change

City, State

20 E. Willard Street

PS Form

Philadelphia, PA 19134

**Certified Mail Provides:**

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-6047

# Exhibit 2

# CERTIFICATION OF SERVICE

County: Philadelphia

State: PA

I, RALPH STOUT, affirm and attest that I am a competent adult not a  
NAME OF PROCESS SERVER  
party to the above referenced matter, and that on OCTOBER 29TH at  
4:01 PM, I personally served a true and correct attested copy of

## NOTICE

on

Marnie Aument-Loughrey, Marnie Aument-Loughrey for Change  
at the following address

720 E. Willard Street, Philadelphia, PA 19134

GEORGE AUMENT

NAME OF PERSON SERVED

I make this statement subject to the penalties set forth in 18 Pa.C.S. § 49:04 relating to unsworn falsifications to authorities.

Server: 

# CERTIFICATION OF SERVICE

County: **Philadelphia**

State: **PA**

I, RAUPA STOUT, affirm and attest that I am a competent adult not a  
NAME OF PROCESS SERVER  
party to the above referenced matter, and that on OCTOBER 29TH at  
4:01 pm, I personally served a true and correct attested copy of

## NOTICE

, on

Donna Aument, Treasurer, Marnie Aument-Loughrey for Change  
at the following address

720 E. Willard Street, Philadelphia, PA 19134

GEORGE AUMENT  
NAME OF PERSON SERVED

I make this statement subject to the penalties set forth in 18 Pa.C.S. § 49:04 relating to unsworn falsifications to authorities.

Server:

Rm OK

# Exhibit 3

**Administrative Enforcement Matter #1510CF16 - Marnie Aument-Loughrey  
for Change and Donna Aument**

Diana Lin

**Sent:** Monday, November 02, 2015 3:37 PM  
**To:** marnie65@verizon.net; Shane Creamer  
**Cc:** Maya Nayak; Michael Cooke; Jordan Segall  
**Attachments:** Intro ltr to respondents 1~1.pdf (80 KB) ; Regulation No.2 with Suppl~1.pdf (259 KB)

Dear Parties,

Please find attached correspondence related to Administrative Adjudication Matter #1510CF16. Please let me know if you have any questions.

Sincerely,  
Diana Lin

Diana J. Lin, Esq.  
Associate General Counsel  
City of Philadelphia Board of Ethics  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
[diana.lin@phila.gov](mailto:diana.lin@phila.gov)  
215.686.9450 (t)  
215.686.9453 (f)  
[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)



## CITY OF PHILADELPHIA

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

*Confidential*

November 2, 2015

*Via first class mail and email*

Donna Aument  
Treasurer  
Marnie Aument-Loughrey for Change  
720 E. Willard St.  
Philadelphia, PA 19134  
marnie65@verizon.net

**Re: Administrative Adjudication Matter #1510CF16**

Dear Ms. Aument:

I write regarding the administrative enforcement proceeding that the Board's Executive Director Shane Creamer initiated against you and the political committee Marnie Aument-Loughrey for Change on October 29, 2015. You may file a written Response to the allegations of violations in the Notice of Administrative Enforcement Proceeding (the "Notice") and may request a hearing to contest the allegations. The Board must receive your Response by November 18, 2015.

If more time is required to respond to the Notice, you must submit a written request for and be granted an extension. You will waive your right to a hearing if you do not file a Response to the Notice or if you do not request a hearing in your timely Response. Please note that unless you consent in writing to a public proceeding, this pending administrative enforcement proceeding, including filings and any hearing, is confidential.

If you do not file a written response to the Notice, the Executive Director may submit to the Board a brief in support of the Notice. You would then have the opportunity to respond to the brief. If the Executive Director does not file a supporting brief, the Board may make its final determination based on the undisputed allegations in the Notice and the supporting exhibits. The Board will serve you with notice of its final determination.



**Re: Administrative Adjudication Matter #1510CF16**

November 2, 2015

Page 2 of 2

In administrative enforcement proceedings, Board members act as the adjudicator with the assistance of General Counsel staff and a Hearing Officer. Neither party may engage in a substantive *ex parte* communication with any member of the Board, General Counsel staff, or the Hearing Officer concerning the administrative enforcement proceeding. The Board, General Counsel staff, and Hearing Officer are not informed of communications or possible settlement discussions you may have with enforcement staff. Such discussions with enforcement staff would not relieve the obligation to follow filing deadlines and other procedural requirements set by the Board in this administrative enforcement proceeding.

The procedures that govern the Board's administrative adjudication proceedings are set forth in Board of Ethics Regulation No. 2 and a Board memorandum containing supplementary procedures for administrative enforcement. You should have received copies of both documents with the Notice, and I am also attaching a copy here. The Board memo on procedures contains important information about the procedures for all phases of administrative enforcement proceedings, including the required format for a Response, how to request an extension, and how to submit filings.

If you engage an attorney to represent you in this enforcement matter, you are required to provide me with counsel's name, address, e-mail address, telephone number, and attorney number. I would then communicate with your counsel going forward. Also, please include the number that has been assigned to this administrative enforcement matter, #1510CF16, on all filings and communications related to this matter.

If you have questions about the applicable procedures, please contact me.

Sincerely,



Maya Nayak  
General Counsel

cc (via email): Shane Creamer, Executive Director

Enclosures (Regulation 2 and Supplemental Procedures Memo)

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

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## **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, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
(215) 686-9450

**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 five megabytes in size to the Board's General Counsel, Maya Nayak (maya.nayak@phila.gov), with a copy to the Board's Clerical Assistant, Hortencia Vasquez (hortencia.vasquez@phila.gov); or
- ii. By mail to General Counsel Maya Nayak, City of Philadelphia Board of Ethics, 1515 Arch Street, 18<sup>th</sup> floor, Philadelphia, 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. Pre-Hearing Matters.**

**A. Exchange of witness lists and exhibits.** At least 21 days prior to the hearing, the parties shall exchange a list of witnesses they each intend to call to testify and copies of exhibits they intend to offer as evidence at the hearing.

**B. Joint Pre-Hearing Memorandum.** At least 14 days prior to the hearing, the parties shall file a joint Pre-Hearing Memorandum that shall contain the following information:

- i. A Statement of Undisputed Facts, in numbered paragraphs;
- ii. The name, address, and telephone number of each person each party intends to call as a witness. The parties shall identify those witnesses whose appearance at the hearing they wish the Board to compel by subpoena;
- iii. Any witness to whom a party objects, the nature of the objection, and the opposing party's response to the objection;
- iv. A list of exhibits that the parties agree may be admitted;
- v. A list of exhibits to which either party objects, the nature of the objection, and the opposing party's response to the objection; and
- vi. An estimate of the time each party believes will be necessary to present its case at the hearing.

**C. Unilateral Pre-Hearing Memorandum.** If the parties cannot agree on the content of a Joint Pre-Hearing Memorandum, then at least 14 days prior to the hearing each party shall file a Unilateral Pre-Hearing Memorandum that includes all the information required by Subparagraph 6.B as well as an explanation of why the parties did not file a Joint Pre-Hearing Memorandum. All facts set forth in the Executive Director's Statement of Undisputed Facts will be deemed to be admitted unless specifically

denied by the respondent in writing no later than seven days after service of the Executive Director's Unilateral Pre-Hearing Memorandum.

**D. Failure to object leads to admissibility of witness or exhibit.** Any witness or exhibit offered by a party shall be admissible at the hearing, unless a party objects as required by Subparagraphs 6.B.(iii) & (v) in a Joint or Unilateral Pre-Hearing Memorandum.

**E. Issuance and Service of Subpoenas.** The Board, Board Chair, or a Hearing Officer may issue subpoenas. The subpoenas that are issued will be provided to the requesting party who shall be responsible for service of the subpoenas.

**7. Order of Presentation.** The order of presentation at the hearing shall be as follows:

- a. Opening statements
  - i. Executive Director
  - ii. Respondent
- b. Presentation of facts: witnesses & exhibits
  - i. Executive Director
  - ii. Respondent
- c. Summation
  - i. Executive Director
  - ii. Respondent

**8. Opening Statements and Summation.** Opening statements shall be limited to 10 minutes per party. Summation shall be limited to 20 minutes per party. The Board or its Hearing Officer may increase the amount of time available for opening statements or summation at the request of a party.

**9. Transcripts.** The General Counsel will provide a copy of the hearing transcript to the parties.

**10. Proposed Findings of Fact and Conclusions of Law.** Each party may file proposed findings of fact and conclusions of law after the hearing has concluded. Proposed findings of fact and conclusion of law shall be set forth in numbered paragraphs and shall be filed within seven days of the General Counsel transmitting the hearing transcript to the parties. A party shall support each proposed finding of fact by citing to a specific part of the record of the administrative enforcement proceeding, which includes filings, the hearing transcript, and hearing exhibits, unless the fact is undisputed.

**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: November 19, 2014

# Exhibit 4

**RE: Administrative Enforcement Matter #1510CF16 - Marnie Aument-Loughrey for Change and Donna Aument**

Diana Lin

**Sent:** Tuesday, November 24, 2015 10:48 AM  
**To:** marnie65@verizon.net; Shane Creamer  
**Cc:** Maya Nayak; Michael Cooke; Jordan Segall  
**Attachments:** Letter to Parties re No Re~1.pdf (54 KB)

Dear Parties,

Please find attached correspondence related to Administrative Adjudication Matter #1510CF16. Please let me know if you have any questions.

Sincerely,  
Diana Lin

**Diana J. Lin, Esq.**  
Associate General Counsel  
City of Philadelphia Board of Ethics  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
[diana.lin@phila.gov](mailto:diana.lin@phila.gov)  
215.686.9450 (t)  
215.686.9453 (f)  
[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)



# CITY OF PHILADELPHIA

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

*Confidential*

November 24, 2015

*Via first class mail and email*

Donna Aument  
Treasurer  
Marnie Aument-Loughrey for Change  
720 E. Willard St.  
Philadelphia, PA 19134  
marnie65@verizon.net

*Via email*

J. Shane Creamer, Jr.  
Executive Director  
Philadelphia Board of Ethics  
1515 Arch Street, 18th Floor  
Philadelphia, PA 19102  
shane.creamer@phila.gov

**Re: Administrative Adjudication Matter #1510CF16**

Dear Parties:

I write regarding the administrative enforcement proceeding that the Board's Executive Director Shane Creamer initiated against the political committee Marnie Aument-Loughrey for Change and its Treasurer Donna Aument (collectively "Respondents") on October 29, 2015. Respondents' written Response to the Notice of Administrative Enforcement Proceeding ("Notice") was due by November 18, 2015. To date, the Board has not received any Response from Respondents, nor did Respondents request an extension of time to file a Response. Respondents have therefore waived the right to a hearing in this matter. Board Reg. 2 ¶ 2.14(c).

As Respondents did not file a written response to the Notice, the Executive Director may – but is not required to – submit to the Board a brief in support of the Notice, and any such brief should be filed on or before December 2, 2015, Board Suppl. Proc.

**Re: Administrative Adjudication Matter #1510CF16**

November 24, 2015

Page 2 of 2

Mem. ¶ 5. Respondents would then have 14 days after service of the Executive Director's brief to file a brief in response. *Id.*

If the Executive Director does not file a supporting brief, then the Board may make its final determination based on the undisputed allegations in the Notice or on evidence submitted by the Executive Director in support of the Notice, including but not limited to deposition transcripts, documents, and affidavits or declarations. Board Reg. 2, ¶ 2.20(b). The Board will serve the Parties with notice of its final determination. *Id.* ¶ 2.20(c).

If you have questions about the applicable procedures, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maya Nayak', written in a cursive style.

Maya Nayak  
General Counsel

# Exhibit 5

**RE: Administrative Enforcement Matter #1510CF16 - Marnie Aument-Loughrey for Change and Donna Aument**

Jordan Segall

**Sent:** Tuesday, November 24, 2015 2:21 PM

**To:** Diana Lin; marnie65@verizon.net; Shane Creamer

**Cc:** Maya Nayak; Michael Cooke

Dear Maya,

Thank you for your correspondence earlier today pertaining to the above captioned matter. The Executive Director respectfully requests an extension of time to submit to the Board a Brief in Support of the Notice of Administrative Enforcement Proceeding. The Executive Director believes he has good cause to ask for an extension because of the Thanksgiving holiday and the upcoming COGEL conference. The Executive Director respectfully requests that the Board extend the time for him to submit to the Board a Brief in Support of the Notice of Administrative Enforcement Proceeding to **December 18, 2015**.

Respectfully Submitted,

Jordan E. Segall

Staff Attorney

**City of Philadelphia Board of Ethics**

One Parkway Building, 18th Floor

1515 Arch Street

Philadelphia, PA 19102

Office: 215-686-9457

Mobile: 215-821-4328

Fax: 215-686-9453

[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)

[www.twitter.com/PhillyEthicsBd](https://twitter.com/PhillyEthicsBd)

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**From:** Diana Lin

**Sent:** Tuesday, November 24, 2015 10:48 AM

**To:** 'marnie65@verizon.net'; Shane Creamer

**Cc:** Maya Nayak; Michael Cooke; Jordan Segall

**Subject:** RE: Administrative Enforcement Matter #1510CF16 - Marnie Aument-Loughrey for Change and Donna Aument

Dear Parties,

Please find attached correspondence related to Administrative Adjudication Matter #1510CF16. Please let me know if you have any questions.

Sincerely,

Diana Lin

**Diana J. Lin, Esq.**

Associate General Counsel

City of Philadelphia Board of Ethics

One Parkway Building, 18th Floor

1515 Arch Street

Philadelphia, PA 19102

[diana.lin@phila.gov](mailto:diana.lin@phila.gov)

215.686.9450 (t)

215.686.9453 (f)

[www.phila.gov/ethicsboard](http://www.phila.gov/ethicsboard)



# Exhibit 6

**Sent:** Wednesday, November 25, 2015 12:07 PM

**Cc:** Michael Cooke

Please let me know if you have any further questions.

General Counsel

maya.nayak@phila.gov

(215) 686-9450

**Sent:** Tuesday, November 24, 2015 2:22 PM

**Cc:** Maya Nayak; Michael Cooke

Thank you for your correspondence earlier today pertaining to the above captioned matter. The Executive Director respectfully requests an extension of time to submit to the Board a Brief in Support of the Notice of Administrative Enforcement Proceeding. The Executive Director believes he has good cause to ask for an extension because of the Thanksgiving holiday and the upcoming COGEL conference. The Executive Director respectfully requests that the Board extend the time for him to submit to the Board a Brief in Support of the Notice of Administrative Enforcement Proceeding to **December 18, 2015**.

Jordan E. Segall

City of Philadelphia Board of Ethics

1515 Arch Street

Office: 215-686-9457

Fax: 215-686-9453

[www.twitter.com/PhillyEthicsBd](http://www.twitter.com/PhillyEthicsBd)

**Sent:** Tuesday, November 24, 2015 10:48 AM

**Cc:** Maya Nayak; Michael Cooke; Jordan Segall

**Subject:** RE: Administrative Enforcement Matter #1510CF16 - Marnie Aument-Loughrey for Change and Donna Aument

Dear Parties,

Please find attached correspondence related to Administrative Adjudication Matter #1510CF16. Please let me know if you have any questions.

Sincerely,  
Diana Lin

Diana J. Lin, Esq.  
Associate General Counsel  
City of Philadelphia Board of Ethics  
One Parkway Building, 18th Floor  
1515 Arch Street  
Philadelphia, PA 19102  
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215.686.9450 (t)  
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# Exhibit 7

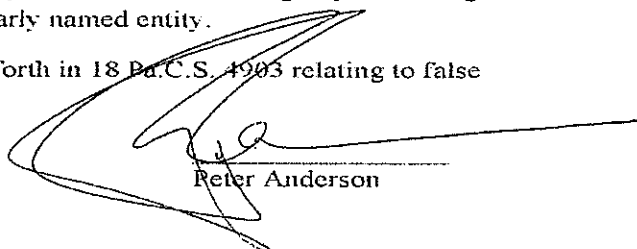
**AFFIDAVIT OF PETER ANDERSON**

I, Peter Anderson, hereby swear and affirm that the following statement is true and correct:

1. I am the Philadelphia Client Services Manager for Tyler Technologies, Inc., which holds a contract with the City of Philadelphia Department of Records.
2. As part of my job duties I help administer the City's campaign finance and financial disclosure databases for the Department of Records. I provide technical support to people who use those databases. As part of my job duties, I have become familiar with the technical workings of the City of Philadelphia's Campaign Finance database.
3. Filers submit campaign finance reports to the campaign finance database electronically either through a software program called SmartClient or by sending an email with the report attached either in the form of text files or an Excel template. When a user submits a report via SmartClient, the report is uploaded across the Internet to Tyler Technologies' secure application. The report is then verified by Tyler Technologies Inc. and added into the City of Philadelphia's Campaign Finance database.
4. Reports on the City's campaign finance database are viewable by the public in a read-only format. The public also has the ability to search the database for reports that have been uploaded and released by Tyler Technologies Inc.
5. As of the date of this affidavit, I have searched the City's campaign finance database, but have not found a 2015 Cycle 3 campaign finance report filed by Marnie Aument-Loughrey for Change, Donna Aument, Marnie Aument-Loughrey, or any similarly named entity.
6. As of the date of this affidavit, I have searched the City's campaign finance database, but have not found any 24 Hour pre-primary reports filed by Marnie Aument-Loughrey for Change, Donna Aument, Marnie Aument-Loughrey, or any similarly named entity.

I make this statement subject to the penalties set forth in 18 Pa.C.S. 4903 relating to false swearing.

Date:

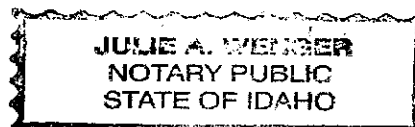
  
Peter Anderson

Signed and Sworn to Before Me:

  
Notary Public

On December 16, 2015

My Commission Expires: 11/25/2019



# Exhibit 8

**DECLARATION OF STEPHEN MORRISSEY**

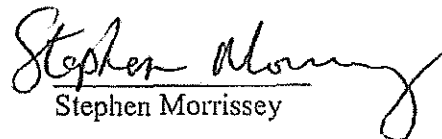
I, Stephen Morrissey, hereby swear and affirm that the following statement is true and correct:

1. I am a Technical Assistant and Business Analyst for Ciber, Inc.. Ciber is a subcontractor for Tyler Technologies, Inc. on a contract with the Philadelphia Department of Records pertaining to the City of Philadelphia's Campaign Finance database.
2. As part of my position, I am responsible for providing technical assistance during campaign finance reporting deadlines and generating data from the City's Campaign Finance database for web reports.
3. Additionally, as part of my duties as a vendor for the City, I routinely generate PDFs from campaign finance reports that have been uploaded to the City's Campaign Finance database.
4. On October 9, 2015, at the request of Board of Ethics staff, I generated a PDF of the 2015 Cycle 3 Laborers District Council PAC campaign finance report that is attached hereto as Exhibit A. On October 9, 2015, I sent the PDF of the 2015 Cycle 3 Laborers District Council PAC campaign finance report to Board staff via email.
5. The copy of the 2015 Cycle 3 Laborers District Council PAC campaign finance report attached hereto as Exhibit A is a true and correct copy of the data in the City's Campaign Finance database that the Laborers District Council PAC submitted to the City.

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

Date:

12/17/15

  
Stephen Morrissey

# EXHIBIT A



Commonwealth of Pennsylvania  
**Campaign Finance Report**

(Note: This report must be clear and legible. It may be typed or printed in blue or black ink.)

Page 1 of 25

<b>Filer Identification Number:</b>	9100189	<b>Report Filed By:</b>	CANDIDATE	1.	COMMITTEE	2.	X	LOBBYIST	3.		
<b>Name of Filing Committee, Candidate or Lobbyist:</b> LABORERS DISTRICT COUNCIL PAC											
<b>Street Address:</b> 665 N BROAD STREET 665 N BROAD STREET											
<b>City:</b> PHILADELPHIA					<b>State:</b> PA		<b>Zip Code:</b> 19123				
<b>TYPE OF REPORT</b>	6th Tuesday Pre-Primary	1.	2nd Friday Pre-Primary	2.	30 Day Post-Primary	3.	X	Amendment Report?	YES	NO	X
	6th Tuesday Pre-Election	4.	2nd Friday Pre-Election	5.	30 Day Post-Election	6.		Termination Report?	YES	NO	X
	Annual Report	7.	YEAR		2015						

<b>Name of Office Sought by Candidate:</b>	<b>DATE OF ELECTION</b>			<b>District Number:</b>	<b>Office Code:</b>	<b>Party Code:</b>	<b>County Code:</b>
	MO.	DAY	YEAR				

<b>Summary of Receipts and Expenditures from:</b>	MO.	DAY	YEAR	To	<b>FOR OFFICE USE ONLY</b>	
	A. Amount Brought Forward From Last Report					\$ 161,231.22
	B. Total Monetary Contributions and Receipts (From Schedule I)					\$ 117,724.70
	C. Total Funds Available (Sum of Lines A and B)					\$ 278,955.92
	D. Total Expenditures (From Schedule III)					\$ 206,983.27
	E. Ending Cash Balance (Subtract Line D from Line C)					\$ 71,972.65
	F. Value of In-Kind Contributions Received (From Schedule II)					\$ -
	G. Unpaid Debts and Obligations (From Schedule IV)					\$ -

**AFFIDAVIT SECTION**

**PART I - If this is a Committee report, treasurer sign here. If this is a Candidate report, candidate sign here.**

I swear (or affirm) that this report, including the attached schedules, on paper or computer diskette, are to the best of my knowledge and belief true, correct and complete.

Sworn to and subscribed before me this

_____ day of _____ 20____	}	_____
Signature		Signature of Person Submitting Report
_____		Printed Name
My commission expires _____		_____
MO. DAY YEAR		Area Code Daytime Telephone Number

**PART II - If this is a report of a Candidate's Authorized Committee, candidate shall sign here.**

I swear (or affirm) that to the best of my knowledge and belief this political committee has not violated any provisions of the Act of June 3, 1937 (P.L. 1333, No 320) as amended.

Sworn to and subscribed before me this

_____ day of _____ 20____	}	_____
Signature		Signature of Candidate
_____		Printed Name
My commission expires _____		_____
MO. DAY YEAR		Area Code Daytime Telephone Number

SCHEDULE I  
**Contributions And Receipts**

Detailed Summary Page

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC	Reporting Period From _____ To _____
--	---

**1. UNITEMIZED CONTRIBUTIONS AND RECEIPTS - \$50.00 OR LESS PER CONTRIBUTOR**

TOTAL for the Reporting Period (1)	\$ 117,649.57
------------------------------------	---------------

**2. CONTRIBUTIONS \$50.01 TO \$250.00 (FROM PART A AND PART B)**

Contributions Received from Political Committees (Part A)	\$ -
All Other Contributions (Part B)	\$ -
TOTAL for the Reporting Period (2)	\$ 0

**3. CONTRIBUTIONS OVER \$250.00 (FROM PART C AND PART D)**

Contributions Received from Political Committees (Part C)	\$ -
All Other Contributions (Part D)	\$ -
TOTAL for the Reporting Period (3)	\$ 0

**4. OTHER RECEIPTS - REFUNDS, INTEREST EARNED, RETURNED CHECKS, ETC. (FROM PART E)**

TOTAL for the Reporting Period (4)	\$ 75.13
------------------------------------	----------

**TOTAL MONETARY CONTRIBUTIONS AND RECEIPTS DURING THIS REPORTING PERIOD** (Add and enter amount totals from Boxes 1, 2, 3 and 4; also enter this amount on Page 1, Report Cover Page, Item B.)

\$ 117,724.70

## Part A

## Contributions Received From Political Committees

\$50.01 TO \$250.00

Use this Part to itemize only contributions received from political committees with an aggregate value from \$50.01 to \$250.00 in the reporting period.

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>						Reporting Period From _____ To _____		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Full Name of Contributing Committee						MO. DAY YEAR \$ -		
Mailing Address								
City				State		Zip Code (Plus 4)		
Enter Grand Total of Part A on Schedule I, Detailed Summary Page, Section 2.						<b>Part A Total</b> \$ -		

## All Other Contributions

Use this Part to itemize all other contributions with an aggregate value from \$50.01 to \$250.00 in the reporting period.

(Exclude contributions from political committees reported in Part A.)

OVER \$250.00

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			
Full Name of Contributing Committee			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City	State	Zip Code (Plus 4)			

## Part D

**All Other Contributions**

OVER \$250.00

Use this Part to itemize all other contributions with an aggregate value of over \$250.00 in the reporting period.

(Exclude contributions from political committees reported in Part C.)

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
Full Name of Contributor			MO.	DAY	YEAR
Mailing Address			\$ -		
City	State	Zip Code (Plus 4)			
Employer Name			Occupation		
Employer Mailing Address/Principal Place of Business					
Full Name of Contributor			MO.	DAY	YEAR
Mailing Address			\$ -		
City	State	Zip Code (Plus 4)			
Employer Name			Occupation		
Employer Mailing Address/Principal Place of Business					
Full Name of Contributor			MO.	DAY	YEAR
Mailing Address			\$ -		
City	State	Zip Code (Plus 4)			
Employer Name			Occupation		
Employer Mailing Address/Principal Place of Business					
Full Name of Contributor			MO.	DAY	YEAR
Mailing Address			\$ -		
City	State	Zip Code (Plus 4)			
Employer Name			Occupation		
Employer Mailing Address/Principal Place of Business					
Full Name of Contributor			MO.	DAY	YEAR
Mailing Address			\$ -		
City	State	Zip Code (Plus 4)			
Employer Name			Occupation		
Employer Mailing Address/Principal Place of Business					
Enter Grand Total of Part D on Schedule I, Detailed Summary Page, Section 3.					Part D Total \$ -

## Part E

**Other Receipts**

REFUNDS, INTEREST INCOME, RETURNED CHECKS, ETC.

Use this Part to report refunds received, interest earned, returned checks and prior expenditures that were returned to the filer.

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
Full Name REPUBLIC BANK			MO. 5	DAY 31	YEAR 2015	\$ 6.13
Mailing Address 50 S 16TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19102				
Receipt Description INTEREST INCOME						
Full Name SAMUEL STATEN JR			MO. 5	DAY 31	YEAR 2015	\$ 69.00
Mailing Address 665 N BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Receipt Description REIMBURSEMENT - CONFERENCE EXPENSE						
Full Name			MO.	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Full Name			MO.	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Full Name			MO.	DAY	YEAR	\$ -
Mailing Address						
City	State	Zip Code (Plus 4)				
Receipt Description						
Enter Grand Total of Part E on Schedule I, Detailed Summary Page, Section 4.						Part E Total \$ 75.13

## SCHEDULE II

**In-Kind Contributions And Valuable Things Received**

USE THIS SCHEDULE TO REPORT ALL IN-KIND CONTRIBUTIONS OF VALUABLE THINGS  
DURING THE REPORTING PERIOD.

## Detailed Summary Page

Name of Filing Committee or Candidate	Reporting Period
LABORERS DISTRICT COUNCIL PAC	From _____ To _____

**1. UNITEMIZED IN-KIND CONTRIBUTIONS RECEIVED - VALUE OF \$50.00 OR LESS PER CONTRIBUTOR**

TOTAL for the Reporting Period (1)	\$ -
------------------------------------	------

**2. IN-KIND CONTRIBUTIONS RECEIVED - VALUE OF \$50.01 TO \$250.00 (FROM PART F)**

TOTAL for the Reporting Period (2)	\$ -
------------------------------------	------

**3. IN-KIND CONTRIBUTION RECEIVED - VALUE OVER \$250 (FROM PART G)**

TOTAL for the Reporting Period (3)	\$ -
------------------------------------	------

TOTAL VALUE OF IN-KIND CONTRIBUTIONS DURING THIS REPORTING PERIOD	\$ 0
--	------

(Add and enter amount totals from Boxes 1, 2 and 3;  
also enter this amount on Page 1, Report Cover Page, Item F.



## SCHEDULE II

## Part F

**In-kind Contributions Received**

VALUE OF \$50.01 TO \$250.00

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Full Name of Contributor			<div style="display: flex; justify-content: space-between;"> <div>MO. DAY YEAR</div> <div>\$ -</div> </div>		
Mailing Address					
City		State		Zip Code (Plus 4)	
Description of Contribution					
Enter Grand Total of Part F on Schedule II, In-Kind Contributions Detailed Summary Page, Section 2.					<b>Part F Total</b> \$ -

## SCHEDULE II

## Part G

**In-kind Contributions Received**

VALUE OVER \$250.00

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
Full Name of Contributor			MO.	DAY	YEAR
			\$ -		
Mailing Address					
City	State	Zip Code (Plus 4)			
Employer of Contributor			Occupation		
Employer Mailing Address/Principal Place of Business			Description of Contribution		
<b>Enter Grand Total of Part G on Schedule II, In-Kind Contributions Detailed Summary Page, Section 3.</b>			<b>Part G Total</b>		
			\$ -		

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid FRIENDS OF DAINE GREY JR			MO. 5	DAY 5	YEAR 2015	\$ 2,500.00
Mailing Address PO BOX 17603						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19135				
Description of Expenditure CONTRIBUTION						
To Whom Paid PERRY N. BLACKMAN CPA			MO. 5	DAY 6	YEAR 2015	\$ 2,125.00
Mailing Address 506 CORPORATE DRIVE WEST						
City LANGHORNE	State PA	Zip Code (Plus 4) 19047				
Description of Expenditure ACCOUNTING FEES						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 6	YEAR 2015	\$ 101.18
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURSE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 6	YEAR 2015	\$ 506.43
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMBURSE - AUTO EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 6	YEAR 2015	\$ 94.53
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure REIMURSE - INSURANCE EXPENSE						
To Whom Paid CHARLES TABOURN			MO. 5	DAY 6	YEAR 2015	\$ 25.00
Mailing Address 246 ROSS ROAD						
City KING OF PRUSSIA	State PA	Zip Code (Plus 4) 19406				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid CITIZENS FOR KENYATTA JOHNSON			MO. 5	DAY 7	YEAR 2015	\$ 11,500.00
Mailing Address PO BOX 7466						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19101				
Description of Expenditure CONTRIBUTION						
To Whom Paid FRIENDS OF CURTIS JONES JR			MO. 5	DAY 7	YEAR 2015	\$ 11,500.00
Mailing Address 100 S BROAD STREET SUITE 1530						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19110				
Description of Expenditure CONTRIBUTION						
To Whom Paid ERIC OREE			MO. 5	DAY 7	YEAR 2015	\$ 125.00
Mailing Address 4114 DUNGAN STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19124				
Description of Expenditure PAC COORDINATOR						
To Whom Paid PHILLY FIRST PAC			MO. 5	DAY 7	YEAR 2015	\$ 10,000.00
Mailing Address 6123 VINE STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19139				
Description of Expenditure CONTRIBUTION						
To Whom Paid WOMEN FOR CHANGE			MO. 5	DAY 7	YEAR 2015	\$ 1,000.00
Mailing Address 495 OSCEOLA AVENUE						
City ELKINS PARK	State PA	Zip Code (Plus 4) 19027				
Description of Expenditure CONTRIBUTION						
To Whom Paid REGIONAL PRIORITIES PAC			MO. 5	DAY 13	YEAR 2015	\$ 22,500.00
Mailing Address 2048 ROWAN STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19140				
Description of Expenditure CONTRIBUTION						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid EATIBLE DELIGHTS CATERING			MO. 5	DAY 13	YEAR 2015	\$ 1,050.00
Mailing Address 2338 RIDGE AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19121				
Description of Expenditure CATERING EXPENSE						
To Whom Paid JAMES HARPER JR			MO. 5	DAY 13	YEAR 2015	\$ 218.73
Mailing Address 4004 FOX MILL DRIVE						
City BOOTHWYN	State PA	Zip Code (Plus 4) 19061				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						
To Whom Paid LIUNA PENSION FUND			MO. 5	DAY 13	YEAR 2015	\$ 1,636.44
Mailing Address 905 16TH STREET NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20006				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid LABORERS INDUSTRIAL PENSION PLAN			MO. 5	DAY 13	YEAR 2015	\$ 1,000.00
Mailing Address 500 N 6TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid LABORERS INDUSTRIAL PENSION PLAN			MO. 5	DAY 13	YEAR 2015	\$ 600.00
Mailing Address 500 N 6TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid ERIC OREE			MO. 5	DAY 13	YEAR 2015	\$ 34.00
Mailing Address 4114 DUNGAN STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19124				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid PNC BANK			MO. 5	DAY 13	YEAR 2015	\$ 2,738.00
Mailing Address PO BOX 822713						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19182				
Description of Expenditure EMPLOYEE BENEFITS						
To Whom Paid SABR ENTERPRISES			MO. 5	DAY 13	YEAR 2015	\$ 9,990.00
Mailing Address 6244 CLEARVIEW STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19138				
Description of Expenditure PRINTING EXPENSE						
To Whom Paid KENNETH WASHINGTON			MO. 5	DAY 13	YEAR 2015	\$ 26.96
Mailing Address 3010 W COLONA STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19132				
Description of Expenditure REIMBURSE - TRAVEL EXPENSE						
To Whom Paid MARNIE AUMENT LOUGHREY			MO. 5	DAY 13	YEAR 2015	\$ 6,500.00
Mailing Address 720 E WILLARD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19134				
Description of Expenditure CONTRIBUTION						
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 13	YEAR 2015	\$ 1,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 13	YEAR 2015	\$ 2,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid NEWMANS GRILL			MO. 5	DAY 14	YEAR 2015	\$ 1,134.00
Mailing Address 5946 GERMANTOWN AVENUE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19144				
Description of Expenditure CATERING EXPENSE						
To Whom Paid BROWN KITCHENS			MO. 5	DAY 14	YEAR 2015	\$ 2,750.00
Mailing Address 1601 CECIL B MOORE AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19121				
Description of Expenditure CATERING EXPENSE						
To Whom Paid GIORGIOS CATERERS			MO. 5	DAY 14	YEAR 2015	\$ 1,269.00
Mailing Address 14002 MCNULTY ROAD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19154				
Description of Expenditure CATERING EXPENSE						
To Whom Paid NEWMANS GRILL			MO. 5	DAY 14	YEAR 2015	\$ 324.00
Mailing Address 5946 GERMANTOWN AVENUE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19144				
Description of Expenditure CATERING EXPENSE						
To Whom Paid THOMPSON'S TASTE CATERING LLC			MO. 5	DAY 14	YEAR 2015	\$ 3,500.00
Mailing Address 422 SOUTH 60TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19143				
Description of Expenditure CATERING EXPENSE						
To Whom Paid FRIENDS OF MARIA QUINONES SANCHEZ			MO. 5	DAY 18	YEAR 2015	\$ 6,500.00
Mailing Address PO BOX 60811						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19133				
Description of Expenditure CONTRIBUTION						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid AFRICAN AMERICANS FOR GOOD GOVERNMENT			MO. 5	DAY 18	YEAR 2015	\$ 10,000.00
Mailing Address PO BOX 5035						
City PITTSBURGH	State PA	Zip Code (Plus 4) 15206				
Description of Expenditure CONTRIBUTION						
To Whom Paid AMIRS			MO. 5	DAY 18	YEAR 2015	\$ 1,100.00
Mailing Address 607 WELSH STREET						
City CHESTER	State PA	Zip Code (Plus 4) 19013				
Description of Expenditure CATERING EXPENSE						
To Whom Paid COMCAST CABLE AREA ONE			MO. 5	DAY 18	YEAR 2015	\$ 91.40
Mailing Address PO BOX 3006						
City SOUTHEASTERN	State PA	Zip Code (Plus 4) 19398				
Description of Expenditure OFFICE EXPENSE						
To Whom Paid LABORERS DISTRICT COUNCIL			MO. 5	DAY 18	YEAR 2015	\$ 649.31
Mailing Address 665 NORTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure RENT						
To Whom Paid MID ATLANTIC LPL			MO. 5	DAY 18	YEAR 2015	\$ 7,500.00
Mailing Address 12355 SUNRISE VALLEY DRIVE						
City RESTON	State VA	Zip Code (Plus 4) 20191				
Description of Expenditure CONTRIBUTION						
To Whom Paid UNIQUE CATERING			MO. 5	DAY 18	YEAR 2015	\$ 300.00
Mailing Address 30 PARKWAY						
City COATESVILLE	State PA	Zip Code (Plus 4) 19320				
Description of Expenditure CATERING						



## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC		Reporting Period From _____ To _____			
To Whom Paid TRACY HARDY		MO. 5	DAY 20	YEAR 2015	\$ 2,275.00
Mailing Address 4674 CANTON STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19127			
Description of Expenditure PRINTING EXPENSE					
To Whom Paid ANTHONY MOSS		MO. 5	DAY 20	YEAR 2015	\$ 125.00
Mailing Address 3104 OPAL COURT					
City WILMINGTON	State DE	Zip Code (Plus 4) 19810			
Description of Expenditure PAC COORDINATOR					
To Whom Paid VERIZON		MO. 5	DAY 20	YEAR 2015	\$ 659.18
Mailing Address PO BOX 28000					
City LEHIGH VALLEY	State PA	Zip Code (Plus 4) 18002			
Description of Expenditure TELEPHONE					
To Whom Paid KENNETH WASHINGTON		MO. 5	DAY 20	YEAR 2015	\$ 49.34
Mailing Address 3010 W COLONA STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19132			
Description of Expenditure REIMBURSE - TRAVEL EXPENSE					
To Whom Paid CHRISTOPHER GUEST		MO. 5	DAY 21	YEAR 2015	\$ 125.00
Mailing Address 3535 W WESSEX LANE					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114			
Description of Expenditure PAC COORDINATOR					
To Whom Paid CHRISTOPHER GUEST		MO. 5	DAY 21	YEAR 2015	\$ 125.00
Mailing Address 3535 W WESSEX LANE					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114			
Description of Expenditure PAC COORDINATOR					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____		
To Whom Paid CHRISTOPHER GUEST			MO.	DAY	YEAR
			5	21	2015
Mailing Address 3535 W WESSEX LANE					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19114			
Description of Expenditure PAC COORDINATOR					
To Whom Paid LABORERS DISTRICT COUNCIL			MO.	DAY	YEAR
			5	28	2015
Mailing Address 665 NORTH BROAD STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123			
Description of Expenditure REIMBURE - AUTO EXPENSE					
To Whom Paid LABORERS DISTRICT COUNCIL			MO.	DAY	YEAR
			5	28	2015
Mailing Address 665 NORTH BROAD STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123			
Description of Expenditure REIMBURSE - AUTO EXPENSE					
To Whom Paid LABORERS DISTRICT COUNCIL			MO.	DAY	YEAR
			5	28	2015
Mailing Address 665 NORTH BROAD STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123			
Description of Expenditure REIMBURSE - INSURANCE EXPENSE					
To Whom Paid CLEARY, JOSEM & TRIGIANI, LLP			MO.	DAY	YEAR
			5	28	2015
Mailing Address 325 CHESTNUT STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19106			
Description of Expenditure LEGAL FEES					
To Whom Paid LUMINOUS STRATEGIES LLC			MO.	DAY	YEAR
			5	29	2015
Mailing Address 1735 MARKET STREET					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103			
Description of Expenditure MARKET RESEARCH					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid LUMINOUS STRATEGIES LLC			MO. 5	DAY 29	YEAR 2015	\$ 1,500.00
Mailing Address 1735 MARKET STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure MARKET RESEARCH						
To Whom Paid LANDMARK AMERICANA			MO. 5	DAY 8	YEAR 2015	\$ 62.33
Mailing Address 2481 N 54TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19131				
Description of Expenditure MEETING EXPENSE						
To Whom Paid LOVE PARK			MO. 5	DAY 13	YEAR 2015	\$ 14.00
Mailing Address 1501 JFK BLVD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid MCCORMICK & SCHMICK			MO. 5	DAY 20	YEAR 2015	\$ 59.40
Mailing Address 1 SOUTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure MEETING EXPENSE						
To Whom Paid 12TH ST PARKING			MO. 5	DAY 20	YEAR 2015	\$ 2.50
Mailing Address 123 S 12TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure PARKING FEES						
To Whom Paid ALESSANDROS			MO. 5	DAY 20	YEAR 2015	\$ 48.15
Mailing Address 655 NORTH BROAD ST						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19123				
Description of Expenditure MEETING EXPENSE						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid 12TH ST PARKING			MO. 5	DAY 20	YEAR 2015	\$ 2.25
Mailing Address 123 S 12TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure PARKING FEES						
To Whom Paid FRONT PAGE			MO. 5	DAY 21	YEAR 2015	\$ 44.40
Mailing Address 1333 NEW HAMPSHIRE AVE NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20036				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid RUTHS CHRIS			MO. 5	DAY 21	YEAR 2015	\$ 100.98
Mailing Address 1801 CONNECTICUT N						
City WASHINGTON	State DC	Zip Code (Plus 4) 20009				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid BEN'S NEXT DOOR			MO. 5	DAY 22	YEAR 2015	\$ 111.50
Mailing Address 1211 U ST NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20009				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid BIG FISH			MO. 5	DAY 22	YEAR 2015	\$ 64.85
Mailing Address 720 JUSTISON ST						
City WILMINGTON	State DE	Zip Code (Plus 4) 19801				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid EMBASSY SUITES - CHEVY CHASE			MO. 5	DAY 22	YEAR 2015	\$ 379.81
Mailing Address 4300 MILITARY RD NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20015				
Description of Expenditure CONFERENCE LODGING						

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid 1616 SANSOM			MO. 5	DAY 23	YEAR 2015	\$ 26.00
Mailing Address 1616 SANSOM STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid THE HAPPY ROOSTER			MO. 5	DAY 23	YEAR 2015	\$ 90.06
Mailing Address 118 S 16TH STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19102				
Description of Expenditure MEETING EXPENSE						
To Whom Paid HILTON TDL			MO. 5	DAY 23	YEAR 2015	\$ 93.04
Mailing Address 1919 CONNECTICUT AVE NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20009				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid PESCE			MO. 5	DAY 23	YEAR 2015	\$ 132.00
Mailing Address 2002 P ST NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20036				
Description of Expenditure CONFERENCE MEALS						
To Whom Paid EMBASSY SUITES - CHEVY CHASE			MO. 5	DAY 24	YEAR 2015	\$ 1,681.18
Mailing Address 4300 MILITARY RD NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20015				
Description of Expenditure CONFERENCE LODGING						
To Whom Paid EMBASSY SUITES - CHEVY CHASE			MO. 5	DAY 24	YEAR 2015	\$ 1,228.65
Mailing Address 4300 MILITARY RD NW						
City WASHINGTON	State DC	Zip Code (Plus 4) 20015				
Description of Expenditure CONFERENCE LODGING						

SCHEDULE III  
**Statement Of Expenditures**

Name of Filing Committee or Candidate <b>LABORERS DISTRICT COUNCIL PAC</b>			Reporting Period From _____ To _____		
To Whom Paid <b>RADNOR</b>			MO. <b>5</b>	DAY <b>27</b>	YEAR <b>2015</b>
Mailing Address <b>593 E LANCASTER AVE</b>			<b>\$ 70.94</b>		
City <b>ST DAVIDS</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19087</b>			
Description of Expenditure <b>MEETING EXPENSE</b>					
To Whom Paid <b>REGIONAL PRIORITIES PAC</b>			MO. <b>5</b>	DAY <b>13</b>	YEAR <b>2015</b>
Mailing Address <b>2048 ROWAN STREET</b>			<b>\$ 60,000.00</b>		
City <b>PHILADELPHIA</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19140</b>			
Description of Expenditure <b>CONTRIBUTION</b>					
To Whom Paid <b>PAYCHEX</b>			MO. <b>5</b>	DAY <b>31</b>	YEAR <b>2015</b>
Mailing Address <b>1100 ADAMS AVENUE</b>			<b>\$ 3,108.01</b>		
City <b>NORRISTOWN</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19403</b>			
Description of Expenditure <b>NET PAYROLL - MAY</b>					
To Whom Paid <b>PAYCHEX</b>			MO. <b>6</b>	DAY <b>4</b>	YEAR <b>2015</b>
Mailing Address <b>1100 ADAMS AVENUE</b>			<b>\$ 777.00</b>		
City <b>NORRISTOWN</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19403</b>			
Description of Expenditure <b>NET PAYROLL - JUNE</b>					
To Whom Paid <b>PAYCHEX</b>			MO. <b>5</b>	DAY <b>31</b>	YEAR <b>2015</b>
Mailing Address <b>1100 ADAMS AVENUE</b>			<b>\$ 2,092.63</b>		
City <b>NORRISTOWN</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19403</b>			
Description of Expenditure <b>PAYROLL TAXES WITHHELD &amp; PAYROLL TAX EXPENSE</b>					
To Whom Paid <b>PAYCHEX</b>			MO. <b>6</b>	DAY <b>4</b>	YEAR <b>2015</b>
Mailing Address <b>1100 ADAMS AVENUE</b>			<b>\$ 523.16</b>		
City <b>NORRISTOWN</b>	State <b>PA</b>	Zip Code (Plus 4) <b>19403</b>			
Description of Expenditure <b>PAYROLL TAXES WITHHELD AND PAYROLL TAX EXPENSE</b>					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC		Reporting Period From _____ To _____			
To Whom Paid PAYCHEX		MO. 5	DAY 6	YEAR 2015	\$ 243.72
Mailing Address 1100 ADAMS AVENUE					
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403			
Description of Expenditure PAYROLL PROCESSING FEES					
To Whom Paid PAYCHEX		MO. 5	DAY 31	YEAR 2015	\$ 300.40
Mailing Address 1100 ADAMS AVENUE					
City NORRISTOWN	State PA	Zip Code (Plus 4) 19403			
Description of Expenditure PAYROLL PROCESSING FEES					
To Whom Paid CROWNE PLAZA		MO. 5	DAY 9	YEAR 2015	\$ 38.91
Mailing Address 4100 PRESIDENTIAL					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19131			
Description of Expenditure MEETING EXPENSE					
To Whom Paid LOVE PARK		MO. 5	DAY 9	YEAR 2015	\$ 18.00
Mailing Address 1501 JFK BLVD					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103			
Description of Expenditure PARKING FEES					
To Whom Paid NEWMANS GRILL		MO. 5	DAY 9	YEAR 2015	\$ 356.00
Mailing Address 5946 GERMANTOWN AVENUE					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19144			
Description of Expenditure MEETING EXPENSE					
To Whom Paid MELROSE DINER		MO. 5	DAY 9	YEAR 2015	\$ 80.56
Mailing Address 1501 SNYDER AVE					
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19145			
Description of Expenditure MEETING EXPENSE					

## SCHEDULE III

## Statement Of Expenditures

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC			Reporting Period From _____ To _____			
To Whom Paid LITTLE PETE'S			MO. 5	DAY 13	YEAR 2015	\$ 63.95
Mailing Address 2401 PENNSYLVANIA AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19130				
Description of Expenditure MEETING EXPENSE						
To Whom Paid LOVE PARK			MO. 5	DAY 19	YEAR 2015	\$ 15.00
Mailing Address 1501 JFK BLVD						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19103				
Description of Expenditure PARKING FEES						
To Whom Paid MCCORMICK & SCHMICK			MO. 5	DAY 29	YEAR 2015	\$ 96.50
Mailing Address 1 SOUTH BROAD STREET						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19107				
Description of Expenditure MEETING EXPENSE						
To Whom Paid THE GOLD STANDARD CAFE			MO. 5	DAY 29	YEAR 2015	\$ 23.98
Mailing Address 4800 BALTIMORE AVE						
City PHILADELPHIA	State PA	Zip Code (Plus 4) 19143				
Description of Expenditure MEETING EXPENSE						
Enter Grand Total of Expenditures on Page 1, Report Cover Page, Item D.						Schedule III Total \$ 206,983.27



## SCHEDULE IV

**Statement Of Unpaid Debts**

Use this Section to itemize all unpaid debts and obligations  
which are outstanding at the end of the reporting period.

Name of Filing Committee or Candidate LABORERS DISTRICT COUNCIL PAC				Reporting Period From _____ To _____	
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO. DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO. DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO. DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Name of Creditor					Outstanding Balance of Debt \$ -
Mailing Address			Date Debt Incurred	MO. DAY YEAR	
City	State	Zip Code (Plus 4)			
Description of Debt					
Enter Grand Total of Unpaid Debts on Page 1, Report Cover Page, Item G.					Schedule IV Total \$ -