

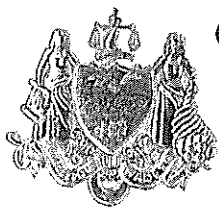
Thomas Klemm

From: Diana Lin
Sent: Friday, February 19, 2016 1:15 PM
To: 'Leron Ben'; Shane Creamer
Cc: Maya Nayak; Michael Cooke; Jordan Segall
Subject: RE: Creamer v. Ben, Matter No. 1510ET17
Attachments: Letter to Parties re Subpoenas and Rulings on Requests and Objections 02 19 2016.pdf; Letter to Respondent enclosing signed subpoenas 02 19 2016.pdf; Letter to Executive Director enclosing signed subpoenas 02 19 2016.pdf

Please find attached correspondence related to Administrative Adjudication Matter #1510ET17.

Sincerely,
Diana

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
215.686.9450 (t)
215.686.9453 (f)
www.phila.gov/ethicsboard
www.twitter.com/PhillyEthicsBd



CITY OF PHILADELPHIA

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

Confidential

February 19, 2016

Via email and hand delivery

Leron Ben Shoshan
22 Evergreen Way
Philadelphia, PA 19115
rent2158332547@gmail.com

Via email and hand delivery

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 #1510ET17

Dear Parties:

Board of Ethics' Hearing Officer Richard Glazer has considered the parties' various pre-hearing requests, objections, and responses. This letter sets forth Hearing Officer Glazer's rulings on the parties' various requests.

After considering the Executive Director's objections and Respondent's responses, Hearing Officer Glazer is issuing certain subpoenas, which will be hand-delivered to each requesting party, respectively, under separate cover. **Please note that each party is responsible for the service of that party's own subpoenas.** See Procedures for Administrative Enforcement Proceedings that Supplement Board Regulation No. 2, Paragraph 6.E. This means that Respondent must serve on each named recipient the subpoenas that Hearing Officer Glazer has issued on Respondent's behalf; similarly, the Executive Director must serve on each named recipient the subpoenas that Hearing Officer Glazer has issued on the Executive Director's behalf. Please note that you must also enter the date and time that you would like the recipients of the subpoena to appear to provide testimony at the hearing. Hearing Officer Glazer is issuing the following subpoenas:

Re: Administrative Adjudication Matter #1510ET17

February 19, 2016

Page 2 of 2

For Respondent:

1. Stephen St. Vincent for both in-person testimony and documents;
2. Paula Weiss for in-person testimony;
3. Yossi Asiag for in-person testimony; and
4. Lisa Brown for in-person testimony.

For the Executive Director:

1. Stephen St. Vincent for in-person testimony;
2. Paula Weiss for in-person testimony;
3. Eileen O'Brien for in-person testimony;
4. Brock J. Atkins for in-person testimony; and
5. Shai Argaman for in-person testimony.

Hearing Officer Glazer denies Respondent's requests to issue subpoenas for Michael Cooke and Jordan Segall.

Hearing Officer Glazer denies the Executive Director's objection to the additional document Respondent submitted in a February 12, 2016, 4:24 pm email and allows Respondent to amend his Pre-Hearing Memorandum to include the additional document as part of Exhibit C.

Hearing Officer Glazer denies the Executive Director's objection to conducting further discovery unless voluntarily agreed to by the Executive Director and Respondent and is issuing a subpoena on Respondent's behalf for production of documents and for in-person testimony to Stephen St. Vincent on Respondent's behalf.

Finally, Hearing Officer Glazer denies Respondent's request to question witness Lisa Brown by telephone at the hearing. Hearing Officer Glazer is issuing a subpoena for Lisa Brown to appear to testify in person.

Please contact me with any questions about applicable procedures.

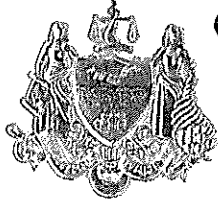
Sincerely,



Diana Lin

Associate General Counsel

cc: Maya Nayak, General Counsel



CITY OF PHILADELPHIA

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

Confidential

February 19, 2016

Via email and hand delivery

Leron Ben Shoshan
22 Evergreen Way
Philadelphia, PA 19115

Re: Administrative Adjudication Matter #1510ET17

Dear Mr. Shoshan:

Please find enclosed four original, signed, and notarized administrative subpoenas that Hearing Officer Richard Glazer is issuing in response to the subpoena requests you included in the pre-hearing memorandum that you filed. The enclosed subpoenas direct the following individuals to appear as witnesses in the hearing in this matter:

1. Stephen St. Vincent (also subpoenaed to produce documents)
2. Paula Weiss
3. Yossi Asiag
4. Lisa Brown

Please note that you are responsible for serving the enclosed subpoenas. Before serving a subpoena on the named recipient, you must first complete the subpoena by indicating the date and time for the recipient to appear before the Board at the hearing in this matter.

Since you and the Executive Director each filed unilateral pre-hearing memoranda on February 12, 2016, please note that the Board's Procedures for Administrative Enforcement Proceedings that Supplement Board Regulation No. 2 provides at Paragraph 6(C) that: "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."

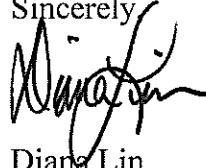
Re: Administrative Adjudication Matter 1510ET17

February 19, 2016

Page 2 of 2

Please contact me with any questions about applicable procedures.

Sincerely

A handwritten signature in black ink, appearing to read 'Diana Lin', written over the word 'Sincerely'.

Diana Lin

Associate General Counsel

cc (*via email without enclosures*): Maya Nayak, General Counsel
Shane Creamer, Executive Director

Enclosures: 4 Subpoenas

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Stephen St. Vincent
4525 Pine Street, Apt. #4
Philadelphia, PA 19143

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

Date: _____ Time: _____

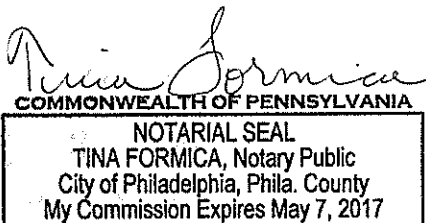
☒ **to produce the things identified on the attached schedule** within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

Date: (same as above) _____ Time: (same as above) _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.

ATTEST:



Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Respondent in this matter, Leron Ben Shoshan. Inquiries concerning this subpoena should be addressed to: Leron Ben Shoshan, 22 Evergreen Way, Philadelphia, PA 19115, 215-833-2547.

SCHEDULE

Documents identified in Respondent's February 12, 2016 request:

1. "Mr. Vincent CV"
2. "Mr. Vincent end of contract /employment with city of Philadelphia"
3. "Any letter was given to Mr. Vincent from city of Philadelphia after the end of his employment"

COMMONWEALTH OF PENNSYLVANIA :
S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Paula Weiss
City of Philadelphia
Office of Administrative Review
100 S. Broad Street, Suite 400
Philadelphia, PA 19110

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

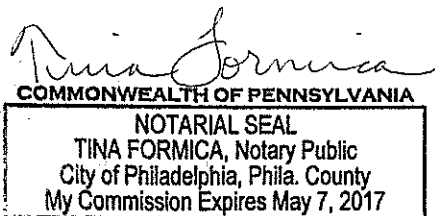
Date: _____ Time: _____

☐ **to produce the things identified on the attached schedule** within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.



ATTEST:

Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Respondent in this matter, Leron Ben Shoshan. Inquiries concerning this subpoena should be addressed to: Leron Ben Shoshan, 22 Evergreen Way, Philadelphia, PA 19115, 215-833-2547.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Yossi Asiag
7838 Montgomery Avenue
Elkins Park, PA 19027

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

Date: _____ Time: _____

☐ **to produce the things identified on the attached schedule** within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.

Tina Formica
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
TINA FORMICA, Notary Public
City of Philadelphia, Phila. County
My Commission Expires May 7, 2017

ATTEST:

Richard Glazer
Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Respondent in this matter, Leron Ben Shoshan. Inquiries concerning this subpoena should be addressed to: Leron Ben Shoshan, 22 Evergreen Way, Philadelphia, PA 19115, 215-833-2547.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Lisa Brown
Brown Accounting
7217 Rising Sun Avenue
Philadelphia, PA 19111

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

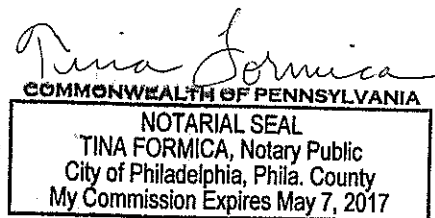
Date: _____ Time: _____

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Place of production: _____

Date: _____ Time: _____

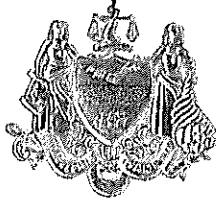
Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 14th day of February, 2016.



ATTEST:

Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Respondent in this matter, Leron Ben Shoshan. Inquiries concerning this subpoena should be addressed to: Leron Ben Shoshan, 22 Evergreen Way, Philadelphia, PA 19115, 215-833-2547.



CITY OF PHILADELPHIA

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

Confidential

February 19, 2016

Via email and hand delivery

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

Re: Administrative Adjudication Matter #1510ET17

Dear Mr. Creamer:

Please find enclosed five original, signed, and notarized administrative subpoenas that Hearing Officer Richard Glazer is issuing in response to the subpoena requests you included in the pre-hearing memorandum that you filed. The enclosed subpoenas direct the following individuals to appear as witnesses in the hearing in this matter:

1. Stephen St. Vincent
2. Paula Weiss
3. Eileen O'Brien
4. Brock J. Atkins
5. Shai Argaman

Please note that you are responsible for serving the enclosed subpoenas. Before serving a subpoena on the named recipient, you must first complete the subpoena by indicating the date and time for the recipient to appear before the Board at the hearing in this matter.

Please contact me with any questions about applicable procedures.

Sincerely,

A handwritten signature in black ink, appearing to read "Diana Lin".

Diana Lin
Associate General Counsel

Re: Administrative Adjudication Matter 1510ET17

February 19, 2016

Page 2 of 2

cc (*via email without enclosures*): Maya Nayak, General Counsel
Leron Ben Shoshan, Respondent

Enclosures: 5 Subpoenas

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Stephen St. Vincent
4525 Pine Street, Apt. #4
Philadelphia, PA 19143

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102


Date: _____ Time: _____

☐ **to produce the things identified on the attached schedule** within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.


COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
TINA FORMICA, Notary Public
City of Philadelphia, Phila. County
My Commission Expires May 7, 2017

ATTEST:


Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Executive Director. Inquiries concerning this subpoena should be addressed to: Michael J. Cooke, Esq., Director of Enforcement, Board of Ethics, 1515 Arch Street, 18th Fl., Philadelphia, PA 19102, (215) 686 9450.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Paula Weiss
City of Philadelphia
Office of Administrative Review
100 S. Broad Street, Suite 400
Philadelphia, PA 19110

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

Date: _____ Time: _____

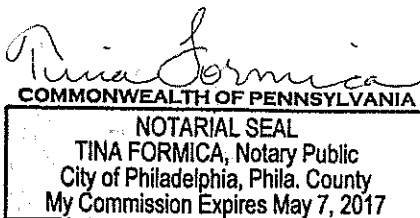
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Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.

ATTEST:



Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Executive Director. Inquiries concerning this subpoena should be addressed to: Michael J. Cooke, Esq., Director of Enforcement, Board of Ethics, 1515 Arch Street, 18th Fl., Philadelphia, PA 19102, (215) 686 9450.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Eileen O'Brien
City of Philadelphia
Office of Administrative Review – Code Unit
714 Market Street, Suite 430
Philadelphia, PA 19106

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:



to testify under oath on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
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Date: _____ Time: _____

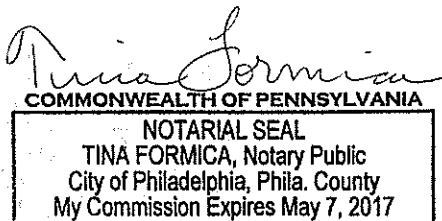


to produce the things identified on the attached schedule within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.



ATTEST:

Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Executive Director. Inquiries concerning this subpoena should be addressed to: Michael J. Cooke, Esq., Director of Enforcement, Board of Ethics, 1515 Arch Street, 18th Fl., Philadelphia, PA 19102, (215) 686 9450.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Brock J. Atkins
City of Philadelphia Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

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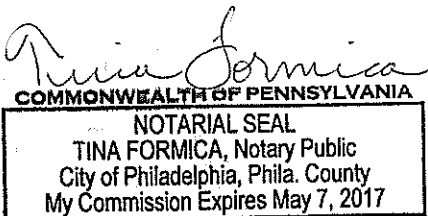
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Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.

ATTEST:



Richard Glazer
Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Executive Director. Inquiries concerning this subpoena should be addressed to: Michael J. Cooke, Esq., Director of Enforcement, Board of Ethics, 1515 Arch Street, 18th Fl., Philadelphia, PA 19102, (215) 686 9450.

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: Shai Argaman
1267 Serota Place
Philadelphia, PA 19115

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, § 20-606 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded to be and appear before the Board of Ethics of the City of Philadelphia:

☒ **to testify under oath** on matters within your knowledge at the administrative enforcement hearing scheduled for March 1, 2016 and March 2, 2016 relating to Administrative Adjudication Matter #1510ET17 at the place, date, and time specified below.

Place of testimony: Board of Ethics, One Parkway Building, 1515 Arch St.,
18th Fl., Room No. 18-009, Philadelphia, PA 19102

Date: _____ Time: _____

☐ **to produce the things identified on the attached schedule** within your possession relating to a matter of inquiry by the Ethics Board.

Place of production: _____

Date: _____ Time: _____

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19th day of February, 2016.

Tina Formica
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
TINA FORMICA, Notary Public
City of Philadelphia, Phila. County
My Commission Expires May 7, 2017

ATTEST:

Richard Glazer
Richard Glazer
Hearing Officer

This subpoena is being issued in response to a request made by the Executive Director. Inquiries concerning this subpoena should be addressed to: Michael J. Cooke, Esq., Director of Enforcement, Board of Ethics, 1515 Arch Street, 18th Fl., Philadelphia, PA 19102, (215) 686 9450.