Thomas Klemm

Subject: Re: Creamer v. Ben, Matter No. 1510ET17 - Objection to Form of Response to Notice

From: Leron Ben [rent2158332547@gmail.com] **Sent:** Thursday, December 03, 2015 7:30 PM **To:** Michael Cooke; Maya Nayak; Jordan Segall

Subject: Re: Creamer v. Ben, Matter No. 1510ET17 - Objection to Form of Response to Notice

Mr. Cooke.

as you already know, i'm not a lawyer and can't speak or respond as you expecting.

- 1 I spoke and e-mailed Ms. Maya Nayak and requested a hearing
- 2 At the hearing i'll answer all your questions
- 3. I DIDN'T GIVE MR. VINCENT ANY MONEY OR GIFT EVER
- 4 At this point i'll represent myself at the hearing, and if needed i'll request to be represented by lawyer.
- 5. You expect me to answer to things that never happened, and all i can say is I DID NOT GIVE MR. VINCENT MONEY OR GIFT OR VIOLATED ANY CITY LAW...i hope this will answer your request. 6 I'll see you and your evidence at the hearing

On Thu, Dec 3, 2015 at 11:42 AM, Michael Cooke < Michael. Cooke @phila.gov > wrote:

Maya,

We received a paper copy of Mr. Ben's Response to the Notice yesterday via certified mail.

The Executive Director objects to Mr. Ben's Response because it does not comply with the Board's Memorandum on Procedures for Administrative Proceedings. Paragraph 4 of the Memorandum provides that "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."

The Response Mr. Ben submitted yesterday is not set forth in consecutively numbered paragraphs that admit or deny each allegation in the corresponding numbered paragraphs of the Notice. This deficiency of Mr. Ben's Response does not allow us to identify the specific facts that are in dispute in this matter. Accordingly, we respectfully request that the Board order Mr. Ben to submit an amended Response that complies with the Board's procedures.

Regards,

Michael J. Cooke, Esq.

Director of Enforcement

Board of Ethics

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Leron Ben

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