

BOARD OF ETHICS  
OF THE CITY OF PHILADELPHIA

J. SHANE CREAMER, JR. )  
EXECUTIVE DIRECTOR, BOARD OF )  
ETHICS OF THE CITY OF )  
PHILADELPHIA, ) Matter No.: 2106ET19  
 )  
 - vs - )  
 )  
 CELENA MORRISON, )  
 )  
 Respondent.)

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TRANSCRIPT OF HEARING, taken by and  
before CATHERINE S. RIVERA, Professional Reporter  
and Notary Public, at the offices of BOARD OF  
ETHICS, One Parkway Building, 1515 Arch Street, 18th  
Floor, Philadelphia, PA 19102, on Wednesday,  
December 15, 2021, commencing at 10:01 a.m.

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2 P R O C E E D I N G S

3 - - -

4 MR. RULLI: Good morning, everyone.

5 We're now on the record. Today we're going to  
6 consider the Board of Ethics Matter  
7 No. 2106ET19: J. Shane Creamer, Jr., Executive  
8 Director, Philadelphia Board of Ethics v.  
9 Respondent, Celena Morrison. And we will  
10 provide the respondent with the hearing that she  
11 has requested in this matter.

12 My name is Louis Rulli. I have been  
13 appointed by the Board of Ethics as the hearing  
14 officer in this matter, and I will be presiding  
15 over the hearing today. The date is Wednesday,  
16 December 15th, 2021, and the time is  
17 approximately 10:02. The location of this  
18 hearing, as I understand it, is the mayor's  
19 office or mayor's room here, Room Number 18-025  
20 located at 1515 Arch Street in Philadelphia.

21 As the hearing officer, it's my  
22 responsibility to conduct a fair hearing. I  
23 will do this by allowing the parties to present  
24 their positions at reasonable length, by

1 following the Board's procedures -- copies of  
2 which have been provided to the parties -- and  
3 by ensuring that a complete record is made of  
4 this proceeding.

5 I will issue oaths of testimony. I  
6 will rule on admissibility of evidence and  
7 maintain proper decorum and order. I may also  
8 ask questions of the witnesses and of the  
9 parties.

10 The Board of Ethics, as you know, will  
11 make the final decision in this case. The  
12 Board's general counsel, Michael Cooke, the  
13 associate general counsel, Jordana Greenwald,  
14 and Staff Attorney Thomas Klemm are seated  
15 beside me, and they will assist me throughout  
16 this hearing. Also this morning, observing is  
17 Danielle Gardner, also of the Board of Ethics.

18 The Board observes walls of division,  
19 and what that means is that the adjudicative  
20 function is separated from the investigatory and  
21 prosecutorial functions in all adjudicated  
22 enforcement matters. During an administrative  
23 enforcement proceeding such as this, the  
24 executive director and professional staff

1 directed by the executive director will carry  
2 out the investigatory and prosecutorial  
3 function. The individual members of the Board,  
4 myself, General Counsel Cooke, Associate General  
5 Counsel Greenwald, and Staff Attorney Klemm will  
6 carry out the adjudicative function.

7                 The Board of Ethics observes these  
8 walls of division with respect to all of its  
9 adjudicative enforcement matters, and it has  
10 observed the walls of division in this  
11 particular matter, number 2106ET19.

12                 Today we have a court reporter with us  
13 to transcribe this hearing, Ms. Catherine  
14 Rivera. She will be our court reporter. And  
15 the Board of Ethics will rely upon the  
16 transcript, any post-hearing briefs that counsel  
17 provides, and the deliberations in this matter.

18                 I would like to go over just a few  
19 instructions at the outset. First, we are in  
20 difficult times and we are all masked, and I  
21 appreciate that. Our goal here was to have an  
22 in-person hearing while keeping everyone safe.  
23 And therefore, we're going to ask that everyone  
24 keep their voice up so that the court reporter

1 can hear and accurately -- accurately report on  
2 what you say.

3 We will ask that you keep your masks  
4 on while speaking just as I am doing now. If it  
5 is impossible to hear a particular answer, we  
6 will ask to remove the mask solely for that  
7 purpose. But otherwise, we will be keeping our  
8 masks on today. This protocol, which has been  
9 referenced as the COVID-19 Prevention and  
10 Mitigation Protocol, has been distributed to the  
11 parties and is available to you.

12 (At this time, a discussion was held  
13 off the record.)

14 MR. RULLI: Now I would like for  
15 everyone to identify themselves on the record  
16 for the court reporter. And we will start with  
17 the executive director. Mr. Creamer, if you  
18 would identify yourself for the record. And I  
19 want everybody to spell their names so that our  
20 court reporter has it clear.

21 MR. CREAMER: I'm J. Shane Creamer,  
22 Jr.: S-H-A-N-E C-R-E-A-M-E-R. I'm the  
23 executive director of the Philadelphia Board of  
24 Ethics.

1                   MR. RULLI: Thank you, Mr. Creamer.

2     And now seated on -- I know Bryan. Are you  
3     planning to remain, or are you just helping,  
4     too?

5                   MR. CREAMER: He's just assisting, but  
6     he will not be speaking.

7                   MR. RULLI: So I would like to turn,  
8     then, to the respondent's counsel.

9                   MR. ALFANO: Sure. Good morning.

10    Gaetan Alfano. I'm joined by my partner, Leslie  
11    Mariotti. And we represent the respondent,  
12    Celena Morrison, who is present, and we have  
13    previously provided the court reporter with the  
14    spelling of our names.

15                  MR. RULLI: Thank you, Counsel. And  
16    Ms. Morrison?

17                  MS. MORRISON: I'm Celena Morrison.  
18    I'm executive director of the mayor's office of  
19    LGBT affairs. My pronouns are she and her. And  
20    I also provided her with a card with spelling  
21    and everything of my name.

22                  MR. RULLI: Thank you, Ms. Morrison.

23                  Bryan, are you planning to stay or  
24    were you just checking on something here?

1 Because we'll put you on the record if you are  
2 staying.

3 MR. CREAMER: You are staying?

4 MR. MCHALE: I am staying.

5 MR. RULLI: So you think, then, it  
6 would be appropriate for you to identify  
7 yourself for the record and your position.  
8 Spell your name, as well.

9 MR. MCHALE: Bryan McHale: B-R-Y-A-N  
10 M-C-H-A-L-E. And I'm the public integrity  
11 client services supervisor for the Board of  
12 Ethics.

13 MR. RULLI: Thank you. Okay.

14 Jurisdiction and procedural history, a little  
15 bit. This hearing is convened under § 4-1100  
16 of the Home Rule Charter, § 20-6061H of the  
17 Philadelphia Code; of course, the Board of  
18 Ethics Regulation 2 and the supplement to  
19 Regulation 2.

20 On June 9th, 2021, the executive  
21 director served the respondent, Ms. Morrison,  
22 with a notice of administrative enforcement  
23 proceeding. The notice of enforcement was  
24 amended by agreement of the parties, an order

1 from myself. That amended notice was served on  
2 the respondent on July 15th, 2021.

3                   The amended notice alleges that  
4 Respondent violated the City gift ordinance  
5 which is found in Code § 20-604, and the term  
6 "gift" is defined in § 20-601. The executive  
7 director is seeking a penalty of \$2,000 based  
8 upon an aggravating factor that the respondent  
9 alleges -- that alleges that the respondent  
10 acted knowingly.

11                  On August 2nd, 2021, counsel for the  
12 respondent entered their appearance in this  
13 matter. And after notifying the hearing officer  
14 that conflicts had been checked and cleared,  
15 that appearance then was cleared on  
16 September 3rd, 2021.

17                  The director's amended notice of  
18 enforcement was filed on September 30th, 2021.  
19 And in that answer, the -- Ms. Morrison  
20 requested a hearing. And that, of course, is  
21 the hearing that we're having today.

22                  I entered a prehearing order on  
23 November 24th, 2021 in accordance with my then  
24 amended prehearing order the parties provided us

1       on December 3rd with witness lists, proposed  
2       exhibits, prehearing motions, and stipulations  
3       in this matter.

4                  The matter, as you know, was scheduled  
5       for today, December 15th, after consultation  
6       with counsel and by my prehearing order. And we  
7       have also agreed that this hearing will continue  
8       to December 16th if necessary.

9                  After this hearing is concluded and  
10      the respondent has been provided with an  
11      opportunity to contest the allegations against  
12      her, the Board will deliberate on the evidence  
13      and determine by preponderance of the evidence  
14      whether any violation of law has occurred. And  
15      if so, the Board will assess penalties for any  
16      such violation.

17                 Now, the parties have previously  
18      been advised that the City Code and Board  
19      Regulation 2 require that the Board's  
20      administrative enforcement proceedings,  
21      including filings and testimony, remain  
22      confidential while this adjudication is pending  
23      unless the respondent provides written consent  
24      to a public proceeding. The respondent has not

1        consented to a public proceeding, and therefore,  
2        this hearing remains confidential.

3                Once the Board has served notice of  
4        its final determination on the respondent, this  
5        adjudication will no longer be pending. And the  
6        Board and the Board staff, Respondent, and  
7        witnesses may disclose information about the  
8        proceedings.

9                I also would like to remind the  
10      parties and Counsel that the Board is not bound  
11      by technical rules of evidence in administrative  
12      enforcement proceedings, and I may admit  
13      evidence on the Board's behalf so that it has a  
14      a complete and full record in this matter.

15                Nonetheless, the parties should make  
16      any objections to evidence on the record and  
17      state the basis for those objections. And I  
18      will rule on those objections as appropriate.

19                Before I turn to opening statements,  
20      I want to note that there have been two motions  
21      in limine filed in this matter by the executive  
22      director. I am reserving judgment on those  
23      motions at this time, and we will consider those  
24      in context if and when they become timely and

1 relevant to this proceeding.

2                   Are there any preliminary matters that  
3 anyone wants to raise before we turn to opening  
4 statements?

5                   MR. CREAMER: No.

6                   MR. ALFANO: No.

7                   MR. RULLI: Thank you, Counsel. All  
8 right. So if the parties wish to make an  
9 opening statement, you may do so at this time.  
10 I will begin with the executive director.

11                  I ask that the parties/counsel permit  
12 each other to make opening statements without  
13 interruption. Please limit your opening  
14 remarks/statement to a reasonable length, which  
15 I think should definitely be no more than 15  
16 minutes; might be less.

17                  Mr. Creamer, if you would like to make  
18 an opening statement --

19                  MR. CREAMER: Thank you, Professor  
20 Rulli.

21                  MR. RULLI: -- you may do so.

22                  MR. CREAMER: And it will be far less  
23 than 15 minutes, I can assure you. City  
24 officials -- including Ms. Morrison, who is the

1 executive director of the mayor's office of LGBT  
2 affairs -- are prohibited from soliciting,  
3 accepting, or receiving monetary gifts from any  
4 person who is seeking official action from that  
5 official at the time or in close proximity to  
6 the time that the gift is received.

7 An official action is an act or  
8 omission that is taken by an officer or employee  
9 that requires discretion and is not ministerial  
10 in action. The testimony and evidence will show  
11 that Ms. Morrison solicited, accepted, and  
12 received a monetary gift in the form of a  
13 no-interest loan from Kendall Stephens, who was  
14 seeking official action from Ms. Morrison at the  
15 time. Ms. Morrison sought, accepted, and  
16 received a no-interest loan in violation of the  
17 City's gift rule.

18 The testimony and evidence will also  
19 show that Ms. Morrison violated the City's gift  
20 rule knowingly, meaning that she did it  
21 voluntarily and intentionally and not because of  
22 mistake or accident or some other innocent  
23 reason. Because Ms. Morrison violated the gift  
24 rule knowingly, she is subject to an increased

1       penalty of \$2,000 under Code § 20-1302.

2                  Thank you.

3                  MR. RULLI: Thank you, Mr. Creamer.

4                  Mr. Alfano, would you like to make an opening  
5                  statement?

6                  MR. ALFANO: I'll reserve to my case  
7                  in chief.

8                  MR. RULLI: All right. So at this  
9                  time, I'm going to permit the executive director  
10                 to call his first witness. And I'm going to  
11                 swear in the witnesses. So do you want to --  
12                 are you planning -- well, who is going to be  
13                 your first witness?

14                 MR. CREAMER: My first witness will be  
15                 Kendall Stephens who is waiting in Bryan  
16                 McHale's office, I understand. I would like to  
17                 go get her myself and just speak with her for  
18                 just a couple of minutes; I haven't seen her  
19                 this morning. But it won't take too long.

20                 MR. RULLI: That would be fine. We  
21                 will stand in recess for a couple minutes in  
22                 order to permit Mr. Creamer to meet with her.

23                 MR. CREAMER: Thank you, Professor.

24                 (At this time, a brief recess was

1 taken.)

2 MR. RULLI: Before I swear in the  
3 witness, I neglected to say one thing I wanted  
4 to say. And that is I know that in this  
5 difficult environment, we may need to take  
6 breaks more than we might otherwise need to. If  
7 at any time anybody needs to take a break, just  
8 please let me know and I will do my best to  
9 accommodate you.

10 I'm going to, at this time, swear in  
11 the witness.

12 - - -

13 (KENDALL STEPHENS, having been duly  
14 sworn, was examined and testified as follows:)

15 - - -

16 MR. RULLI: And would you identify  
17 yourself on the record for our court reporter?  
18 Identify your name, and please spell your name,  
19 as well.

20 THE WITNESS: Yes. My name is Kendall  
21 Stephens: K-E-N-D-A-L-L S-T-E-P-H-E-N-S.

22 MR. RULLI: Thank you. Mr. Creamer,  
23 you may now question your witness.

24 MR. CREAMER: Thank you, Professor

1 Rulli.

2 BY MR. CREAMER:

3 Q. Good morning, Ms. Stephens.

4 A. Good morning.

5 Q. And you've already identified yourself. Are you  
6 currently employed?

7 A. Not quite. I mean, I -- I'm a cultural  
8 competency trainer, so I've been getting money from that.

9 Q. Okay.

10 A. But that's kind of here and there.

11 Q. And were you employed in 2020?

12 A. I was not.

13 Q. Are you a student?

14 A. I am.

15 Q. Where are you a student?

16 A. Temple University.

17 Q. How long have you been a student at Temple  
18 University?

19 A. Since August of 2020.

20 Q. And were you a student somewhere else before  
21 August of 2020?

22 A. I was.

23 Q. Where?

24 A. Community College of Philadelphia.

1 Q. Okay. And how long were you a student there?

2 A. Two years.

3 Q. Okay. And are you active at Temple University  
4 in any way in the community of Temple University?

5 A. Yes. I am on student government, the chair of  
6 student health and wellness. I'm on a diversity  
7 subcommittee, as well. I'm on the LGBTQ task force. I'm  
8 on the student health and wellness advisory council. I  
9 think that's pretty much about it. I'm pretty active as  
10 an advocate on campus.

11 Q. Do you represent the Temple University community  
12 in any way?

13 A. Yeah, I do. So I'm also their diversity,  
14 equity, and inclusion kind of spokesperson in a way, so  
15 they have me on their DEI ads. I'm all over the City and  
16 every subway stop, billboards, part of their promotional  
17 material, things of that nature.

18 Q. So when you say you're on the billboards, what  
19 do you mean you're on the billboards?

20 A. So basically if you -- if you look at any of the  
21 billboards, you'll see my face and then a quote about  
22 education being powerful, it being, I guess, the nexus to  
23 a person's personal and professional growth.

24 Q. Okay. And when you were at Philadelphia

1      Community College, did you have any honors or speaking  
2      roles there?

3      A.         Yes. I had several. I paneled many cultural  
4      competency endeavors. I was also the commencement speaker  
5      at CCP. I was the president of the LGBTQ club, and I was  
6      a 2020 dream scholar; that, as well.

7      Q.         And are you involved in any LGBT organizations  
8      or committees?

9      A.         Yes. I'm on the Black and Latinx community  
10     control organization. I'm on the board of William Way  
11     LGB [sic] community center. I'm also on the board of  
12     Bethany Children's Home. I -- there's so much stuff.  
13     It's hard to keep up with everything.

14               That's all I can, like -- oh, yeah. So of  
15     course. I'm on the advisory board of the district  
16     attorney's office LGBT community -- community board. I'm  
17     also on the Philadelphia Police Department's liaison  
18     committee, as well.

19      Q.         Oh. You mentioned, I think, the DA LGBT  
20     advisory board.

21      A.         Mm-hm.

22      Q.         How long you been on that?

23      A.         I've been on that Board, I would say, about a  
24     year and a half.

1 Q. You mentioned the police liaison committee. How  
2 long you been on that?

3 A. Little under a year.

4 Q. Okay. And how about any other LGBT  
5 organizations or committees?

6 A. None that I can really think of. Because I know  
7 I'm on the task force; I already said that. I cannot  
8 really think at this point. Like I said, I have a lot  
9 going on. I know I'm on the CDC and UPenn HIV  
10 surveillance survey committee, so I know I'm on that.

11 Q. Okay. Now, do you know Celena Morrison?

12 A. I do.

13 Q. How long have you known her?

14 A. I would say about maybe eight years.

15 Q. All right. And are you or were you friends with  
16 Ms. Morrison?

17 A. Yes.

18 Q. In 2020, did Ms. Morrison live with you or --  
19 for a period of time?

20 A. Yes, she did.

21 Q. Approximately when was that?

22 A. That was approximately, I want to say, sometime  
23 in late August. I mean, late -- yeah, late summer, she  
24 was in my -- in my home.

1 Q. And was this in your apartment or your home?

2 A. I had a -- I had a house. So she was staying in  
3 the back room.

4 Q. Okay. Was this -- did you rent the house or own  
5 the house?

6 A. No, I was renting.

7 Q. Renting?

8 A. Yes.

9 Q. And were you charging her rent or did she  
10 contribute --

11 A. No. No, no, no.

12 Q. -- to utilities?

13 A. Not at all. I didn't charge rent.

14 Q. Okay.

15 MR. RULLI: Excuse me. I'm just going  
16 to stop you for one second. I want to make sure  
17 that the court reporter gets it all down, so  
18 don't talk over each other. Okay? And --

19 THE WITNESS: Certainly.

20 MR. RULLI: So just pause for a second  
21 and -- thank you.

22 THE WITNESS: No problem.

23 BY MR. CREAMER:

24 Q. Okay. And was Ms. Morrison employed at that

1 time?

2 A. At the time, yes, she was.

3 Q. And what was her position?

4 A. She -- same position she has now working with  
5 the mayor, the LGBT affairs office.

6 Q. Okay. And at that time or currently, were you  
7 involved in an organization called Hearts on a Wire?

8 A. Oh, yes. Yes. I was involved with Hearts on a  
9 Wire. I was a member, so -- at the time.

10 Q. And can you explain what that organization is?

11 A. Yes. So Hearts on a Wire connects very critical  
12 resources to people of the TGNCNB community -- that's  
13 trans, gender nonconforming, nonbinary community -- that  
14 are incarcerated. So by resources, that can mean putting  
15 money on someone's "books," per se. Putting their  
16 poetry -- they publish their poetry, as well. They  
17 connect them with I think, like, resources such as, like,  
18 counseling services, things of that nature.

19 Q. Okay. And what's your role with that  
20 organization?

21 A. I'm just a member. I was just someone that was  
22 helping to that endeavor.

23 Q. And in 2020, did you have any conversations with  
24 Ms. Morrison about Hearts on a Wire?

1 A. I did. I did.

2 Q. All right. And approximately when did you have  
3 those conversations with her?

4 A. I was -- I think I had those conversations with  
5 her, I think it started around like April or May.

6 Q. Okay. And did they continue after April and  
7 May?

8 A. They did continue afterwards.

9 Q. And what did you talk to her about Hearts on a  
10 Wire?

11 A. Well, I was hoping that her office could be used  
12 as a bit of a resource hub to bring attention to the  
13 plight of incarcerated LGBTQ folks and hopefully provide  
14 even more resources. So I was hoping that she would be a  
15 bit of a resource hub. So it was a bit of a, like,  
16 multi-organizational effort. I asked her and another  
17 person, too, who was in the community dealing with that  
18 specific issue of incarcerated individuals.

19 Q. All right. And what was your understanding of  
20 what her office -- what kind of resources could her office  
21 provide to Hearts on a Wire?

22 A. Yeah. So what I was hoping that she would be  
23 able to do is be able to work with CJC with those LGBTQ+  
24 folks who are incarcerated on State Road. That would be

1       within her purview of being an official member in  
2       Philadelphia, even though we deal with people throughout  
3       the entire state of Pennsylvania who are incarcerated.

4                   So I was hoping that she would be able to use  
5       her social media platforms to raise awareness and also,  
6       too, try to mine her office to find resources that could  
7       be allocated to help people either post bail or have money  
8       on their books, be able to have a bit of quality of life  
9       while they're incarcerated.

10      Q.           And did you have a plan for explaining exactly  
11     what you -- how you hoped to, you know, use her office as  
12     a resource hub?

13      A.           Yeah. I definitely had a plan. So, you know,  
14     and that was part of why I wanted to get this meeting.  
15     You know, my plan was to see what was within her  
16     jurisdiction; you know what her powers were, what her  
17     thoughts were so that we can kind of match what she could  
18     do with what our vision was. So, you know, this was going  
19     to be more like an exploratory sort of meeting to see what  
20     was possible. I had my own ideas, but you know, I don't  
21     know what her office can do or can't do.

22      Q.           Okay. You mentioned a meeting?

23      A.           Yes.

24      Q.           Did you ask for a meeting --

1 A. I did ask for a meeting.

2 Q. -- with Ms. Morrison?

3 A. Yes, we did. We set a date for the meeting.

4 She couldn't make the meeting.

5 Q. All right. I would like to just show the  
6 witness Exhibit ED-3, an email dated August 10, 2020. All  
7 right. If you could look at the top where it says "Hello  
8 friends" and then "Best, Kendall Stephens." If you could  
9 just review that email.

10 A. (Witness complied.)

11 Q. Can you identify what that email is at the top  
12 of the first page of that email?

13 A. Yes. So this was me kind of connecting the dots  
14 between all of the people that I spoke with, including  
15 Ms. Morrison, just expressing my excitement for this  
16 meeting and also, too, so to find -- or trying to,  
17 anyway -- a date to meet.

18 Q. Okay. And you copied Ms. Morrison on that  
19 email?

20 A. I certainly did.

21 Q. And did you reference the possibility of a  
22 meeting with Ms. Morrison --

23 A. I did.

24 Q. -- regarding Hearts on a Wire?

1 A. I did.

2 Q. Okay. And I would like to direct your attention  
3 to Exhibit ED-4, an email which is I think the next tab in  
4 that book, hopefully. It's an email from Celena Morrison  
5 dated Wednesday, August 19, 2020. Give you a chance to  
6 look at that. Can you tell me what that is?

7 A. So this is her confirming the date and time to  
8 meet.

9 Q. And what does that indicate?

10 A. Indicates that she had an intention to meet with  
11 us, Hearts on a Wire, me, Kelly Burkhardt, and Naiymah  
12 Sanchez on August 28th after 1:00.

13 Q. Okay. And she was indicating meeting -- a  
14 willingness to meet with you and others? Is that --

15 A. Yes. Naiymah, Kelly Burkhardt, and Hearts on a  
16 Wire.

17 Q. All right. And who were Naiymah and Kelly  
18 Burkhardt?

19 A. So Naiymah is a woman of trans experience --  
20 trans experience, Latinx -- who was incarcerated and has  
21 done amazing work in that capacity with raising awareness  
22 around treatment of LGBTQ folks while being incarcerated.  
23 So I wanted to have her in this conversation. She was  
24 excited to do so.

1 Kelly Burkhardt works within the DA's office as  
2 a victim coordinator, and that was very important. Not --  
3 don't really know who Sayeeda is. I'm guessing they're  
4 part of Hearts on a Wire in some way. But I know Adrian  
5 Lowe. Adrian Lowe is a lawyer with the Philly AIDS  
6 Project.

7 So this is me trying to kind of get everyone  
8 together who would be, I think, the most impactful [sic]  
9 in this opportunity to reallocate -- or allocate resources  
10 to people who are incarcerated.

11 Q. From, from Ms. Morrison's --

12 A. From the mayor's office.

13 Q. -- office?

14 A. Yes.

15 Q. From Ms. Morrison?

16 A. Yes.

17 Q. Okay. And did you explain your expectation to  
18 Ms. Morrison while the meeting was being planned?

19 A. I certainly did. Yes, I made it very clear to  
20 her that, you know, her being in this position would carry  
21 tremendous weight in us trying to gain some traction and  
22 raising awareness. And she agreed. She agreed.

23 Q. Okay. So you were -- according to ED-3, you  
24 were -- you were attempting to schedule this meeting on

1       August 10th. According to ED-4, Ms. Morrison replied on  
2       August 19th indicating availability on August 28th, but  
3       something happened on August 24th. Do you remember?

4       A.           Yes.

5       Q.           What happened?

6       A.           So unfortunately, I was a victim of a hate  
7       crime. People barged into my home and physically  
8       assaulted me while I had two adolescent children inside  
9       who witnessed all of this. And had some broken bones, was  
10      battered and bruised up really bad. And Celena was the  
11      first person that I called.

12      Q.           All right. And was Ms. Morrison on the phone  
13      with you when the attack happened?

14      A.           No, she wasn't. She was on the phone with me  
15      after the attack commenced. At that point, I collected  
16      myself.

17      Q.           Okay.

18      A.           I called her.

19      Q.           I would like to direct your attention to another  
20      exhibit in the binder, ED-6, which hopefully is at tab 6.  
21      And can you identify that?

22      A.           Yes. This is an article in the Philadelphia  
23      Inquirer speaking about the hate crime attack that  
24      happened to me.

1 Q. Okay.

2 MR. CREAMER: Professor Rulli, just a  
3 point of order. Would you prefer that we wait  
4 until the end to move exhibits into evidence or  
5 would you like us to do it as we cover them in  
6 the testimony?

7 MR. RULLI: I mean, it's your choice,  
8 actually. But I think it probably would be  
9 easier to do -- as long as the witness is still  
10 here, we can do them at the end at one time or  
11 you can do them as you're developing them. It's  
12 your preference.

13 MR. CREAMER: I might forget, so maybe  
14 I'll do it as we go. So I would like to move  
15 ED-3, 4, and 6.

16 MR. RULLI: Well, let's do one at a  
17 time.

18 MR. CREAMER: Okay. I would like to  
19 move ED-3 into evidence.

20 MR. ALFANO: I have no objection as to  
21 ED-3.

22 MR. RULLI: Thank you, Counsel. So  
23 ED-3 will be accepted into evidence.

24 (At this time, a document marked for

1 identification as ED-3 was received into  
2 evidence.)

3 MR. RULLI: Next exhibit.

4 MR. CREAMER: I would like to move  
5 ED-4 into evidence.

6 MR. ALFANO: No objection as to ED-4.

7 I think it's part -- actually part of the same  
8 communication.

9 MR. CREAMER: I would like to move  
10 ED-6 into evidence.

11 MR. ALFANO: Okay. Well, I --

12 MR. RULLI: One second, one second.  
13 So ED-4 will be accepted into evidence.

14 (At this time, a document marked for  
15 identification as ED-4 was received into  
16 evidence.)

17 MR. ALFANO: Yeah. I do object to  
18 ED-6. I'm not sure --

19 MR. RULLI: All right. Wait a minute.  
20 Let's get that moved in. I'm sorry. You're  
21 jumping ahead of me. I just want to make sure  
22 the record is clear. So ED-3 and ED-4 have been  
23 accepted into evidence without objection.

24 MR. ALFANO: All right.

1 MR. RULLI: Now, your next exhibit.

2 MR. CREAMER: Thank you. I'd like to  
3 move ED-6 into evidence.

4 MR. ALFANO: And I object to ED-6.

5 I'm not sure of its -- of its purpose. It's a  
6 newspaper article. I'll agree to that. I'm not  
7 sure of its relevance.

8 MR. RULLI: Would you address that?

9 MR. CREAMER: Yes. It documents the  
10 hate crime. I don't think that that's in  
11 dispute at all. I don't see why it's  
12 controversial. Again, we're not bound by the  
13 rules of evidence. I don't see the controversy.

14 There's no dispute that this was -- I  
15 think Ms. Morrison agrees that this was a hate  
16 crime. Ms. Stephens agrees it was a hate crime.  
17 There's no dispute. It's a noncontroversial  
18 explanation of what happened.

19 MR. ALFANO: And I don't think, if I  
20 may, that the newspaper article makes it any  
21 more or less of a hate crime. I mean, it's  
22 just -- it's just a reporting on an incident.  
23 And again, I don't think it's -- I don't believe  
24 it's relevant.

1                   And, you know, if the issue is whether  
2                   it's a hate crime or not, I'm sure Ms. Stephens  
3                   can testify to her perception, and you can ask  
4                   Ms. Morrison to testify to her perception. But  
5                   I don't think that Julie Shaw's reporting on it  
6                   really has anything to do with this case.

7                   MR. RULLI: Well, as I understand, the  
8                   purpose in moving this is to -- you know, to  
9                   report that a hate crime occurred. I don't  
10                  think there's a dispute that it occurred. And  
11                  to that certainly limited purpose, I'm going to  
12                  allow it to come in. I don't hear you saying  
13                  that each and every sentence in there is being  
14                  offered for the truth --

15                  MR. CREAMER: No.

16                  MR. RULLI: -- of the matter asserted;  
17                  right?

18                  MR. CREAMER: That's correct.

19                  MR. RULLI: So you're offering it for  
20                  that more limited purpose. And on that basis --

21                  MR. ALFANO: We agree. We agree. It  
22                  was a hate crime.

23                  MR. RULLI: I don't think there was a  
24                  lot of disagreement about that.

1 MR. ALFANO: No. We agree it was  
2 characterized as a hate crime. I'm not sure  
3 what the newspaper article absolutely adds to  
4 that. And I would be concerned if I saw in the  
5 findings of fact or other pleadings, you know,  
6 specific quotations, you know, from this  
7 article. That's my concern. Again, I don't see  
8 what it -- what it adds at this point.

9 MR. RULLI: So just to clarify for the  
10 record, why don't you state once again the  
11 purpose for which you're offering this  
12 Philadelphia Inquirer article.

13 MR. CREAMER: Just to document that  
14 this was a significant hate crime in  
15 Philadelphia, and it's relevant to how  
16 Ms. Stephens was treated by the police  
17 subsequently after the attack.

18 MR. ALFANO: I don't think we can get  
19 that from this article. I don't think we can  
20 get from this article how she was treated by the  
21 police, Ms. Stephens was treated by the police,  
22 subsequent to this attack.

23 MR. CREAMER: Well, we can get that  
24 through testimony from Ms. Stephens and

1 Ms. Morrison.

2 MR. ALFANO: Nothing to do with this  
3 article. That's my --

4 MR. RULLI: Wait, wait. Let me slow  
5 everybody down for a second. I'm going to  
6 accept it into the record. You're still  
7 questioning your witness, and you may question  
8 further. And we'll see as this develops as to  
9 whether or not there's anything else in this  
10 article that is within the purpose that I hear  
11 you trying to introduce it.

12 So let's let counsel continue with his  
13 questioning and we will accept it. I'll reserve  
14 judgment as to the question for the moment. All  
15 right? But you may continue.

16 MR. CREAMER: Thank you.

17 (At this time, a document marked for  
18 identification as ED-6 was received into  
19 evidence.)

20 BY MR. CREAMER:

21 Q. Ms. Stephens, did Ms. Morrison assist you in any  
22 way after the attack?

23 A. Yes, she did.

24 Q. And how did she assist you?

1 A. Well, first she -- she came to my home. And I  
2 was telling her what was happening; you know, what had  
3 happened. It was still very much at the scene. So I was  
4 just discussing this with her. I was telling her how I  
5 was treated by the police officers, the responding police  
6 officers, how they categorized it initially as a simple  
7 assault and told me to go downtown and file a complaint,  
8 which I thought was ridiculous.

9 So she said that she would help me have that  
10 charge enhanced because of the gravity of the situation.  
11 She also helped me with the advocacy around that. So we  
12 ended up -- I got in her car. We went to the 17th  
13 district police station. And I believe the person's name  
14 was Sergeant Vogel or Captain Vogel. He was especially  
15 nasty towards me because I was still, like, bleeding out  
16 and trying to advocate.

17 And she was there in her official capacity. She  
18 let him --

19 MR. ALFANO: Objection. Objection to  
20 that. I'm going to move to strike that.

21 THE WITNESS: Well, she said --

22 MR. RULLI: Don't tell us what she  
23 said.

24 THE WITNESS: Oh. Don't say what she

1                   said?

2                   MR. RULLI: No.

3                   THE WITNESS: Fine. So she helped me  
4                   advocate in this regard. So after the fact, she  
5                   took me to the hospital. And we went to the  
6                   hospital, then that's -- that's that.

7                   And afterwards, we had some  
8                   communication on the phone and through text  
9                   trying to get charges enhanced, trying to have  
10                  people be accountable for how I was treated.

11                  And by "people," I mean responding officers and  
12                  members of the 17th district police.

13 BY MR. CREAMER:

14 Q.               Okay. So when you mentioned she was going to  
15 help you get the charges enhanced, did you ask her for  
16 that help?

17 A.               I did ask her for that help.

18 Q.               And when you say getting charges "enhanced,"  
19 what -- can you explain what that means?

20 A.               Well, it was a hate crime, so I was confused by  
21 the only charge was simple assault. I mean, these people  
22 barged into my home. They broke and entered. It was,  
23 like, so many other charges that weren't -- they weren't  
24 charged with, the people who assaulted me. So I was

1       confused and didn't know really what to do. So she helped  
2       me in that regard.

3       Q.           What was your understanding as to how  
4       Ms. Morrison could help you get the charges enhanced?

5       A.           She would use --

6                   MR. ALFANO: I'm objecting to the form  
7                   of the question as to how she could help. It's  
8                   either factual or not. She either did or she  
9                   didn't.

10                  MR. CREAMER: No, it's her  
11                  understanding. I'm asking for her understanding  
12                  of how she could help.

13                  MR. ALFANO: It's not what she could  
14                  do. She's being charged with what she allegedly  
15                  did or didn't do. So I think it's not a factual  
16                  question.

17                  MR. CREAMER: I'm asking for her state  
18                  of mind --

19                  MR. RULLI: Mr. Creamer --

20                  MR. CREAMER: -- how she thought she  
21                  could help --

22                  MR. RULLI: I'm going to allow the  
23                  question.

24                  THE WITNESS: Okay.

1                           MR. RULLI: And she can answer as to  
2                           her understanding. You may answer.

3                           THE WITNESS: Using the power of her  
4                           office, the connections that she had with the  
5                           police to help me get justice. And we had  
6                           conversations on text message where I was asking  
7                           for help, and I was getting and receiving help.

8                           So I was getting the help that I was  
9                           asking for: Help to get charges enhanced, help  
10                          to, you know, start an internal affairs  
11                          investigation on the responding officers. I  
12                          didn't know names. I didn't know emails. And I  
13                          was -- that was given to me by Ms. Morrison on  
14                          how to move forward.

15 BY MR. CREAMER:

16 Q.                   And you were seeking that help because of her  
17 position?

18                           MR. ALFANO: Objection. Objection.  
19                           It's a leading question.

20                           MR. RULLI: Try not to lead your  
21 witness, please.

22 BY MR. CREAMER:

23 Q.                   Why were you seeking that help from Ms. Morrison  
24 and not someone else?

1 A. Well, I was seeking that help from her because  
2 she was the executive director of the LGBTQ affairs  
3 office. She was someone that had ties with the Criminal  
4 Justice Center. I did not have ties to that degree at  
5 that time.

6 Q. And did Ms. Morrison assist you with the police  
7 or the charges?

8 A. Yes, she did assist me.

9 Q. Okay. Now, after -- after the assault, did you  
10 have injuries?

11 A. I did have injuries.

12 Q. And did you have medical expenses?

13 A. I didn't have any out because I'm on welfare, so  
14 that took care of my expenses as far as medical. But  
15 there was some things that I could not get done because it  
16 was considered cosmetic, so it would have cost me. And I  
17 just didn't have the money at the time to pursue any, I  
18 guess, cosmetic adjustments.

19 Q. And did you make an effort to -- after the  
20 August 24th, 2020 assault, did you make an effort to raise  
21 money to pay for your expenses?

22 A. Yes. Me and my husband created a GoFundMe,  
23 initially for \$5,000, to help with my expenses.

24 Q. All right. And I'll direct your attention to

1      Exhibit ED-11, which should be at tab 11. And can you  
2      describe what that exhibit is?

3      A.         Yes. So this was the GoFundMe that I created to  
4      help with my bills and also to help with resources that  
5      can help the community, as well. So I was looking beyond  
6      myself in this matter and was looking to also raise money  
7      to help other people such as myself who share my identity  
8      who often get attacked.

9      Q.         And how were you going to do that? How were you  
10     going to share the money you raised?

11     A.         My purpose was to -- my plan was to give \$10,000  
12     to Williams Way's new Arcila-Adams trans resource center.  
13     And I gave -- well, the plan was give another \$5,000 to  
14     members of the community that need it -- that needed it.  
15     And then also, too, a friend of mine was murdered who was  
16     trans and I wanted to raise money to find the suspect and  
17     her murderer. All which I did, eventually, with the  
18     money.

19     Q.         All right. How much money did you raise?

20     A.         I raised about \$36,000.

21     Q.         Okay. And do you know whether Ms. Morrison was  
22     following the progress of the money raised from your  
23     GoFundMe site?

24     A.         She was following it on practically a daily

1 basis.

2 Q. How do you know that?

3 A. Well, she was texting me what the balance was --  
4 not the balance but, you know, how much I had raised. She  
5 was texting me how much and calling me, too; you know,  
6 calling me and letting me know, "Oh, it was at this  
7 amount. It was at that amount." I wasn't checking the  
8 GoFundMe regularly, so.

9 Q. All right. At some point after the August 24,  
10 2020 assault and after you had sought the meeting with  
11 Ms. Morrison regarding Hearts on a Wire, did Ms. Morrison  
12 borrow money from you?

13 A. Yes, she did.

14 Q. When did that happen?

15 A. She borrowed the money in, I want to say,  
16 September.

17 Q. Okay.

18 A. Yes.

19 Q. And was that after you raised the money through  
20 the GoFundMe site?

21 A. That was after I raised the money, yes.

22 Q. Okay. And how much did she borrow?

23 A. \$4,000.

24 Q. And how -- and what was the purpose of that

1 money?

2 A. She wanted to put first, last, and security on a  
3 new home. She was [REDACTED]  
4 which was why she was at my house originally. So I wanted  
5 to -- I just wanted to help her, and I had the money.

6 She said, you know, "You made all this money  
7 from the GoFundMe. You know, could you help me with  
8 \$4,000?"

9 And I didn't see a problem with it. I was  
10 already helping people with the community. She was a  
11 member of the community so, you know. I had raised a lot  
12 of money towards this same effort, you know, just to help  
13 [REDACTED], and  
14 [REDACTED] I wanted to help  
15 her.

16 Q. Okay.

17 MR. CREAMER: Can I back up for a  
18 point of order? I would like to move into  
19 evidence ED-11 before I forget.

20 MR. ALFANO: Again, I'm going to  
21 object on the basis of relevance. There's a  
22 stipulation that Ms. Morrison had no part of  
23 this GoFundMe campaign already in the record.  
24 So I'm not sure.

1                           MR. RULLI: That reminds me. We  
2                           haven't moved the stipulations into evidence.

3                           Why don't we do that?

4                           MR. ALFANO: Yeah. There is a  
5                           stipulation that Ms. Morrison had no part of the  
6                           GoFundMe campaign. I'm not sure, you know,  
7                           again, why it's relevant. But I'm not sure why  
8                           this article about it is relevant.

9                           MR. RULLI: Do you want to address the  
10                          relevance?

11                          MR. CREAMER: The GoFundMe money  
12                          funded the loan, and I think it's relevant  
13                          because Ms. Morrison seems to believe that the  
14                          money came from another source -- which we'll  
15                          get to in a moment. And I think it's very  
16                          relevant to this case.

17                          And it's not controversial. The  
18                          witness has authenticated this document, and I  
19                          don't see why it's controversial. It's not  
20                          prejudicial to Ms. Morrison.

21                          MR. ALFANO: I think it is, because  
22                          I think the implication is that somehow even  
23                          though there's a stipulation that Ms. Morrison  
24                          had no participation in the GoFundMe campaign

1           that somehow, you know, she was supporting it or  
2           involved in it in some way. That's because that  
3           became the source of funds.

4                   And while that is disputed whether it  
5           was the source of funds, in reality, it's  
6           immaterial what the source of the funds were.  
7           She wasn't involved in the campaign, so whether  
8           the source of funds was a gift to Ms. Stephens  
9           or a loan from someone else to Ms. Stephens or  
10           some other source of income makes absolutely no  
11           difference.

12                   MR. CREAMER: I'm not suggesting --

13                   MR. ALFANO: I think it's -- and I do  
14           think it's prejudicial because the implication  
15           is that, you know, somehow Ms. Morrison was  
16           supporting this so she could get the money.  
17           And there's a stipulation that she didn't  
18           participate in it. So I think that the, you  
19           know, executive director can't have it both  
20           ways. Either she participated or she didn't.  
21           And if she didn't, then this article has  
22           absolutely no bearing.

23                   MR. CREAMER: I'm not suggesting that  
24           she participated in it at all. I don't know

1 where Counsel is getting that suggestion from.

2 MR. ALFANO: Well, there was a  
3 stipulation to it.

4 MR. RULLI: The question is obviously  
5 whether or not this is relevant and whether it's  
6 probative. And right now, as I understand the  
7 testimony, it's testimony about Ms. Morrison's  
8 awareness of the GoFund [sic] campaign, if you  
9 will, and what was received as part of that  
10 campaign. Whether or not she participated in  
11 it, I understand there's a stipulation she  
12 didn't participate in it.

13 So to -- so I'm going to allow it in  
14 at this time. I'm not making any final ruling  
15 on that, but I'm going to allow it in to  
16 continue, you know, to see that it is relevant  
17 and probative in this case.

18 MR. CREAMER: Thank you.

19 BY MR. CREAMER:

20 Q. All right. I would like to turn to Exhibit  
21 ED-12. Turn to that in the binder; hopefully it's at  
22 tab 12. Take a look at that for a moment. Can you  
23 identify that document for us, please?

24 A. Yes. This is the loan agreement between me and

1 Ms. Morrison in reference to the \$4,000 that was to be  
2 paid back that I loaned her.

3 Q. Okay. And it appears to be dated September  
4 23rd, 2020; is that right?

5 A. That is correct.

6 Q. And what are the terms of the loan, if you could  
7 just explain?

8 A. Yes, definitely. So I wanted her to pay it back  
9 over a 12-month period, and it was supposed to be set  
10 up -- broken up pretty much \$4,000 divided by 12 months so  
11 she wasn't overburdened with paying back the loan. And it  
12 was a noninterest loan; I didn't want to do that to her.  
13 So that's what that was.

14 Q. Okay.

15 MR. CREAMER: I would move into  
16 evidence Exhibit ED-12.

17 MR. ALFANO: No objection.

18 MR. RULLI: I would note, just for the  
19 record, it's not marked.

20 MR. CREAMER: Oh, yeah.

21 MR. RULLI: So I would like the court  
22 reporter just to mark that as ED-12, please.

23 (At this time, a document marked for  
24 identification as ED-12 was received into

1 evidence.)

2 BY MR. CREAMER:

3 Q. I would direct your attention to the next  
4 exhibit, ED-13. Can you identify that exhibit for us,  
5 please?

6 A. Yes. This was the cashier's check -- receipt,  
7 rather, of the cashier's check that I gave to  
8 Ms. Morrison.

9 Q. All right. In the amount of \$4,000?

10 A. In the amount of \$4,000.

11 Q. And that was the cashier's check pursuant to the  
12 loan agreement that you executed on September 23rd, 2020?

13 A. Yes. That, and I also put "loan" in the memo to  
14 indicate that that's what it was: A loan.

15 MR. CREAMER: Okay. I would like to  
16 move into evidence Exhibit ED-13.

17 MR. ALFANO: No objection.

18 MR. RULLI: ED-13 will be accepted  
19 into evidence without objection.

20 (At this time, a document marked for  
21 identification as ED-13 was received into  
22 evidence.)

23 BY MR. CREAMER:

24 Q. All right. Turning your attention back to

1      Exhibit ED-12, Ms. Stephens, that loan agreement indicates  
2      that the first payment was due on October 23rd, 2020 in  
3      the amount of \$150. Did Ms. Morrison make that payment?

4      A.           She did not.

5      Q.           And it indicates that subsequent payments will  
6      be in the amount of \$350 paid on the 23rd day of each  
7      month ending on October 23rd, 2021. So the next payment  
8      would have been due in the amount of \$350 on  
9      November 23rd, 2020. Did Ms. Morrison make that payment?

10     A.           She did not.

11     Q.           The next payment would have been due on  
12     December 23rd, 2020. Did she make that payment?

13     A.           She did not.

14     Q.           And January 23rd, 2021, did she make that  
15     payment?

16     A.           She did not.

17     Q.           February 23rd, 2021: Did she make that payment?

18     A.           She did not.

19     Q.           March 23rd, 2021: Did she make that payment?

20     A.           She did not.

21     Q.           April 23rd, 2021: Did she make that payment?

22     A.           She did not.

23     Q.           Did you have an understanding that excused her  
24     from making those payments that I just -- we just talked

1 about?

2 A. None.

3 Q. Did you ask, ask her why she wasn't making those  
4 payments?

5 A. I did inquire -- well, more so I contacted her  
6 to seek payment towards the loan.

7 Q. And what'd she say?

8 A. She didn't respond. She ignored my text  
9 message.

10 Q. She --

11 A. She ignored me.

12 Q. She ignored you?

13 A. I called and texted, and she ignored both forms  
14 of communication.

15 Q. And why didn't you pursue her more aggressively  
16 then?

17 A. I pursued her more aggressively because I got  
18 blocked on Facebook, so I was confused why that happened.  
19 So that alarmed me and indicated to me that there was  
20 something amiss.

21 And then there was a press conference that  
22 happened, as well -- which was the last time her and I  
23 communicated -- that involved violence against  
24 trans women, and aspects of what happened to me were

1       brought up in this context.

2                 And I was getting phone calls by reporters, you  
3       know, asking me what time I would be there and, you know,  
4       what I would say and I had no clue what they were talking  
5       about. I'm like, "What press conference?" I was very  
6       confused.

7                 So I contacted her and I said, "Hey. You know,  
8       reporters are calling me saying that you're involved with  
9       this press conference and that you have a speaker and, you  
10      know, you have the DA involved. What is going on here?  
11      Why didn't you tell me this?"

12                And I felt shrugged off. She said that she  
13      wasn't organizing it. That's not what I asked her. I  
14      said, "Well, no. Why wasn't I invited, told about it,  
15      something?" And then her last message to me as I was  
16      trying to inquire -- because I wanted to be there. I  
17      said, "I want to be there. I want to, you know, be a part  
18      of this."

19                She said, "Are you serious?" That's what she  
20      said to me with a question mark. So I didn't know what  
21      she meant by that. But I thought I was getting baited  
22      into some kind of argument or something, so I just left  
23      it alone.

24                And the next time I contacted her was when the

1       first payment was due, because I didn't want to you  
2       know -- I didn't want to create any you know, animosity.  
3       So I just decided not to, you know, contact her until the  
4       loan was due. I was already blocked on Facebook. I was  
5       already not getting responses back from her through text  
6       or phone call. I couldn't reach her. Phone calls going  
7       right to voicemail. The writings were on the wall.

8                   So I did contact her. I said, "Today is the  
9       first day of your loan. Do you -- you know, how do you  
10      plan on paying it," something to that -- something to that  
11      regard.

12                  She never responded back to me. So then the  
13      next text message was my intent to sue her if she planned  
14      on defaulting on the loan. I made it very clear that that  
15      was what I was going to do and I meant it. I wanted her  
16      to know that was the next course of action from me if the  
17      communication, you know, wasn't there and I wasn't getting  
18      any money toward the loan.

19   Q.            Okay. Now, are you familiar with the  
20      governor -- Governor Wolf's LGBT affairs commission?

21   A.            I am very aware of it, yes.

22   Q.            And did you ever attempt to get on that  
23      commission?

24   A.            I did. But initially, I was asked to -- to be

1 on the board by someone. I forgot his name, but he was  
2 already the executive director or head commissioner. But  
3 he had contacted me through Facebook and we weren't  
4 friends, so it went into my spam folder. I didn't receive  
5 the communication until maybe like a month or two later.  
6 And at that point, he had already stepped on, you know, to  
7 a different position.

8 So there wasn't really much I could do because  
9 there was no one else that was in that capacity in their  
10 role. So I was kind of left in limbo, and I kind of left  
11 the matter alone until Ms. Morrison assumed her position  
12 with the mayor's office and wanted to reassess some of the  
13 members that were on the affairs commission.

14 And from what my understanding was in our  
15 conversations, that she had some power in determining who  
16 would be on the board and who wouldn't. So I had  
17 mentioned that I was asked to be on it. And if that was  
18 the case, that I would like to be on it now since there  
19 were nothing I could do in the meantime because there was,  
20 like, really no one there that could help me get on the  
21 board. And she said she would help me.

22 MR. ALFANO: Professor Rulli, I'm  
23 going to object. Move to strike that entire  
24 line of testimony. There's no allegation in the

1                   original charge or the amended charge having  
2                   anything to do with this commission and any  
3                   purported official action by Ms. Morrison in  
4                   connection to this, you know, suggested  
5                   appointment or requested appointment on this  
6                   commission.

7                   MR. CREAMER: I just learned about  
8                   this on Friday.

9                   MR. ALFANO: Doesn't matter. It's not  
10                  in the case.

11                  MR. CREAMER: It still happened.

12                  MR. ALFANO: Please.

13                  MR. RULLI: Wait, wait. Let's not  
14                  argue, please. I want to hear each of your  
15                  positions, but I don't want you to argue back  
16                  and forth.

17                  MR. ALFANO: So I made the objection.  
18                  My position is there's been absolutely -- to the  
19                  extent that this testimony is intended, and I'm  
20                  not sure of its intent.

21                  But let's assume it's intended to  
22                  suggest that there was some other, quote,  
23                  unquote, "official action" by Ms. Morrison in  
24                  connection with this commission. This is the

1                   first time we're hearing about it. It's not the  
2                   charge. It wasn't -- it's not in the amended  
3                   charge. There's been no exchange of information  
4                   about it. It's a complete surprise. And on  
5                   that basis, I would suggest it has absolutely no  
6                   bearing in this hearing today.

7                   MR. RULLI: You can respond to that,  
8                   Counsel.

9                   MR. CREAMER: I just learned about it  
10                  on Friday. It still happened.

11                  MR. RULLI: You admit, though, it's  
12                  not part of the notice of enforcement.

13                  MR. CREAMER: It is not.

14                  MR. RULLI: And it wasn't part of  
15                  anything exchanged between parties --

16                  MR. CREAMER: It was not.

17                  MR. RULLI: -- is that right? I'm  
18                  going to -- I'm going to permit counsel to cross  
19                  examine on this issue, and I'm going to reserve  
20                  judgment on your motion to strike that  
21                  testimony. But I appreciate -- I am concerned  
22                  that this is coming at this late hour and hasn't  
23                  been disclosed, hasn't been -- and so I will  
24                  revisit this question of moving to strike this.

1                   But since we have testimony -- maybe  
2                   I should ask one more question before. What do  
3                   you see as the relevance of this testimony?

4                   MR. CREAMER: This is another example  
5                   of seeking official action from Ms. Morrison by  
6                   Ms. Stephens. And I'll get to the timeframe.

7                   MR. ALFANO: And whether I do the most  
8                   brilliant cross-examination in the world or the  
9                   poorest cross-examination in the world on this  
10                  topic, it doesn't matter. There's been no  
11                  notice of this, of this aspect of this charge.  
12                  This is the first we're hearing it. And it's  
13                  patently unfair to Ms. Morrison to ask us to  
14                  defend against this today. It should be  
15                  stricken. It should be not even be part of this  
16                  record.

17                  MR. CREAMER: Ms. Morrison knew it  
18                  happened.

19                  MR. ALFANO: It doesn't matter.

20                  MR. RULLI: I've heard both, unless  
21                  there's something new either of you want to say.  
22                  I'm going to reserve judgment on this question  
23                  for a moment, and I will rule on that before we  
24                  go to cross-examination. All right?

1 MR. ALFANO: Thank you.

2 MR. RULLI: I want to think about it a  
3 little bit more and confer with my colleagues.

4 And so we will leave it there for the moment.

5 MR. CREAMER: All right. I just have  
6 one more question on that topic --

7 MR. RULLI: You may.

8 MR. CREAMER: -- if I may.

9 MR. RULLI: You may.

10 MR. CREAMER: Thank you.

11 BY MR. CREAMER:

12 Q. Ms. Stephens, approximately what was the  
13 timeframe that this happened, that you were --

14 A. So this happened while she was over my house  
15 staying there.

16 Q. So August of 2020?

17 A. Yes. This happened around that time.

18 Q. Thank you. All right. Changing subjects now:  
19 At any point in 2020, did you have a large amount of cash  
20 in your closet?

21 A. No.

22 Q. Did you ever show a large amount of cash to  
23 Ms. Morrison in 2020?

24 A. I do not.

1 Q. Did you ever tell Ms. Morrison that you had  
2 \$200,000 in cash in your apartment in 2020?

3 A. I never did such things.

4 Q. Did you ever show Ms. Morrison \$200,000 in cash  
5 in your apartment in 2020?

6 A. No, I did not.

7 Q. You already told us you rented in 2020; is that  
8 right?

9 A. That's correct.

10 Q. And do you have -- you're a student, and you  
11 were a student in 2020; is that right?

12 A. I certainly was.

13 Q. Did you have student loans in 2020?

14 A. I did have loans to pay back, yes.

15 Q. And do you have loans now?

16 A. Yes, I do.

17 Q. Did you ever pull a prank on Ms. Morrison in  
18 2020 and show her some money and pretend that it was more  
19 than that --

20 A. No.

21 Q. -- you know, as a joke?

22 A. No.

23 Q. Okay.

24 MR. CREAMER: That's all the questions

1 I have.

2 MR. RULLI: So we want to break for  
3 two minutes. And if you need to use the  
4 restroom --

5 MR. CREAMER: Oh, I'm sorry. I do  
6 have -- I do have one more question.

7 MR. RULLI: Hold up.

8 MR. CREAMER: I'm sorry.

9 MR. RULLI: That's all right.

10 MR. CREAMER: And I would like to  
11 confer with opposing counsel out in the hallway  
12 for a second.

13 MR. ALFANO: Okay.

14 MR. RULLI: Is that all right with  
15 you?

16 MR. ALFANO: Sure.

17 (At this time, a brief pause was  
18 taken.)

19 MR. CREAMER: I wanted to show the  
20 witness a printout of a post that happened last  
21 night. How would you like me to do this?

22 MR. RULLI: Something that happened  
23 last night?

24 MR. CREAMER: This was --

1 MR. RULLI: You showed it to counsel?

2 MR. ALFANO: He did. And I'm going to  
3 object to the document and any questions about  
4 the document.

5 MR. CREAMER: So this was posted last  
6 night by Ms. Morrison.

7 MR. ALFANO: And to the extent that we  
8 would be arguing about this, I would ask that  
9 the witness not be present.

10 MR. RULLI: I need some discussion  
11 here, but I don't want that in front of the  
12 witness. So if I may, I'm going to ask -- we  
13 could either --

14 THE WITNESS: I can leave.

15 MR. RULLI: I'm going to ask if you  
16 would step out.

17 THE WITNESS: Please. No problem.

18 MR. RULLI: We'll call you back.

19 (At this time, Ms. Stephens exited the  
20 room.)

21 MR. RULLI: All right, Mr. Creamer.  
22 You may be heard on this.

23 MR. CREAMER: Thank you. This was  
24 posted last night by Ms. Morrison. This was

1                   sent to me last night by Ms. Stephens.

2                   Ms. Stephens is a board member at William Way.

3                   She is the only board member at William Way who  
4                   facilitates a support group.

5                   Ms. Stephens feels very strongly that  
6                   this was witness intimidation. She believes  
7                   that this post by Ms. Morrison -- which doesn't  
8                   identify Ms. Stephens by name, but clearly  
9                   identifies her because she's the only person who  
10                  runs a support group at William Way -- suggests  
11                  that there is some sort of conflict of interest.  
12                  And it is an effort at witness intimidation by  
13                  Ms. Morrison.

14                  And Ms. Stephens was very upset by it  
15                  last night when it was posted the night before  
16                  this hearing. And I intend to question  
17                  Ms. Stephens about her reaction to this and how  
18                  she felt about it. And I believe this was an  
19                  effort at witness intimidation the night before  
20                  this hearing.

21                  And I think it's outrageous that  
22                  Ms. Morrison did this. And I think we need to  
23                  amend § 20-1302 to add witness intimidation to  
24                  the aggravating factors for penalties.

1                           MR. RULLI: Well, I certainly don't  
2                           have the authority to do that.

3                           MR. CREAMER: I understand that. But  
4                           I intend to petition --

5                           MR. RULLI: But I hear --

6                           MR. CREAMER: -- the council for that.  
7                           And this is a factual predicate for amending the  
8                           law.

9                           MR. ALFANO: I guess I don't share  
10                          Mr. Creamer's outrage over a question.

11                         MR. CREAMER: Well, let's hear  
12                         Ms. Stephens' testimony.

13                         MR. RULLI: Now, Mr. Creamer, I heard  
14                         you. Let me hear from Mr. Alfano, and I'll come  
15                         back to you.

16                         MR. ALFANO: I mean, it appears to be  
17                         a question. It seems to be innocent on its  
18                         face. There's nothing threatening about it.  
19                         There's no one who's identified in it, so I'm --  
20                         I'm failing to see where it's quote, unquote,  
21                         "witness intimidation."

22                         And now this is the second piece of  
23                         evidence that has been sprung on us, you know,  
24                         basically the morning of the hearing. You know,

1                   first, we have this governor's commission  
2                   appointment which we knew nothing about, you  
3                   know, and now we have this.

4                   I mean, if it was significant enough  
5                   that it needs -- something needs to be amended,  
6                   then we should adjourn the hearing. Whatever  
7                   amendments needed to be made should have been  
8                   made. We should have been given full notice and  
9                   an opportunity to respond in effect.

10                  But I honestly think -- and you know,  
11                  I say this with all due respect to my colleague.  
12                  I honestly think that their court case is so  
13                  weak that what they're trying to do at the  
14                  eleventh hour is to bring in evidence of other  
15                  things that have absolutely no bearing on the  
16                  two issues.

17                  And those two issues, that I  
18                  understand them, is whether Ms. Morrison took  
19                  official action in connection with Hearts on a  
20                  Wire; that was the first part of the testimony.  
21                  And then the second part was whether she took  
22                  official action in connection with interfacing  
23                  with the police and law enforcement following in  
24                  Ms. Stephens's unfortunate attack.

1                   Those are the -- those are the two  
2                   issues that we were put on notice of. Those  
3                   were the two issues that we're prepared to  
4                   defend, not these two issues. And I would  
5                   suggest they have absolutely no bearing. If  
6                   they're that important, adjourn, amend, and give  
7                   us the opportunity to deal with it.

8                   But this, again, I think it's just --  
9                   I think it's just unfair. And respectfully, I  
10                  think it's a sign of weakness with respect to  
11                  the underlying case.

12                  MR. RULLI: Anything further,  
13                  Mr. Creamer?

14                  MR. CREAMER: Those are not the two  
15                  issues. Those are actually not the two issues.  
16                  The issues are whether Ms. Stephens was seeking  
17                  official action from Ms. Morrison at the time of  
18                  the -- you know, the gift was sought and  
19                  received.

20                  And this happened last night. This  
21                  was witness intimidation that occurred last  
22                  night. How am I supposed to add this and give  
23                  them notice when witness intimidation happened  
24                  last night? And what are we supposed to do?

1                   Adjourn this to give Ms. Morrison more time to  
2                   engage in more mischief?

3                   MR. ALFANO: Okay. I --

4                   MR. RULLI: All right. Since the  
5                   court reporter's taking this down, I'm  
6                   getting --

7                   MR. ALFANO: I absolutely object to  
8                   that.

9                   MR. RULLI: -- one last response.

10                  MR. ALFANO: No, I just -- I object to  
11                  the characterization of "engage in more  
12                  mischief."

13                  MR. RULLI: Well, both of you  
14                  characterized perhaps inappropriately. I would  
15                  just say that, so, to be fair here.

16                  MR. ALFANO: I'm sorry. Did I  
17                  mischaracterize?

18                  MR. RULLI: Well, in terms of  
19                  "weakness of the case," et cetera. I think --

20                  MR. ALFANO: Okay.

21                  MR. RULLI: I want to just stick to  
22                  the facts.

23                  MR. ALFANO: Sure.

24                  MR. RULLI: And what we have in front

1                   of us.

2                   MR. ALFANO: Sure. I mean, that's --  
3                   that's fair and I agree. That's a fair --  
4                   that's a fair comment. But it has nothing to do  
5                   with whether this is relevant and permissible at  
6                   this time. It just doesn't. I mean, there's  
7                   nothing -- you can't spring this on us this  
8                   morning.

9                   MR. RULLI: I'm going to break. I  
10                  think I've heard -- I'm going to break now for a  
11                  few moments. I want to consult with my  
12                  colleagues, and I will return and address the  
13                  decision.

14                  We are in recess.

15                  (At this time, a recess was taken from  
16                  11:16 a.m. to 11:46 a.m.)

17                  MR. RULLI: All right. We're back on  
18                  the record. During the break, we had an  
19                  opportunity to consult with the general counsel  
20                  and general counsel staff two issues that have  
21                  come before us.

22                  First was a motion to strike testimony  
23                  with regard -- that we heard from Ms. Stephens  
24                  with regard to her desire to be on the

1                   governor's commission. I must say that there is  
2                   unfairness in presenting this factual  
3                   information at this late date, especially  
4                   considering that this factual information should  
5                   have been available to the executive director at  
6                   an earlier stage.

7                   However, I'm denying the motion to  
8                   strike. I will leave to the Board the  
9                   opportunity to see that testimony and determine  
10                  it's probative value and it relevance, if any,  
11                  to this case. I also will reserve to counsel  
12                  for the respondent the opportunity to cross  
13                  examine with regard to that testimony if he so  
14                  desires. So that testimony will stay in the  
15                  record.

16                  On the second issue, we have a request  
17                  to admit into evidence a document which we have  
18                  not -- we have not numbered.

19                  MR. CREAMER: Well, I haven't offered  
20                  it into evidence yet. I wanted to ask  
21                  Ms. Stephens questions about it. And then I  
22                  would probably offer it as an exhibit.

23                  MR. RULLI: So I may have  
24                  misunderstood. I thought you were attempting to

1 move this at this point.

2 MR. CREAMER: No. I was going to ask  
3 Ms. Stephens questions about it. I was going to  
4 ask her what it is and to explain the context of  
5 it and what it meant to her, how she reacted to  
6 it.

7 MR. RULLI: Give me one more moment.

8 (At this time, a brief pause was  
9 taken.)

10 MR. RULLI: So at this time, I'm going  
11 to deny any questioning of Ms. Stephens on this.  
12 I think it's proper at this time to reserve to  
13 the executive director the opportunity to cross  
14 examine the respondent with respect to this  
15 issue. And certainly, there can be redirect  
16 after that as appropriate if that questioning  
17 can tie this to this case and to a proper  
18 determination, whether it be of credibility or  
19 somehow relevance and probative value for the  
20 Board.

21 But I'm not going to allow questioning  
22 at this stage, and I'm not going to allow the  
23 admission of this document into the record --

24 MR. CREAMER: All right.

1 MR. RULLI: -- at this stage.

2 MR. CREAMER: I would still like to  
3 call -- re-call Ms. Stephens regarding Avery  
4 Shaw, who was Ms. Morrison's -- who was on --

5 MR. RULLI: We're not finished with  
6 the testimony; right?

7 MR. CREAMER: Testimony regarding --

8 MR. RULLI: We'll bring her back and  
9 you may continue your questioning.

10 MR. CREAMER: Thank you.

11 (At this time, a brief pause was  
12 taken.)

13 (At this time, Ms. Stephens entered  
14 the room.)

15 MR. RULLI: All right. We're ready to  
16 resume testimony.

17 MR. CREAMER: Thank you.

18 MR. RULLI: You may proceed.

19 MR. CREAMER: Thank you, Professor.

20 BY MR. CREAMER:

21 Q. Ms. Stephens; do you know Avery Shaw?

22 A. I do.

23 Q. And how do you know Mr. Shaw?

24 A. Because I was married to him.

1 Q. And are you currently married to him?

2 A. Well, technically. I'm still married.

3 Q. Okay?

4 A. We're not officially divorced. We're separated.

5 Q. And bringing your attention to October of 2020.

6 Did something occur with Mr. Shaw?

7 A. Yes. He had a [REDACTED] and  
8 attacked me unprovoked. And he ended up getting charged  
9 and convicted with felony for that.

10 MR. ALFANO: I'm going to object to  
11 the relevance of this testimony.

12 MR. CREAMER: Mr. Shaw is listed as a  
13 witness in this case. And you'll see the  
14 relevance in a moment.

15 MR. ALFANO: First of all, I'm not  
16 calling him as a witness.

17 MR. CREAMER: He was listed as a  
18 witness in this case.

19 MR. ALFANO: I know, but I'm not  
20 calling him.

21 MR. CREAMER: And the fact that he is  
22 listed as a witness will be relevant in a  
23 moment.

24 MR. RULLI: I'll let you go a little

1                   bit further, but I don't see the relevance of  
2                   this.

3 BY MR. CREAMER:

4 Q.               And after that assault, did you take any action  
5 regarding Mr. Shaw?

6 A.               Yes. I got a protective order against him.

7 It's still in place.

8 Q.               It's still in place?

9 A.               Yes, it is.

10                   MR. CREAMER: Thank you. I have no  
11 further questions.

12                   MR. ALFANO: Okay. Again, I'm  
13 withdrawing Mr. Shaw as a witness. I would move  
14 to strike this entire testimony. It has  
15 absolutely no relevance to anything.

16                   MR. RULLI: Well, I appreciate you not  
17 calling him as a witness. If I could,  
18 Counsel --

19                   MR. CREAMER: I just learned this fact  
20 just now that Ms. Morrison listed a witness that  
21 is -- that my witness has a protective order  
22 against. I just learned this just this moment.

23                   MR. RULLI: And would you state for  
24 the record the relevance of it as you see it --

1 MR. CREAMER: I see it --

2 MR. RULLI: -- to issues before us.

3 MR. CREAMER: -- as, again, witness

4 intimidation that I didn't know about until just

5 now.

6 MR. RULLI: I see what you're saying.

7 MR. ALFANO: Okay.

8 MR. CREAMER: And you should have seen

9 her reaction when I told her that Ms. Morrison

10 had listed Mr. Shaw --

11 MR. RULLI: Don't say that to me.

12 MR. CREAMER: Okay.

13 MR. ALFANO: Again, move to strike.

14 I mean, we listed Mr. Shaw for a very specific

15 point. He's not attending today. And you know,

16 it's unfortunate that there's a protection from

17 abuse order. If there was a question of

18 logistics, I certainly would have coordinated

19 with the executive director in terms of how to

20 make that -- make that work. It has absolutely

21 no bearing on the issues.

22 MR. RULLI: I think we're going to

23 move on. We're just going to move on here and

24 leave that testimony where it is.

1 MR. ALFANO: All right.

2 MR. RULLI: And we'll move on.

3 Anything further, Mr. Creamer?

4 MR. CREAMER: No, Professor.

5 MR. RULLI: Thank you, Counsel.

6 MR. ALFANO: May I?

7 MR. RULLI: Now, it's time to cross  
8 examine. I assume you want to cross examine,  
9 not take a break at this point?

10 MR. ALFANO: No. I would like --

11 MR. RULLI: I'm fine with that. I  
12 just want to make sure everybody else is fine.

13 All right. Please proceed.

14 BY MR. ALFANO:

15 Q. Good morning or afternoon, Ms. Stephens; I'm not  
16 sure where we are yet. But my name is Gaetan Alfano, and  
17 my partner Leslie Mariotti and I represent Ms. Morrison.  
18 Do you understand that?

19 A. I do.

20 Q. Okay. I'm going to ask some questions. If at  
21 any point you can't hear me because of the masks or my  
22 voice, let me know. Is that fair?

23 A. That's fair.

24 Q. Great. And if I ask you a question that you do

1 not understand, let me know that, as well, and I'll try my  
2 best to phrase it in a way that will help you to  
3 understand it.

4 A. Okay.

5 Q. Is that fair?

6 A. That's fair. Thank you.

7 Q. All right. Thanks. The other thing I'm going  
8 to ask you is that you give me a chance to finish my  
9 question before you provide the answer so that the court  
10 reporter can take it down accurately. Is that fair?

11 A. Yes, sir.

12 Q. Great, thank you. So I just want to -- I want  
13 to talk about this GoFundMe campaign for a moment.

14 A. Okay.

15 Q. I think we've established that you loaned my  
16 client \$4,000; correct?

17 A. That's correct.

18 Q. And that would have been in the fall of --  
19 sometime in the fall of 2020?

20 A. Yes.

21 Q. Okay. And did you make that loan after you had  
22 established this GoFundMe campaign?

23 A. Yes.

24 Q. Okay. And is it your testimony before Professor

1 Rulli today that the source of the funds for the loan to  
2 Ms. Morrison came from whatever you raised in the GoFundMe  
3 campaign?

4 A. That's correct.

5 Q. Okay. So that was the source of the funds;  
6 right?

7 A. That's correct.

8 Q. Okay. So you got -- you raised a bunch of money  
9 including \$4,000; right?

10 A. Yes.

11 Q. And then you took \$4,000 from the GoFundMe  
12 campaign and you loaned it to Ms. Morrison?

13 A. I did.

14 Q. Okay. Is that what you told the community when  
15 you went out with your GoFundMe campaign?

16 A. Repeat that?

17 Q. Yes. Is that --

18 MR. CREAMER: Objection. Relevance.

19 MR. ALFANO: Is that what you told the  
20 community?

21 MR. CREAMER: Objection. Relevance.

22 MR. RULLI: I will allow the question.

23 THE WITNESS: I don't know what you  
24 mean.

1 BY MR. ALFANO:

2 Q. So when you -- and again, I'm a -- I'm a Luddite  
3 when it comes to technology, so you'll have to forgive me.  
4 But my understanding of GoFundMe is that there's some sort  
5 of a public campaign --

6 A. Yes.

7 Q. -- where you raise funds. One raises funds for  
8 a cause, whether it's you raising them or someone else.  
9 But one raises funds for a specific cause.

10 A. Oh. Now I understand what you're saying.

11 Q. Right.

12 A. So I did put in the campaign that this money  
13 will go to people who are trans, who were in some sort of  
14 crisis, whether it be violent or otherwise. She would fit  
15 under that purview.

16 Q. Okay. So I want to go to -- you have it in  
17 front of you. It's a document that's marked as ED-11. I  
18 think it may be under tab K, the way this is numbered.

19 A. Okay.

20 Q. And so we're clear, you're familiar with William  
21 Way; correct?

22 A. Yes.

23 Q. Right, the William Way organization, community  
24 center?

1 A. Yes.

2 Q. All right. And the money that went to  
3 Ms. Morrison didn't go through William Way, did it?

4 A. No.

5 Q. Okay. So let me know when you're at ED-11?

6 A. I'm here.

7 Q. Okay. Let's go to ED-11.2.

8 A. Right.

9 Q. All right? And I just want to read you a  
10 section of that document. And it reads, quote: "how  
11 funds will be used: Half of the money will go to the  
12 operational costs associated with William Way's LGBT  
13 community center's trans resource center and board  
14 member's dues associated with my volunteering there."

15 Do you see that?

16 A. Mm-hm.

17 Q. Okay. Did I read that correctly?

18 A. You did.

19 Q. Okay. Is that what you -- you wrote at the  
20 time?

21 A. Yes.

22 Q. Okay. And then there's, in the next sentence --  
23 I'm not going to read it for the sake of time. But you  
24 talk about the work that William Way does in the

1       community; right?

2       A.            Correct.

3       Q.            Okay. And then the sentence -- the next  
4       sentence reads, quote: "The other half will go to  
5       establishing and updating security in my house,  
6       moving/relocation expenses, and medical, travel-related,  
7       and other miscellaneous expenses associated with my road  
8       to recovery."

9                  Do you see that?

10      A.           I do.

11      Q.           Okay. So tell me where you told anyone in this  
12     GoFundMe campaign that a portion of the money was going to  
13     go to Ms. Morrison.

14      A.           Well, I never said it was going to go to her  
15     specifically. So actually, this is not the final nor was  
16     it the first draft. It was a working GoFundMe that had  
17     varying language all throughout its existence.

18      Q.           Okay.

19      A.           Because at first, it was \$5,000, sir. And then  
20     I raised it to \$35,000 because it was at 5,000. It  
21     reached about 25,000 --

22      Q.           Okay.

23      A.           -- all by its own, all on its own. I had a  
24     conversation with Chris Bartlett, the executive director,

1 about adding William Way to this effort. I wanted to  
2 offer 50 percent. He did not take 50 percent. He said,  
3 "Give what you want, but 50 percent's not going to work."

4 He can attest to this. I actually have email  
5 communication with him. So I ended up saying, "Well,  
6 maybe we can do \$10,000."

7 We had some back and forth, some correspondence.  
8 So we settled on \$10,000. So by him saying that, that  
9 allowed me additional funds to now I can disperse  
10 throughout the community. So that is where the  
11 discrepancy is.

12 Q. Okay. So let me make sure I understand what you  
13 just testified to. There were other drafts of this  
14 GoFundMe language somewhere?

15 A. Yes.

16 Q. Okay. And in those other drafts of that  
17 language, do you tell the community, all right, that --  
18 whoever the reader of this GoFundMe campaign may be, do  
19 you tell them at any time that you were using the funds  
20 that were being raised to give them to Ms. Morrison for  
21 her needs?

22 A. I would have never listed [REDACTED].

23 Q. Excuse me?

24 A. I would never have listed [REDACTED].

1 Q. That's fair enough.

2 A. Publicly.

3 Q. Fair enough. Did you ever tell -- because I  
4 don't see in this language; maybe I'm misreading it. But  
5 did you ever tell the community that you were using those  
6 funds for [REDACTED]?

7 A. I did tell members of the community, yes.

8 Q. In your GoFundMe campaign?

9 A. No, I didn't go -- see, that's why I said "the  
10 plan." So I said "the plan." It didn't go according to  
11 plan because the plan changed.

12 Q. I get that. I get plans -- our plans change all  
13 the time. I get that.

14 A. So the plan changed.

15 Q. But that's not my question.

16 A. Yes.

17 Q. My question is in what you published to the  
18 community --

19 A. No. To answer your question, no.

20 Q. And whether that was either anonymously or by  
21 email?

22 A. I understand.

23 Q. Okay. So we're clear, you never told the  
24 community --

1 A. I never told the community --

2 Q. Let me finish my question.

3 A. -- through the GoFundMe page.

4 Q. Let me finish my question.

5 MR. RULLI: Ms. Stephens, yeah. So we  
6 have to have this recorded. And so --

7 THE WITNESS: Okay.

8 MR. RULLI: -- therefore, wait for the  
9 question to finish.

10 THE WITNESS: Okay.

11 MR. RULLI: And then answer it.

12 THE WITNESS: Got you. Yes, sir.

13 BY MR. ALFANO:

14 Q. I'll try and make it very simple.

15 A. Okay.

16 Q. It's your testimony today --

17 A. Okay.

18 Q. -- that the source of the funds for this  
19 Ms. Morrison's loan came from your GoFundMe campaign?

20 A. That is correct.

21 Q. Okay. And it's also true that you never told  
22 the community that you were soliciting funds from that you  
23 were going to use the funds or had used the funds to give  
24 Ms. Morrison a loan?

1 A. That is false.

2 Q. That's false?

3 A. Yeah. You said -- I did tell people in the

4 community.

5 Q. In your -- on your GoFundMe?

6 A. You didn't say that in your question, sir.

7 Q. Okay. With respect to what you published in

8 your GoFundMe campaign --

9 A. Okay.

10 Q. -- did you ever tell the community, the

11 readers --

12 A. Mm-hm.

13 Q. -- that you were using any portion of those

14 funds to provide Ms. Morrison with a loan?

15 A. I did not.

16 Q. Thank you. So let me move to, if I could,

17 Hearts on a Wire --

18 A. Okay.

19 Q. -- for a moment. And my understanding, and

20 correct me if I'm wrong, is that Hearts on a Wire is an

21 organization whose mission is to help incarcerated members

22 of the transgender community; is that fair?

23 A. Yes. Mostly BIPOC people, but yes.

24 Q. Okay. All right. And in connection with Hearts

1 on a Wire, so I'm clear, you were never a member of the  
2 board?

3 A. They don't have a board.

4 Q. Okay. Were you ever an officer?

5 A. They don't have officers.

6 Q. Okay. It's just a -- it's a community group of  
7 which you were a member?

8 A. Yes.

9 Q. Okay. And at some point, you approached  
10 Ms. Morrison about -- about a meeting with Hearts on a  
11 Wire in her office; correct?

12 A. I did.

13 Q. At that time, was she the only City official  
14 that you were trying to connect into this meeting?

15 A. No.

16 Q. Okay. Was Ms. Burkhardt one?

17 A. Yes.

18 Q. Okay. And Ms. Burkhardt actually is an employee  
19 of the district attorney's office here in the City?

20 A. Yes.

21 Q. Okay. And do you think -- is it your  
22 understanding she's in victim services?

23 A. She is.

24 Q. Okay, perfect. And you knew of Ms. Burkhardt

1 and her role in the DA's office and victim services before  
2 your unfortunate attack; correct?

3 A. Yes.

4 Q. Okay. And with respect to Hearts on a Wire, I  
5 think you said that you were trying to set up, and I think  
6 the word that you used was, an "exploratory" meeting;  
7 correct?

8 A. Yes.

9 Q. Okay. And the purpose of that exploratory  
10 meeting was to see if -- among other things, if  
11 Ms. Morrison's office would provide resources to Hearts on  
12 a Wire?

13 A. Yes.

14 Q. Okay. And by "resources," did you mean -- did  
15 you mean potentially money, funding?

16 A. It meant funding. It meant raising awareness.  
17 It meant many things.

18 Q. Okay. All right. And am I correct that this  
19 exploratory meeting never took place?

20 A. Never took place.

21 Q. All right. Am I also correct that Ms. Morrison,  
22 through her office, did not provide any funding, money, or  
23 resources to -- to Hearts on a Wire?

24 A. No.

1 Q. Okay. So let's now go to the incident in which  
2 you were attacked.

3 A. Yes.

4 Q. You said it occurred -- there was a commotion  
5 outside your home, and then people actually entered your  
6 home and --

7 A. Yes.

8 Q. -- assaulted you?

9 A. Yes.

10 Q. Okay. And is it your testimony that you weren't  
11 on the phone with Ms. Morrison when that occurred?

12 A. I was not on the phone during the commission of  
13 me getting attacked.

14 Q. Okay. Were you on the phone with her shortly  
15 afterwards?

16 A. After --

17 Q. Okay.

18 A. -- the attack, yes.

19 Q. Right. And did you tell her what had happened?

20 A. I did.

21 Q. Okay. All right. And did you go to the police  
22 station?

23 A. I did.

24 Q. Okay. And that would have been 17th and -- the

1      17th district or 17th and Johnson; I'm forgetting my South  
2      Philadelphia police stations.

3      A.            17th district.

4      Q.            Okay. But in any event, you go to the police  
5      station in the district in your neighborhood?

6      A.            Yes.

7      Q.            Correct? Okay. And does Ms. Morrison meet you  
8      there?

9      A.            I think she met me at the house. She could have  
10     met me at the -- a lot happened that day. You know what  
11     I'm saying, so.

12     Q.            I understand.

13     A.            It could have been at the police station. Now  
14     that I'm thinking about it, it could have been there. I  
15     know she took me from the police station to the hospital.

16     Q.            Right. Yeah, that's right. So Ms. Morrison  
17     actually drove you from the police station --

18     A.            Yeah.

19     Q.            -- to the hospital?

20     A.            Right. Where we met originally, I don't  
21     remember. I don't recall.

22     Q.            That's fair. Okay. Was Mr. Shaw there, as  
23     well, at some point?

24     A.            At some point, yes.

1 Q. Okay. And is it -- and is it fair to say that  
2 you were upset with your treatment by the police when you  
3 went there?

4 A. Yes, I was.

5 Q. Okay. And you felt that -- specifically that  
6 they were characterizing it as a simple assault, and you  
7 felt that this attack on you was actually much worse than  
8 a simple assault; correct?

9 A. Yes.

10 Q. Is that a yes?

11 A. That's a yes.

12 Q. Sure. And you believe that it was a hate crime;  
13 correct?

14 A. Yes.

15 Q. And so I'm clear, you already had a contact in  
16 the district attorney's office at that point, did you not?

17 A. With Kelly Burkhardt?

18 Q. Yeah.

19 A. Yes.

20 Q. Okay. And did you have contacts in the police  
21 department at that point in time?

22 A. Not many. Not to the point where I have  
23 cellphone numbers, no.

24 Q. But you knew how to get ahold of Kelly

1 Burkhardt; right?

2 A. Yes, I did. I had her cellphone number.

3 Q. All right. And you understood that the district  
4 attorney's office ultimately is responsible for bringing  
5 criminal charges in the City of Philadelphia?

6 A. I wasn't too sure of what the capacity of the  
7 DA's office was.

8 Q. Okay. When did you join this police liaison  
9 committee?

10 A. So I joined the police liaison commission  
11 officially, I would say, two months ago.

12 Q. Okay.

13 A. I was invited to meetings prior to that in an  
14 unofficial capacity, I would say, about maybe seven months  
15 ago. But I had to do a background check and go through  
16 all of that. That happened about two months ago. So I  
17 wasn't officially on the board, but I was like, I guess,  
18 an honorary member, so to speak.

19 Q. And I'm sure, with respect to at least Kelly  
20 Burkhardt, you had her email? You had her personal email;  
21 right?

22 A. No. I did not have personal email at the time.  
23 Oh, yeah. I did. Sorry; I did.

24 Q. Sure. Yeah, sure you did. Because you're --

1 A. Right.

2 Q. You're connecting with her --

3 A. Right, right, right.

4 Q. -- to try and have this meeting with Hearts on a  
5 Wire; right?

6 A. Yeah.

7 Q. Okay. All right. And then -- and again, my  
8 understanding is when you go to the police station,  
9 you're -- you're very upset? You're kind of off to one  
10 portion of the --

11 A. Mm-hm.

12 Q. -- station? And Ms. Morrison is there, and  
13 she's actually speaking at some point to the -- to  
14 the officers who are there; correct?

15 A. She was speaking to either the captain or the  
16 sergeant.

17 Q. Okay. And do you recall her talking about a  
18 particular directive to the police officers?

19 A. Yes, she did.

20 Q. Okay. And that directive dealt specifically  
21 with how officers were to consider hate crimes and  
22 transgender people; correct?

23 A. Yes.

24 Q. Perfect. Okay. And after that, you speak to

1 Ms. Morrison about the case; right?

2 A. I do.

3 Q. Okay. And she put you -- did she put you in  
4 touch with other police officers?

5 A. She did.

6 Q. And did you understand that those other police  
7 officers had contacted Ms. Morrison for information about  
8 your case?

9 A. I wasn't too sure what the contact was between  
10 her and the other people.

11 Q. Okay. But in any event, however those people  
12 came in contact with Ms. Morrison, she simply put those  
13 people, ultimately, in touch with you?

14 A. Yes.

15 Q. Okay. And would one of those people, if you  
16 recall, have been Deputy Commissioner Robin Wimberly?

17 A. Yes. I do remember that, yes.

18 Q. Okay. Did you speak to Deputy Commissioner  
19 Wimberly?

20 A. Yes, I did.

21 Q. And did you also speak to anybody from the  
22 district attorney's office?

23 A. I didn't talk to anyone about it, I don't think,  
24 until some point -- I don't recall. Honestly, I don't

1 recall when I spoke to them.

2 Q. Okay. But you believe that Ms. Morrison put you  
3 in touch with people from the district attorney's office?

4 A. I'm not so sure.

5 Q. You're not sure?

6 A. I'm not sure.

7 Q. Okay. All right. And so we're clear, though,  
8 it's your understanding that -- I know you said you don't  
9 know whether the DA is responsible for bringing charges or  
10 not or any of that. But you understand that  
11 Ms. Morrison's not responsible for charging decisions in  
12 criminal cases?

13 A. Of course.

14 Q. You understood that; right?

15 A. Yes.

16 Q. Okay. All right. And she didn't do anything to  
17 impact whether the people who attacked you were charged or  
18 not, did she?

19 A. Not to my understanding.

20 Q. Sure. And while we're on that subject, do you  
21 know if the people who attacked you were charged?

22 A. Yes, they were charged.

23 Q. Okay. Do you know what they were charged with?

24 A. Ethnic intimidation.

1 Q. Okay. And --

2 MR. RULLI: I'm sorry. Would you keep  
3 your voice up just a little bit?

4 THE WITNESS: I'm sorry. Ethnic  
5 intimidation.

6 BY MR. ALFANO:

7 Q. And were they -- and did they ultimately either  
8 go to trial or plead guilty, to your knowledge?

9 A. We're still in the midst of that situation.

10 A. Got it, got it. Okay. And that's something  
11 that you're dealing with presumably, with the district  
12 attorney's office --

13 A. Correct.

14 Q. -- correct? Okay. So I want to talk to you  
15 about this, this press conference on violence against  
16 transgenders.

17 A. Mm-hm.

18 Q. And this was after -- this occurred after you  
19 had given Ms. Morrison a loan; correct?

20 A. Approximately a week after, yes.

21 Q. Okay. And you were upset with Ms. Morrison that  
22 you weren't invited to be part of that press conference;  
23 correct?

24 A. Incorrect.

1 Q. You weren't? I got that wrong?

2 A. I was not upset.

3 Q. Okay. Did you contact her and ask her why you  
4 weren't invited?

5 A. I did.

6 Q. Okay. And did Ms. Morrison explain to you --  
7 first of all, why did you do that? Why did you contact  
8 her and ask her why you weren't invited?

9 A. Because I was contacted asking me what time I  
10 would be there by media personnel.

11 Q. Okay.

12 A. And her name was mentioned in those  
13 correspondence.

14 Q. Okay.

15 A. You know, yeah.

16 Q. And did you understand this was not about your  
17 case? This press conference was not specifically about  
18 your case?

19 A. I did understand that.

20 Q. Okay. And did you understand that was a press  
21 conference that was conducted by someone other than  
22 Ms. Morrison?

23 A. Conducted by others other than her?

24 Q. Yeah.

1 A. No. My understanding was that she was involved.

2 Q. Okay. That this was a -- that you believe --

3 A. A joint effort.

4 Q. A press conference that emanated -- that came

5 out of her office?

6 A. I didn't say that. I said "joint effort."

7 Q. Okay.

8 A. I don't know what originated out of her office

9 because I'm not in her office.

10 Q. Okay. And did you contact her, I guess, by text

11 and say, "Hey. Why was I not invited?"

12 A. I did.

13 Q. Okay. And did she respond and explain to you

14 that she wasn't the organizer of this event?

15 A. She did say that.

16 Q. Okay. All right. So whatever her involvement

17 was, you understood that she wasn't -- she wasn't the

18 organizer; right?

19 A. From what she told me.

20 Q. Okay. And do you know who the organizers were?

21 A. No. I don't know specifically who actually

22 organized it. I just know from what I heard from other

23 people -- so that was hearsay, so I don't know if I can

24 bring this up -- that she had more of a heavy hand in it

1 than she let on.

2 Q. Okay. So others -- others told you that somehow  
3 she was involved in this press conference?

4 A. Well, what ended up happening was I got in  
5 contact with in Larry Krasner because I was upset after  
6 the fact. And at this point, the conversation led to him  
7 apologizing to me.

8 Q. Who apologizing to you?

9 A. Larry Krasner.

10 Q. The DA?

11 A. Yes.

12 Q. Okay. And did he say that this was  
13 Ms. Morrison's fault?

14 A. He didn't say it was Ms. Morrison's fault. But  
15 he did say that there was communication between him and  
16 Ms. Morrison.

17 Q. I guess I'm confused because I thought when I  
18 first started asking you about this press conference, you  
19 said that you weren't upset. And I thought --

20 A. I wasn't upset when I contacted her, sir.

21 Q. Okay. So you -- you became upset?

22 A. I became upset --

23 Q. Got it.

24 A. -- yes, after the fact.

1 Q. Because you felt that somehow Ms. Morrison was  
2 responsible for precluding you from being invited to speak  
3 at this press conference?

4 A. Not quite. That was one aspect of it, but that  
5 wasn't the reason why I was upset.

6 Q. Okay. All right. But whatever happens at this  
7 press conference, so we're clear, it's not Ms. Morrison  
8 who apologizes to you: It's Larry Krasner?

9 A. Yes.

10 Q. Okay. Does that suggest to you that perhaps it  
11 was Mr. Krasner's press conference?

12 A. It meant to me that he was the, I think,  
13 dominating presence there.

14 Q. Okay. I'm sure he's a dominating presence  
15 wherever he goes. But so we're clear, this wasn't an  
16 office -- mayor's office of LGBT press conference; right?

17 A. Well, she was actually one of the people that  
18 was headlining the situation. She was --

19 Q. She was one of the people that was what?

20 A. She was headlining the situation.

21 Q. Headlining, okay.

22 A. She was in the paper.

23 Q. Okay. All right.

24 A. At the press conference.

1 Q. Got it. All right.

2 A. With her office listed --

3 Q. Okay.

4 A. -- as one of the organizers. I was confused.

5 Q. Right. And then -- and her office is organizing  
6 it now, okay. I think you just -- you believed her office  
7 was organizing it? Is that your testimony?

8 A. From what I read in the paper, yes.

9 Q. Okay. All right. And is it your testimony,  
10 then, that you weren't upset for not being part of it or  
11 you were upset?

12 A. I said that was one aspect. You asked me this  
13 question. I said it was one aspect of it.

14 Q. Right.

15 A. But not the dominating reason why I was upset.  
16 I was upset --

17 Q. Okay.

18 A. -- that I was lied to.

19 Q. So to some degree, you were upset with  
20 Ms. Morrison because you weren't part of this press  
21 conference?

22 A. I didn't know who to be upset with. I was just  
23 upset, period.

24 Q. Okay.

1 A. In that regard.

2 Q. So you weren't upset? I'm just trying to  
3 understand whether you were upset with my client or not  
4 over the press conference.

5 A. I was upset that she lied to me, yes.

6 Q. Okay. And how it is that she lied to you?

7 A. She lied to me by underrepresenting her role in  
8 that press conference.

9 Q. Okay. And did you -- so you become upset with  
10 her, and this is when she -- she owes you the money,  
11 right, at this point? She's taken out the loan? She owed  
12 you the money?

13 A. No, she didn't owe me money yet because that  
14 wasn't quite the time that she had to pay, sir.

15 Q. Okay. But she had already -- you had already  
16 given her the money; right?

17 A. Yeah, sure.

18 Q. And you had given her the cash?

19 A. I did.

20 Q. And then you --

21 A. I gave her a check.

22 Q. Right. I'm sorry. You had given her the  
23 \$4,000, and then you become upset with her afterwards over  
24 this press conference and her role in it?

1 A. My main issue was posted afterwards: The  
2 trivializing of the event which she posted how her and  
3 another young trans woman, Tatyana Ali, were  
4 click-clacking their heels around Center City and making  
5 light of the situation. That was really why I was upset,  
6 you know --

7 Q. All right.

8 A. -- to be honest with you.

9 Q. All right.

10 A. Me not getting invited to an event is not going  
11 to make me upset.

12 Q. Okay. Now, I understand that you were --

13 A. I get invited to a lot of events.

14 Q. I understand at some point, you become upset  
15 with Ms. Morrison --

16 A. Yes.

17 Q. -- involving some aspect of this press  
18 conference?

19 A. I would like the word "disappointed" than  
20 "upset."

21 Q. Okay.

22 A. Because I don't want -- I don't want to gauge  
23 that emotion from over a year ago.

24 Q. Okay.

1 A. I mean, I can't tell you how I felt that long  
2 ago.

3 Q. And is it because you believe that you should  
4 have been a participant in this press conference?

5 A. I believe that I should have been -- should have  
6 had some role in it, either being invited or just been --  
7 it brought to my attention.

8 Q. Okay. All right. And that's based on your  
9 status in the -- in the community?

10 A. Not quite. More so because I was just a recent  
11 victim of a hate crime, and they were talking about --  
12 this press conference talking about violence against  
13 trans women. I am a trans woman that just experienced  
14 recent violence. So just I thought at that time because  
15 of what happened to me that my voice, my face still being  
16 swollen, that people seeing this would see what happened  
17 to me and see the impact of hate crimes against  
18 trans people. That's why I wanted to be there.

19 Q. And did you believe that this was Ms. Morrison  
20 who made the decision to not allow you to be there?

21 A. Oh, I know for a fact.

22 Q. Okay. Ms. Morrison made the decision not to  
23 include you?

24 A. Yes.

1 Q. Okay.

2 A. This was told to me by Kelly Burkhardt.

3 Q. All right. When did you -- when did you learn  
4 that?

5 A. I learned this, I would say, about maybe a few  
6 days, maybe a week after the fact because I started making  
7 some inquiries as to why. And I talked to Kelly  
8 Burkhardt. And between that conversation, she said,  
9 "Well, you know, I'm sorry. But that was Celena's  
10 decision to invite Tatyana and not you."

11 Q. Okay. So let me make sure I understand your  
12 relationship with Celena up to this point. You're  
13 friends, and you had been friends for several years before  
14 this; right?

15 A. Yes.

16 Q. Sure. And in fact, you're so close that when  
17 Ms. Morrison was having some personal difficulties, you  
18 were gracious enough to allow her to stay in your home for  
19 a couple weeks; right?

20 A. Correct.

21 Q. Okay. And you also, realizing that she needed  
22 money in order to leave her -- her residential situation  
23 at that point, you also offered to provide her with --

24 MR. CREAMER: Objection.

1 MR. ALFANO: -- a 4,000-dollar loan?

2 MR. RULLI: Just a minute. Don't  
3 answer the question.

4 MR. CREAMER: That's not her  
5 testimony. There's no testimony that she  
6 offered the money.

7 MR. ALFANO: I can ask.

8 MR. RULLI: It is cross-examination.  
9 You can ask the question.

10 BY MR. ALFANO:

11 Q. Yeah. I mean, you offered to give her \$4,000?

12 A. I did not offer to give her \$4,000.

13 Q. Okay. All right. But you gave her, whether --

14 A. I didn't give her \$4,000.

15 Q. Okay. Whether you offered it first or she asked  
16 first, before this press conference, you agreed to give  
17 Ms. Morrison a 4,000-dollar loan; right?

18 A. Yes.

19 Q. Okay. And it was your understanding that the  
20 loan was to help her find a new place to live; right?

21 A. Yes.

22 Q. And she explained to you. And didn't you and  
23 she discuss the amount?

24 A. Yes.

1 Q. Okay. All right. And did she explain it to you  
2 that it was going to be first month, last month, and a  
3 security deposit?

4 A. She did tell me this.

5 Q. And that's why she needed \$4,000?

6 A. That's what she said.

7 Q. Okay. All right. And you didn't -- you didn't  
8 not believe her at the time, did you?

9 A. I had no reason to not believe what she told me.

10 Q. Right. Sure. Okay. And then -- and is that a  
11 pretty good summary of how close the two of you were  
12 before this press conference?

13 A. What does "close" mean? Can you please  
14 elaborate on what "close" means?

15 Q. Okay.

16 A. Because I have allowed people into my home --

17 Q. Sure.

18 A. -- that I barely knew for longer periods of time  
19 than Ms. Morrison.

20 Q. Okay.

21 A. So you know, I live -- I work in a community.  
22 It's a tight community.

23 Q. Okay. Have you ever loaned anybody else \$4,000?  
24 Let them stay in your home, loan them \$4,000, that sort of

1       thing?

2       A.           I never had \$4,000 to loan prior to this amount.

3       Q.           Okay. Got it. So this is the first time that  
4       you actually --

5       A.           First time I --

6       Q.           Let me finish my question.

7       A.           Go ahead. Sorry.

8       Q.           First time that you loaned -- you know, let  
9       me -- let me ask it differently.

10      A.           Okay.

11      Q.           You considered Ms. Morrison to be your friend  
12       right before the press conference; right?

13      A.           Not a close friend, but a friend, yes. Just a  
14       friend.

15      Q.           Wasn't she the first person that you called  
16       after you were attacked?

17      A.           Yes, she was.

18      Q.           And that's because she was a close friend?

19      A.           No.

20      Q.           Did you just call her randomly after you were  
21       attacked?

22      A.           No.

23      Q.           Did you and Ms. Morrison speak every day before  
24       this press conference incident --

1 A. Not every day.

2 Q. -- either by text or by phone or by email?

3 A. Not every day. No, sir.

4 Q. So let's talk about the questions that

5 Mr. Creamer asked you about the money, where the money

6 came from.

7 A. Yes, sir.

8 Q. May I ask how old you are, Ms. Stephens?

9 A. I'm 35.

10 Q. 35?

11 A. Yes.

12 Q. Okay. And as I understand it, you've been a

13 student for the last few years?

14 A. The last four or five years, yes.

15 Q. Okay. And as I also understand it, you're on

16 public assistance?

17 A. I am.

18 Q. Okay. And also have student loans?

19 A. Yes.

20 Q. Correct? Okay. And I'm assuming you pay for

21 the rent in your home, either through public assistance or

22 student loans?

23 A. No. That's paid through outside programs.

24 Q. Okay. Was that -- and what is that outside

1 program?

2 A. So initially for, I would say, the better  
3 portion of the pandemic when it first started, my husband  
4 got a veteran's housing loan --

5 Q. Okay.

6 A. -- that paid for the rent month to month, month  
7 to month. Then after we separated in October, at that  
8 point, I sought a case manager at UPenn, and they were  
9 able to give me a 3,000-dollar loan.

10 Q. Okay.

11 A. Give me a grant, sorry. A grant to help me with  
12 my living expenses.

13 Q. Before you were a student, did you work?

14 A. No, I did not. No, I did not.

15 Q. So from -- you graduated, I'm assuming. Did you  
16 graduate from high school?

17 A. I did.

18 Q. Okay. So between high school and becoming a  
19 student, did you ever work?

20 A. I did.

21 Q. Okay. And what did you do for work?

22 A. Last time I worked, like, a 9:00 to 5:00 system  
23 job where I had to file taxes? So the last time I filed  
24 taxes and worked a 9:00 to 5:00 job -- because I had some

1 odd and ends jobs in between. The last time was at  
2 Friendly's. I was a waitress, 2009.

3 Q. When was that?

4 A. 2009.

5 Q. 2009 --

6 A. Yes.

7 Q. -- was the last 9:00 to 5:00 job that you had?

8 A. Last 9:00 to 5:00 job.

9 Q. Okay. Did you ever work as a masseuse?

10 A. Uh, no. No. I'm not trained to be a masseuse.

11 Q. Did you ever -- have you ever made a claim  
12 against anyone for -- for money, where they owe you money?

13 A. No.

14 MR. CREAMER: Objection. Relevance.

15 MR. ALFANO: Okay.

16 BY MR. ALFANO:

17 Q. And then I assume it's your testimony, then,  
18 that you did not have a large cash amount, say \$200,000,  
19 in your home at the time that you were attacked?

20 A. I did not.

21 Q. Did you ever show Ms. Morrison a bag or some  
22 grouping of cash in your home?

23 A. No.

24 Q. And to tell -- let me finish. And tell her that

1 you had this cash available to you?

2 A. No.

3 MR. ALFANO: May I have a brief  
4 five-minute break to see if I have any other  
5 questions?

6 MR. RULLI: You may. We'll stand in  
7 recess for five minutes.

8 (At this time, a brief recess was  
9 taken from 12:25 p.m. to 12:34 p.m.)

10 BY MR. ALFANO:

11 Q. I just want to make sure I understand the  
12 timeline a little bit better, Ms. Stephens.  
13 Ms. Morrison's living with you before you were attacked,  
14 correct, for some period of time?

15 A. Before.

16 Q. Okay.

17 A. And then she came for a few days after.

18 Q. Okay. But in this period when she's living in  
19 your -- in your back room, and she tells you she's  
20 having -- she tells you she's having difficulties with --  
21 you know, with her partner at that point and she's looking  
22 for housing; right?

23 A. Yes.

24 Q. Okay. And is that when you and she discussed

1 this loan?

2 A. We discussed the loan, I would say at some point  
3 after the GoFundMe.

4 Q. Okay. So you never discussed the loan before  
5 the GoFundMe came?

6 A. She had mentioned her wanting to leave the place  
7 but had nowhere to go; that's why she was in my home.

8 Q. Okay. So before your attack -- so I'm clear,  
9 before your attack, you and Ms. Morrison never discussed  
10 the loan?

11 A. No.

12 Q. Okay. All right. And then you're -- you're  
13 attacked; correct?

14 A. Correct.

15 Q. And then you, shortly afterwards, start a  
16 GoFundMe campaign?

17 A. Me and my husband and I, yes.

18 Q. Yes. Right, yes, you and your husband. Okay.  
19 Then I think you told the hearing officer that it was  
20 about a week after your attack that there was this press  
21 conference with the district attorney's office that I  
22 asked you a bunch of questions about; right?

23 A. Right.

24 Q. Okay. And as a result of that press conference,

1 you know, at some point, you -- and so that would have  
2 been late August, early September?

3 A. No.

4 Q. The press conference?

5 A. No. It was in October, sir.

6 Q. Okay. I thought you said the press conference  
7 was a week after you were attacked?

8 A. No. I said it was a week after I gave her the  
9 loan.

10 Q. Okay. So the press conference was the week  
11 after you gave her a loan?

12 A. Yes, sir.

13 Q. And you and she never discussed the loan until  
14 after the GoFundMe campaign?

15 A. I didn't have the money, so no.

16 Q. Okay. So let's go back to what you said about  
17 your GoFundMe campaign. If you could go back to 11.2.

18 A. Okay.

19 Q. So in the section I just read to you about how  
20 funds will be used, you say half of the money will go to  
21 the operational costs associated with William Way's;  
22 right?

23 A. Correct.

24 Q. Okay. Did you provide half of the money you

1 raised to -- to William Way's?

2 A. You asked me this question before and I answered  
3 it.

4 MR. RULLI: This is cross-examination.

5 You can answer it again.

6 THE WITNESS: Okay. So what happened  
7 was it was my intent.

8 BY MR. ALFANO:

9 Q. I'm sorry. Before you answer, can you answer  
10 that yes or no for me?

11 A. Say it again, please?

12 Q. Did you give half of what you raised in the  
13 GoFundMe campaign?

14 A I did not

15 Q. You did not? That's a no, okay. All right.

16 Did you -- other than your testimony about Ms. Morrison,  
17 did you -- did you provide any money to any other  
18 individual or organization?

19 A. I did.

20 Q. Okay. And who? Who were they?

21 A. You want me to list the victims of -- of attacks  
22 and crimes?

23 A. Got it. Okay.

24 A. I'm not going to do that, sir.

1 Q. Oh, no, no, no. I don't need their names. It's  
2 fine.

3 A. Okay.

4 Q. No, you don't need to identify them. I just  
5 want to make sure that you did provide funds from the  
6 GoFundMe campaign to various victims of -- of crime;  
7 correct?

8 A. They were not loans, yes.

9 Q. Right. That was my question. They weren't  
10 loans: Those were gifts. Right?

11 A. They weren't gifts either. I don't think you're  
12 really gifting something to someone that's a victim of a  
13 crime.

14 Q. Okay.

15 A. You're helping them.

16 Q. They were -- they were grants? You just --

17 A. They weren't grants, sir, because I'm not a  
18 nonprofit. I can't give anyone a grant.

19 Q. Okay.

20 A. I'm an individual person that helped someone in  
21 need.

22 Q. Sure. With those, with those -- the money that  
23 you provided, and we don't have to call them gifts or  
24 grants or -- you know, or anything. We'll just call it

1 money that you gave to victims of crime.

2 A. Okay.

3 Q. Okay? Did you have -- did you ask them to  
4 execute loan documents?

5 A. No.

6 Q. Okay. Did you expect to be paid back?

7 A. No.

8 Q. And what else did you do? Other than giving  
9 amounts of money to these individual victims of crime,  
10 what did you do with the rest of the funds?

11 A. Okay. So \$10,000 went to William Way --

12 Q. Okay.

13 A. -- LGBTQ center.

14 Q. Let me stop you there. William Way, was that  
15 a -- was that a gift, a grant, a loan, or just -- just  
16 money that you just gave them to continue their good work?

17 A. That was money that was supposed go to the  
18 trans resource center.

19 Q. Okay. Did you execute any loan documents asking  
20 to be paid back?

21 A. No.

22 Q. Okay. All right. What else did you do?

23 A. \$5,000 went to a crimes commission to help raise  
24 money to find the suspect in the murder of my friend.

1 Q. Okay. Did you, was it -- was that a loan? Did  
2 you execute any loan documents?

3 A. No. Okay. All right. What else?

4 A. Well, actually, can I backtrack? I want to --  
5 think it may have been a loan because I got the money  
6 back.

7 Q. Okay.

8 A. So they -- the person -- so here's how it works.  
9 You put the money up.

10 Q. Mm-hm.

11 A. And then if someone calls in a tip and then that  
12 tip leads to an arrest, then they get the money. It never  
13 led to that -- that promotion or whatever, it never led to  
14 anyone even calling to, you know -- to that effort. So I  
15 got money back.

16 Q. Got it. So you had put money up --

17 A. And I did sign a contract saying --

18 Q. Right.

19 A. -- that the money would be --

20 Q. In the hope that if it led to a tip, you would  
21 pay it. But because there was no tip and no basis to pay  
22 it, the money was refunded you?

23 A. Correct.

24 Q. What -- did you then take that money and give it

1 to some other good cause?

2 A. No, I did not.

3 Q. You just kept it?

4 A. I just got the money back last month.

5 Q. Okay.

6 A. Yeah.

7 Q. But between now and then, you just -- you kept  
8 those proceeds?

9 A. So 10,000 went to the trans resource center.

10 Q. Right. We talked about that.

11 A. Okay. So 5,000 went to the community members,  
12 and now we're at 15,000.

13 Q. Mm-hm.

14 A. The other 5,000 went to the crimes commission.  
15 Okay?

16 Q. Mm-hm.

17 A. The 4,000 went to Celena Morrison. The other  
18 money went towards exactly what I said it was going to go  
19 towards: My bills.

20 Q. Okay.

21 A. Security.

22 Q. All right.

23 A. Not a lot of money left over.

24 Q. Right. Your personal expenses?

1 A. Yeah.

2 Q. Right?

3 A. Security --

4 Q. Sure. No, I get it. But--

5 A. -- for me and my family. I got children.

6 Q. I realize that's important, but those --

7 MR. RULLI: One at a time.

8 BY MR. ALFANO:

9 Q. Those were your -- were your personal expenses;  
10 right?

11 A. Yes.

12 Q. All right. Is there any iteration of your  
13 GoFundMe campaign page anywhere that discusses what you  
14 just testified to?

15 A. I didn't break it down systematically in that  
16 way. No, I did not.

17 Q. All right. And so we're clear, the only loan  
18 that you provided was the one to Ms. Morrison?

19 A. Yes.

20 Q. All right.

21 MR. ALFANO: I have no further  
22 questions.

23 MR. RULLI: Thank you, Counsel.

24 Redirect?

1 MR. CREAMER: Yes. Just a couple  
2 questions I want to ask.

3 BY MR. CREAMER:

4 Q. Ms. Stephens, regarding the GoFundMe page and  
5 you were asked questions about whether you informed the  
6 community about how you distributed the money. Did you  
7 inform the community by other means other than the  
8 GoFundMe page --

9 A. I certainly did.

10 Q. -- about how you distributed the money?

11 A. I certainly did.

12 Q. How did you do that?

13 A. Word of mouth, through text messaging, through  
14 phonecalls.

15 Q. Okay. And you were asked questions about --  
16 about Ms. Morrison being the first person you called after  
17 the attack?

18 A. Correct.

19 Q. Why did you call Ms. Morrison? Why was she the  
20 first person you called after the attack?

21 A. She was the first person I called because I knew  
22 that she had networked with the Philadelphia Police  
23 Department and also the district attorney's office. So I  
24 looked at her as her office, as a one-stop shop of getting

1 all of my needs met at the time of after my attack versus  
2 me talking to individual people, one here, one there, who  
3 may have been a specialist or working within a particular  
4 office. She was someone that I viewed as a connector, in  
5 a way, of all of these different organizations.

6 Q. So you called her not as a friend, as an  
7 official?

8 A. Definitely.

9 MR. CREAMER: No more questions.

10 BY MR. ALFANO:

11 Q. What time, what time did you --

12 MR. RULLI: Is this recross?

13 MR. ALFANO: Yeah. One question, if I  
14 could.

15 BY MR. ALFANO:

16 Q. What time was it that you called her, not as a  
17 friend, but as an official? What time of night?

18 MR. CREAMER: Objection. Beyond  
19 the -- beyond the scope of redirect.

20 MR. RULLI: I'm going to allow that.

21 THE WITNESS: The attack happened  
22 around 10:00.

23 MR. ALFANO: Mm-hm.

24 THE WITNESS: So sometime around after

1                   that. I couldn't tell you.

2 BY MR. ALFANO:

3 Q.               All right. So you -- you dialed her City  
4 number; right? 215-686, whatever her City number was, to  
5 call her as a City official; right?

6 A.               The City number would not have been working at  
7 the time. So as a City official, she has a cellphone that  
8 should be active in situations like this, and it is.

9 She's done this before for other victims of crime.

10 Q.              So my question was did you -- did you call her  
11 at --

12 A.              I did not have a City number to call her on. I  
13 called her on the number that I had for her.

14 Q.              Right. You called her on the number that you  
15 spoke with her typically, which was her personal number;  
16 right?

17 A.              I didn't know what number that was. How would I  
18 know if it's a personal number or not, sir?

19 Q.              In fact, you only ever had her personal number;  
20 right?

21 A.              How would I know? I don't know. I don't know  
22 if it was her personal number, sir. I don't know.

23 Q.              Well, when you called her, was it 10:00 o'clock  
24 at night; right?

1 A. After the attack.

2 Q. Whenever, late at night?

3 A. Okay.

4 Q. Did you think you were getting her in her office  
5 at 10:00 o'clock at night?

6 A. I had no clue what capacity she was. People  
7 take their work home. They work around the clock. I had  
8 no clue whether she was clocked in or clocked out, sir.

9 Q. Even though you've known her for eight areas?

10 A. Yeah, I've known her eight years.

11 Q. And you've always known this number that you  
12 called?

13 A. No. It's changed over the years.

14 Q. I'm sorry. You've known this number to be her  
15 personal number that you called?

16 A. For a limited time. She had just recently got  
17 the number.

18 Q. When she was living in your house, was that her  
19 personal number?

20 A. She had a couple numbers, so that was one of  
21 them.

22 Q. Sure. Because she had a -- she had a  
23 separate -- she had a separate City phone, a separate City  
24 number; right?

1 A. I had no clue why there was different numbers.

2 I know she had done sex work, so I assumed that that's  
3 what it was.

4 Q. Did you see her ever with two devices?

5 A. No. I never had.

6 MR. ALFANO: No further questions.

7 MR. CREAMER: No further questions.

8 MR. RULLI: All right. Ms. Stephens,  
9 I think that concludes your testimony.

10 THE WITNESS: Thank you.

11 MR. RULLI: And I want to thank you  
12 for coming in today and testifying. One moment.

13 (At this time, a brief pause was  
14 taken.)

15 MR. RULLI: In terms of Ms. Stephens,  
16 are either of you planning any further  
17 questioning of Ms. Stephens? In other words,  
18 can she be released, or should she remain  
19 around?

20 MR. CREAMER: I don't plan on asking  
21 any further questions.

22 MR. ALFANO: I don't plan on recalling  
23 her in my case in chief, so.

24 MR. RULLI: All right. So I just want

1                   to -- before I let her go, I want to make sure.

2                   MR. ALFANO: No. We appreciate that  
3                   very much.

4                   MR. RULLI: Okay.

5                   MR. CREAMER: Ms. Stephens has asked  
6                   whether she can attend the rest of the hearing.

7                   MR. ALFANO: And I would object to  
8                   that.

9                   THE WITNESS: I would appreciate it,  
10                  sir.

11                  MR. RULLI: I appreciate that, and I  
12                  can understand why you would want to be here.  
13                  But this is a little different from a court  
14                  hearing --

15                  THE WITNESS: Yes, sir.

16                  MR. RULLI: -- which is open to the  
17                  public --

18                  THE WITNESS: Yes.

19                  MR. RULLI: -- under the constitution.

20                  THE WITNESS: Yes, sir.

21                  MR. RULLI: And this is this  
22                  confidential proceeding --

23                  THE WITNESS: Yes, sir.

24                  MR. RULLI: -- under the rules of the

1                   Board of Ethics --

2                   THE WITNESS: Yes, sir.

3                   MR. RULLI: -- and so I have to apply  
4                   those rules.

5                   THE WITNESS: Yes, sir.

6                   MR. RULLI: And so I am going to  
7                   dismiss you from this, and you will not be able  
8                   to stay and observe the rest of this.

9                   THE WITNESS: Thank you for  
10                  illuminating me. Thank you.

11                  MR. RULLI: But it's some of the  
12                  rules, and because this is a confidential  
13                  hearing.

14                  THE WITNESS: You got it. Thank you  
15                  so much.

16                  MR. ALFANO: And is the witness bound  
17                  by confidentiality at this point, as well?

18                  MR. RULLI: Yes. As I understand it,  
19                  everyone participating in this proceeding, until  
20                  there's a decision of the Board, is bound by  
21                  confidentiality. I turn to my general counsel  
22                  here to --

23                  MS. GREENWALD: Yeah.

24                  MR. RULLI: Yeah.

1                   THE WITNESS: Okay.

2                   MR. RULLI: And so I would ask that  
3                   you keep confidential everything that was said  
4                   today, okay, until such time as the Board  
5                   renders a decision; at which time, then, the  
6                   decision will be public, and you will be able to  
7                   speak about it.

8                   THE WITNESS: Okay. That's fine.

9                   Would that --

10                  MR. RULLI: If you should ever have  
11                  questions about that, you can contact the  
12                  general counsel's office for further  
13                  instruction.

14                  THE WITNESS: And, sir, if you don't  
15                  mind, would that preclude my [REDACTED]? Because  
16                  this is causing me a lot of [REDACTED]. So  
17                  would that preclude me from talking to my  
18                  [REDACTED]

19                  [REDACTED] that I'm dealing with right  
20                  now as a result of kind of being here and having  
21                  to go through this process? I would like some  
22                  leniency to talk to [REDACTED], please, who is  
23                  also bound by confidentiality.

24                  MR. ALFANO: I have no objections as

1 long as they're -- as long as those  
2 conversations are confidential.

3 MR. RULLI: Counsel are being --  
4 trying to be very helpful to you, and I can  
5 understand. Normally, we would say that the  
6 [REDACTED] then would need to be informed that  
7 apart from the normal confidentiality that  
8 applies to [REDACTED] --

9 THE WITNESS: Yes.

10 MR. RULLI: -- there's an additional  
11 overlay of confidentiality because of this  
12 proceeding.

13 THE WITNESS: Okay.

14 MR. RULLI: And I would ask that you  
15 give the [REDACTED] General Counsel's name and  
16 number.

17 THE WITNESS: Okay.

18 MR. RULLI: Because anything you  
19 disclose to your [REDACTED] solely for [REDACTED],  
20 [REDACTED] --

21 THE WITNESS: Correct.

22 MR. RULLI: -- must remain  
23 confidential pursuant to our rules as well as  
24 the rules that govern them.

1                           THE WITNESS: That sounds perfect.

2                           Thank you.

3                           MR. RULLI: Okay.

4                           THE WITNESS: Thank you so much.

5                           MR. RULLI: Unless there's an  
6                           objection, I think you can --

7                           THE WITNESS: Okay.

8                           MR. RULLI: -- proceed in that way.

9                           THE WITNESS: Okay.

10                          MR. RULLI: And again, any questions,  
11                          contact the general counsel.

12                          THE WITNESS: Thank you.

13                          (The witness was excused.)

14                          MR. RULLI: And I am looking at the  
15                          clock. It's 12:49. And so I think we should  
16                          break at this point. And then we'll come back,  
17                          maybe with a little unfinished business, and  
18                          then move on.

19                          Just to get a sense of where we are in  
20                          terms of witnesses, Mr. Creamer, do you plan to  
21                          present any other witnesses?

22                          MR. CREAMER: Yes. I intend to call  
23                          Ms. Morrison as a cross.

24                          MR. RULLI: Okay.

1                           MR. CREAMER: And then that will be it  
2                           for my witnesses. I have a few more exhibits I  
3                           intend to introduce, and that will be my case.

4                           MR. RULLI: Okay. And Mr. Alfano?

5                           MR. ALFANO: I may or may not call  
6                           Ms. Morrison, depending upon cross.

7                           MR. RULLI: What happens on cross?

8                           MR. ALFANO: Right.

9                           MR. RULLI: Okay.

10                          MR. ALFANO: But that would be it.

11                          MR. RULLI: And there's no other  
12                          witnesses?

13                          MR. ALFANO: Right. And I think I  
14                          only have perhaps one, one or two exhibits.

15                          MR. RULLI: Okay. I just wanted to  
16                          get a sense of what this afternoon would look  
17                          like. With that, I want to encourage everyone  
18                          to go outside, get a little fresh air. And we  
19                          will resume --

20                          MR. ALFANO: 1:30? Is that okay?

21                          MR. RULLI: I think 1:30 should be  
22                          fine. All right. We'll stand in recess until  
23                          1:30.

24                          (At this time, a recess was taken from

1                   12:50 p.m. to 1:35 p.m.)

2                   MR. RULLI: Before, Mr. Creamer, you  
3                   call your next witness, I just wanted to clear  
4                   up a couple of things and just make sure it's  
5                   clear on the record.

6                   In terms of exhibits, ED-3 was  
7                   admitted into evidence with no objection. ED-4  
8                   was admitted with no objection. ED-12 was  
9                   admitted with no objection. And ED-13 was  
10                  admitted with no objection.

11                  ED-6 was offered. That's the Inquirer  
12                  article. It will be allowed in for the limited  
13                  purpose of confirming the incident, hate crime  
14                  but specific statements in there, of course,  
15                  like we said. So it will only be admitted for  
16                  that limited purpose.

17                  MR. CREAMER: Okay.

18                  MR. RULLI: ED-11 was the GoFund.  
19                  There was both a fair amount of direct and  
20                  cross-examination with respect to that document.  
21                  Do you still object to -- Mr. Alfano, do you  
22                  still object to ED-11?

23                  MR. ALFANO: I didn't appreciate that  
24                  I did previously. But if I do, I no longer

1 object to it.

2 MR. RULLI: All right. Thank you.

3 MR. ALFANO: Thank you.

4 MR. RULLI: And so ED-11 will be  
5 admitted without objection.

6 (At this time, a document marked for  
7 identification as ED-11 was received into  
8 evidence.)

9 MR. RULLI: And with that, I think  
10 we're caught up and we're ready to proceed.

11 Mr. Creamer?

12 MR. CREAMER: Thank you, Professor.  
13 I call as my next witness, the respondent Celena  
14 Morrison, as a cross.

15 MR. RULLI: I'm going to swear you in,  
16 Ms. Morrison.

17 - - -

18 (KENDALL STEPHENS, having been duly  
19 sworn, was examined and testified as follows:)

20 - - -

21 MR. RULLI: You may proceed.

22 MR. CREAMER: Thank you, Professor.

23 BY MR. CREAMER:

24 Q. Good afternoon, Ms. Morrison.

1 A. Hello.

2 Q. Have you stated your name for the record?

3 MR. CREAMER: Does she need to  
4 identify herself?

5 MR. RULLI: Yes. I should have asked  
6 you that, actually. Why don't you go ahead and  
7 identify yourself? Spell your name again.

8 THE WITNESS: Okay. My name is Celena  
9 Morrison. That's C-E-L-E-N-A M-O-R-R-I-S-O-N.  
10 And I use she and her pronouns.

11 MR. RULLI: Thank you.

12 BY MR. CREAMER:

13 Q. Ms. Morrison, you're the executive director of  
14 the mayor's office of LGBT affairs?

15 A. Yes.

16 Q. And you served in that position in the mayor's  
17 office since March 2nd, 2020; correct?

18 A. Yes.

19 Q. And I direct your attention to the exhibit book  
20 in front of you to Exhibit ED-2, which is Chapter 20 of  
21 the Philadelphia Home Rule Charter, Office of LGBT  
22 Affairs. Take a moment.

23 A. Can you --

24 Q. I apologize. The printout is poor from the

1 website.

2 A. I'm familiar with it, though.

3 Q. Okay. I'm sure you are. And you agree with me  
4 that's the section of the Philadelphia Home Rule Charter  
5 that established the office of LGBT affairs; correct?

6 A. Yes.

7 Q. And under the City's Home Rule Charter, you and  
8 your office have the authority to develop proposed City  
9 policy regarding civil rights issues affecting LGBT  
10 people?

11 A. Yes.

12 Q. You also have the authority to coordinate the  
13 implementation of policies and programs to meet the City's  
14 diversity and equality goals as expressed in the charter?

15 A. Yes.

16 Q. Ordinances and executive orders; correct?

17 A. Yes.

18 Q. You also have the authority to coordinate among  
19 the City departments, agencies, and offices to improve  
20 LGBT access to City services and to promote equality and  
21 safety for LGBT people?

22 A. Absolutely.

23 Q. You also have the authority to support the  
24 growth and development of the City's LGBT communities?

1 A. Yes.

2 Q. And you also have the authority to serve as  
3 liaison between the City's and region's LGBT communities  
4 and the City; correct?

5 A. Mostly, yes.

6 Q. I'm basically just reading the charter.

7 A. Yes.

8 Q. And that's a broad mandate, wouldn't you agree?

9 A. Yes.

10 Q. And that broad mandate necessarily requires you  
11 to exercise discretion; correct?

12 A. Yes.

13 Q. And you exercise that discretion on a daily  
14 basis; wouldn't that be fair to say?

15 A. Yes.

16 Q. And you exercise your official discretion when  
17 deciding what policies to set and programs to pursue?

18 A. Yes. But can I explain how that works?

19 Q. She's answered the question.

20 MR. RULLI: I think it's part of your  
21 answer. You can go ahead.

22 THE WITNESS: Yes. I do have  
23 discretion. But as the executive director of  
24 the office, it is my practice and my office's

1 practice to take any meeting or any inquiries of  
2 anyone who is interested with working with my  
3 office to determine if a partnership is in -- if  
4 their mission meets our mission and if there's a  
5 possibility of how --

6 MR. CREAMER: Okay.

7 THE WITNESS: -- a partnership would  
8 work.

9 BY MR. CREAMER:

10 Q. And you also exercise your official discretion  
11 when you choose how to implement those policies and  
12 programs that you just mentioned?

13 A. Yes.

14 Q. You also exercise your official discretion when  
15 you plan how to coordinate with City departments and  
16 agencies to meet the City's diversity and equality goals?

17 A. Well, I work with other offices to make sure  
18 that that happens.

19 Q. Right. That's the coordination aspect of --

20 A. Yeah, mm-hm.

21 Q. -- of your office --

22 A. Yes.

23 Q. -- and how you --

24 A. In collaboration with --

1 Q. Right.

2 A. -- other offices, yes.

3 Q. You rely on the City agencies and departments  
4 because your office actually doesn't have any power or  
5 authority in and of itself. You rely on other agencies  
6 and offices and departments and their power to implement  
7 your goals and policies; correct?

8 A. Well, it depends on what that policy is.

9 Q. Okay. Fair enough. And you also exercise your  
10 official discretion when you plan how to promote equality  
11 and safety for LGBT people; is that fair to say?

12 A. Yes. Within the guidelines of the City.

13 Q. Right.

14 A. Within City guidelines.

15 Q. And finally, you also exercise your official  
16 discretion when you serve as a liaison between LGBT  
17 communities and the City?

18 A. Yes.

19 Q. Now, you kind of touched on this already.

20 People and groups within the LGBT community come to you  
21 all the time seeking official action from you and your  
22 office; is that right?

23 A. Yes.

24 Q. And they do so for support?

1 A. Yes.

2 Q. They do so for guidance?

3 A. Yes.

4 Q. They do so for resources?

5 A. Yes.

6 Q. They do so for intervention sometimes?

7 A. When they do reach out for interventions, that  
8 is not typically what my office does. And in any --  
9 anything that requires an intervention, like disputes  
10 between community members, is not within my office purview  
11 whatsoever.

12 Q. Would you refer them to somebody else?

13 A. To PCHR, yes.

14 Q. Okay. But they come to you for facilitation  
15 sometimes?

16 A. Facilitation? What do you mean, "facilitation"?

17 Q. To facilitate their needs or a goal that they  
18 may have?

19 A. Facilitate to who? I'm sorry. I'm not  
20 understanding. Facilitate to who?

21 Q. Facilitate some goal they may have that would  
22 require City resources?

23 A. But when you say I would "facilitate," what do  
24 you mean? Would I speak for them, or?

1 Q. That you would -- you would be a conduit for  
2 resources to facilitate their goals that they may have?

3 A. Well, I wouldn't say "facilitate." I would say  
4 I would make those connections.

5 Q. Okay. Fair enough. And also when these groups  
6 come to you, you would sometimes act as a liaison, among  
7 other things that you may do for them; is that fair to  
8 say?

9 A. Yes. Depending on their needs, if my office is  
10 not able to help them, we typically help connect them to  
11 whoever can.

12 Q. And these are individuals and groups?

13 A. And organizations and companies and church --  
14 religious. We are contacted by sports teams. It's never  
15 ending.

16 Q. You're busy?

17 A. Yes.

18 Q. And individuals, too?

19 A. Yes.

20 Q. Not just organizations?

21 A. Yeah, absolutely.

22 Q. Yes. And that's what your office was created to  
23 do; right?

24 A. Mm-hm.

1 Q. Is that yes? I'm sorry.

2 A. Yes, yes, yes.

3 Q. The court reporter --

4 A. Yes. I'm sorry.

5 Q. To help people and groups within the LGBT  
6 community interact with City departments and agencies and  
7 access City resources, among other things.

8 A. Yeah.

9 Q. Is that a fair statement?

10 A. Yes.

11 Q. Okay. Now, you've known Kendall Stephens since  
12 about 2014 or 2015; is that right?

13 A. Mm-hm, yes.

14 Q. And would it be fair to say that she's an  
15 activist within the LGBT community?

16 A. Yes.

17 Q. Now, Ms. Stephens is involved with the  
18 organization Hearts on a Wire; correct?

19 A. I think that's a bit of a stretch.

20 Q. That's a stretch?

21 A. She was a member. She was not one of the -- and  
22 as far as I know, she was -- I didn't know that she was  
23 actually a member until I received communication from her  
24 about Hearts on a Wire.

1 Q. In 2020 --

2 A. Yes.

3 Q. -- you received that communication?

4 A. Prior to that, I did not know of her being  
5 involved.

6 Q. All right. And you were familiar with Hearts on  
7 a Wire?

8 A. Very.

9 Q. And you were familiar with that organization in  
10 2020?

11 A. Very.

12 Q. And that organization is an advocacy group that  
13 works to address the needs of transgender people in  
14 Pennsylvania's prisons, among other things; is that right?

15 A. Yes.

16 Q. After you became executive director of the  
17 mayor's office of LGBT affairs in 2020, you lived with  
18 Ms. Stephens -- in Ms. Stephens's apartment for a brief  
19 period of time; correct?

20 A. Mm-hm.

21 Q. Around -- is that yes?

22 A. In her house, yes.

23 Q. In her house?

24 A. Yes.

1 Q. In and around August of 2020?

2 A. Yes.

3 Q. But just for a couple weeks?

4 A. Yeah, just for a couple weeks.

5 Q. And she did that as a favor to you because you  
6 were escaping --

7 A. Yes.

8 Q. -- a difficult --

9 A. Yes.

10 Q. -- problem? Around that time, Ms. Steven [sic]  
11 asked -- Ms. Stephens asked to meet with -- with you and  
12 Kelly Burkhardt and I think some other individuals,  
13 possibly regarding Hearts on a Wire; is that correct?

14 A. Yes.

15 Q. And you understood the purpose of that meeting  
16 would be to seek what resources you and your office might  
17 be able to provide Hearts on a Wire; correct?

18 A. Yes.

19 Q. Direct your attention to Exhibit ED-4, which  
20 should be at tab 4 in that binder in front of you. It's  
21 an email dated August 19th. Have you had a chance to look  
22 at that?

23 A. Yes.

24 Q. And that -- that is an email from you indicating

1       that you have some availability on Friday, August 28th  
2       after 1:00 p.m. to meet regarding Hearts on a Wire; is  
3       that correct?

4       A.           Yes.

5       Q.           And you're responding to the group, including  
6       Ms. Stephens?

7       A.           Mm-hm.

8       Q.           Correct?

9       A.           Yes.

10      Q.           And again, the purpose of that meeting would be  
11      to see what resources your -- you and your office might be  
12      able to offer Hearts on a Wire?

13      A.           Yes. It was, as she said, an exploratory  
14      meeting.

15      Q.           Okay.

16                   MR. RULLI: When you say "she said, an  
17                   exploratory meeting" --

18                   THE WITNESS: Oh.

19                   MR. RULLI: -- who was the "she"?

20                   THE WITNESS: Oh, Kendall. Kendall  
21                   Stephens.

22                   MR. ALFANO: That was her testimony on  
23                   direct.

24                   MR. RULLI: Yeah, I just wanted to be

1                   sure.

2                   THE WITNESS: Yeah. It was Kendall.

3 BY MR. CREAMER:

4 Q.               All right. Now, that meeting never took place,  
5 as we know?

6 A.               Correct.

7 Q.               But five days after you sent that email on  
8 August 19th, Ms. Stephens was violently attacked?

9 A.               Mm-hm.

10 Q.              Correct?

11 A.              Yes.

12 Q.              On August 24th. And she suffered significant  
13 injuries as a result of that attack, as you know?

14 A.              As far as I know, yes.

15 Q.              Well, you saw her; right?

16 A.              Yes, I did.

17 Q.              Yeah.

18 A.              I was not able to determine what her injuries  
19 were at that time, though.

20 Q.              But you saw her face?

21 A.              Yes.

22 Q.              And you could see that she was brutally --

23 A.              I could see that she was bruised and bleeding,  
24 but I was not able to determine what her injuries were.

1 Q. Okay. And after the assault, that meeting was  
2 never scheduled?

3 A. That meeting never happened. But I mean, the  
4 meeting could have happened without Kendall, but the  
5 meeting never happened even --

6 Q. But she was the one that was the driving  
7 force --

8 A. Absolutely.

9 Q. -- meaning that she was the one who was trying  
10 to schedule it?

11 A. Mm-hm.

12 Q. I'm sorry. Is that --

13 A. Yes.

14 Q. Yes? Now, you were on the phone with  
15 Ms. Stephens either during the attack or after the attack;  
16 is that right?

17 A. I was on the phone with Kendall Stephens prior  
18 to the attack, and I was the first one she called  
19 immediately following the attack.

20 Q. Okay.

21 A. The attack. I was on the phone with her when  
22 she opened the door, and I heard the commotion going on  
23 outside. And that's when I ended our phone call, and I  
24 told her to be careful, be safe, and call me back to let

1 me know that everything was okay. And that's about, I  
2 guess, maybe 30 -- 30 minutes later, I got a call from  
3 her.

4 Q. From her? And she was either at the police  
5 station at that time or on her way to the station?

6 A. At the time she called me, she was still at  
7 home.

8 Q. And then did you meet her at her home or at the  
9 police station after that call?

10 A. I immediately jumped out of bed and rushed to  
11 her house. When I got to her house, she was already at  
12 the police station. So I immediately left her house and  
13 went to the police station.

14 Q. Okay. And when you went to the police station,  
15 did you speak to police officers?

16 A. Yes, I did.

17 Q. Okay. And did you also speak to Ms. Stephens?

18 A. Briefly. She was really upset and yelling. And  
19 she did kind of scream out that they weren't taking her  
20 serious, that it wasn't -- they're saying that it's not a  
21 hate -- that that's a simple assault. And so because she  
22 was making so much noise, I asked Avery, who was her  
23 husband at the time, to take her over to the side while I  
24 was able to have a conversation with the police officer.

1 Q. And did -- did you mention Police Directive

2 4.15 --

3 A. I absolutely --

4 Q. -- to the police officers --

5 A. I absolutely did.

6 Q. -- at the time?

7 A. And I do --

8 MR. RULLI: Ms. Morrison, wait for the  
9 full question.

10 THE WITNESS: Okay. I'm sorry.

11 MR. RULLI: And then answer it. Okay.

12 Let's take that one again.

13 BY MR. CREAMER:

14 Q. Okay. We'll try that again. So did you mention  
15 police -- Philadelphia Police Department Directive 4.15 to  
16 the police officers at that time?

17 A. I believe I did.

18 Q. Okay. And that directive instructs police  
19 officers how to interact with transgendered individuals?

20 A. Yes.

21 Q. And it's quite detailed. I have it in front of  
22 me. I'm not going to offer it as an exhibit. But it --  
23 it's quite detailed on how police officers are to interact  
24 with, handle, and deal with transgender individuals; is

1 that correct?

2 A. Yes, that is.

3 Q. And you felt it was appropriate at that point to  
4 remind or inform police officers about Directive 4.15, did  
5 you not?

6 A. As a Black transgender woman, I find it  
7 appropriate every time I encounter a police officer to not  
8 only -- not remind them of Directive 4.5, but to inform  
9 them of it because they don't know about it.

10 Half of them -- I have plenty of friends who are  
11 police officers, and I'm always surprised that none of  
12 them are really familiar with the directives that are in  
13 place. So I make it a habit to announce those directives  
14 before my interactions with police.

15 Q. And did you identify yourself as the executive  
16 director --

17 A. No, I did not.

18 Q. -- from the mayor's office of LGBT --

19 A. No, I did not.

20 Q. -- affairs? Not at any time that night?

21 A. No.

22 Q. But you did tell them about Directive 4.15?

23 A. Yes.

24 Q. All right. After you left the police station,

1 you texted Ms. Stephens at some point as a follow-up that  
2 night?

3 A. Mm-hm.

4 Q. Is that correct?

5 A. Yes. Sorry.

6 Q. All right. Direct your attention to Exhibit  
7 ED-7 which should be at tab 7. Give you a chance to look  
8 at that. And that appears to be a number of text messages  
9 that I think were sent by you that night at about  
10 1:50 a.m.?

11 A. Yes.

12 Q. That's actually the following day, looks like  
13 it's August 25th, 2020 at 1:50 a.m.; is that correct?

14 A. Yes.

15 Q. All right. And could you read the second --  
16 looks like the second text message?

17 A. "I just want you know that I love you as my  
18 sister and -- and I have your back as my sister. And as a  
19 member of this community --" I'm sorry. "And as a member  
20 of this community, I have your back in my professional  
21 position, as well. And we will not take this lying down."

22 Q. Do you need a moment?

23 A. No.

24 Q. Are you sure?

1 A. Yes. I'm okay.

2 MR. CREAMER: I'll take this moment to  
3 move ED-7 into evidence.

4 MR. ALFANO: No objection.

5 MR. RULLI: ED-7 will be admitted into  
6 evidence, no objection.

7 (At this time, a document marked for  
8 identification as ED-7 was received into  
9 evidence.)

10 MR. CREAMER: You okay?

11 THE WITNESS: Mm-hm.

12 MR. RULLI: If you need at any  
13 point --

14 THE WITNESS: I'm fine.

15 MR. RULLI: You just let us know.

16 BY MR. CREAMER:

17 Q. So in that text message you just mentioned, you  
18 indicate that you had Ms. Stephens' back in your  
19 professional position, as well. Did you not?

20 A. Yes.

21 Q. And by that, you're referring to your ability to  
22 act as a liaison with the police department and the DA's  
23 office; isn't that right?

24 A. What -- what I meant is that I could make those

1 connections to whatever resources that she needed and  
2 those people that she needed to be in contact with as a  
3 victim of a crime.

4 Q. Okay. Thank you. Okay. I would like to direct  
5 your attention to the next exhibit in the book, Exhibit  
6 ED-8, which is an email exchange dated September 2nd, 2020  
7 to September 15th, 2020 regarding the complaint against  
8 the police with Robin Wimberly who is the Philadelphia  
9 Police Department deputy commissioner of the office of  
10 professional responsibility. Get that out.

11 And actually, it's a little bit -- okay. So  
12 it's a little bit out of order. So it starts up at the  
13 top with the first page on ED-8, page 1, with a -- with an  
14 email from Ms. Wimberly to you. I believe that's the  
15 first one, and then actually the next one is on the bottom  
16 of page 2. And it follows up in the middle of page 2, I  
17 think.

18 In any case, so beginning at the top of page 1,  
19 that's an email from Robin Wimberly. And again, she is  
20 the -- she's the Philadelphia Police Department deputy  
21 commissioner, Office of Professional Responsibility; is  
22 that right?

23 A. Yes.

24 Q. And do you know Ms. Wimberly?

1 A. Not personally.

2 Q. Not personally, but you have occasion to work  
3 with her?

4 A. Not until this.

5 Q. Not until this? Okay.

6 A. I had never been contacted by the police --

7 Q. All right.

8 A. -- commissioner until this.

9 Q. So she sends you this email reaching out to you  
10 about the incident occurring at the 17th district with  
11 Kendall Stephens; is that right?

12 A. Yes.

13 Q. And she says she wanted to ensure that Kendall  
14 understands the complaint against the police process was  
15 available. And she said or asked you to call her on her  
16 cell, and give -- provides her number; is that right?

17 A. Yes.

18 Q. Okay. Did you call her?

19 A. Yes, I did.

20 Q. Okay. And then -- and that's -- she's referring  
21 to the potential complaint against the police officers and  
22 the handling of -- of Ms. Stephens at the police station?

23 A. Mm-hm, yes.

24 Q. Is that right?

1 A. Yes. Yes.

2 Q. Okay. And then if you turn to the next page and  
3 go to the bottom of the next page, it says "Good  
4 afternoon." I don't know why that -- that seems to be  
5 the next email in this exchange; I don't know why it goes  
6 down there.

7 And then if you turn to the third page, it's,  
8 again, an email following up from Robin Wimberly, and she  
9 said, "Circling back, has Kendall changed her mind  
10 regarding filing a complaint against the police? Please  
11 let me know if I can be of service in any matter. Thanks,  
12 Deputy Commissioner Robin Wimberly."

13 Is that right? And that was to you; is that  
14 right?

15 A. Yes.

16 Q. Okay. And then if you jump back to page 2 --  
17 again, I apologize. I don't know why it printed out this  
18 way.

19 MR. RULLI: Counsel, I think it would  
20 be easier just to identify the date each time  
21 you're jumping from --

22 MR. CREAMER: Oh, sorry.

23 MR. RULLI: -- one to another.

24 MR. CREAMER: So that's September 9th

1                   2020 at 3:01 p.m., email from Robin Wimberly to  
2                   Ms. Morrison. Again, "Circling back, has  
3                   Kendall changed her mind?"

4 BY MR. CREAMER:

5 Q.               And then on -- in the middle of page 2 of ED-8,  
6 you responded on Thursday, September 10th, 2020 to  
7 Ms. Wimberly. And you said, "Hello. Thank you so much  
8 for following up. I spoke with Kendall and she does want  
9 to move forward with filing a complaint against the  
10 police. And she --"

11                  Is that correct?

12 A.              Yes.

13 Q.               And then you go on to say, "She asked me to  
14 share her contact info with her -- with you." And you  
15 provide her cellphone number. "Let me know if there's  
16 anything else I can do."

17                  Is that correct?

18 A.              Yes.

19 Q.               And then at the top of that page, there's  
20 another email responding to your email from Ms. Wimberly  
21 dated September 15th regarding Kendall saying, "Hi. I  
22 just spoke with Kendall and walked her through the  
23 process. Again, thank you for your help."

24                  Is that right?

1 A. Yes.

2 Q. Okay.

3 MR. CREAMER: I would move ED-8 into  
4 evidence.

5 MR. ALFANO: No objection.

6 MR. RULLI: ED-8 will be accepted into  
7 evidence with no objection.

8 (At this time, a document marked for  
9 identification as ED-8 was received into  
10 evidence.)

11 BY MR. CREAMER:

12 Q. Okay. All right. This email exchange documents  
13 you serving in your role as liaison with the police  
14 department with Kendall Stephens, an LGBT victim of a hate  
15 crime; correct?

16 A. Yes.

17 Q. That's one of your primary roles in your office  
18 under the Philadelphia Home Rule Charter; correct?

19 A. Yes.

20 Q. You didn't tell Ms. Wimberly in this email  
21 exchange that you were not working in your official  
22 capacity; did you?

23 A. No, I did not.

24 Q. Okay. And I would like to direct your attention

1 to Exhibit ED-9, which is an email exchange with Adam  
2 Geer, director of diversity and inclusion at the DA's  
3 office. Do you have that in front of you?

4 A. Yes.

5 Q. Okay. Now, he reached out to you in your  
6 official capacity as executive director at the mayor's  
7 office of LGBT affairs about Ms. Stephens' assault; is  
8 that correct?

9 A. Yes.

10 Q. And you didn't tell Mr. Geer that you weren't  
11 working in your official capacity in this email exchange,  
12 did you?

13 A. No, I did not. He contacted me during the day  
14 when I was in my office and in my official capacity, so  
15 any information I was providing to him was in that.

16 Q. All right.

17 MR. CREAMER: I would move to move  
18 Exhibit ED-9 into evidence.

19 MR. ALFANO: No objection.

20 MR. RULLI: ED-9 will be accepted into  
21 evidence, no objection.

22 MR. CREAMER: All right.

23 (At this time, a document marked for  
24 identification as ED-9 was received into

1                   evidence.)

2 BY MR. CREAMER:

3 Q.               Direct your attention to the next exhibit,  
4 ED-10, which is an email exchange with Mary Grace [sic].

5 A.               What exhibit is this? I'm sorry.

6 Q.               I'm sorry. ED-10.

7 A.               Okay.

8 Q.               It should be the next tab.

9 A.               Okay. Got it.

10 Q.               You can take a look at that for a minute. And  
11 direct your attention to the second paragraph there. If  
12 you could read that second paragraph?

13 A.               Oh. "I've been working hard with the police  
14 commissioners and the district attorneys to get all the --  
15 all of this taken care of."

16 Q.               Okay. And what are you referring to there?

17 A.               Connecting Kendall to the police commissioner  
18 and connecting her to the district attorney's office, Adam  
19 Geer, who had -- both had reached out to me.

20 Q.               All right. And again, this is another example  
21 of you serving in your role as liaison in your official  
22 capacity as the executive director of mayor's office of  
23 LGBT affairs; correct?

24 A.               Yes, that is.

1 Q. All right. Now, turning your attention to the  
2 loan. At some point after the August 24, 2020 assault,  
3 you asked Ms. Stephens if you could borrow \$4,000 from her  
4 so you could rent your own apartment; correct?

5 A. No. That is not correct.

6 Q. You did -- you came up with that amount, though;  
7 didn't you?

8 A. We came -- we discussed it and with -- after  
9 calculating approximately what I could -- what I would be  
10 able to afford for rent and multiplied by three, and  
11 that's how we came up with that number.

12 Q. So how'd you come up with that number?

13 A. Because I knew that I could afford around --  
14 roughly around \$1,500 a month for rent. For that  
15 multiplied by three would be around \$3,500 [sic], so we  
16 rounded it to \$4,000.

17 Q. And this was after Ms. Stephens raised money  
18 through the GoFundMe site; correct?

19 A. No. This was prior to that.

20 Q. And where was the money going to come from?

21 A. From the money that was hidden in Ms. Stephens'  
22 closet. I had no idea that Ms. Stephens had that money.  
23 I would have never even known to even ask to borrow the  
24 money -- that amount of money from her because she did not

1 have a job. She was -- she had student loans. I had -- I  
2 wasn't even aware that she had that amount of money, so I  
3 would have never even thought to ask her for that.

4 Q. So direct your attention to Exhibit ED-12.

5 A. Yes.

6 Q. You're familiar with that document?

7 A. Yes.

8 Q. And that is the loan agreement?

9 A. Yes.

10 Q. And that is your signature at the borrower line?

11 A. Yes.

12 Q. And under this agreement, you agreed to repay  
13 the 4,000-dollar loan over a 12-month period; is that  
14 correct?

15 A. Yes.

16 Q. And the first payment in the amount of 150 was  
17 going to be due on October 23rd, 2020; is that correct?

18 A. Yes.

19 MR. ALFANO: Objection.

20 BY MR. CREAMER:

21 Q. And then all subsequent payments in the amount  
22 of \$350 would be paid on the 23rd day of each subsequent  
23 month, ending on October 23rd, 2021; is that correct?

24 A. Yes.

1 Q. And that's what -- those were the terms you  
2 agreed to; correct?

3 A. Yes.

4 MR. CREAMER: I believe this exhibit  
5 has already been --

6 MR. RULLI: That's already been  
7 admitted into evidence. Did you have an  
8 objection?

9 MR. ALFANO: No, I did not.

10 MR. RULLI: Okay. Proceed.

11 BY MR. CREAMER:

12 Q. All right. So but you never made that first  
13 payment on October 23rd, 2020, did you?

14 A. By that time, Kendall and I was not in  
15 communication. She had blocked me. I had attempted to  
16 communicate with her, but she was not responding. She, I  
17 believe by this time -- I can't remember if the press  
18 conference had already happened. But she was upset with  
19 me before, before that date.

20 Q. So does that excuse your obligation to repay the  
21 loan?

22 A. Well, if I had -- I had no way of contacting  
23 her. I actually reached out to Avery to try to contact  
24 her.

1 Q. So you knew her address because you lived at her  
2 house. You couldn't mail her a check?

3 A. No.

4 Q. No? Why not?

5 A. Because I -- no. That, that -- I'm not mailing  
6 anyone a check these days.

7 Q. Do you have a checking account? Did you have a  
8 checking account in 2020?

9 A. Yes, I did.

10 Q. You know how to mail --

11 A. No, I didn't say I don't know how to send a  
12 check. I said I just wouldn't send a check.

13 Q. Why not?

14 A. Because at that time, Kendall and I had  
15 differences. I actually spoke with Ms. Curley. And I'm  
16 sure it's probably in your record that I told Ms. Curley  
17 that by -- in no means was I ever intending not to pay her  
18 back. I paid her back in one lump sum. I didn't want to  
19 go through with those payments after she started this  
20 conflict.

21 Q. So I don't understand. Why would you not mail a  
22 check to someone that you were obligated to mail a check  
23 to on October 23rd, 2020?

24 A. Well, now that I think of it, I wouldn't have --

1 I couldn't call Kendall's -- recall Kendall's address off  
2 the top of my head anyway. I do know my way to her house;  
3 I know she lives, but I don't know her address. And I  
4 don't typically -- I don't write checks. I don't even own  
5 a checkbook. So I -- that wouldn't have been a first -- a  
6 thought.

7 Q. So how did you intend to repay the loan when you  
8 signed this loan agreement?

9 A. Because Kendall and I were friends, and I could  
10 have -- we could have met up. Because the last  
11 communication that I had with Kendall was asking her to  
12 call me, and she never did.

13 Q. How were you intending to repay this loan in  
14 monthly payments?

15 A. I was intending to meet with my friend and give  
16 her the money every time it was due. That was the  
17 agreement that we had. We hadn't talked about checks,  
18 anything. This was someone who was a friend of mine. And  
19 I think it's clear of how close we were because I was the  
20 very first person that she called after an attack.

21 Q. So you believe that when you stopped speaking to  
22 a friend, that relieves you of your obligation --

23 A. I didn't say I stopped speaking to a friend.  
24 She stopped speaking to me. She made it almost impossible

1 to contact her. I was not going to her house because, as  
2 we see, she has already made it clear that she felt some  
3 kind of way about me and she was upset.

4 Q. So you believe that excused you --

5 A. No, I don't.

6 Q. May I finish my question?

7 MR. RULLI: Yeah, let him finish the  
8 question.

9 BY MR. CREAMER:

10 Q. Do you believe that excused you of your  
11 obligation to repay this loan according to its terms?

12 A. No, I don't.

13 Q. Then why didn't you repay it according to its  
14 terms?

15 A. It was impossible for me to repay her if I was  
16 not in contact with her.

17 Q. So again, you couldn't mail a check?

18 A. I could have did --

19 Q. That's not impossible --

20 A. I could have did a lot of things.

21 Q. Let me finish my question, please. It's not  
22 impossible to mail a check, is it?

23 A. No, it's not.

24 Q. No. You just chose not to; isn't that right?

1 A. No.

2 Q. You chose not to?

3 A. That is not right.

4 Q. It's not impossible?

5 A. No, that is not right. I never made a conscious  
6 decision not to send a check. I never said, "Oh, I could  
7 send a check but I'm not going to." That was not my  
8 intent.

9 Q. But you didn't?

10 A. Correct.

11 Q. You just blew it off?

12 A. No.

13 Q. You didn't pay it?

14 A. I made attempts to contact her about the  
15 payment. Has she been paid?

16 Q. After the ethics board started an investigation,  
17 yes. We'll get to that in a moment.

18 MR. RULLI: This is argument now, and  
19 it's not questioning. So let's -- and I think  
20 this has been asked and answered multiple times.

21 MR. CREAMER: I'm prepared to move on.

22 MR. RULLI: Let's move on.

23 BY MR. CREAMER:

24 Q. So actually, my next question is you didn't pay

1 Ms. Stephens anything until you were contacted by Ethics  
2 Board Staff Attorney Caroline Curley and learned that the  
3 loan was under investigation as a possible violation of  
4 the City's gift rule; correct?

5 A. Well, at that time, I asked Ms. Curley if she  
6 would be a conduit to make sure that -- because I did not  
7 want to have contact with Ms. Stephens because I was not  
8 sure what frame of mind she was in, and she tends to  
9 contact the media and make false claims and do all these  
10 things. So I asked Ms. Curley if she would deliver the  
11 check for the entire \$4,000 to Ms. Stephens.

12 Q. And you arranged to have that check delivered  
13 through the ethics board dated April 22nd, 2021; correct?

14 A. Well, I delivered it myself.

15 Q. To the ethics board?

16 A. Yes. To Mrs. Curley.

17 Q. To this office, this floor?

18 A. Yes.

19 Q. Yes. And that check was dated April 22nd, 2021;  
20 is that correct?

21 A. I'm not sure.

22 Q. Let's -- I think it's ED-14, if you look at  
23 that.

24 A. 4/22, yes.

1 Q. Is that the check you delivered to the ethics  
2 board office?

3 A. Yes.

4 Q. Sometime in April?

5 A. Yes.

6 Q. Okay.

7 MR. CREAMER: I move that ED-14 be  
8 introduced into evidence.

9 MR. ALFANO: No objection.

10 MR. RULLI: ED-14 will be admitted  
11 into evidence, no objections.

12 (At this time, a document marked for  
13 identification as ED-14 was received into  
14 evidence.)

15 BY MR. CREAMER:

16 Q. And then I would like to have you look at ED-15,  
17 tab 15. That is your original City of Philadelphia  
18 statement of financial interests?

19 A. Yes.

20 Q. Which was filed on May 18th, 2021; is that  
21 correct?

22 A. Yes.

23 Q. And you did not declare any sources of income or  
24 any gifts; is that correct?

1 A. Correct.

2 Q. All right.

3 MR. CREAMER: I move that Exhibit  
4 ED-15 be admitted into evidence.

5 THE WITNESS: Can I explain?

6 MR. RULLI: No. There's no question  
7 just yet.

8 THE WITNESS: Okay.

9 MR. ALFANO: No objection.

10 MR. RULLI: No objection. ED-15 will  
11 be admitted into evidence with no objection.

12 (At this time, a document marked for  
13 identification as ED-15 was received into  
14 evidence.)

15 BY MR. CREAMER:

16 Q. And then if you take a look at ED-16 which is  
17 the next tab, that is the statement of financial interests  
18 form that you've filed on May 18th, 2021 that did not  
19 declare any gifts, is that correct, or sources of income;  
20 is that correct?

21 A. Correct.

22 MR. CREAMER: I move that ED-16 be  
23 introduced into evidence.

24 MR. ALFANO: No objection.

1                           MR. RULLI: ED-16 will be admitted  
2                           into evidence with no objection.

3                           MR. CREAMER: Thank you.

4                           (At this time, a document marked for  
5                           identification as ED-16 was received into  
6                           evidence.)

7     BY MR. CREAMER:

8     Q.                  Direct your attention to ED-17 which is an email  
9                          from former staff -- Ethics Board Staff Attorney Caroline  
10                         Curley to you dated June 3rd, 2021 regarding the two  
11                         statements of financial interest that we just talked about  
12                         encouraging you to file amended forms identifying the City  
13                         as a source of income and also that you should declare the  
14                         loan as a gift on the form; is that correct?

15    A.                 Yes.

16                         MR. CREAMER: All right. I move that  
17                         Exhibit ED-17 be introduced into evidence.

18                         MR. ALFANO: No objection.

19                         MR. RULLI: ED-17 will be admitted  
20                         into evidence, no objection.

21                         MR. CREAMER: Thank you.

22                         (At this time, a document marked for  
23                         identification as ED-17 was received into  
24                         evidence.)

1 BY MR. CREAMER:

2 Q. Direct your attention to Exhibit 18 and tab 18.  
3 That is your amended City statement of financial interest  
4 which you filed on June 4th, 2021 in which you identified  
5 the City as a source of income. And you identified a  
6 4,000-dollar loan from Kendall Stephens; is that correct?

7 A. Yes.

8 MR. CREAMER: I move Exhibit ED-18  
9 into evidence.

10 MR. ALFANO: No objection.

11 MR. RULLI: ED-18 will be admitted  
12 into evidence with no objection.

13 MR. CREAMER: Thank you.

14 (At this time, a document marked for  
15 identification as ED-18 was received into  
16 evidence.)

17 BY MR. CREAMER:

18 Q. Now, in your Hearing, in your answer to the  
19 amended notice and also in your testimony you've already  
20 mentioned it, you say that Ms. Stephens showed you money  
21 in her closet. You said that she had over \$200,000 in  
22 cash hidden in her closet; is that correct?

23 A. Yes.

24 Q. It was over 200,000?

1 A. Yes.

2 Q. How did you know the amount?

3 A. She told me.

4 Q. What denomination was the money in?

5 A. A lot of different. It was in multiple  
6 envelopes, and she had it packaged in multiple  
7 different --

8 Q. Was it neatly organized or was it loosely  
9 packed?

10 A. No. It was actually -- some was in yellow  
11 envelopes. Some was in manila envelopes. None of the  
12 envelopes looked the same. It was some of it was taped.  
13 Some of it had rubber bands, and -- and when she told me  
14 and showed me, it scared me. And I told her don't ever  
15 show anyone else.

16 Q. And how was it contained? Was it in a box? Was  
17 it in a suitcase? Was it --

18 A. It was thrown in the bottom of her closet up  
19 under a bunch of clothes. I'm sorry. I didn't mean to  
20 cut you off.

21 Q. It was all loose?

22 A. No.

23 Q. Was it in a box -- let me finish the question.

24 Was it in a box, a suitcase, a duffel bag, a backpack, any

1 kind of container? Or was it all loose in envelopes and  
2 manila containers?

3 A. I did not see her pull it from a box or a  
4 container. All I saw her do was reach into her closet and  
5 pull out the multiple packages and throw them on the bed.

6 Q. Threw them on the bed? How many packages did  
7 she --

8 A. It was about --

9 MR. ALFANO: Let him finish the  
10 question, please.

11 BY MR. CREAMER:

12 Q. How many packages did she throw on her bed?

13 A. I don't -- maybe four or five.

14 Q. And did you see more packages of money in the  
15 closet, other than the four or five that were thrown on  
16 the bed?

17 A. Actually, I never saw them at all until she  
18 pulled them out of the closet, so I wouldn't have saw if  
19 she had any more in there.

20 Q. So you only saw three or four packages that were  
21 thrown on the bed?

22 A. Three to five. Probably four or five packages.

23 Q. Four to five packages on the bed. You didn't  
24 see any other packages in the closet?

1 A. No.

2 Q. And how big were the packages that you saw on  
3 the bed?

4 A. Some of them were as thick as this (indicating).

5 Q. So indicating about 5 inches or 6 inches?

6 You're holding your hand --

7 A. Some of them, yes.

8 Q. -- like a "C." Okay. And what denominations of  
9 money --

10 A. I didn't -- I did not touch the money. I did  
11 not flip through the money. I didn't do any of that, so I  
12 don't know what denominations the money was. I don't -- I  
13 don't know.

14 Q. Can you estimate how much money was on the bed  
15 in those three or four packages?

16 A. I did not pick the money up. I did not count  
17 it. I did not flip through it. I did not touch it.

18 Q. But could you estimate, give us a guess, how  
19 much money was on the bed?

20 A. I can't.

21 Q. All right. Did you suggest that she deposit the  
22 money in a bank or secure it somehow?

23 A. No.

24 Q. Why not?

1 A. Because that's ridiculous.

2 Q. And if she had over \$200,000 in cash hidden in  
3 her closet, why did she start a GoFundMe site after her  
4 assault?

5 A. Good question.

6 Q. Now, you suggested that your lawyers call Avery  
7 Shaw as a witness in this case, did you not?

8 A. Yes.

9 Q. Now, Avery Shaw is Ms. Stephens' husband; right?

10 A. He was. I'm not sure what the status is.

11 Q. All right. She still may be. Now, you know  
12 that he has -- suffers from [REDACTED] --

13 MR. ALFANO: Objection.

14 THE WITNESS: I --

15 MR. CREAMER: And [REDACTED]?

16 MR. RULLI: Hold on. Hold on a  
17 moment.

18 MR. ALFANO: Objection. It has  
19 nothing do with this.

20 MR. CREAMER: This is relevant. You  
21 know that --

22 MR. RULLI: Wait a minute. Just a  
23 minute. Calm down. Slow down. First of all,  
24 this is cross-examination, and so I'm going to

1 give you some latitude.

2 But where are we going with this? I  
3 mean, there's no -- there's no foundation for  
4 this. There's no prior testimony. I'm not sure  
5 I understand where you're going. Why is this  
6 relevant? Maybe you need to make an offer --

7 MR. CREAMER: I think she intended to  
8 call Avery Shaw or let Kendall -- this was a  
9 signal to Kendall Stephens that she was  
10 intending to call Avery Shaw to intimidate  
11 Kendall Stephens because Kendall Stephens has a  
12 protective order against Mr. Shaw.

13 MR. ALFANO: I think we've been  
14 through this.

15 THE WITNESS: I wasn't --

16 MR. ALFANO: You're not allowed to --  
17 there are no questions at this point.

18 MR. CREAMER: She knows this. She  
19 knows this.

20 MR. RULLI: This is back to the  
21 earlier question.

22 MR. CREAMER: And again, I didn't know  
23 that until today. But I already had a motion in  
24 limine against him because he has no -- no

1                   probative value in this case. But she told --  
2                   asked her lawyers to put him on the witness  
3                   list, and they don't even know what -- on  
4                   Friday, Counsel said that his testimony would be  
5                   cumulative.

6                   MR. ALFANO: No, I didn't. I  
7                   absolutely did not.

8                   MR. CREAMER: That's the word you  
9                   used.

10                  MR. ALFANO: Time out. May I speak?

11                  MR. RULLI: Let's take a break for one  
12                  moment. I want everybody to slow down a minute,  
13                  because I don't want the record to be  
14                  interspersed with things --

15                  MR. ALFANO: Sure.

16                  MR. RULLI: -- that's not appropriate.

17                  MR. ALFANO: And just so we're clear  
18                  for the record, I didn't say "cumulative": I  
19                  said "corroborative." And I can certainly  
20                  discuss that if at any point you would like to  
21                  hear from me further on this point.

22                  MR. RULLI: Let's take a one-minute  
23                  break. Before we do, just so I understand, this  
24                  goes to the question that you raised earlier as

1 to whether or not there's witness intimidation  
2 in this case; right?

3 MR. CREAMER: Correct, as another  
4 example.

5 MR. RULLI: All right. So we will  
6 take a one-minute break.

9 MR. RULLI: Had a chance to confer  
10 with the general counsel and the general counsel  
11 staff. There have been these questions and  
12 testimony along the lines of witness  
13 intimidation. We're going to stop there on that  
14 point. It is on the record. It will be up to  
15 the Board to determine whether or not it has any  
16 bearing at all to the issue that the Board has  
17 to decide.

If there's a serious question of  
witness intimidation, that may be something that  
has to be pursued outside of this proceeding.  
It's not part of this proceeding. The fact that  
Avery Shaw was on the list is not -- there can  
be many explanations for that. He was involved,  
obviously, with the -- the loan. And I think

1           we've gone as far as we're going to go on the  
2           question of witness intimidation.

3           You've put some things on the record,  
4           Mr. Creamer. It will be up to the Board to  
5           decide whether it has any relevance in deciding  
6           the precise issues before this -- in this case.

7           MR. CREAMER: All right.

8           MR. RULLI: Let's move on.

9           MR. CREAMER: All right. That applies  
10          also to the posting last night, I assume.

11          MR. RULLI: That's already been on the  
12          record. The Board will get that.

13          MR. CREAMER: I see.

14          MR. RULLI: But we're not going to go  
15          any further.

16          MR. CREAMER: All right. That's all I  
17          have, then.

18          MR. ALFANO: I have no questions at  
19          this time. I'm going to call Ms. Morrison back  
20          in my case in chief. Can I just --

21          MR. RULLI: So Ms. Morrison, you may  
22          step down now.

23          THE WITNESS: Thank you.

24          MR. RULLI: Thank you. I want to just

1 go over the exhibits as well, just to make sure  
2 that we're all on the same page. Mr. Creamer,  
3 you referenced ED-10 but you didn't move that  
4 one, and I -- were you intending to move it or  
5 not?

6 MR. CREAMER: Yes. I would like to  
7 move that into evidence.

8 MR. ALFANO: May I just have a moment  
9 to --

10 MR. RULLI: Yes, of course.

11 MR. ALFANO: Yeah. No objection to  
12 10.

13 MR. RULLI: So ED-10 will be admitted  
14 into evidence with no objection.

15 (At this time, a document marked for  
16 identification as ED-10 was received into  
17 evidence.)

18 MR. RULLI: You referenced ED-12, but  
19 that was already admitted into evidence. Let's  
20 see. I just want to be sure.

21 So ED-7 was admitted into evidence  
22 with no objection. ED-8 was admitted into  
23 evidence, no objection. ED-9, no objection.  
24 ED-10 now has been admitted into evidence.

1           ED-14 was admitted into evidence with no  
2           objection. The same is true for ED-15, ED-16,  
3           ED-17, and ED-18.

4           MR. CREAMER: So I believe ED Exhibits  
5           2 through 18 should be admitted.

6           MS. GREENWALD: (Indicating.)

7           MR. CREAMER: No? What am I missing?

8           MR. RULLI: I'm sorry. ED-2?

9           MR. CREAMER: 2 through --

10          MR. ALFANO: 2's a matter of public  
11          record. I have no objection.

12          MR. CREAMER: I think I admitted it.  
13          But yeah, it's public record.

14          MR. RULLI: No, you didn't move it.  
15          You questioned the witness about it.

16          MR. CREAMER: Okay. Well, public  
17          record's fine.

18          MR. ALFANO: Yeah. No objection to  
19          it. It's a matter of public record.

20          MR. RULLI: Yeah, there's no reason.

21          MR. CREAMER: Yeah. It doesn't need  
22          to be an exhibit.

23          MR. RULLI: All right. So ED-2 will  
24          be admitted into evidence, no objection.

4 MR. CREAMER: And then I think  
5 everything after that. I do not intend to  
6 introduce Exhibit 1. I don't think it's  
7 necessary.

8 MR. RULLI: The Hearing?

9 MR. CREAMER: Yeah.

10 MR. ALFANO: Oh, I -- no. Go ahead.

11 MR. RULLI: Just to finish up. Did  
12 you move ED-4 into evidence?

13 MS. GREENWALD: Mm-hm.

14 MR. CREAMER: Yes. I intended to.

15 MS. GREENWALD: I have it in my notes.

16 MR. RULLI: Yeah. I don't think --  
17 you referenced it, but there wasn't an actual  
18 think, moving of it into evidence.

19 MR. CREAMER: Okay. I so move.

20 MR. RULLI: Okay. And any objection  
21 to ED-4?

22 MR. ALFANO: ED-4, no objection.

23 obviously. It's a party admission. It's the  
24 statement by Ms. Morrison.

1                   MR. RULLI: So therefore, ED-4 will be  
2                   moved into evidence, no objection.

3                   MR. CREAMER: Thank you.

4                   MR. RULLI: You're welcome. And  
5                   that's all I have that was moved into evidence.  
6                   Anything further from the executive director?

7                   MR. CREAMER: No.

8                   MR. RULLI: Executive director rests.

9                   MR. CREAMER: Yes.

10                  MR. RULLI: Thank you, sir.

11                  MR. ALFANO: So I'm going to move  
12                  ED-1, which is marked as the director's  
13                  exhibits, the Hearing, I'm going to move it.  
14                  There may be statements in there that are prior  
15                  consistent statements that we may cite to in our  
16                  findings of fact and conclusions of law. It's  
17                  prior testimony under oath by Ms. Morrison.

18                  MR. CREAMER: I have no objection.

19                  MR. RULLI: Okay. So ED-1, which is  
20                  the Hearing, and that consists of with  
21                  obviously the index 67 pages --

22                  MR. ALFANO: Mm-hm.

23                  MR. RULLI: -- will be accepted into  
24                  evidence with no objection.

1 MR. ALFANO: Thank you.

2 MS. GREENWALD: That's just the  
3 Hearing; no exhibits?

4 MR. CREAMER: Yeah. The way I have  
5 introduced it, it does not have exhibits.

6 MR. RULLI: No.

7 MR. CREAMER: No.

8 MR. RULLI: Right. That's why I said  
9 67 pages.

10 MR. CREAMER: Correct.

11 (At this time, a document marked for  
12 identification as ED-1 was received into  
13 evidence.)

14 MR. RULLI: All right. Do you need a  
15 break or you ready to begin?

16 THE WITNESS: Can I just get some  
17 tissue?

18 MR. RULLI: Let's take a five-minute  
19 break, and then we will proceed with the case.

20 (At this time, a brief recess was  
21 taken from 2:35 p.m. to 2:40 p.m.)

22 MR. RULLI: All right. We're ready to  
23 proceed with the case. Ms. Morrison, if you  
24 would take the stand. You've already been sworn

1           in, so we do not need to do that again.

2           THE WITNESS: All right. Thank you.

3           MR. RULLI: Okay. Do you want to  
4           proceed directly, or do you want to make an  
5           opening?

6           MR. ALFANO: No, I'm ready defer --  
7           I'll defer my opening.

8           MR. RULLI: That's fine.

9           MR. ALFANO: I defer my closing, too.  
10          Just get the testimony in, and I know you're  
11          going to do findings of fact and conclusions of  
12          law, so.

13          MR. RULLI: Well, we'll talk about  
14          closing in a few moments.

15          MR. ALFANO: That's fine.

16          MR. RULLI: Let's proceed.

17          BY MR. ALFANO:

18          Q.        Good afternoon, Ms. Morrison.

19          A.        Hello.

20          Q.        So I would like to establish a little bit about  
21          your background. Okay? Let's start with the very  
22          beginning. When were you born?

23          A.        Mm-hm.

24          Q.        When were you born, ma'am?

1 A. I was born in █ in --

2 Q. Tell us a little bit about your family, your  
3 background.

4 A. Well, I was raised in a fairly big family but a  
5 single -- single-parent home, my mom. I was born in  
6 Queens, New York. But because of my mom's job, we kind of  
7 relocated depending on where she was being moved to. So  
8 most of my formative years were spent in Minneapolis,  
9 Minnesota.

10 So my family is originally from North Carolina.

11 So I eventually moved back to North Carolina, I think  
12 before high school, because I spent my high school years  
13 in North Carolina. Following that, I started to recognize  
14 my identity, and I identified as transgender. And that's,  
15 I believe, when things kind of went awry.

16 Q. What do you mean by that when you say things  
17 "went awry"?

18 A. It became difficult to just navigate society  
19 when I wanted to live in my truth when I started to  
20 transition. I dealt with a lot of barriers because of how  
21 I identified. I was denied employment. And so meeting my  
22 basic needs became difficult. So I did a lot of -- a lot  
23 of different things to just try to make an income. So I  
24 lived in survival mode for many, many years.

1 Q. Did you go to college?

2 A. No.

3 Q. And the highest that you've been educated is  
4 high school --

5 A. Yes.

6 Q. -- is that correct? And when you talk about  
7 "survival mode," can you give us some sense of what your  
8 prior work experiences were?

9 A. Well, my prior work experience was practically  
10 none for a long time. I had a little series of odd jobs.  
11 But when I speak about being in survival mode, it was a  
12 time where I didn't have income. I didn't really have a  
13 steady place to live. So when I say "survival mode," I  
14 mean usually doing things that were outside of the law to  
15 survive.

16 Q. And did there come a point in time in your life  
17 when you decided to go in a different direction as far as  
18 your --

19 A. Yes.

20 Q. As far as your survival? Can you tell us about  
21 that?

22 A. You know, after struggling to meet my needs for  
23 so long, I just -- I knew that I wanted to -- I didn't  
24 want to continue down that road, and I needed to make a

1 change. And that's when I decided to pack up everything  
2 that I own and put it in a truck and drive to Philadelphia  
3 where I had family members. So I drove here from North  
4 Carolina with everything that I owned and \$35.

5 Q. And was there an incident when you came to  
6 Philadelphia that kind of influenced the other decisions  
7 that you were going to make in your life?

8 A. Well, I think there was a number of things that  
9 happened, because coming to Philly just didn't magically  
10 change my situation and things didn't happen overnight for  
11 me. So I -- the reality of it is that I still continued  
12 to be in survival mode for a while until I was able to get  
13 my footing here in the city.

14 Q. And did something in particular happen that kind  
15 of caused you to think about different work experience?

16 A. I wanted to do something -- I wanted to give  
17 back to the community, because I knew how hard it had been  
18 for me. And I didn't know what that was going to look  
19 like, so I started to volunteer at some of the nonprofit  
20 organizations. And one of the transformative things that  
21 I did was volunteering with the Trans Wellness Conference,  
22 and that was my first introduction to the nonprofit round  
23 of Philadelphia.

24 Q. And what organization was that with?

1 A. Well, the -- the conference is organized by the  
2 Mazzoni Center, but it's a -- it's a collaboration of many  
3 organizations and groups here in the city.

4 Q. And tell us what happened after that volunteer  
5 opportunity.

6 A. Someone recognized me at that -- at that  
7 conference and asked would I be interested in -- well,  
8 they thought that I would be good for a position that was  
9 going to be coming available soon, and we exchanged  
10 information. And when, I guess, that position opened up,  
11 they contacted me. And the rest is -- that was me on  
12 my -- my first introduction to the nonprofit world.

13 Q. And can you tell us generally what you did at  
14 Mazzoni and how long you worked there?

15 A. Oh, yeah. When I first started, it was just --  
16 it was a part-time outreach position where I would go out,  
17 particularly at night, in the areas of the city most known  
18 for sex workers and provide them with safe sex kits,  
19 educating them about the resources that are available to  
20 them for -- at the Mazzoni Center. That was my first job  
21 there.

22 Q. And did you work through other -- other  
23 positions and other programs at Mazzoni?

24 A. Yes. Because of -- because I felt like

1 wasn't -- enough wasn't being done, I started to, on my  
2 own, introduce new programs and ideas to my little  
3 part-time position. And because of that, the Mazzoni  
4 Center recognized that and created a new position for me  
5 and the new programming that I had brought to the  
6 organization.

7 Q. And could you tell us something about that,  
8 about that program?

9 A. Well, the first program that I developed was  
10 called the "Welcome Home Kit." It was a program that's  
11 just really literally started off of my back.

12 I would go to conferences that were happening  
13 around the city and approach the members -- the attendees  
14 and convince everyone to give me the little lotions and  
15 shampoos and things that they give you at these fancy  
16 hotels that they were. So I would leave these conferences  
17 with, like, big trash bags full of that stuff.

18 And I would go back to my office and I'd sit on  
19 the floor and pour everything out and make up little kits  
20 to give to people who were victims. And it wasn't much  
21 and because those things are only that little  
22 (indicating). But at some point, MAC Cosmetics heard  
23 about my program and donated \$50,000 to it so I was able  
24 to grow that to be able to provide more for folks that

1 were coming home.

2 Q. And that was for the homeless?

3 A. Well, that was for trans identified folks that  
4 were being released from prison.

5 Q. And what were some of the other programs that  
6 you worked on at Mazzoni?

7 A. Sisterly Love was a support group for  
8 trans identified -- trans and nonbinary folks was one of  
9 the programs also that I headed there.

10 Q. Did you eventually leave Mazzoni?

11 A. Yes.

12 Q. After approximately how many years?

13 A. Two or three. I can't remember exactly.

14 Q. And where did you go next?

15 A. I went to William Way Community Center.

16 Q. Okay. And for the record, can you tell us what  
17 William Way is?

18 A. William Way Community -- LGBTQ community center  
19 is the -- I like to consider it the hub of the Gayborhood.  
20 But it's the community center that is -- it really is. I  
21 can't think of another word to kind of describe it, but  
22 it's the hub of the community. It's a -- they have a lot  
23 of programming. There's a lot of things that happen at  
24 William Way. And my involvement with that community

1 center existed prior to my working there and to today.

2 Q. And is it fair to say when we talk about this  
3 Mazzoni Center and William Way that that's the first  
4 stable employment that you've had in your life?

5 A. I would -- yes. Stable: I would say, yes.

6 Q. And how long were you at William Way?

7 A. About two years.

8 Q. Okay. And can you again give us some sense of  
9 the sorts of -- you know, what your position was as far as  
10 the programs that you were working with?

11 A. I was the director of programming so I oversaw  
12 all of the programming that the center provided. That was  
13 everything from the art gallery committee to just the  
14 support groups.

15 Q. And why did you -- how long were you there? And  
16 let's talk about why you left.

17 A. I was there for about two years. I had planned  
18 on staying there longer than that. But in 2019, [REDACTED]

19 [REDACTED] I was out of work for  
20 most of 2019. And at the end of 2019 is when I returned  
21 back to work. And I was approached by the City, and they  
22 expressed their interest in my applying for the position  
23 of executive director in the mayor's office of LGBT  
24 affairs.

1 Q. And did you eventually apply for that position?

2 A. After much deliberation. After much thought,  
3 yes, I did.

4 Q. And you were -- and you were awarded that  
5 position; right?

6 A. Yes.

7 Q. Okay. And let's talk a little bit about kind of  
8 the timing of when you start your position with the City.  
9 Is that -- I think Mr. Creamer might have asked that. Was  
10 that early March of 2020?

11 A. March 2nd of 2020 was my start date.

12 Q. Okay. And tell us about your experience when  
13 you stepped into that office in early March of 2020.

14 A. I was excited originally. But prior to me  
15 starting, I think two -- maybe two or three days prior to  
16 me starting the position, the person who hired me who was  
17 to be my supervisor resigned.

18 So I started the job, and maybe a week and a  
19 half into my working there -- I think I might have been in  
20 the office maybe a week and a half. And COVID was  
21 happening, and it was starting to really -- and [REDACTED]  
22 [REDACTED], I started to get nervous. So I had  
23 actually asked to work from home prior to everyone else,  
24 because after I went -- worked from home, a few days

1 later, everyone was sent home.

2 During that time, the person who had became my  
3 supervisor resigned. So the person that became my  
4 supervisor was someone who was in a sister office who  
5 was -- whose position was parallel to mine, but they  
6 ended up becoming my supervisor because of the  
7 resignations that had happened and they needed someone  
8 to kind of fill that gap.

9 So they stepped in as interim in that role and  
10 that made them my supervisor, someone who had no clue of  
11 what was going on or of the work the office did. So I  
12 had --

13 Q. Go ahead. I didn't mean to interrupt you. Go  
14 ahead.

15 A. I had very little supervision. Luckily, there  
16 were two fellow interns that were in the office that had  
17 been in there since the prior person, the prior ED was  
18 there. So I depended a lot on the interns to help me  
19 learn my job and to know who I needed to contact for what.

20 Not being in City Hall, it was difficult because  
21 to do anything, I had to reach out the someone to find out  
22 who I should reach out to or who handles this. So it  
23 was -- it was a lot, so I'm really proud to be where I am  
24 right now.

1 Q. So and I know at some point in your, in your --  
2 when you started working for the City, you received ethics  
3 training; correct?

4 A. Yes. Yes, I did.

5 Q. Can you tell us about your experience with that?

6 A. At the time, I was -- I felt like I was kind of  
7 falling around in the dark, trying to learn what I was  
8 supposed to be doing, trying to find out who I worked with  
9 to do what. I knew that I was scheduled to go -- at that  
10 time, my calendar was being handled by the fellows. So at  
11 the time, it was a lot of, "Okay, I have to be here. I  
12 don't know what this is. I just show up."

13 So when I attended the ethics -- ethics  
14 training, the first time I did attend, I'm not sure how  
15 much I took from that. Because I really -- I really  
16 didn't have an idea of who the ethics office was, the  
17 Board of Ethics, who they are, what the relationship is  
18 with the City or any -- I didn't understand much of any of  
19 that. I came totally from a nonprofit realm, so how  
20 things worked in the City was really beyond my scope.

21 Q. So if we can, you were asked about ED-15, which  
22 is one of the exhibits that the executive director showed  
23 to you.

24 A. Mm-hm.

1 Q. STATEMENT OF FINANCIAL INTERESTS. CAN YOU GO TO  
2 ED-15?

3 A. Yes.

4 Q. And if you'll look at -- at line 8 where it says  
5 "DIRECT OR INDIRECT SOURCES OF INCOME," DO YOU HAVE THAT?

6 A. No. I mean, I have it; I see it, but.

7 Q. Yeah, you see the line?

8 A. Yes.

9 Q. Right. And you left it blank?

10 A. Yes.

11 Q. Okay. When you were filling out this form, did  
12 you understand you were supposed to list your income from  
13 the City?

14 A. I didn't understand what I was supposed to be  
15 listing. That's why I didn't put anything -- I didn't put  
16 anything on there, not even the money I knew I was making.

17 Q. And you didn't list any -- any gifts or loans or  
18 transactions with Ms. Stephens, did you?

19 A. No, I didn't.

20 Q. And tell us why you didn't do that.

21 A. I really didn't understand it. I didn't know.  
22 I mean, that may -- yeah. I didn't know.

23 Q. But so we're clear, from a timing standpoint,  
24 you submit this form in the middle of May of 2021; right?

1 A. Yeah.

2 Q. I mean, you were already talking to the --

3 Ms. Curley from the ethics board about this loan from

4 Ms. Stephens, aren't you?

5 A. Mm-hm, yes.

6 Q. And despite having spoken to Ms. Curley about  
7 it, you don't list it?

8 A. No. No, I didn't.

9 Q. I mean, were you trying to keep it a secret?

10 A. No. I just didn't -- I mean, I would have put  
11 my -- I think I would have put my income on there, and I  
12 don't know. I just didn't -- I didn't know what was  
13 supposed to go on there. I didn't have anyone to ask, or  
14 I didn't ask and I didn't find out that -- what I was  
15 supposed to put on there until after I was contacted by  
16 Ms. Curley.

17 Q. By the ethics -- by Ms. Curley; right?

18 A. Yes.

19 Q. And when you were contacted by Ms. Curley, what  
20 was your understanding of what -- of what that was about?  
21 I mean, tell us about that experience.

22 A. The original call?

23 Q. Yes, please.

24 A. I didn't know. Like I said, I didn't know.

1 I didn't understand. I didn't understand the Board of  
2 Ethics relationship. I almost -- I really thought that  
3 when she contacted me that she was defending me --  
4 defending me against something that someone was saying  
5 about me. I wasn't sure who she was or -- I just didn't  
6 know.

7 Q. Yeah. And we're not -- you're not suggesting  
8 that Ms. Curley misled you in any way?

9 A. No.

10 Q. It was just a question of your understanding of  
11 her role --

12 A. Yeah.

13 Q. -- and what was happening?

14 A. Yeah.

15 Q. And what did you believe was happening when you  
16 got that contact?

17 A. I wasn't sure. I really wasn't sure. It was --  
18 it just came out of nowhere. I wasn't sure what it was  
19 about. She later explained that it was about the loan  
20 because when she originally contacted me, I just kept  
21 asking her, "What are you talking about?"

22 Q. Did you ever deny that you had received a loan  
23 from Ms. Stephens?

24 A. No. In fact, when I realized that she was

1 talking about the loan from Kendall, I, at that point,  
2 told her that I definitely never intended not to pay  
3 Kendall back. And I asked her at that time would she be  
4 the person to deliver the check to Kendall.

5 And in reference -- to reference the mailing of  
6 checks, I wouldn't mail the check to her, either. I came  
7 here and hand delivered the check to her.

8 Q. But to "her," to Ms. Curley?

9 A. To Ms. Curley, right, yes.

10 Q. To pay back Ms. Stephens?

11 A. Yes.

12 Q. So let's talk, if we could about -- about  
13 Ms. Stephens. How long have you known her?

14 A. For about eight or nine years.

15 Q. Okay. And would you describe -- and I realize  
16 it may -- the answer may change over different periods of  
17 time. But can you generally tell us, you know, the nature  
18 of your relationship with Ms. Stephens?

19 A. Our relationship, she started -- it started when  
20 she was someone who would come to the support group  
21 Sisterly Love that I started at the Mazzoni Center. And  
22 over the years I knew her, she had been -- when I -- when  
23 I started working at William Way, she became -- she would  
24 sometimes volunteer in the library. She would also lead

1 one of the support groups there.

2 So over the years, I -- you know, I knew her.

3 But we -- over the years, we started to get closer. She  
4 became -- she became a friend to me at the warning of  
5 everyone else. But she and I -- she hadn't done anything  
6 to me and we worked fine together, so I considered her a  
7 good friend.

8 Q. So tell us about the circumstances that led you  
9 to eventually move in with her for a short period of time.  
10 Why don't you take us back to what was happening in your  
11 life and how it is that you came to live in her home?

12 A. Well, I was with a partner that [REDACTED] --

13 Q. Before I ask you that, how long were you with  
14 that partner?

15 A. About 18 years.

16 Q. Okay. And tell us what happened.

17 A. I think -- well, the more I started to -- the  
18 better I started to do in my career, the worse my  
19 relationship got. He did a lot of cheating. [REDACTED]

20 [REDACTED] [REDACTED] And I  
21 made excuses and stayed there a really long time.

22 And there were a few things that had happened  
23 that just led me to ask Kendall if I could just spend a  
24 couple nights at her house and just figure out what I

1       needed to do because I couldn't stay.

2       Q.            You said he was [REDACTED]?

3       A.            Yes.

4       Q.            And did Ms. Stephens agree that you could stay  
5       with her?

6       A.            Yes.

7       Q.            Okay. And can you give us a sense of when it  
8       was that you actually started to stay at Ms. Stephens'  
9       home?

10      A.           I struggle with that timeframe. But I believe  
11      it was July or August, maybe. I'm not really sure.

12      Q.           And July or August of which year?

13      A.           2021.

14      Q.           Okay. And are you -- you're in your City  
15      position at that point when you're staying with  
16      Ms. Stephens?

17      A.           I mean 2020.

18      Q.           2020, right. So you're in your City position?

19      A.           Yeah. I was fairly new.

20      Q.           Are you working remotely from Ms. Stephens's  
21      home?

22      A.           I was attempting to.

23      Q.           And tell us about that, that experience.

24      A.           Well, I didn't want anyone to know that I wasn't

1 at home. I had spoke to my boss about it and just told  
2 her that I was staying with a friend, but I didn't want to  
3 make a big deal of it. So I would work from the back room  
4 at Kendall's house.

5 But the reason why I only stayed at Kendall's  
6 house for that -- for a couple weeks was because she made  
7 it very difficult for me to work. Because I would be in  
8 the room in a meeting or just back there working, and she  
9 would come in with her laptop where she's going on the  
10 phone, going in a meeting with someone and she's like,  
11 "Oh, Celena Morrison's here" and here's the computer in my  
12 face. And I'm in a situation where I don't want people to  
13 know that I'm displaced from my home.

14 And because she had issues with boundaries, I  
15 had -- I was forced to reach out to my ex and make an  
16 arrangement where he would sleep in another room and I  
17 would sleep in one room, just so that I could continue to  
18 work without those interruptions and without what I was  
19 going through personally possibly being out in the  
20 community.

21 Q. So I know there's been some discussion so far  
22 today about the timing of when you and Ms. Stephens  
23 discussed a possible loan.

24 A. Yes.

1 Q. Now, can you tell the -- can you tell the  
2 hearing officer about that discussion: When it occurred,  
3 where it occurred, and what the circumstances were?

4 A. During the time that I was staying in  
5 Ms. Stephens' back room, I had talked to her about what my  
6 plan was to find a place and never go back. We all know  
7 that's a stretch; finding a place that fast is not  
8 realistic so that wasn't happening.

9 But in that conversation, she, myself, and Avery  
10 were present during that conversation. And during that  
11 conversation, Kendall said, "I got you girl. If you need  
12 anything, I got you."

13 And she went to the closet, and that's when she  
14 started to show me the money that she had.

15 Q. And when she said "I got you girl," what did  
16 you -- what did you take from that?

17 A. Well, I wasn't sure, because she said if I  
18 needed to borrow any money, you know, she got me. And  
19 then she showed me the money, and Avery was there. We  
20 agreed -- we talked about it at the time.

21 I don't know if it was during that particular  
22 conversation, but at one point, we discussed Avery drawing  
23 up the contract. He is the person who made the contract  
24 that we signed, because she felt like he was appropriate

1 to do it because at the time, he was in law school. So  
2 that is the reason why I wanted Avery here because he  
3 could attest to the timeframe.

4 Q. Okay. But in this -- in this discussion where  
5 she shows you the cash and she says "I got you," you're  
6 talking about moving out, that's in this period in the  
7 summer of 2020 when you're living --

8 A. When I'm living, yes.

9 Q. -- in her back room?

10 A. Mm-hm, yes.

11 Q. All right. Did you and she discuss an amount at  
12 that point or at some other point?

13 A. Yes.

14 Q. Tell us --

15 A. At some point, yes.

16 Q. Tell us when.

17 A. When she said she got me and she told me how  
18 much money she had on hand, she later asked me how much  
19 did I think I would need.

20 Q. Okay. And what did you tell her?

21 A. And I told her that I -- that I would have to  
22 figure out about how much rent I could afford and then  
23 figure it out from there. And so we talked about it.

24 I told her I could probably -- I would probably

1 look for a place in the range from 12 to 1500 a month.  
2 And multiplying that 1500 a month by the first, last, and  
3 deposit, it would have been about \$3,500. So we decided  
4 that \$4,000 was a good enough amount, and then she said  
5 that she would provide that when I needed it.

6 Q. Did she agree to this loan before she was  
7 attacked?

8 A. Absolutely. I was in her house before she was  
9 attacked. I was staying in her house before she was  
10 attacked.

11 Q. In fact, you had -- but you had moved out prior  
12 to the attack, didn't you?

13 A. Yes.

14 Q. Okay. Did she agree to this, this -- this  
15 amount before the attack?

16 A. Yes. Absolutely.

17 Q. And did you discuss with her the formula that  
18 you just testified to in terms of how much you thought you  
19 needed?

20 A. Yes.

21 Q. Did that happen before the attack?

22 A. Yes.

23 Q. Did you eventually move out of your -- I'm  
24 assuming from Ms. Stephens's house, you went back into

1 some arrangement with your -- with your partner; right?

2 A. Yes.

3 Q. Did you eventually move out?

4 A. Yes, I did.

5 Q. So tell us about that, when it occurred, and  
6 what happened with the money.

7 A. I found a place. Well, I went back to live with  
8 my -- with my ex. We were coexisting in two different  
9 rooms. And I believe he was trying to, like, keep things  
10 okay so maybe we'd fall back into our routine and things  
11 would be normal.

12 But I actually found a place, and that was, I  
13 think, maybe in October but it fell through. So I didn't  
14 take that place because of where it was at and I didn't  
15 feel safe. So it wasn't until November that I found a  
16 place to move into.

17 Q. And did Ms. Stephens eventually provide you with  
18 the \$4,000?

19 A. Yeah. She had provided me with the \$4,000  
20 before the first place I found. But the money ended up  
21 just sitting there because that place fell through, and I  
22 didn't actually find another place until November.

23 Q. So you heard testimony from Ms. Stephens that  
24 she gave you the money -- the source of the money was a

1     GoFundMe campaign. Is that -- is that accurate?

2     A.           No, it's not. No.

3     Q.           Why not?

4     A.           Because I saw the money that Ms. Stephens had.

5     I didn't count it, but I saw that it was a large amount of  
6     cash. Ms. Stephens had also told me about where some of  
7     the cash came from. So I -- prior to the GoFundMe, I knew  
8     that she -- that she had more money, which was surprising  
9     me why she did the GoFundMe.

10    Q.           And is it -- and is it accurate that you didn't  
11    participate in the GoFundMe at all?

12    A.           Not at all.

13    Q.           Okay.

14    A.           I wasn't even aware of how much it was, so I  
15    don't know why she said that I was texting the amounts.

16    Q.           Right. I was going to ask you about that. She  
17    testified that basically you were texting her questions  
18    about how much was being raised; is that -- is that  
19    accurate?

20    A.           But we didn't -- yeah. Well, no. That's not  
21    accurate because we didn't see those texts. She showed a  
22    lot of other ones, but not those.

23    Q.           But irrespective, did you text her to see how  
24    she was doing with her GoFundMe?

1 A. No.

2 Q. Was your understanding that the loan was going  
3 to come from the cash that she had in her -- in her  
4 closet?

5 A. Yeah. I never thought about the GoFundMe. I  
6 don't -- I'm not sure how those work or how -- how quickly  
7 you get the money for that, so I would have never thought  
8 about that as being a source. We had already discussed  
9 that long before that accident happened. And when that  
10 accident happened to her, I wasn't thinking about the  
11 4,000 then, you know. So yeah.

12 Q. So let's talk for a moment about the night that  
13 Ms. Stephens was attacked. I'm sorry. Before we go  
14 there, before the attack, was there some discussion with  
15 you and Ms. Stephens and others about Hearts on a Wire?

16 A. Yeah. Yeah.

17 Q. Okay. And you said that you know Hearts on a  
18 Wire, you know, pretty well --

19 A. Yes.

20 Q. -- even before Ms. Stephens's involvement? Tell  
21 us. Tell us about your experience with Hearts on a Wire.

22 A. Yes. I've known of Hearts on a Wire for a very  
23 long time. Like I said, some of my earliest programs were  
24 to help incarcerated people there and helping them with

1 returning home, whether that be connecting them to  
2 resources or providing those welcome home kits.

3 So I was very familiar with the work that Hearts  
4 on a Wire did, which was typically submitting art from  
5 the -- from the incarcerated folks in their newsletter or  
6 sending correspondence which was letters and resources.

7 Q. And you agreed to schedule a meeting with Hearts  
8 on a Wire at some point? I mean, we've seen those emails.

9 A. Well, yeah. It was a meeting with Kendall in --  
10 in respect to Hearts on a Wire.

11 Q. Right. And is it your understanding of your --  
12 what's your understanding of your position when it comes  
13 to people asking if they can have meetings with you? Why  
14 don't you tell us your understanding?

15 A. Well, any -- any time someone reaches out to my  
16 office, it is -- I've always made it clear to my staff  
17 that we -- we take those meetings. We schedule -- we  
18 figure out a time to meet with these people to give them  
19 an opportunity to tell us about the work that they're  
20 doing and to make sense of why they feel the need to work  
21 with us. And we have those exploratory meetings with just  
22 about anyone that asks.

23 But from that -- after that -- those meetings  
24 are to determine what they're doing, if that work aligns

1       with our mission, and if partnering makes sense for  
2       what -- what we're doing.

3       Q.           And with respect to this Hearts on a Wire  
4       reach-out or contact, did you even ever have the  
5       exploratory meeting?

6       A.           No, we did not.

7       Q.           Okay. And did your office ever provide  
8       resources to Hearts on a Wire?

9       A.           No, we didn't.

10      Q.           Did you provide funding or promotional  
11       opportunities?

12      A.           No, we did not.

13      Q.           Did you ever, you know, quote, unquote,  
14       "partner" with Hearts on a Wire?

15      A.           No. I've only spoke with the lead person of  
16       Hearts on a Wire.

17      Q.           And who was that?

18      A.           Adrian.

19      Q.           Okay. But nothing ever came of the suggestion  
20       about having a meeting with them?

21      A.           No. Adrian actually attested -- he said that  
22       Kendall was not in position to represent Hearts on a Wire.

23      Q.           Okay. You know, I gave you a bizarre example  
24       once about if somebody called your office to talk to you

1 about an opportunity to work on, you know, truck parts,  
2 would you take that kind of a meeting?

3 A. Yes. We might.

4 Q. Why?

5 A. Because we -- I feel that we should always give  
6 them the opportunity to talk about the work that they're  
7 doing and to share with us why they feel like  
8 collaborating with our office would be beneficial to  
9 the -- to the community.

10 Q. Even though on its face, something like that  
11 would not necessarily seem to fit into your mission?

12 A. Absolutely. But I think it -- you know, just  
13 because I don't think it's a fit, they may share something  
14 in that meeting that I may say, "Oh, it makes sense." So  
15 I like to afford them that opportunity.

16 Q. So let's then move to the night of the attack.  
17 Tell us -- tell us what you remember about the night of  
18 the assault on Ms. Stephens.

19 A. Kendall and I were on the phone.

20 Q. And about what time is this? I'm sorry.

21 A. Ooh, I -- I'm struggling with time. It's  
22 nighttime.

23 Q. I was going to say it's not during business --

24 A. Maybe 9:00, 9:00 o'clock.

1 Q. Right. Let me stop you. Not during the  
2 business day; right?

3 A. No. Not at all.

4 Q. Okay.

5 A. No. We were on the phone talking. Kendall --  
6 in the midst of our conversation, Kendall said, "Someone's  
7 fighting outside my house."

8 And because I had stayed in Kendall's house, I  
9 could hear her shuffling because she has a lot of stuff in  
10 her hallway. So I could hear her shuffling through the  
11 hallway. I heard her go down the steps. The kids are  
12 always in the living room. So I could hear on the phone  
13 when the kids joined her to heading to the front door.

14 Q. When you talk about the kids, you're talking  
15 about children that were in her home?

16 A. Yeah, the children that were staying at her  
17 house.

18 Q. Okay.

19 A. And I could hear when she got downstairs and the  
20 kids kind of joined in. And I heard her open the front  
21 door. And I immediately heard someone say, "He punched me  
22 in the face."

23 And I said, "Kendall, did I just hear someone  
24 say they punched -- that someone got punched in the face?"

1 And she said -- I don't recall what her response was. But  
2 I do remember telling her, "Well, go ahead. Be safe.  
3 Call me and let me know everything's okay."

4 And we ended our phonecall.

5 Q. And you are where when you're receiving this?

6 A. In the bed.

7 Q. But in the -- in your home --

8 A. In my house, yes. In my house.

9 Q. -- with your partner at that point?

10 A. Yes.

11 Q. All right. Tell us what happens next.

12 A. About 30 minutes later, Kendall called me back.  
13 She was upset and screaming and yelling in the phone that  
14 they came up in her house and beat her up. And I  
15 immediately hung up, jumped out of bed, got dressed, and  
16 headed to her house.

17 Q. And what happens when you get there?

18 A. She was gone. There was just, like, maybe an  
19 officer there. It was a couple neighbors still standing  
20 out there. But she was gone.

21 Q. Okay. What do you do next?

22 A. I jumped back in my car and drove. They -- I  
23 don't recall who told me. But someone said that she went  
24 to the police station, and I drove there.

1 Q. And tell us what happens when you get there.

2 A. When I got there, Ms. Stephens was in an uproar.  
3 She was yelling, screaming, yelling at the police officers  
4 and fussing at them because she said that they were  
5 labeling it as a simple assault. And she didn't  
6 understand why, so she was yelling.

7 So I asked Avery, who was there with her, to  
8 kind of take her to the side so that I could hear what the  
9 officers were saying and get an understanding of what the  
10 issue was.

11 And I really wanted -- it wasn't for me to  
12 determine whether it was a hate crime or not. But I  
13 wanted to listen to their reasoning of why it wasn't being  
14 labeled a hate crime so that I could tell that to Kendall,  
15 because she wasn't hearing it because she was yelling, and  
16 so they weren't trying to communicate with her during that  
17 time.

18 Q. Okay. All right. What I assume when you get  
19 there, you don't, like, flash a badge or shoot them a  
20 card and say --

21 A. No.

22 Q. -- "Hey. I'm Celena Morrison. I'm head of the  
23 the City's LGBT office" --

24 A. No. I actually just came in and said "shut up"

1 and went over to talk to the police.

2 Q. Yeah. So you don't even identify yourself as a  
3 City official?

4 A. No, I don't. Never did.

5 Q. Tell us what happens next.

6 A. I talked to the -- to I think was the sergeant  
7 or a captain or something. And he said that she was upset  
8 because she accused two officers of laughing. I asked  
9 him -- I said something about Directive 4.15, which I do  
10 for my own protection; I always have ever since it's been  
11 in place.

12 Q. Yes. And tell us about 4.15 a little bit. Tell  
13 us --

14 A. Directive --

15 Q. -- generally what that says and why you thought  
16 that was important at that time to discuss it with the  
17 police.

18 A. Directive 4.15, yeah, is -- is a directive that  
19 dictates how the police interact with trans identified  
20 folks. It instructs them to use their -- the correct  
21 pronouns, the preferred name of their choice; and also, in  
22 the case that someone needs to be searched, you know, who  
23 to call. You know, if there's a trans-identified woman  
24 and there's only men officers present, then a female

1      officer needs to be called to do that.

2                So I have associates that are police officers  
3      prior to this role and some that I've met while serving in  
4      this role. And I am -- I was about to say "surprised,"  
5      but I'm not surprised anymore at how often they are not  
6      aware of the directives that are in place.

7                So as a trans-identified person who has had  
8      those terrible interactions with police, who has been  
9      assaulted by police, for my own protection, I'm going to  
10     remind you of Directive 4.15 before I start having a  
11     conversation with you before I interact myself. So it's  
12     kind of a precautionary thing.

13    Q.           And were you doing that as the director of the  
14     mayor's office?

15    A.           I was doing that as just Celena, a Black woman  
16     of trans experience.

17    Q.           What happens after you have this discussion with  
18     the police?

19    A.           After that, nothing really happened. I then  
20     drove Ms. Stephens and Avery to the hospital, and I went  
21     back home.

22    Q.           Okay. The next day -- I believe we established  
23     that the attack was on August 24th. The next day, were  
24     you contacted by the media about -- about this incident?

1 A. Yes. I'm not sure if it was the next day, but I  
2 know I was. I can't remember.

3 Q. Shortly -- shortly after --

4 A. Yeah.

5 Q. -- you were contacted by the media. Let's go,  
6 if we could, to Respondent's 1.

7 MS. MARIOTTI: Blue binder.

8 MR. ALFANO: The other binder.

9 BY MR. ALFANO:

10 Q. And I would like you to go to Respondent's 1,  
11 and it's numbered 1-1 through 1-5. And I think to make  
12 sense of this, you have to start at the back which is 1-5.  
13 Why don't you start at that -- at that email on 1-5 and  
14 just -- and just read this document to yourself for a  
15 moment from the back to the front.

16 A. (Witness complied.)

17 MR. MCHALE: Professor Rulli, I have  
18 an objection to this exhibit.

19 MR. RULLI: To the use of the exhibit?

20 MR. CREAMER: I have a motion in  
21 limine.

22 MR. RULLI: Yeah, we have a motion in  
23 limine but it hasn't been moved yet. Are you  
24 intending to question her about the content of

1                   this?

2                   MR. ALFANO: I intend to question her  
3                   about the content and her responses, for sure.

4                   And I think it's --

5                   MR. CREAMER: I filed a motion in  
6                   limine weeks ago for the purpose of prohibiting  
7                   this exhibit from being used at this hearing,  
8                   and the motion has not been ruled on. And now  
9                   here we are in their case and it's being used  
10                  and there's been no ruling. So I'm kind of --  
11                  I don't know. I don't know what to say here.

12                  MR. RULLI: All right. Well, maybe  
13                  this is an appropriate time to ask you to  
14                  explain why you believe that this exhibit should  
15                  not be used.

16                  MR. CREAMER: Well, as explained in  
17                  the motion and as we've discussed in the Zoom  
18                  conference call, this contains hearsay from  
19                  Lauren Cox, deputy communications director and  
20                  the office of the mayor, and I'm not able to  
21                  cross examine Ms. Cox. It also contains a legal  
22                  opinion from Ms. Cox. That's the basis of my  
23                  motion.

24                  I don't believe that this should be

1                   permitted to be used to examine Ms. Morrison or  
2                   be introduced as an exhibit or be used at all at  
3                   this hearing. And that -- they could have  
4                   called Ms. Cox as a witness based on my motion  
5                   in limine, but they chose not to.

6                   MR. RULLI: So one of the problems  
7                   here -- and I want to hear from you, Counsel --  
8                   is that this is a chain here. We've got things  
9                   mixed into one document.

10                  MR. ALFANO: Yeah.

11                  MR. RULLI: And much of what you  
12                  directed your opposition to, we haven't reached  
13                  yet. I think you're asking the witness about  
14                  1.15, the fifth page of this.

15                  MR. ALFANO: Yeah. And to be clear,  
16                  I'm going to ask the witness if she had this  
17                  communication. I think it's highly relevant.  
18                  It occurs, you know -- it's not months later.  
19                  It's the next day, right, if we're looking at --  
20                  if we're looking at Michele Zipkin's inquiry  
21                  from The Gay News. You know, "Thank you so much  
22                  for your willingness to send a statement about  
23                  the attack on Kendall Stephens that happened  
24                  last night."

1 So it's the -- it's not even 24 hours  
2 after the incident, and Ms. Morrison is  
3 describing her role in that incident which we  
4 think is -- is completely relevant. We think it  
5 certainly is admissible for her state of mind at  
6 the time. And to the extent that she tells  
7 Ms. Cox that she was not there in an official  
8 capacity, we think that that's also not  
9 hearsay and --

10 MR. RULLI: Well, you're jumping ahead  
11 again, and I want to separate this.

12 MR. ALFANO: Yeah.

13 MR. RULLI: Because I think there are  
14 different things, and there may be different  
15 objections to different parts of this.

16 MR. ALFANO: Okay. Why don't we go  
17 email by email, and then we can --

18 MR. RULLI: I think that is the best  
19 way to proceed.

20 MR. ALFANO: Okay.

21 MR. RULLI: Since there's questions  
22 about this.

23 MR. ALFANO: Okay. So let's start at  
24 page 1-5 --

1 THE WITNESS: Okay.

2 MR. ALFANO: -- Ms. Morrison.

3 MR. RULLI: And so just so we're clear  
4 on the record, we're directing our attention to  
5 the email from Michele Zipkin that's dated  
6 August 25th?

7 MR. ALFANO: Right, August 25th.

8 BY MR. ALFANO:

9 Q. I'm going to ask you about this email. I'm not  
10 going to go word for word or line by line.

11 A. Okay.

12 Q. But the email that appears in the middle of the  
13 page 1-5 is an email from Michele Zipkin to you dated  
14 August 25th, 2020 at 4:29 p.m. Do you see that?

15 A. Yes.

16 Q. Okay. And do you see in the first paragraph of  
17 that email, she's -- and I'm paraphrasing, but she's  
18 asking you to send a statement for a story about the  
19 attack --

20 MR. CREAMER: Objection. Leading.

21 MR. ALFANO: Why don't you read the  
22 first -- read that first paragraph.

23 MR. RULLI: Yeah. Let her read the  
24 document.

1 MR. ALFANO: Read the first document.

2 MR. RULLI: And then you may ask her  
3 about it.

4 THE WITNESS: It says, "Thanks so much  
5 for your willingness to send a statement for the  
6 story about the attack on Kendall Stephens that  
7 happened last night. My questions are below."

8 BY MR. ALFANO:

9 Q. Right. And without getting into the specific  
10 questions that she asked you, okay, tell us -- tell us  
11 your understanding of this email.

12 A. My understanding was that immediately following  
13 the event, Kendall contacted Michele. She contacted  
14 Beccah Hendrickson from ABC and some other reporters to  
15 tell them about the attack. During that conversation,  
16 Kendall volunteered me as someone who was present during  
17 the incident, and I -- that's why Michele reached out to  
18 me.

19 Q. And then what do you do when you get this  
20 inquiry from the media? What, if anything, do you do?

21 A. I immediately contacted my supervisor and the  
22 communications department because I didn't want to make  
23 any statements. I didn't want to -- I didn't want  
24 anything to be officially on record or a statement about

1 what happened to Kendall because it was not my experience.  
2 I didn't want anything that I said in the media to  
3 contradict anything that may have happened because I  
4 didn't know all the facts.

5 So I contacted my boss and communications  
6 department to draft kind of a general statement from me  
7 because I was not in my official capacity at 10:00 o'clock  
8 at night.

9 Q. So let's go to page 1:4, right, which is just  
10 the page in front of the one we were just discussing.

11 A. Okay.

12 MR. RULLI: And now, are we referring  
13 to the August 25th email?

14 MR. ALFANO: That's where -- that's  
15 where I'm going to go next, the email from  
16 Lauren Cox.

17 MR. RULLI: And before you do that,  
18 Counsel. So with regard to the August 25th --  
19 which as I understand it, is an email to  
20 Ms. Morrison with regard to the incident, right,  
21 Mr. Creamer, do you have any objection to that?  
22 Trying to break this apart.

23 MR. CREAMER: To which part? I'm  
24 sorry.

1                           MR. RULLI: So it's the email that's  
2                           found at R-1:5, and it's the one that's dated  
3                           August 25th, 2020 from Michele Zipkin --

4                           MR. CREAMER: No.

5                           MR. RULLI: -- to Ms. Morrison.

6                           MR. CREAMER: No.

7                           MR. RULLI: Okay. That's why I think  
8                           it's important to break this apart, because  
9                           there are different, I think, objections to  
10                          different points.

11                         (At this time, a document marked for  
12                         identification as R-1:5 was received into  
13                         evidence.)

14                         MR. RULLI: All right. So now we're  
15                         going to go to the second part which is the  
16                         email which is on page R-1:4 from Lauren Cox to  
17                         the press. Is that the one you're referring to?

18                         MR. ALFANO: It was to the  
19                         press@phila.gov, which has a specific meaning  
20                         but it also goes --

21                         MR. RULLI: And to Ms. Morrison.

22                         MR. ALFANO: But most importantly, it  
23                         goes to Ms. Morrison.

24                         MR. RULLI: Okay. Right. And that's

1                   the one dated August 25th, 2020.

2                   MR. ALFANO: Right, at 4:47 p.m.

3 BY MR. ALFANO:

4 Q.               And you see there what Ms. Cox both tells you  
5 and asks you?

6 A.               Yes.

7 Q.               All right. And she asks you if you could fill  
8 us in.

9 A.               Yes.

10 Q.               Okay. And then do you respond to that email  
11 from Ms. Cox?

12 A.               Yes, I did.

13 Q.               Okay. So let's go to R-1:3.

14                   MR. RULLI: All right. Before we do  
15 that, Mr. Creamer, do you have any objection to  
16 that email that we just referenced at 1:4?

17                   MR. CREAMER: No.

18                   MR. RULLI: So now we're at the third  
19 email. Just next time, I think these should be  
20 separated but -- as opposed to all in one  
21 exhibit. I think it would be easier. But --

22                   MR. ALFANO: Okay.

23                   MR. RULLI: -- it's okay. We're  
24 breaking them apart.

1                           MR. ALFANO: Yeah. I'm going to take  
2                           Ms. Morrison through her response, and I'm going  
3                           direct her to page 1-3. And you'll see at the  
4                           very bottom, there's the beginning of an email  
5                           that, for printing purposes, appears to carry  
6                           over to the next page. Do you see that?

7                           MR. RULLI: And that's the one that is  
8                           dated August 25th, 2020?

9                           MR. ALFANO: 25th, 5:18 p.m.

10                          MR. RULLI: From Lauren Cox, right, to  
11                          Ms. Morrison.

12                          MR. ALFANO: From Celena Morrison to  
13                          Lauren Cox, August 25th, 5:18 p.m. And then the  
14                          text of it actually carries over to the next  
15                          page.

16 BY MR. ALFANO:

17 Q.                     Do you see that, Ms. Morrison?

18 A.                     Yes.

19 Q.                     Okay. And then tell us how you responded to --  
20 to Ms. Cox's inquiry.

21 A.                     Well, I explained to her what had happened to  
22 Kendall and that Kendall was a close friend of mine and  
23 that I needed their assistance because I didn't want to  
24 comment.

1               And I just -- I knew that the -- the media would  
2       want a statement from my office. And my thought was that  
3       of course there should be a statement from my office, but  
4       I did not want that statement to come from me personally  
5       because I did not want to involve myself professionally as  
6       much as possible. It's -- outside of connecting Kendall  
7       to resources. I didn't want to make any statement about  
8       what happened because I was not there when the actual  
9       attack happened.

10      Q.        Okay. And that's when you said "I don't feel --  
11     I honestly don't feel comfortable answering those  
12     questions"?

13      A.        Yes.

14      Q.        Is that what you meant?

15      A.        Yes.

16      Q.        But you did explain to Ms. Cox your  
17     understanding of the assault?

18      A.        Yes.

19      Q.        Okay. And then you went on to say -- can you  
20     tell us what you told Ms. Cox the day after with  
21     respect to, to --

22      A.        Which one are we reading?

23      Q.        "Lauren, this is a close friend of mine," that  
24     second sentence?

1 A. Okay. Yes.

2 Q. That's okay. I think I'm confusing you.

3 MR. RULLI: Yeah.

4 THE WITNESS: Oh, okay. Okay.

5 "Lauren, this is a close friend of mine that was  
6 assaulted last night by about five guys and  
7 girls. I met her at the police department and  
8 drove her to the hospital. I honestly don't  
9 feel comfortable answering those questions. I  
10 will take your advice it differs."

11 BY MR. ALFANO:

12 Q. Okay. And what did you mean when you said you  
13 didn't feel comfortable answering those questions?

14 A. Again, I didn't want to speak on Kendall's  
15 experience. I didn't want -- there were a lot -- well,  
16 she actually thanked me later for not making any  
17 statements because a few other community members attempted  
18 to speak on her behalf, and there was some -- it caused  
19 some contradictions because what they said in their  
20 statements about what happened contradicted what Kendall  
21 said and it caused -- and I immediately called Kendall and  
22 said, "That's exactly why I did not make any statements."

23 Q. So let's go back to 1 hyphen --

24 A. Yes.

1 Q. -- 3.

2 MR. RULLI: Was there any objection to  
3 that email?

4 MR. CREAMER: No.

5 MR. RULLI: All right. So that email  
6 will be admitted into evidence without  
7 objection.

8 (At this time, a document marked for  
9 identification as R-1:4 was received into  
10 evidence.)

11 BY MR. ALFANO:

12 Q. Let's go to 1-3.

13 A. Mm-hm.

14 Q. And then you see Ms. Cox's response on  
15 August 25th at 5:27 p.m. --

16 A. Yes.

17 Q. -- where she writes both to you and to the  
18 press@phila.gov. Do you see that?

19 A. Mm-hm.

20 Q. And what did she tell you?

21 A. She said that she would draft a general  
22 statement later that evening and have me review it before  
23 she sent it to the reporter.

24 Q. Okay. And then did she ask you a question at

1 the end of that for more specific information?

2 A. "Based on what you know, were the attackers  
3 already in her home when an assault happened or did they  
4 enter the home specifically to attack her?"

5 Q. Okay.

6 MR. ALFANO: Any objection to that  
7 email?

8 MR. CREAMER: No.

9 MR. RULLI: So you're moving that one,  
10 as well, and no objection. That will be  
11 admitted.

12 (At this time, a document marked for  
13 identification as R-1:3 was received into  
14 evidence.)

15 BY MR. ALFANO:

16 Q. Let's move to page 1-2.

17 A. Okay.

18 Q. And I want to direct your attention to your  
19 email to Ms. Cox dated August 25th, 2020 at 6:19 p.m.

20 A. Mm-hm.

21 Q. Do you see that?

22 A. Yes.

23 Q. And what do you tell Ms. Cox there?

24 A. "A fight started outside her home. I was

1 actually on the phone with her because she is a popular  
2 community activist. We were discussing prison policy when  
3 I heard her say that there was, there was -- there was a  
4 fight outside her house. I told her that I would catch up  
5 with her later and to be safe.

6 "At some point the angry mob [sic] turned on her  
7 when they were told that she was trans. They forced  
8 themselves into her house and assaulted her. She even has  
9 a broken nose."

10 So I guess I did know.

11 MR. ALFANO: Move that into evidence.

12 MR. RULLI: Any objection?

13 MR. CREAMER: No.

14 MR. RULLI: All right. That email,  
15 which is dated August 25th, 2020, will be  
16 admitted into evidence without objection.

17 (At this time, a portion of a document  
18 marked for identification as R-1:2 was received  
19 into evidence.)

20 BY MR. ALFANO:

21 Q. Let's go to the one above it now, from Ms. Cox  
22 to you and the press@phila.gov, August 25th, 6:34 p.m. Do  
23 you see that?

24 A. Yes.

1 Q. And her response is?

2 A. "I'll draft something up in a bit and send it --  
3 send your way."

4 Q. Okay. And then above it --

5 MR. ALFANO: Again, I'm assuming no  
6 objection to that email?

7 MR. CREAMER: No objection.

8 MR. ALFANO: There's another email, a  
9 response.

10 MR. RULLI: I just want the record to  
11 be clear. So I'm sorry I'm holding you up for a  
12 second.

13 MR. ALFANO: It's okay. You're not  
14 holding me up.

15 MR. RULLI: There's -- obviously,  
16 these are all dated August the 25th, but they  
17 have different times.

18 MR. ALFANO: Mm-hm. 6:34 p.m.

19 MR. RULLI: And I want to be clear on  
20 the record and so when we're finished with this  
21 testimony, for those that are coming in without  
22 objection, I just want to review again the times  
23 of them.

24 MR. ALFANO: Sure, absolutely. Yes.

4 BY MR. ALFANO:

5 Q. And the one that we just discussed that was  
6 moved in was at 6:34. So let's go, if we could, go the  
7 email above that and that's also August 25th at 6:41 p.m.  
8 And that's from Ms. Morrison -- that's from you,  
9 Ms. Morrison, back to Ms. Cox and others. And what do you  
10 say there?

11 A. "Thank you, Lauren."

12 Q. Okay. And then Ms. Cox responds --

13 MR. RULLI: Are you moving that one  
14 in, Counsel?

15 MR. ALFANO: I am moving that one in.

16 MR. RULLI: All right. Any objection  
17 to that one?

18 MR. CREAMER: No.

19 MR. RULLI: All right.

23 BY MR. ALFANO:

24 Q. And then if you go above that, there's an email

1 from Ms. Cox the way that this has been --

2 A. Mm-hm.

3 Q. Appears to be, if you go to R-1, from Lauren Cox  
4 to you dated August 25th, 2020 at 8:08 p.m. Do you see  
5 that?

6 A. Yes.

7 Q. Okay. And Ms. Cox writes: "Just added you to a  
8 chain with PPP -- PPD to review." Do you see that?

9 A. Yes.

10 Q. Okay. All right.

11 MR. CREAMER: I object to this as  
12 hearsay.

13 MR. RULLI: Counsel?

14 MR. ALFANO: I think it's a -- I think  
15 it's Ms. Morrison's state of mind, and I think  
16 based on the question so it's not hearsay; it  
17 falls into the exception. And I think that --  
18 in any event, I think it comes in as a prior  
19 consistent statement.

20 MR. CREAMER: It's not a statement by  
21 her.

22 MR. ALFANO: Well, let me ask you  
23 this. Fine. Let me lay the foundation, then.

24 MR. RULLI: All right.

1 BY MR. ALFANO:

2 Q. Did you tell -- when you were talking to  
3 Ms. Cox, did you discuss with her that you were acting in  
4 a personal or an official capacity?

5 A. Yes. I absolutely told her and my supervisor  
6 that, and that's why I did not feel comfortable making any  
7 statements.

8 Q. And what was -- when you were at the hospital  
9 with Ms. Stephens?

10 A. Mm-hm.

11 Q. You know, helping her?

12 A. Yes.

13 Q. Okay? Were you acting in a personal or official  
14 capacity?

15 A. No. It was personal. It was 10:00 o'clock at  
16 night. I'm not doing anything in my professional capacity  
17 at 10:00 o'clock at night. I'm not paid to be doing that.

18 MR. RULLI: Well, the -- obviously,  
19 the statement is hearsay statement. The  
20 question, of course, is whether or not what --  
21 what purpose is it being offered for, whether it  
22 be -- you know, is an exception to the hearsay  
23 rule.

24 MR. ALFANO: Mm-hm.

1 MR. RULLI: And I am going to accept  
2 it for the record for whatever value it has.  
3 I think it is giving to the Board the context of  
4 this discussion and the understanding that you  
5 have in which you're operating. And so to that  
6 extent, I'm going to allow that statement in for  
7 the Board to consider its probative value and  
8 then its -- you know.

9 BY MR. ALFANO:

10 Q. If we could, let's go to our Exhibit 2,  
11 Respondent's 2. And I would like you go to page 2.2 --  
12 2:2. Let me know when you're there. Are you there,  
13 Ms. Morrison?

**14 A.** Yes.

15 Q. Okay. I want to direct your attention to an  
16 email dated August 25th, 2020 at 9:29 p.m.

17 A. Yes.

18 Q. Same day, now it's 9:00 o'clock at night,  
19 9:29 p.m., from Ms. Cox to Michele. Do you see that?

**20 A. Yes.**

21 Q. Okay. And do you understand who Michele is,  
22 Michele Zipkin?

23 A. Yes.

## 24 Q. The Gay News reporter?

1 A. Yes.

2 Q. Who had asked you for a comment earlier? Okay.

3 And there's a statement that Ms. Cox makes to Ms. Zipkin.

4 Have you read that?

5 A. Yes.

6 Q. Okay. And with respect to that, that first line  
7 where she talks about your joining Kendall on the night of  
8 her assault, okay?

9 A. Mm-hm.

10 Q. Did you tell Ms. Cox that?

11 A. That I joined Kendall?

12 Q. Yeah. What Ms. Cox writes there about -- in  
13 that first sentence, did you tell her that?

14 A. Yes.

15 Q. Okay. And that was your statement to her?

16 A. Yes.

17 Q. Okay. And I would ask you to read that into the  
18 record.

19 A. "Celena joined Kendall following her assault as  
20 a personal friend. As such, she is not comfortable  
21 confirming any specific details of the incident."

22 Q. And then you see there that the -- Ms. Cox then  
23 makes a statement that can be attributed to you; correct?

24 A. Yes.

1 Q. As the director of the office of LGBT affairs --

2 A. Yes.

3 Q. -- correct? And did you approve that statement?

4 A. Yes, I did.

5 Q. Before it was sent?

6 A. Yes.

7 Q. So we're clear, Ms. Cox is in the -- is a

8 communications director?

9 A. Yes.

10 Q. Is asking you about something that you

11 experienced personally; right?

12 A. Yes.

13 Q. That you believe you acted in a personal

14 capacity, as well --

15 A. Yes.

16 Q. -- right?

17 A. Yes.

18 Q. But she's also asking you to make a statement in

19 your official capacity?

20 A. Yes.

21 Q. So let's talk now about the days that follow

22 this assault on Ms. Stephens. Were you in touch with --

23 and I don't want to talk yet about who contacted who, so

24 let me ask the question this way. Were you in touch with

1       representatives from the police department and  
2       representatives from the district attorney's office?

3       A.           At some point following, yes.

4       Q.           Okay. And why don't you tell us about those  
5       contacts, how they -- how they occurred?

6       A.           Well, as you see from the email, the police  
7       commissioner contacted me. I'm not really sure how they  
8       found out about Kendall -- Kendall's experience. But in  
9       my -- in my experience, I know Kendall to be -- when  
10      something happens, she reaches out to anyone she can. So  
11      I wasn't surprised if she had contacted someone or the  
12      story had made it to the police commissioner of what her  
13      intentions were as far as how she felt she was treated by  
14      the police.

15      Q.           Let's stop there at the police commissioner. I  
16      think -- deputy commissioner. I think we've identified  
17      her in the emails as Deputy Commissioner Robin Wimberly?

18      A.           Okay.

19      Q.           Right? You get to your -- you know, you get to  
20      work the next day, obviously not in your office. Do you  
21      start calling the police department about -- about  
22      Kendall, or do they call you?

23      A.           They call me.

24      Q.           Okay. All right. And did you feel that you had

1 the discretion to ignore the deputy police commissioner  
2 when she asked you questions about Kendall?

3 A. I never would do that, especially not when  
4 they're calling me in reference to someone being attacked.

5 Q. And how about the district attorney, somebody  
6 from the DA's office, you're in touch with, as well?

7 A. Yes. They contacted me, as well.

8 Q. And what are the circumstances?

9 A. I'm going to make that connection, yeah.

10 They're never going to contact me about making a -- or  
11 being in contact with someone and I refuse to make that  
12 connection.

13 Q. Okay. And if they asked you -- did they ask you  
14 for information about Kendall?

15 A. No. I made it very clear that no matter who it  
16 was that I didn't want to make any statements, even -- I  
17 didn't even want to give her phone number without checking  
18 in with her about that. So any communication I had with  
19 them, I was -- I guess for a minute I was a liaison until  
20 she confirmed that she wanted to meet with them, and they  
21 were available and I made that connection.

22 Q. Okay. And is that the sort of liaison activity  
23 that you do? Well, I don't want to describe. You tell  
24 us.

1 A. Yeah. Any time someone -- an individual reaches  
2 out to my office, we have a number of reasons that they  
3 reach out to us. But any time someone reaches out and we  
4 give special attention if it's an act of violence or a  
5 violent experience that they'd had, I make sure to connect  
6 them with some of the people we spoke about today: Kelly  
7 Burkhardt and the people in -- the people in the district  
8 attorney's office of victim services.

9 Q. Did you feel that you could have simply ignored  
10 Deputy Commissioner Wimberly or anybody from the district  
11 attorney's office? Did you have that discretion?

12 A. No. No, I -- no. I think I would -- I think I  
13 would have to answer to that, so.

14 Q. And if you're not there making those  
15 connections. I mean, we talked about the staffing in your  
16 office; right?

17 A. Mm-hm.

18 Q. The supervisors, and then they leave and you  
19 have a couple of interns. If you're not there making  
20 those connections for the victims of -- of violence  
21 against trans people, who would do it?

22 A. I'm not sure. I mean, the way that I think is  
23 different, so I would -- I would try everything possible.  
24 Some folks don't do that. They don't Google. They don't

1 search for the -- so my office is their go-to for a lot of  
2 things, and that's why we end up sending them and  
3 connecting them to the folks that can actually help them.

4 Q. So did there come a time after this incident  
5 when there was a falling out with Ms. Stephens over a  
6 press conference?

7 A. Yes.

8 Q. Okay. And can you tell the hearing officer  
9 about the circumstances under which that occurred?

10 A. Okay. This was following Ms. Stephens' attack.  
11 But there was a transgender woman that was murdered, and  
12 that's what actually prompted the press conference with  
13 the district attorney's office. I was contacted by the  
14 district attorney's office and asked to be a part of the  
15 press conference. And I was asked also by the district  
16 attorney's office to find someone who could speak that  
17 works with the trans community.

18 They -- I was not instructed to contact someone  
19 who was a victim of a hate crime. That's not what I was  
20 tasked to do. I was asked to find someone that works with  
21 the community, which is why I was so surprised when  
22 Kendall was upset that she was not invited to be a part.

23 Q. Did you -- did you find that person?

24 A. Yes, I did.

1 Q. And who was that?

2 A. Tatyana Woodard.

3 Q. Okay.

4 A. Someone who works with the community.

5 Q. Okay. And how did you find out that Kendall was  
6 upset with you?

7 A. She called me, and she was upset.

8 Q. And said what?

9 A. She said --

10 MR. CREAMER: Okay. Hearsay.

11 MR. RULLI: Sustained.

12 MR. ALFANO: Okay. I'm not  
13 offering it for the truth of whether she was  
14 really upset or not. I'm offering it for its  
15 impression upon her and her subsequent reactions  
16 to it.

17 MR. CREAMER: It's hearsay and I can't  
18 re-call Ms. Stephens.

19 MR. RULLI: You can rephrase that.

20 MR. ALFANO: Sure.

21 BY MR. ALFANO:

22 Q. What did -- what did she tell you?

23 MR. RULLI: No, that's the same  
24 question.

1 MR. CREAMER: That's hearsay.

2 MR. ALFANO: It's not hearsay. I'm  
3 not offering it for the truth. She may have  
4 been -- she may not have been upset with her.  
5 We don't know that. The question is what did  
6 she say to Ms. Morrison and what was  
7 Ms. Morrison's reaction to that statement.

8 MR. CREAMER: It's hearsay. Hearsay  
9 is hearsay, and the state of mind exception --  
10 I'm not familiar with state of mind exception to  
11 the hearsay rule.

12 MR. ALFANO: It's not being offered  
13 for the truth of whether Ms. Stephens was upset  
14 or not.

15 MR. CREAMER: Sure it is.

16 MR. ALFANO: Only Ms. Stephens --

17 MR. RULLI: One at a time. The record  
18 has to be clear.

19 MR. ALFANO: Only Ms. Stephens would  
20 know that. Okay? But if it --

21 MR. CREAMER: But I can't call her  
22 back.

23 MR. RULLI: One at a time.

24 MR. ALFANO: Let me finish. Let me

1                   finish. Only Ms. Stephens would know that. The  
2                   important factor here is what was the  
3                   impact that it had on Ms. Morrison. The fact  
4                   that the statement was made is not hearsay. I'm  
5                   not offering it because I'm going to submit a  
6                   finding of a fact that says, "Oh, and following  
7                   this conference, Ms. Stephens was upset."

8                   First of all, Ms. Stephens admitted  
9                   she was upset about three hours ago.

10                  MR. RULLI: Right.

11                  MR. ALFANO: But that -- but putting  
12                  that aside, I'm not offering it for the truth.  
13                  I'm offering it for its impact after  
14                  Ms. Morrison heard it on Mr. Morrison.

15                  MR. CREAMER: Mr. Alfano --

16                  MR. ALFANO: Let me finish. Let me  
17                  finish, if I could. Because then the argument's  
18                  going to be, "Well, she didn't pay the loan  
19                  back." She didn't pay the loan back because she  
20                  thought --

21                  MR. RULLI: Well, let's not jump  
22                  ahead, gentlemen. Let's stick to this question  
23                  first.

24                  MR. CREAMER: Ms. Stephens was here as

1                   a witness earlier today. Mr. Alfano could have  
2                   cross-examined her about whatever he thinks she  
3                   said and chose not to.

4                   MR. ALFANO: I did. I did cross  
5                   examine her. She said she was upset.

6                   MR. CREAMER: And he didn't ask  
7                   specifically what he thinks she -- that now  
8                   Ms. Morrison is going to put in her mouth.

9                   MR. ALFANO: Doesn't matter. I'm not  
10                  asking -- for purposes of this question, it  
11                  doesn't matter.

12                  MR. RULLI: All right. Let's stop for  
13                  a second, please. Let's stop for a second.  
14                  Give me a moment.

15                  (At this time, a brief pause was  
16                  taken.)

17                  MR. RULLI: Let's state for the  
18                  record, so that we're clear, the purpose that  
19                  you're asking this question.

20                  MR. ALFANO: Purpose I'm asking the  
21                  question is to gauge Ms. Morrison's reaction to  
22                  what she was told. Okay? Because I think it's  
23                  important in terms of her efforts to  
24                  subsequently address the loan. Whether -- what

1 Ms. Stephens said or not --

2 MR. RULLI: And you're not offering it  
3 for the truth of the statement or the content of  
4 the statement?

5 MR. ALFANO: Absolutely not.

6 MR. RULLI: And that's on the record.

7 Now, Mr. Creamer, you may state your response to  
8 this.

9 MR. CREAMER: So then she can just  
10 say, "I had a conversation with Ms. Stephens and  
11 I was -- my state of mind was X or Y after that  
12 call." She doesn't have to say the hearsay  
13 statement from Ms. Stephens.

14 MR. RULLI: And that's why I suggested  
15 perhaps rephrasing the question would avoid this  
16 question entirely. But we're going to allow the  
17 question. It's been objected to. Obviously,  
18 the Board cannot rely on objected hearsay. That  
19 is outside of the responsibilities that it has  
20 in applying the law.

21 So I'm going to allow you to question  
22 it -- to proceed with the question. It's  
23 admitted -- it's going to be on the record for  
24 the Board. The Board will make the ultimate

1 determination on this question.

2 I will say that you have said to the  
3 Board that you are not offering it for the truth  
4 of the statement and the content. And  
5 therefore, the Board cannot rely upon the  
6 content of the statement for any finding of  
7 fact. And it's being offered solely for the  
8 limited purpose of her understanding as you've  
9 expressed it.

10 MR. ALFANO: Absolutely. And I've  
11 said previously --

12 MR. RULLI: So I want to make that  
13 clear to the Board.

14 MR. ALFANO: Right. I wouldn't cite  
15 it for that purpose and the findings of fact.  
16 Again, I think -- I think Ms. Stephens already  
17 testified to, but the record will bear that out  
18 or not, whatever it provides.

19 But I just want to know what she was  
20 told and how that influenced her subsequent  
21 questions.

22 MR. CREAMER: You know, we can't  
23 un-ring the bell. It's there.

24 MR. ALFANO: I'm not offering it --

1                   MR. CREAMER: It's going to be on the  
2 record, and it's going to influence the Board --

3                   MR. ALFANO: I'm not arguing --

4                   MR. CREAMER: -- whether they rely on  
5 it or not.

6                   MR. RULLI: Well, the Board can't rely  
7 on it if it's, in fact, objected hearsay. And  
8 there's no question --

9                   MR. CREAMER: Right. But it's going  
10 to influence them because they're going to see  
11 it or hear it or whatever it is. They're going  
12 want to know what she was going to say.

13                  MR. RULLI: I'm going to rephrase the  
14 question. Based upon that conversation, what  
15 was your understanding?

16                  THE WITNESS: That --

17                  MR. RULLI: I don't think we need the  
18 content of the question.

19                  THE WITNESS: That Ms. Stephens was  
20 upset that she was not invited to participate in  
21 the press conference.

22                  MR. RULLI: And that was your  
23 understanding?

24                  THE WITNESS: Yes. Clear

1 understanding.

2 MR. RULLI: Explicitly.

3 BY MR. ALFANO:

4 Q. And following that, did Ms. Stephens take any  
5 other actions in connection with the press conference?

6 A. No.

7 Q. Did you take any other actions in connection  
8 with her?

9 A. No.

10 Q. Did you attempt to pay back the loan?

11 A. Well, when I reached out to Kendall, I didn't  
12 get a response.

13 Q. When you say you "reached out" to her, what  
14 do --

15 A. I called her.

16 Q. Okay.

17 A. I called her.

18 Q. And was that after the press conference?

19 A. Yeah. That was after the press conference.

20 Q. Okay. Tell us --

21 A. Because we had after -- following the press  
22 conference, we didn't speak for -- for a while. And when  
23 I got a text message from her, we always -- we talked on  
24 the phone almost every day. And when she texted me, I was

1 like, "Why don't you just call me like you always do?"

2 I was actually at work, and I told her to just  
3 call me and we could talk.

4 Q. Did you try to -- did you try to call her?

5 A. Yes, I did.

6 Q. And what was --

7 A. But I was blocked. And I -- after I realized  
8 and came to the conclusion that I was probably blocked, I  
9 then reached out to Avery.

10 Q. Okay.

11 MR. ALFANO: Hold on just a second.

12 Can I just have a moment?

13 MR. RULLI: Sure.

14 MR. ALFANO: I'm about to wrap up.

15 (At this time, a brief pause was  
16 taken.)

17 BY MR. ALFANO:

18 Q. So I just want to clarify something with Hearts  
19 on a Wire. Is it your testimony that you take exploratory  
20 meetings with groups and individuals?

21 A. Yes.

22 Q. Okay. But when it comes to which ones you  
23 actually partner with, is that where you feel you have  
24 discretion?

1 A. Well, yes, but in -- I look at it differently.  
2 It's really not based on my -- my discretion, whether --  
3 it's not like, "Oh, I don't like what your work is. We're  
4 not going to --"

5 It just -- it depends on if it makes sense. If  
6 they're what -- the work that they're doing aligns with  
7 our mission. Because our involvement could be just us  
8 posting their event on our social media pages. So those  
9 meetings are really just to determine if we can support  
10 the work and what that work can possibly look like.

11 Q. So just one final question. I mean, do you,  
12 Ms. Morrison, believe that you've done anything wrong  
13 here?

14 A. You know, no. Can I explain?

15 Q. Sure.

16 A. I don't. I know that my intentions were not to  
17 violate any rule. But I do -- I did, and from the  
18 beginning I said that if I did break an ethics rule, it  
19 was not intentional. I was not aware of the stipulations  
20 and how these things worked at that point. Going through  
21 this has taught me all that I know about how the Board of  
22 Ethics works with -- as opposed to with the City. So I  
23 didn't know any of that.

24 MR. ALFANO: I have no further

1                   questions.

2                   MR. RULLI: Cross-examination?

3                   MR. CREAMER: Thank you, Professor.

4 BY MR. CREAMER:

5 Q.               Just some follow-up. Let's go back to this  
6 email exchange starting with R-1:5 and the email from  
7 Michele Zipkin dated August 25 at 4:29 from Michele to  
8 you.

9 A.               Yes.

10 Q.               It says, "Hi, Celena. Thank you so much for  
11 your willingness to send a statement for the story."

12                   So this is a reporter from the Philadelphia Gay  
13 News?

14 A.               Yes.

15 Q.               And so you had an earlier communication about  
16 sending a statement; is that right?

17 A.               No.

18 Q.               Or --

19 A.               No. I had -- I had no communication with  
20 Michele Zipkin before this.

21 Q.               Okay. So she thought that you were going to  
22 send a statement?

23 A.               Absolutely.

24 Q.               And then you then contacted Lauren Cox and said

1 "They're looking for a statement about this. Can you do  
2 this, handle this?" Is that -- is that kind of what  
3 happened?

4 A. Yes.

5 Q. Okay. So then at that point, then, Lauren asked  
6 you for some help. "Can you help me? You know, because I  
7 don't know anything about this. Can you help with some  
8 information about this?"

9 Is that kind of what happened in this exchange?

10 And you said, "I don't know. I wasn't there. I don't  
11 know anything about the facts."

12 A. I provided what context I could.

13 Q. Okay. And that's -- that's kind of what  
14 happened here. And that ultimately -- and then she said  
15 on -- on R-1.3 in an email from Lauren to you dated  
16 August 25th at 5:27, she talked about drafting up "a  
17 general statement later for the evening and have you  
18 review it before I send it to the reporter"; is that  
19 right?

20 A. Yes.

21 Q. So before the mayor's office sends an official  
22 statement from the mayor's office to a reporter, you're  
23 going to review it?

24 A. We all review it.

1 Q. Okay.

2 A. When a statement is attributed to anyone, that  
3 person reviews it before it's sent out.

4 Q. All right. And then in the email that begins at  
5 the bottom of R-1:2, dated August 25th at 6:19 p.m., and  
6 this is from you to Lauren, you say that -- you explained  
7 to Lauren that you were on the phone with Kendall at the  
8 time the fight broke outside, and you were discussing  
9 prison policy with Lauren -- with Kendall at the time --

10 A. Mm-hm.

11 Q. -- that this happened; is that right?

12 A. Yes.

13 Q. Okay. And that would be consistent with Hearts  
14 on a Wire?

15 A. No. It wasn't about Hearts on a Wire.

16 Q. Okay. So it's unrelated to that. All right.

17 But you also say that she even had a broken nose; is that  
18 right?

19 A. Yeah, I saw that.

20 Q. So you were familiar with the extent of her  
21 injuries; is that right?

22 A. Yeah. And when I read that, I said I guess I  
23 did know, so yeah.

24 Q. Okay. And then later -- let's see.

1 A. But I will say I didn't know by just looking at  
2 her.

3 Q. And then looking at Exhibit R-2:2, you have at  
4 the bottom of the page the email from Michele to you dated  
5 August 25th at 4:30. Again, the reporter Michele from the  
6 Philadelphia Gay News: "Hi, Celena. Thanks so much for  
7 your willingness to send a statement --"

8 Oh, I guess this is the same email, I guess --  
9 is this the same one as the other? Is that a repeat? Oh,  
10 it's follow-up. Okay.

11 Okay. And then above that, August 25th at  
12 9:29 p.m., this is the statement which you've read that  
13 you prepared or you helped Lauren Cox prepare, and this is  
14 the official statement from the mayor's office?

15 A. No. I did not help Lauren Cox prepare. I did  
16 not assist in preparing the statement at all. Just like  
17 most statements, even for the mayor, most of the things we  
18 say that go in any publication goes out to the public/the  
19 press is drafted by the comms department.

20 Normally I'll make a first draft of statements  
21 myself, send it to comms. They make edits and send it  
22 back to me. But pretty much what they draft is what's  
23 going to go out.

24 Q. Well, the information "Celena joined Kendall

1 following her assault as a personal friend. As such, she  
2 is not comfortable confirming any specific details of the  
3 incident," that came from you; correct?

4 A. That communication came from Lauren.

5 Q. Well, that information came from you; correct?

6 A. Yes. I've stated that.

7 Q. Right. And then "However, the following  
8 statement can be attributed to Celena Morrison as  
9 executive director of the office of LGBT affairs" and then  
10 there's a quote?

11 A. Attributed, yes.

12 Q. Attributed to you?

13 A. Yes.

14 Q. So you did review that before it went out,  
15 didn't you?

16 A. It was attributed to me, yes.

17 Q. All right. So you helped Lauren Cox prepare and  
18 release that statement, didn't you?

19 A. No.

20 Q. No?

21 A. I approved what Lauren Cox created and drafted,  
22 and then it went out.

23 Q. Right.

24 A. I approved what she -- what she drafted.

1 Q. Okay. It might be semantics, but --

2 A. I approved it.

3 Q. -- you were involved in that statement, in the  
4 drafting of that statement?

5 A. In the approval of the statement, yes.

6 Q. Okay. All right. You were asked questions by  
7 your counsel about communications with the police and the  
8 district attorney's office. And I think you were saying,  
9 you know, you wouldn't turn down, you know, requests from  
10 them. You, of course, would communicate with them?

11 A. Yes.

12 Q. But I want to make sure I understand clearly  
13 about then you would then -- they would contact you. I  
14 think the victims' offices would contact you. If there  
15 were LGBT victims, they would contact you to reach out to  
16 those individuals to see if they wanted their services?

17 Is that how it works?

18 A. No.

19 Q. Okay.

20 A. Typically, no. That's not how it works.

21 That's how it happened in this case.

22 Q. Okay.

23 A. My office at some point is informed when -- when  
24 these things happen. This particular case, all of this

1       happened really quickly because Kendall initiated the  
2       phone calls to the press, to all of these people in -- on  
3       her own behalf. So that's how my office was contacted.

4           I've never been contacted by the deputy  
5       commissioner of the police. I've never been contacted by  
6       Adam Geer from the district attorney's office about a  
7       victim, ever.

8   Q.           Okay. And so I think if I understood your  
9       testimony correctly, you would never give the police or  
10      the district attorney's office contact information for a  
11      victim without the victim's permission; is that right?

12   A.           Correct.

13   Q.           So you did so in this case because Ms. Stephens  
14      was seeking your -- your support and your help getting --

15   A.           No, I did not.

16   Q.           -- the police department and DA's office?

17   A.           No, I did not. I didn't provide Ms. Kendall's  
18      information until I checked in with Ms. Stephens to make  
19      sure that she was okay.

20   Q.           But that's -- that's what I mean. Until after  
21      you knew that she was seeking your help in contacting  
22      those departments?

23   A.           Well, she wasn't -- she was -- I was contacted  
24      by those offices on Kendall's behalf. They wanted to be

1 connected to Kendall. I then reached out to Kendall to  
2 see if she was okay with me providing her contact  
3 information, and that's how those connections were made.

4 Q. Right. Okay. Now --

5 A. Kendall did not reach out to me to contact the  
6 deputy commissioner or the district attorney's office.

7 Q. Now, with the -- with the money, you said at one  
8 point, Kendall said, "I got you girl," meaning if you need  
9 to borrow the money, any money, when she showed you the  
10 money. Is that a fair statement of what you said?

11 A. Well, she made the statement "I got you, girl"  
12 before she actually showed me the money.

13 Q. Okay. And you said the money was not from the  
14 GoFundMe site?

15 A. No. Well, the attack had not happened when I  
16 saw the money.

17 Q. All right.

18 A. So it couldn't have been.

19 Q. You said the attack had not happened when you  
20 borrowed the money?

21 A. The attack had not happened when she showed me  
22 the \$200,000.

23 Q. Showed you the money. But the attack had  
24 happened almost a month before you borrowed the money?

1 A. We had actually discussed it prior to the  
2 attack. But the transaction was not made until after the  
3 attack.

4 Q. On September 23rd, you borrowed the money;  
5 correct?

6 A. That's when it was -- the loan agreement was  
7 signed, yes.

8 Q. And attack was on August 24th, almost a month  
9 before?

10 A. Yeah. I think so.

11 Q. All right. And is it true that you texted  
12 Ms. Stephens on August 26th, two days after the attack,  
13 about the GoFundMe site, saying, quote, "The GoFundMe is  
14 at \$19,895."

15 A. I don't know.

16 Q. And you did that -- on August 26th, 2020 at  
17 11:03 p.m.?

18 A. Well, that may have been another GoFundMe  
19 because there were two GoFundMes going on at one time.  
20 And there was a GoFundMe that was being headed by Morris  
21 Home and Kendall. So I'm not sure which one I was  
22 referencing at that time.

23 Q. So you do know how to track a GoFundMe site?

24 A. I mean -- track?

1 Q. You said you didn't know how to follow a  
2 GoFundMe site.

3 A. When did I say that?

4 Q. In the answer to your questions from your  
5 attorney.

6 A. I don't recall saying that.

7 Q. All right. So you do know how to follow a  
8 GoFundMe site?

9 A. Anyone can just pull up a GoFundMe site.  
10 They're open to the public.

11 Q. All right. And you were following the progress  
12 of Ms. Morrison -- of Ms. Stephens' GoFundMe site for --  
13 that she was raising money after her assault?

14 A. No. No.

15 Q. All right.

16 A. No, I was not following it.

17 Q. And when you -- when you borrowed the \$4,000  
18 from her --

19 A. Mm-hm.

20 Q. -- she didn't go to her closet and get \$4,000 in  
21 cash; that's right?

22 A. Well, I don't know where she got it because we  
23 met -- we didn't meet at her home to make that exchange.

24 Q. Well, she gave you a cashier's check from a

1 bank; isn't that true?

2 A. We met at the bank.

3 Q. Well, she didn't give you cash?

4 A. Yeah, that's right. She gave me a cashier's  
5 check at the bank.

6 Q. And when you -- when you meet with -- your  
7 policy to meet with people in your office, to meet with  
8 everybody, you have sort of an open meeting policy, I'll  
9 call it; that's my phrase. That's -- that's your  
10 discretion. That's the policy you set up in your office;  
11 isn't that right?

12 A. Well, there's an understanding that my -- my  
13 position is to represent and support any initiatives that  
14 are geared towards the LGBTQ community. So I don't think  
15 that -- I don't think that I should deny anyone who is  
16 intentionally wanting to work with the community and  
17 provide resources.

18 Q. Well, I think that's a great --

19 A. I wouldn't be doing my job --

20 Q. I think that's great.

21 A. -- if I were to deny those meetings.

22 Q. That's a great idea. But that is your policy?  
23 That's your -- that's your choice? That's your  
24 discretion; isn't that correct?

1 A. That is the mayor's policy. That is the culture  
2 of the major's office.

3 Q. But that is not a requirement? You're not a --  
4 it's a material thing that you're required --

5 MR. ALFANO: Object. Argumentative.

6 It's been asked and answered.

7 MR. RULLI: I'll give him a little  
8 more latitude on that. I understand your point.

9 BY MR. CREAMER:

10 Q. You could just as easily require people to fill  
11 out a form, an application for meetings or have other -- a  
12 narrower scope for meeting requirements, couldn't you?

13 A. Well, actually, we did create a form because of  
14 the amount of requests that we get. But those forms are  
15 not to determine -- we don't use those forms to determine  
16 whether or not we're going to have that meeting.

17 We have those forms in place so that we can  
18 schedule those meetings and have a clear -- a format of  
19 and a clear idea of who we're -- we have on our docket and  
20 who we should be planning meetings within -- you know. We  
21 use that -- those documents to kind of plan our months  
22 ahead and who we're going to meet with.

23 MR. CREAMER: I have no further  
24 questions.

1 BY MR. ALFANO:

2 Q. What bank did you --

3 MR. RULLI: Redirect?

4 MR. ALFANO: -- meet Ms. Stephens at?

5 THE WITNESS: I can't remember the  
6 name of it. It might have been PN -- somewhere  
7 on Broad Street.

8 MR. ALFANO: Okay.

9 THE WITNESS: It was on Broad Street.

10 It's down on the other end. There's a TD Bank  
11 down the street from the Capital Grille or  
12 one --

13 BY MR. ALFANO:

14 Q. Here in town? Here in Center City?

15 A. Yeah. Yeah, right on Broad Street.

16 Q. Okay. So you met her -- you met her at a bank,  
17 and that's when she presented you with a cashier's check?

18 A. Yes.

19 MR. ALFANO: Thank you. No further  
20 questions.

21 MR. RULLI: Nothing further of this  
22 witness?

23 MR. CREAMER: (Indicating.)

24 MR. RULLI: We have a couple of things

1 to clear up. Excuse me one second.

2 (At this time, a brief pause was  
3 taken.)

4 MR. RULLI: I'm going to follow up  
5 with one or two questions.

6 THE WITNESS: Okay.

7 MR. RULLI: When you met at the bank,  
8 do you know -- describe when you met her at the  
9 bank how this transaction occurred. How was it  
10 that you got this check?

11 THE WITNESS: When I got to the bank,  
12 Kendall was already there. She was waiting  
13 there at -- they've got these stands in the  
14 middle, I guess, where you can write your checks  
15 and get the things, and she was standing at one  
16 of those. She already had -- I was on the phone  
17 with her, telling her I'm on my way, and we were  
18 communicating.

19 So she was there already. She already  
20 had the cashier's check in hand, and she had the  
21 contract. And I didn't see her withdraw money  
22 or anything. I just know that she was already  
23 there with the contract and the cashier's check.

24 MR. RULLI: All right. So she had the

1                   cashier's check when you arrived at the bank?

2                   THE WITNESS: Yes.

3                   MR. RULLI: Do you know the source of  
4                   the funds that constituted that cashier's check?

5                   THE WITNESS: I -- well, I know that  
6                   when -- I'm not even sure if that GoFundMe money  
7                   had been available to her at that time yet. So  
8                   I assumed that the money -- my assumption was  
9                   that the money came from the money that she  
10                  showed me at -- in the closet because that's how  
11                  she told me that she got me. When she made that  
12                  statement "I got you if you need anything," she  
13                  was referring to that money. So my assumption  
14                  is that's where that money came from.

15                  MR. RULLI: Other than that  
16                  assumption, did she say to you at any time what  
17                  the source of those funds were?

18                  THE WITNESS: Oh, the money that was  
19                  in her closet or the money that she gave me?

20                  MR. RULLI: No, no, no. The funds  
21                  that constituted the \$4,000?

22                  THE WITNESS: No. We never discussed  
23                  that. We never discussed that because at that  
24                  time, we had already had all of those

1 discussions where we talked about the source of  
2 the money, how it would be paid back. All of  
3 those things had long been discussed.

4 MR. RULLI: And you signed the loan  
5 agreement at the bank?

6 THE WITNESS: Yes.

7 MR. RULLI: All right. Thank you very  
8 much.

9 THE WITNESS: Thank you.

10 MR. RULLI: We have a couple of things  
11 I just want to be clear about. Coming back to  
12 R-2:2, which was not moved into evidence.

13 MR. ALFANO: I'm going to move my two  
14 exhibits now, if I may. 2:1 and -- 1:2 and 2:1.  
15 Let me try that again.

16 MR. RULLI: No, yeah. I think --

17 MR. ALFANO: I'm going to -- I'm going  
18 to move Respondent's 1 and Respondent's 2 at  
19 this point.

20 MR. RULLI: Well, Respondent's 1 was  
21 already moved in without objection, so. Right?

22 MS. GREENWALD: Partially over --

23 MR. CREAMER: I had that one  
24 objection.

1 MR. RULLI: Right.

2 MR. COOKE: This one (indicating).

3 MR. RULLI: Just one second. And

4 that's just so that the record is clear, you are

5 moving that into evidence; right?

6 MR. ALFANO: I'm moving exhibit, yeah,

7 Respondent's 2 in its entirety into the record.

8 MR. RULLI: And Mr. Creamer, of course

9 you have an objection?

10 MR. CREAMER: I don't have an

11 objection to 2.

12 MR. RULLI: Yeah. I'm sorry?

13 MR. CREAMER: I don't have any

14 objection to R-2. I had an objection to R-1:1.

15 MR. RULLI: Okay.

16 MR. CREAMER: But not to the rest of

17 R-1.

18 MR. RULLI: All right. So --

19 MR. CREAMER: I think when we drilled

20 down to it.

21 MR. RULLI: I thought you had an

22 objection to 2.2, that's why I wanted to clear

23 that up.

24 MR. CREAMER: 2.2, 2.2? No, I don't

1 think I did.

2 MR. RULLI: Okay. All right. Well,  
3 then that would be admitted without objection on  
4 the record.

5 (At this time, a document marked for  
6 identification as R-2 was received into  
7 evidence.)

8 MR. ALFANO: I had also had R-3, but I  
9 believe R-3 is the same as ED-17 or one of the  
10 exhibits already.

11 MR. CREAMER: I think that's right.

12 MR. ALFANO: So no need to --

13 MR. RULLI: I've already checked that.  
14 That's the same. That's already been admitted  
15 into evidence. Lastly, the stipulations. Do  
16 counsel intend to move those in?

17 MR. CREAMER: Sure.

18 MR. ALFANO: Absolutely. I assume it  
19 was stipulated; in fact, it's in the record.  
20 Thank you.

21 MR. RULLI: We'll put that on the  
22 record: The stipulations will be accepted by  
23 counsel. Is there anything further from --

24 MR. ALFANO: Nothing further from

1                   Respondent by way of evidence at this point.

2                   MR. RULLI: Thank you very much. At  
3                   this time, I will turn to closings. You will  
4                   have post-briefing requirements, but I want to  
5                   give you an opportunity for closing arguments if  
6                   you like. And it's up to you. And if you'd  
7                   like to discuss that first or not, I leave it to  
8                   you.

9                   MR. ALFANO: I mean, I'll defer to my  
10                  colleague. I mean, I've already said if we're  
11                  going to do findings of fact and conclusions of  
12                  law, I would defer. So yeah, not much benefit  
13                  in a closing argument at this point. The  
14                  record's pretty full.

15                  MR. CREAMER: I think we've had a long  
16                  day. I made a brief opening. My closing would  
17                  be my brief opening with maybe one or two  
18                  sentences added. I don't want to take up any  
19                  more time, and I agree with Counsel. We're  
20                  going to be doing closing briefs and proposed  
21                  findings and conclusions of law anyway, so.

22                  MR. RULLI: All right. Well, I  
23                  think --

24                  MR. CREAMER: Unless you'd like to

1 hear the argument.

2 MR. RULLI: I would love to hear it,  
3 but I think we can end on that consensus there.  
4 It's not necessary, and we will look forward to  
5 those findings of facts and conclusions of law.

6 MR. ALFANO: Great.

7 MR. CREAMER: Great.

8 MR. ALFANO: Thank you. And thanks  
9 everyone for your listening and cooperation in  
10 conducting this.

11 MR. RULLI: I just want to thank both  
12 counsel for the really outstanding quality of  
13 your work and, for the most part, the very  
14 collaborative and respectful way that you both  
15 handled this matter. And I appreciate that very  
16 much.

17 And Ms. Morrison, I just want to thank  
18 you, as well. I know this has been difficult,  
19 and you can be assured that we and the Board  
20 will give this our very close and careful  
21 attention.

22 THE WITNESS: Thank you.

23 MR. CREAMER: Thank you, Professor,  
24 for the time you've volunteered to --

1                   MR. RULLI: My pleasure.

2                   MR. CREAMER: -- this effort. I  
3                   appreciate it.

4                   MR. RULLI: With that, we are  
5                   adjourned.

6                   (Proceedings ended at 4:19 p.m.)

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C E R T I F I C A T I O N

I, Catherine S. Rivera, a Professional Reporter and Notary Public for the Commonwealth of Pennsylvania, do hereby certify that the foregoing is a true and accurate transcript of the stenographic notes taken by me in the aforementioned matter.

- - -

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying reporter.)

DATED: DECEMBER 15, 2021

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CATHERINE S. RIVERA

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R-1:2

R-1:3

R-1:4

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ED-1

12/15/21 csw

BOARD OF ETHICS

J. SHANE CREAMER, JR., ) DEPOSITION UPON  
EXECUTIVE DIRECTOR of the) ORAL EXAMINATION  
PHILADELPHIA BOARD OF )  
ETHICS )  
 ) OF  
- vs - )  
 ) CELENA MORRISON  
CELENA MORRISON )  
-----)

TRANSCRIPT OF DEPOSITION, taken  
by and before KATHLEEN M. RIGBY, Professional  
Reporter and Notary Public, via Zoom  
Teleconference, Philadelphia, Pennsylvania, on  
Monday, May 3, 2021, commencing at 10:19 a.m.

ERSA COURT REPORTERS

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Philadelphia, PA 19103

(215) 564-1233

CELENA MORRISON

1

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

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CITY OF PHILADELPHIA  
4 BOARD OF ETHICS  
BY: CAROLINE CURLEY, ESQUIRE  
(via zoom)  
5 1515 Arch Street  
6 18th Floor  
7 Philadelphia, PA 19102

8 -- Representing the Board of Ethics

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CELENA MORRISON

1

## I N D E X

2

## E X A M I N A T I O N

3

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	By Ms. Curley:	4

5

6

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7

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1 PROCEEDINGS

2 CELENA MORRISON, after having  
3 first been duly sworn, was examined and  
4 testified as follows:

5 EXAMINATION

6 BY MS. CURLEY:

7 Q. Ms. Morrison, can you state your name for  
8 the record.

9 A. Celena Morrison.

10 Q. And what is your current position for  
11 employment?

12 A. The Executive Director of Mayor's Office  
13 of LGBT Affairs.

14 Q. And how long have you held that position?

15 A. Since March 2nd of last year.

16 Q. So March 2, 2020?

17 A. Yes.

18 Q. And you're a Philadelphia City employee;  
19 correct?

20 A. Yes.

21 Q. So what are some of the job duties that  
22 you have as the Executive Director?

23 A. To review all City policies and revise  
24 those policies to ensure that we are being very

1 inclusive with our policies pertaining to the  
2 LGBT+ -- LGBTQ+ community.

3 Q. Sorry. You froze for me. I don't know if  
4 you froze for Kathleen. The last thing I heard was  
5 revise policies to ensure. Could you go back  
6 and --

7 A. That we are being inclusive of our LGBTQ+  
8 communities.

9 Q. Would you agree that your job duties  
10 include developing proposed City policies regarding  
11 civil rights issues affecting LGBT people within  
12 the City?

13 A. Yes.

14 Q. Would you agree that your job duties  
15 include coordinating the implementation of policies  
16 and programs to meet the City's diversity and  
17 equality goals as expressed in the Home Rule  
18 Charter?

19 A. Yes.

20 Q. Would agree that your job duties include  
21 coordinating among other City departments,  
22 agencies, and offices to improve LGBT access to  
23 these services and to promote equality and safety  
24 for LGBT people?

1 A. Yes.

2 Q. Would you agree that your job duties  
3 include supporting the growth and development of  
4 the City's LGBT communities?

5 A. Yes.

6 Did someone else just join?

7 COURT REPORTER: Yes.

8 MR. ROCKEY: I apologize. This  
9 is John. I'm the tech with Ersa Court  
10 Reporting. I'm just assigning post  
11 capabilities.

12 I'm off now. Have a good day.

13 BY MS. CURLEY:

14 Q. I'm sorry, one more time. Would you agree  
15 that your job duties include supporting the growth  
16 and development of the City's LGBT communities?

17 A. Yes.

18 Q. And would you agree that your job duties  
19 include serving as liaison between the City's and  
20 region's LGBT communities and the City?

21 A. Yes.

22 Q. And as part of your job duties as  
23 Executive Director, do you have discretion about  
24 which agencies the City can interact with to

1 promote those missions?

2 A. Wait. Excuse me, could you say that  
3 again?

4 Q. Yes.

5 So as the Executive Director, do you have  
6 a say in which agencies or communities in the City  
7 that you partner with --

8 A. Yes.

9 Q. -- to promote the missions that we just  
10 outlined?

11 A. Yes.

12 Q. And do your job duties also include  
13 answering e-mails, doing administrative tasks --

14 A. Yes.

15 Q. Are you familiar with the individual  
16 Kendall Stephens?

17 A. Yes.

18 Q. How are you familiar with her?

19 A. She is a friend of mine. I've known her  
20 for several years personally. We've been friends  
21 for a really long time.

22 Q. Could you approximate when you first met?

23 A. It was probably -- let me think. I want  
24 to say maybe -- this is '21. I'm going to say

1 maybe -- I think I'm going to say maybe 2014, '15  
2 maybe. It may have been a little longer than that,  
3 yeah.

4 Q. Okay. And you said you were personally  
5 friends. Can you elaborate on that?

6 A. I mean, I've actually lived in her house,  
7 yeah.

8 Q. Fair to say that when you took on this  
9 role as the Executive Director in March of 2020,  
10 Ms. Stephens was aware that you acquired that  
11 position?

12 A. Yes, absolutely.

13 Q. And she knew throughout the time since  
14 March of 2020? She's known throughout that entire  
15 time that you've held that job?

16 A. Yes.

17 Q. And are you familiar with the organization  
18 Hearts on a Wire?

19 A. Yes.

20 Q. And what was your office's involvement  
21 with Hearts on a Wire?

22 A. We didn't have any involvement with Hearts  
23 on a Wire.

24 Q. Did Hearts on a Wire ever approach your

1 office about becoming involved in their  
2 organization?

3 A. Because of this investigation, I was  
4 reminded of a time that Kendall had reached out to  
5 me about doing some -- I don't even remember what  
6 it was, but she reached out to me about doing  
7 something with Hearts on a Wire. But because of my  
8 prior knowledge of working at William Way and  
9 knowing who's affiliated with Hearts on a Wire and  
10 there's a lack of, you know, the work that happens  
11 there. Because I used to be the program director  
12 at William Way, so I had no intentions of working  
13 with Hearts on a Wire.

14 Q. Let me figure out how to share my screen.  
15 Can you see my screen?

16 A. Yes.

17 MS. CURLEY: So I'm going to  
18 ask -- this has been premarked, but I just  
19 ask that this be marked as Board  
20 Exhibit-1.

21 BY MS. CURLEY:

22 Q. And, Ms. Morrison, do you recognize this  
23 document?

24 A. Yes.

1 Q. And do you see the from e-mail address is  
2 marked as Kendall Stephens?

3 A. Uh-huh.

4 Q. And do you see where it's cc'd -- you're  
5 cc'd on this e-mail?

6 A. Yes.

7 Q. Do you recognize your name there?

8 A. Yes, absolutely.

9 Q. And do you see in the body of the e-mail  
10 it just says -- and this is from August 10th of  
11 2020. You agree that that e-mail was sent to you  
12 on August 10th of 2020 or cc'd to you?

13 A. Uh-huh.

14 Q. And do you see where it says -- Ms.  
15 Stephens indicates in the first line that she spoke  
16 with you, identified your title, regarding a  
17 meeting on Hearts on a Wire concerning our  
18 incarcerated sisters, brothers, and others. And  
19 she is excited to participate in a virtual meeting  
20 with her team and Hearts on a Wire, etcetera?

21 A. Uh-huh.

22 Q. Do you agree that you received this  
23 e-mail?

24 A. Yes.

1 Q. Do you recall this conversation with Ms.

2 Stephens?

3 A. The only reason -- at that time -- when I  
4 said that I had no intentions of working with  
5 Hearts on a Wire, the only reason why I was -- I  
6 spoke to -- that was prior to this. The only  
7 reason why I was considering meeting to talk about  
8 Hearts on a Wire was because my friend Kendall had  
9 reached out to me about it.

10 Prior to that, I knew about Hearts on a  
11 Wire, so I had no intentions of working with Hearts  
12 on a Wire. Kendall did ask me about it, but  
13 because, once again, Hearts on a Wire does not  
14 follow through with anything, nothing ever came of  
15 this either.

16 Q. But at this time, to clarify, when Ms.  
17 Stephens reached out to you --

18 A. Uh-huh.

19 Q. -- to become involved, you then did  
20 consider whether your office would become involved?

21 A. Yes, because I had actually -- Kelly  
22 Burkhardt had already -- had also asked me, who is  
23 another friend of mine. So because of their  
24 involvement -- which Kelly had not been involved

1 prior to that with Hearts on a Wire. If she had,  
2 it was not to my knowledge. But because it was  
3 those two -- because the person who actually  
4 oversees -- overseen, I don't know if they still  
5 do, oversaw Hearts on a Wire, I would never work  
6 with that person.

7 Q. And just to go back, what is Kelly  
8 Burkhardt's position?

9 A. Kelly Burkhardt worked with the District  
10 Attorney's Office.

11 Q. In like an official capacity; correct?

12 A. Yes, absolutely.

13 Q. And so would you agree that because  
14 Kendall was involved at this time and was asking  
15 for your involvement, that made you want to  
16 consider working with Hearts on a Wire?

17 A. Yes. Yes.

18 Q. So both Kelly and Ms. Stephens'  
19 involvement was an important component when you  
20 were considering whether to work with them?

21 A. Yes.

22 MS. CURLEY: This is premarked,  
23 and I'm just going to ask that it be  
24 marked again as Board of Ethics Exhibit-2.

1 BY MS. CURLEY:

2 Q. And, Ms. Morrison, do you recognize this  
3 e-mail?

4 A. This is the same one; right?

5 Q. This is now dated August 11th and is  
6 from --

7 A. Not what I'm looking at.

8 Q. Shoot. What does it say? Does it say  
9 Board Exhibit-2 on the top?

10 A. No. I see the same e-mail that I was  
11 looking at, the Kendall Stephens, August 10.

12 Q. Okay. Hold on. Give me one second. I'll  
13 try that one more time.

14 How about now?

15 A. Yes.

16 Q. So this is Board of Ethics Exhibit-2. Do  
17 you recognize this document?

18 A. Yes.

19 Q. And who is Adrian Lowe?

20 A. I don't remember.

21 Q. But you recall receiving this e-mail from  
22 this individual regarding Hearts on a Wire?

23 A. Basically if you have it, I'm not  
24 disputing that I received it. I don't remember if

1 I read it or not.

2 Q. Okay. But you would acknowledge that you  
3 did receive it?

4 A. It's addressed to me.

5 Q. And can you now see the Board Exhibit-3?

6 A. Yes.

7 Q. And, again, you are cc'd on this August  
8 12th document sent from Ms. --

9 A. Are we going to see any responses to me  
10 actually responding to any of these e-mails?

11 Q. Yes.

12 Do you acknowledge receiving this e-mail?

13 A. If it's addressed to me, I'm going to  
14 acknowledge it.

15 MS. CURLEY: This has been  
16 premarked, I'm just asking that it be  
17 marked again.

18 BY MS. CURLEY:

19 Q. And moving on to Exhibit-4. Do you see  
20 this e-mail?

21 A. Yes.

22 Q. And it indicates that you have -- I can  
23 scroll down.

24 A. Yes.

1 Q. This says from Ms. Burkhardt regarding --  
2 I'll give you a minute to read it, but it's about  
3 setting up a meeting.

4 A. Okay.

5 Q. And this is from Ms. Sanchez --

6 A. Yes. I saw that one.

7 Q. You recognize that, setting up a meeting.  
8 And then this is your response to that  
9 setting up a meeting?

10 A. Is that it? Is that that whole chain?

11 Q. This is the very first one, which I think  
12 we've already seen, from Ms. Stephens. This is  
13 another one from -- this is from Ms. Sanchez.

14 A. Okay.

15 Q. Let me know when you're ready for me to  
16 scroll up.

17 A. Okay. Uh-huh. Okay. And that I have  
18 availability.

19 Q. Do you recall when this meeting was set  
20 up?

21 A. I don't -- I didn't have the meeting. I  
22 don't -- I don't --

23 Q. The meeting did not occur?

24 A. I wasn't there.

1 Q. When you sent this, was it your indication  
2 to join -- was it your intention to join that  
3 meeting regarding Hearts on a Wire?

4 A. Yes.

5 Q. And, again, is that because of the reasons  
6 we've talked about, about Ms. Stephens --

7 A. Yes.

8 Q. -- and Ms. Burkhardt's involvement?

9 A. If I -- when I sent this e-mail, if I said  
10 that I had some availability, that was my intent.

11 Q. And what were your discussions -- when you  
12 were considering having the office become involved  
13 with this organization, what were your discussions  
14 with Ms. Stephens?

15 A. I don't remember. I don't remember. I  
16 don't remember what they were.

17 Q. Do you believe --

18 A. I don't even remember what she -- what the  
19 specific ask was. I don't recall that.

20 Q. Would it refresh your recollection -- do  
21 you have any understanding at all what your  
22 involvement was going to be?

23 A. Well, not really. We hadn't really  
24 discussed that. But I know what type of work that

1       Hearts on a Wire does. And it's around  
2       incarcerated trans and gender non-conforming folks.

3                 Actually, my understanding was this  
4       meeting was to talk about, which is what a lot of  
5       the meetings at my office has with -- we meet with  
6       tons of groups and organizations on a daily to talk  
7       about ways that our office can support the work.

8                 So what was talked -- I don't recall  
9       exactly what the ask was, because we are asked to  
10      be in everything from support groups to softball  
11      games.

12     Q.           So you would agree at some level this was  
13      about how your office could possibly get involved  
14      with Hearts on a Wire --

15     A.           Yes.

16     Q.           -- and support them and be involved in  
17      their mission in some way?

18     A.           Yes. Yes.

19                 MS. CURLEY: And, again, this  
20      was premarked as Board of Ethics  
21      Exhibit-5. I just ask that it be marked  
22      again.

23     BY MS. CURLEY:

24     Q.           And, again, this is an e-mail to you -- or

CELENA MORRISON

1 from Ms. Stephens, cc'd to you. And just at the  
2 last -- I think it's the third from the bottom, it  
3 indicates -- Ms. Stephens writes, third line from  
4 the bottom at the very end of the line, Celena  
5 Morrison has availability any time after 1:00 p.m.  
6 on Friday.

7                 Would you agree that you may have  
8 discussed with Ms. Stephens your availability or  
9 your involvement?

10 A.                 The availability was clearly printed in  
11 the e-mail that I sent, so that's obviously what  
12 she's referencing.

13 Q.                 But you would acknowledge that you got  
14 this e-mail.

15                 Now, I'm going to move on to -- do you  
16 recall Ms. Stephens being attacked in August 2020?

17 A.                 Yes.

18 Q.                 Were you involved with that -- not  
19 involved with the attack obviously, but how did you  
20 come to be aware of that incident?

21 A.                 I was on the phone with her when it  
22 happened.

23 Q.                 Can you tell me a little bit more about  
24 that?

1 A. We were just on the phone like we always  
2 were. She's my friend -- well, she was my friend.  
3 We were talking on the phone, joking and laughing.  
4 I don't remember exactly what we were talking  
5 about. But I remember it was after dark and we  
6 were on the phone. And I remember her getting  
7 really quiet and then she said they're fighting  
8 outside of my house. And I was like what? And I  
9 heard her shuffling. I had -- the only reason  
10 why -- I had just moved out of her house, stopped  
11 living at her house a couple weeks prior to this.  
12 This is why I know -- I could tell when she got up,  
13 she started making her way through the house, I  
14 could hear it. I could also hear when the kids  
15 joined and they made their way through the house to  
16 the front door where everything was happening. I  
17 was on the phone through all of that, so that's  
18 originally how I know.

19 Q. And when did you -- had the attack started  
20 while you were still on the phone or --

21 A. When she opened the door and said  
22 something to the people while I was on the phone,  
23 and I said, Kendall, be careful. Call me -- call  
24 me back, because I heard -- when she opened the

1 door, I heard someone say, yell out, oh, my God, he  
2 punched me in the face. And I knew that at that  
3 moment that that was really a situation that she  
4 should not be entering. And whatever the case, I  
5 need to let her get off of the phone. And I told  
6 her to call me back and let me know that everything  
7 was okay.

8 Q. If I said this was on August 24, 2020,  
9 would that sound right?

10 A. I'm sure she remembers the date more than  
11 I do. So if that's what she told you, then that's  
12 what it was.

13 Q. So what happened next? What was the next  
14 thing that happened?

15 A. I was getting into bed -- well, actually,  
16 I was already in bed as we were talking on the  
17 phone. So I went to sleep. And it was maybe 20,  
18 30 minutes later she called me back screaming and  
19 yelling on the phone that they had come in her  
20 house and beat her up and stuff.

21 Q. And then what happened?

22 A. And then I hung up my phone and jumped out  
23 of bed and jumped into my car to go be with my  
24 friend.

1 Q. And where did you go?

2 A. I went to her house.

3 Q. Then what happened?

4 A. She was -- she was gone when I got there.

5 She was at the police station already.

6 Q. So what did you do next?

7 A. I immediately went to the police station.

8 Q. How did you know what police station to go

9 to?

10 A. I was on the phone with her husband.

11 Q. And who is that individual? What's his

12 name?

13 A. I'm --

14 Q. You can take a minute. Just let me know

15 when you're ready.

16 A. I forgot his name. I don't remember. I'm

17 drawing a blank. I know him so well.

18 Q. Just take a minute. That's fine. Take as

19 much time as you need.

20 A. Well, I just want to move on. I don't

21 remember his name.

22 Q. Okay. You were on the phone with him, you

23 went to the police station. What happened next?

24 A. I remember walking in and Kendall was

1 yelling and screaming at the officer. And he was  
2 trying to talk to her. So I asked her -- Avery,  
3 his name is Avery.

4 Q. The husband?

5 A. Yes. I asked Avery to pull her to the  
6 side. And I walked up to the counter and I just --  
7 I asked -- well, I asked Kendall first, I believe,  
8 what the issue was. And she said that they weren't  
9 listening to her and they were laughing at her.  
10 And the officer just was like I've been trying to  
11 talk to her. She won't stop screaming at me.

12 And I asked Kendall to be quiet -- she was  
13 yelling behind me -- to give the officer an  
14 opportunity to explain what was going on. And that  
15 was pretty much it.

16 My part was I asked Kendall was she okay.  
17 And I actually -- there wasn't anything else that I  
18 could do, so I left and went back home. And I told  
19 her to call me if she needed anything, to document  
20 everything. I told her, you know, always document  
21 everything, make sure you get all the names of  
22 everyone, everything.

23 And a lot of it I talked to her husband,  
24 because I knew -- I knew them both very well prior

1 to them being together. So, yeah.

2 Q. Did you speak with any of the officers  
3 while you were there?

4 A. Yes. I did just through the glass. I  
5 stepped up and the officer was explaining to me  
6 that they took a report. He just said that he  
7 already explained to her that it wasn't -- they  
8 aren't able to label it a hate crime or something.  
9 I think that's what her concern was at the time.  
10 And he explained that to me and that was it.

11 Q. Did at any point you speak to the officers  
12 about Directive 4.15?

13 A. At that time, no. I don't recall  
14 making -- I may have, but I don't recall there  
15 being a reason for me to mention it. I may have  
16 had, but I don't know. It was a lot that night.  
17 But I do try to make it a habit of mentioning that,  
18 because even my friends that are police officers,  
19 any time I mention that, it's just mind boggling  
20 that not -- I have not encountered one police  
21 officer that actually knows what that directive is.

22 Q. I know it also falls under your job duty,  
23 you know, educating with City agencies; correct?

24 A. Well, not just as my job, but as a black

1 trans woman. Even before I was doing this job, I  
2 did that same thing, because it involves me, you  
3 know. It's something personal to me. It's about  
4 even my -- because I have a history of having  
5 really horrible experiences when it comes to  
6 dealing with law enforcement. So when I'm  
7 advocating like that, it has nothing to do with  
8 this job, because I've been doing this long before  
9 this job.

10 Q. Well, you would agree --

11 A. This is about -- when I talk about asking  
12 officers about -- I've never had the opportunity to  
13 meet with officers in this capacity at this job and  
14 they know who I am to have those conversations with  
15 them.

16 Any time that I've had that conversation  
17 with an officer, it's because they don't know who I  
18 am and I ask them those questions. And then some  
19 of them I know personally.

20 Q. But you would agree, even though it is  
21 clearly something you're passionate about  
22 personally, it is also your job; right?

23 A. Yeah. But I would have asked those  
24 questions even if I were not in this role.

1 Q. Was Kendall always present when you were  
2 speaking with the police officers? At any point  
3 were you separated?

4 A. Well, she was kind of over to the side a  
5 little ways. Because she wouldn't stop yelling, so  
6 her husband was kind of pulling her to the side.

7 Q. But she could see and hear you  
8 interacting?

9 A. I can't -- I'm sure she could see, but I  
10 can't attest to what she could hear.

11 Q. But you weren't in separate locations; you  
12 guys were relatively together?

13 A. We were in like the same room, but we were  
14 not standing together. She was on the other side  
15 of the room with her husband clearly upset.

16 Q. So afterwards you left the police station.  
17 Did you text or correspond with Kendall afterwards?

18 A. I'm sure I probably did, because she was  
19 my friend and I was concerned.

20 Q. I'm going to go to down to -- can you see  
21 this screen? It's marked as BOE Exhibit-7. Can  
22 you see this?

23 A. So can I ask you why it's important for  
24 you to show my text messages that I sent to her out

1 of support for my friend? And how these text  
2 messages of me being a friend to someone are being  
3 used against me?

4 Q. I just want to clarify --

5 A. I don't need to see them. I know they  
6 exist.

7 Q. So you acknowledge then that this is a  
8 text message you sent Kendall?

9 A. Yes.

10 MS. CURLEY: So I just ask --  
11 was premarked Board Exhibit-7. I just ask  
12 that this be marked again.

13 BY MS. CURLEY:

14 Q. I just want to ask one clarifying  
15 statement on this particular text message. It  
16 should say in the second screen, "I just want you  
17 to know that I love you as a sister and I have your  
18 back as my sister and as a member of this  
19 community. I have your back in my professional  
20 position as well. And we will not take this lying  
21 down."

22 What did you mean when you said I have  
23 your back in a professional position?

24 A. Because I wanted to connect Kendall to

1 every resource that was available to her.

2 Q. And you would agree that that is also part  
3 of your job?

4 A. Yes.

5 Q. Whether Kendall Stephens was a friend of  
6 yours or not, you would have done this for any  
7 victim; correct?

8 A. For any victim, yes.

9 Q. And I took it down already, but it said,  
10 you know, I sent Avery, whom you've identified as  
11 Ms. Stephens' husband, the e-mail address of the  
12 police LGBTQ liaison so that he can notify him.  
13 And I'm going to call on your behalf tomorrow.

14 And was that your intention?

15 A. Uh-huh.

16 Q. And, again, you would have done this for  
17 any victim of --

18 A. I do that because I am notified by the  
19 police liaison any time a trans person is assaulted  
20 or murdered or any of those. Any time anti-trans  
21 violence happens, the police liaison and -- we  
22 coordinate and talk about it.

23 Q. So this was not only part of -- you were  
24 involved because you were personally friends with

1 Ms. Stephens, but you would agree that this kind of  
2 reach out or this kind of assistance would be part  
3 of the Executive Director's role?

4 A. Yes. Yeah. I would say it's part of the  
5 office's role.

6 Q. The office, correct. So someone from your  
7 staff --

8 A. Yes.

9 Q. Even if it wasn't you personally, someone  
10 on your staff who you oversee would participate in  
11 this if --

12 A. If we're notified and we are -- and we  
13 have knowledge of it and we are contacted.

14 This is not something that is -- this is  
15 not a standard policy or there's not a  
16 communication pipeline in place, which is something  
17 that I'm working on now. But we try to stay in  
18 contact to let folks know to contact us at some  
19 point.

20 Q. And so if you can, you will --

21 A. Yes.

22 Q. -- is that fair to say?

23 MS. CURLEY: And just for  
24 purposes of -- so this one is marked as

1                   Board of Ethics Exhibit-6. So I just ask  
2                   that this be marked and moved in.

3 BY MS. CURLEY:

4 Q.               And, again, this just refers -- we already  
5 talked about this with Directive 4.15. If you --  
6 you know, it sounds like you would have told  
7 them --

8 A.               Yes.

9 Q.               Even if you don't remember, you probably  
10 would have told them?

11 A.               Yes, I did. And I'm glad I did, because  
12 that means I'm doing my job.

13 Q.               Correct.

14 A.               And that's my job as a black woman and my  
15 job as the Director.

16 Q.               Now, following this incident, what  
17 happened afterwards? What was kind of the  
18 aftermath for you?

19 A.               Well, a lot of meet -- Kendall has a  
20 tendency to want to be in the news a lot. And so  
21 she reached out to every platform there was about  
22 this, and it became a huge story.

23                   Because of some of -- I knew that Kendall  
24 was actually starting to add things on to the

1 story. Everything that she was saying was not  
2 fact. And I didn't want to make any statements  
3 about it, so I had already contacted my supervisor  
4 in the comm department, because I didn't want to  
5 make any comments to the press, because -- and I  
6 sent you the e-mails, I think, where I was saying  
7 that I did not want to make any comments because I  
8 was not there in my professional capacity, I was  
9 there to support my friend, and it was not my story  
10 to tell.

11 Because I knew that -- after everything, I  
12 knew that Kendall had this open case with the girl  
13 who -- one of the girls who was now being charged  
14 with her attack.

15 And at sometime following that, a trans  
16 woman was murdered. And the District Attorney's  
17 Office reached out to me about doing a press  
18 conference about anti-trans violence and the  
19 murders and hate crimes. And so we did that.

20 And he asked -- the District Attorney's  
21 Office asked me to find someone who was working  
22 with the trans community to be a part of this press  
23 conference. And I reached out to Tatiana Waters  
24 (ph), who is someone who works in the community.

1               Once Kendall found out about that, she was  
2   furious. She was furious with me. She texted me  
3   and cursed me out and she called me and cursed me  
4   out. She said that she couldn't believe that I did  
5   not invite her as a survivor of a hate crime, and  
6   she should have been a part of that.

7               And she didn't even give me a chance to  
8   explain to her that not only did they not ask about  
9   someone who was a survivor, they said that's not  
10   what they requested, we were talking about someone  
11   who lost their life. And I couldn't believe that  
12   she was just like going off on me about this,  
13   because she made this whole situation where this  
14   woman lost her life about her. And that was when  
15   our friendship completely changed.

16   Q.           And this press conference, when  
17   approximately was that?

18   A.           I don't remember.

19   Q.           If I said late October, would that sound  
20   correct?

21   A.           Possibly. I've had so much going on this  
22   year. This was my first year in this role.  
23   Everything started to run together. Dealing with  
24   the pandemic. It was a lot.

1 Q. Immediately after the incident, did you at  
2 any point talk to anyone in the police department  
3 that you recall?

4 A. Well, Kendall -- Kendall had said that her  
5 experience with the police was problematic and she  
6 talked about a couple things. I can't remember  
7 specifically what she said they didn't do or what  
8 they did do. I can't remember what it was.

9 So because I know that that has been an  
10 issue for even myself, I connected -- I spoke to  
11 the police commissioner. And they -- I believe  
12 they may have -- one of them may have reached out  
13 to me first. But I did speak to one or both of the  
14 police commissioners. I think I spoke to one, and  
15 then one contacted me and I told them that I had  
16 already spoken with another.

17 And she asked me to forward her  
18 information to Kendall if Kendall wanted to make a  
19 formal complaint. And I just passed on the  
20 information to Kendall. I don't know if she ever  
21 actually did or not, but...

22 Q. I'm going to show you a couple of e-mails.  
23 And the same thing, we'll just acknowledge -- we'll  
24 get them marked and moved.

1                   Can you see these marked as BOE Exhibit-8?

2   A.            Uh-huh.

3   Q.            That's not legible.

4   A.            But that's -- that's from Adam Greer --

5   Geer, Adam Geer. That's the District Attorney's

6   Office. That's not the police department.

7   Q.            Correct. But you did get this information  
8   from Mr. Geer --

9   A.            Yes.

10   Q.           -- who's indicated as Director of  
11   Diversity & Inclusion, wants to speak with you  
12   about the Kendall Stephens matter. And you said  
13   yes, you will call?

14   A.           Yes. He -- that's the situation where he  
15   reached out to me. I know in the community that a  
16   lot of people knew of Kendall and my personal  
17   relationship.

18   Q.           Was this meeting in a professional -- with  
19   Mr. Geer, was this conversation in a professional  
20   capacity?

21   A.           Yes. Yes.

22   Q.           You don't have to get into specifics about  
23   it, but was it just about the incident or what was  
24   the topic of discussion?

1 A. I don't remember. I'm not sure. I don't  
2 remember what the conversation was about or what  
3 information we shared.

4 Q. Something about the Kendall situation?

5 A. Yes. It was definitely about the Kendall  
6 situation.

7 One of the things -- I had just did a  
8 training for the entire District Attorney's Office.  
9 And we -- this came right after having these  
10 conversations about how to better respond to these  
11 types of incidents.

12 MS. CURLEY: This is marked as  
13 Board of Ethics Exhibit-9. Just asking  
14 that to be marked and moved in as well.

15 BY MS. CURLEY:

16 Q. This is identified from Melvin Singleton,  
17 First Deputy Commissioner in the Field Operations  
18 for the Philadelphia Police Department, sent to you  
19 on September 2, 2020. Subject line, 17th District  
20 experience.

21 Do you acknowledge receiving this e-mail?

22 A. Yeah.

23 Q. And do you recall -- this is in line with  
24 what you said how the police department reached out

1 to you about your experience and Ms. Stephens'  
2 experience. Would you agree?

3 A. Yeah.

4 Q. Moving back to Exhibit-10. This is now a  
5 follow-up e-mail on September 2nd from Deputy  
6 Commissioner Robin Wimberly, who is the Office of  
7 Professional Responsibility for the police  
8 department, reaching out to you on September 2,  
9 2020.

10 Do you acknowledge receiving this e-mail?

11 A. Yeah. Just as I said, I was contacted by  
12 one or both of the commissioners, police  
13 commissioners.

14 Q. This indicates it's ensuring Kendall  
15 Stephens understands the complaint against police  
16 process?

17 A. Yes.

18 Q. And this one is marked Board of Ethics  
19 Exhibit-11. I ask --

20 A. They wanted to get -- I guess relay or  
21 have an opportunity to tell, to show or inform  
22 Kendall of the process. I don't know the process.  
23 They didn't tell me. It wasn't like they gave me  
24 the information about the process and I relayed it

1 to her. This was just about me connecting her to  
2 them so that they can --

3 Q. Kind of serving as a --

4 A. Yes.

5 Q. As Executive Director, your job is not  
6 to --

7 A. Yes.

8 Q. -- file complaints against the police  
9 department?

10 A. Yeah, absolutely not.

11 Q. But you would agree even if it wasn't Ms.  
12 Stephens, you would have provided the same -- you  
13 would have acted as the same liaison or conduit for  
14 the police department for any victim of a potential  
15 violence against --

16 A. Possibly. I will say that this was the  
17 first time that I've had to -- well, actually, it  
18 was the only time that I've had to connect someone  
19 to someone other than the police liaison within law  
20 enforcement.

21 Q. Because it was elevated?

22 A. Not on my -- well, I guess so, yes.

23 Someone felt the need to elevate it. And I think  
24 it was because of the uptake in the cases that we

1 have seen and how much violence had been happening  
2 around the world, not just in Philly. So I believe  
3 that is partially why it was such a different  
4 response this time.

5 MS. CURLEY: This one is marked  
6 as Board of Ethics Exhibit-11. I'm asking  
7 that to be remarked and moved in.

8 BY MS. CURLEY:

9 Q. And in this one there's your e-mail to Mr.  
10 Geer again where you're sharing information about  
11 the attack, that's on September 2nd, down here, if  
12 you can see.

13 I guess why did you feel -- why was this  
14 information shared, if you recall?

15 A. This was information that Kendall wanted  
16 me to share, because I believe she sent me -- oh,  
17 yes. Yes. This information came from Kendall,  
18 because I remember that I had not -- I had no idea  
19 who the girl was. I really hadn't been on social  
20 media that much. And Kendall sent me --

21 Q. When you say "who the girl was," who are  
22 you referring to?

23 A. I'm not sure what her name is. It was the  
24 young lady that was charged with Kendall's attack.

1 Q. So the alleged attacker?

2 A. Yes.

3 Q. Okay. I'm sorry, you can continue.

4 A. So Kendall sent me a video that she did --  
5 an interview she did about the incident with some  
6 blogger.

7 Q. And why were you forwarding this  
8 information?

9 A. Kendall asked me to forward it to him. I  
10 don't remember if her and -- if Adam and Kendall  
11 had been connected at that point.

12 My understanding was -- I really didn't  
13 understand if Kendall should be connected and  
14 directly working along with the District Attorney's  
15 Office or not. I'm not sure how that worked, which  
16 is another reason why I didn't ask her to be a part  
17 of that press conference. I wasn't sure if that  
18 was in violation -- I don't know. I didn't know.  
19 Being that she had that case with the young lady, I  
20 wasn't sure how that would affect her.

21 Q. And I guess why did you feel that your  
22 office should be the one to provide it then?

23 A. I didn't feel that I should be. Kendall  
24 asked me to provide it. It's not that I felt an

1 obligation to. She asked me just to share that  
2 information with the District Attorney's Office,  
3 and I did.

4 Q. I mean, I guess it was sent from your  
5 Philadelphia Government e-mail address versus your  
6 personal address. So why --

7 A. Well, I didn't communicate with -- I don't  
8 think you'll note that any of these e-mails are  
9 sent to my personal e-mail address.

10 Q. Correct. They're all sent to your  
11 official --

12 A. Why would you expect me to send this from  
13 my personal e-mail address? I'm not sure -- I'm  
14 not understanding where you're going with that.

15 Q. Well, if you're sending an e-mail address  
16 with your -- from your City Government e-mail  
17 address that has your position and title, it seems  
18 to come from your office; no?

19 A. Okay. And I'm not disputing that. But  
20 I'm not understanding why you're -- what are you  
21 asking me?

22 Q. I'm asking why the decision was -- if  
23 there was any decision process about why this had  
24 to come from the City's e-mail address?

1 A. There was never a time -- because she sent  
2 it to my City -- when I got the information from  
3 her, it came to my City e-mail address.

4 Q. So Ms. Stephens sent it to your City  
5 e-mail address and then you sent the information --  
6 you sent a new e-mail, because I guess this isn't  
7 forwarded, it's a new e-mail to Mr. Geer?

8 A. Yes. Yes.

9 There was never a time where I thought,  
10 oh, is this a personal issue or is this -- it was  
11 not that type of situation where it required that  
12 much thought because someone had been attacked  
13 violently.

14 I'm not sure how you respond to those  
15 types of things when your friends are attacked  
16 violently, but I was only trying to help my friend  
17 and get the information that she wanted me to share  
18 to the people who it needed to go to -- that she  
19 felt it needed to go to. I don't know, I don't  
20 make those types of decisions.

21 That video coming to me would have been  
22 worthless. I don't work with the detectives and I  
23 don't work with the police. So my job was to do  
24 what she asked me to do as her friend or however

1 you want to put it, in my professional capacity.  
2 It doesn't matter. The only thing that mattered at  
3 that time is that that information got to where it  
4 needed to go.

5 Whether you feel like I was doing it as a  
6 friend or in my professional capacity, at the time  
7 that did not matter to me. And if it happened to  
8 you, it wouldn't matter to me.

9 Q. You would agree that even if it hadn't  
10 been Ms. Stephens, if it had been anybody, you  
11 would have -- you would have considered it -- you  
12 would have done it the same?

13 A. Maybe. I can't say that it would be  
14 anybody. Because if you were to send me that, the  
15 way that I've been treated, I can't say that I  
16 would do that for you.

17 Q. Sounds fair.

18 But a potential victim of LGBT violence  
19 perhaps, something that would fall under your  
20 office's role?

21 A. Or someone that falls into my community.

22 Q. And you would agree that maybe in this  
23 circumstance you're doing it for Ms. Stephens for  
24 both, it's personal and related to your office?

1 A. Uh-huh.

2 MS. CURLEY: I'm going to move  
3 to -- this is marked as Board of Ethics  
4 Exhibit-12. I'm just going to ask that  
5 that be remarked in line with that.

6 BY MS. CURLEY:

7 Q. This is an e-mail from -- let me scroll  
8 down so you can see the first e-mail -- September  
9 2nd from a Ms. Mary Grace, I presume, to you asking  
10 how you're doing about Kendall after the incident.

11 Do you recall these e-mails?

12 A. Who's that from?

13 Q. This says Mary Grace.

14 A. I don't know who that is.

15 Q. You would acknowledge that that's your  
16 e-mail address, though?

17 A. Oh, yes, I do know who that is. I do know  
18 who that is.

19 Q. Okay. And so you recognize this e-mail  
20 and getting it?

21 A. Yeah. I do know who that is. She's from  
22 John C. Anderson.

23 Q. Then I just want to direct your attention  
24 to September 2nd, your response. And I want to ask

1 about the second paragraph.

2 First off, do you recall sending this  
3 e-mail or recognize it?

4 A. What a terrible e-mail that is. I look  
5 like such a horrible person.

6 Q. So you acknowledge sending it?

7 A. (Witness nods head.)

8 Q. That was a yes?

9 A. You have it right there. It comes from my  
10 e-mail address.

11 I'm not understanding. What are we doing  
12 here?

13 Q. I just need -- I'm just asking the  
14 questions to make sure it's clear for the record,  
15 because this is being recorded. So we're going to  
16 get a transcript afterwards, so I just want to make  
17 sure it's -- the transcript is not going to be able  
18 to capture if you're nodding your head or anything  
19 like that. So I just want to make sure that when  
20 you nod your head yes, you mean yes.

21 A. Yes.

22 Q. So in the second paragraph it says, I've  
23 been working hard with the police commissioners and  
24 District Attorney's Office to get all this,

1 referring to Ms. Stephens' attack, taken care of.

2 What were you referring to in this e-mail?

3 A. Having her connected to the District  
4 Attorney's Office and -- well, at that time the  
5 District Attorney's Office had victim services. So  
6 that's mainly what -- she was being connected to  
7 victims services, who is also another friend of  
8 ours, who happens to be the other person that was  
9 in the other e-mails, Kelly Burkhardt. So she  
10 played a part in this as well, because she works  
11 along with Adam Geer.

12 So this was about connecting her, just as  
13 I said before, connecting her to those resources.

14 And the other was about the attack and the  
15 other was about her interactions with the police  
16 following the attack.

17 MS. CURLEY: So now I'm going to  
18 move to this. This is marked as Board of  
19 Ethics Exhibit-13. I'm asking that to be  
20 remarked.

21 BY MS. CURLEY:

22 Q. Do you recognize this document?

23 A. Yes.

24 Q. And what is this?

1 A. The loan agreement.

2 Q. And this is the loan agreement executed  
3 between yourself and Ms. Stephens?

4 A. Uh-huh.

5 Q. And it's dated September 23, 2020. Does  
6 that date sound right to you?

7 A. Yes.

8 Q. Can you explain to me how this loan  
9 agreement came about?

10 A. Like I said before, I was -- that's before  
11 she was attacked. I was in a really bad  
12 relationship and I had to leave. And I stayed with  
13 Kendall.

14 And at that time -- during that time that  
15 I was at her house, Kendall showed me over \$200,000  
16 cash hidden in her closet. And because she knew  
17 that I was looking for a new place, she offered to  
18 loan me -- first she asked me about how much would  
19 I need to move into a new place. And I told her  
20 about \$4,000, because it was going to be first  
21 month, last month, deposit, and all that stuff to  
22 move in. And we agreed at that time while I was  
23 still staying in her house that she offered to loan  
24 me the \$4,000, and I said okay.

1           At the time her husband was still living  
2 there. Because he was going to law school, he was  
3 supposed to draw up the loan agreement. So he was  
4 very well aware of when we first had this  
5 discussion, which was way before the date you see  
6 on the agreement, which was prior to her attack.

7 Q.           When approximately were you living with  
8 Ms. Stephens?

9 A.           I'm going to say I had probably been gone  
10 maybe a week or two prior to the attack. I'm  
11 trying to think, because [REDACTED] is August  
12 16th, and I was back at home, I think, before [REDACTED]  
13 [REDACTED].

14 Q.           Approximately how long had you been living  
15 with Ms. Stephens?

16 A.           I stayed at her house for a few weeks, but  
17 I did not stay long, because she made it extremely  
18 difficult to keep my work life and personal life  
19 separate. So I made an agreement with my partner  
20 that I would come back home so that I could work  
21 and look for a place, continue to look for a place.

22 Q.           So that sounds like maybe two to three  
23 weeks?

24 A.           Yes. It probably wasn't three weeks.

1 Probably maybe two and a half weeks.

2 Q. So less than three weeks, but probably  
3 more than like a week?

4 A. Oh, yes, definitely.

5 Q. So sometime either end of July or  
6 beginning of August?

7 A. Yeah.

8 Q. And you said it was difficult for you to  
9 keep your work and personal life separate while you  
10 were living with Ms. Stephens?

11 A. Yeah.

12 Q. What do you mean by that?

13 A. Because I would be in meetings sometimes  
14 in the back room, because, of course, everything  
15 was happening virtually, and I was there staying at  
16 my friend's house who was supporting me, and it  
17 was -- what I was dealing with in my personal life  
18 was really private to me. And me being in a  
19 situation where I needed to be at Kendall's house  
20 with private too.

21 And there were times where she would be in  
22 her room in a meeting and she would just randomly  
23 be like, oh, well, you know, Celena Morrison is --  
24 and try to incorporate me into whatever they were

1 talking about. And then she would come into the  
2 back room all of a sudden and be like, oh, she's  
3 here right now and have her laptop in her hand and  
4 like putting me on camera like here she is, she's  
5 here right now.

6 And that -- it was really uncomfortable  
7 for me, because I was already uncomfortable being  
8 away from my room.

9 Q. Okay. So then these discussions --  
10 obviously it sounds like you were trying to find --  
11 you didn't want to go back to your original home,  
12 you wanted to find a new home; is that correct?

13 A. Yes.

14 Q. And so what was that process like? How  
15 did you go about finding a new place?

16 A. Just the usual, online, riding around.

17 And then it got really difficult because I  
18 was in a car accident. So I was looking for a  
19 house and a car at the same time.

20 But everyone -- even my boss knew that I  
21 was displaced. And I was open with them about I  
22 was staying at my friend's house. She knew at the  
23 time that I was staying at Kendall's house. I  
24 talked to my boss about returning back home for a

1       little while trying to find my own place.

2                 And when I finally did find a place -- I  
3       actually got the money from Kendall because I found  
4       a place, but then I had to back out of that place.

5                 I didn't actually find a place until  
6       October. I was actually supposed to move in the  
7       1st of November, but because of the situation and I  
8       needed to get out of that house, they allowed me to  
9       move in, I think, a week early.

10      Q.            Okay. I want to back up. The loan  
11     agreement, how did you come up with the \$4,000?

12      A.            That was just approximately the price  
13     range of the houses that I was looking in.

14      Q.            So when that number came up, you didn't  
15     have a specific house, you didn't know the --

16      A.            No. No.

17      Q.            You didn't know exactly what --

18      A.            No, not at all.

19      Q.            And you came up with that estimation?

20      A.            Yes.

21      Q.            And were there any other discussions  
22     with --

23      A.            We actually had that discussion a few  
24     times. And she just kept -- she actually even had

1       that discussion -- I'm like -- Kendall has a big  
2       mouth. And I later -- my assumption was that we  
3       were the only ones that knew about this agreement  
4       and me accepting a loan from her. But apparently  
5       she had already called my girlfriend in California  
6       and said, oh, yeah, you know Celena is my girl. I  
7       had to loan her some money. She said Kendall never  
8       told her how much money it was, but she did tell  
9       her that she loaned me the money.

10      Q.       It sounds like these conversations started  
11     when you were living with Ms. Stephens?

12      A.       Yes.

13      Q.       Did they continue after -- regarding the  
14     loan and the money --

15      A.       Oh, yeah.

16      Q.       -- they continued after you left?

17      A.       Yeah. Yeah. It was clear that -- because  
18     we talked about Avery drawing up the loan  
19     agreement.

20           One thing I do want to say is the document  
21     that you shared with me continuously stated that I  
22     requested money from Kendall Stephens. And that is  
23     not the case.

24           I never would have requested that amount

1 of money from Kendall, because I never -- Kendall  
2 has always been on the system. She's always  
3 utilized all the programs, all the resources in the  
4 community. I would have never thought that Kendall  
5 had \$4,000 to loan me until she showed me that  
6 \$200,000 cash that she had hidden in her closet.  
7 So there was no reason for me to ever even request  
8 that amount of money from her, because Kendall  
9 doesn't have a job. I would have never thought she  
10 had that amount of money.

11 So you keep saying that I requested it,  
12 and I want to clarify that that is not the case.  
13 She --

14 Q. So let's clarify that. So you became  
15 aware that -- Ms. Stephens made you aware that she  
16 had this large sum of money?

17 A. Yes.

18 Q. You did independent research about how  
19 much you thought you needed a down payment for?

20 A. Yes, because she said how much do you  
21 need, and I said I'll let you know. And I went to  
22 the back room. I knew about how much I could  
23 afford to pay for rent and multiply it by three.

24 Q. Ms. Stephens obviously knew you were in a

1 bad situation --

2 A. Yes.

3 Q. -- correct?

4 A. Because we talked about -- yes, she knew  
5 exactly my situation, because we were friends. We  
6 talked about my situation all the time.

7 Q. Talked about your situation. She knew  
8 about your job. She knew about all the  
9 responsibilities you had and all the ways you were  
10 involved in the community; correct?

11 A. She knew my -- she knew about my -- well,  
12 I can't really talk about what she knew about my  
13 job duties. But she knows -- the entire community  
14 knows about this office. The Office of LGBT  
15 Affairs is one of the most commonly known Mayor  
16 offices of them all. No one gets contacted as much  
17 as our office does. No one is -- no Mayor's office  
18 is as visible other than the Office of I think  
19 Public Engagement, and that's questionable.

20 Q. So then you did all the independent  
21 research about exactly how much you needed. And  
22 then you asked for that amount?

23 A. Well, she asked me how much did I need,  
24 and I simply multiplied. It wasn't research. It

1 was math. I thought about how much I could afford,  
2 and I multiplied it by three, and just told her  
3 that.

4 Q. Okay. And you came up with that \$4,000  
5 and you asked for that \$4,000?

6 A. Yes.

7 Q. You would agree you asked for that  
8 specific amount?

9 A. No, I didn't ask for it. I told her what  
10 it would take for me to get a new place. She asked  
11 me how much would it take for me to move into a  
12 place, and I told her \$4,000, that's what I'm  
13 saying.

14 Q. And then why was this done as a loan  
15 instead of any other process?

16 A. Because I told her that I was going to pay  
17 her back.

18 Q. Okay. And so you wanted to memorialize  
19 that, put it in writing?

20 A. Yes.

21 Q. And that's this document that we see  
22 executed here?

23 A. Uh-huh.

24 Q. And you agree that, in fact, you did get

1 the \$4,000?

2 A. Uh-huh.

3 MS. CURLEY: And that's  
4 reflected -- and this is marked as Board  
5 Exhibit-14. I'm asking that to be  
6 remarked.

7 BY MS. CURLEY:

8 Q. That's the check you received?

9 A. Yes.

10 Q. I think I have a copy of the purchaser's  
11 copy.

12 And just to clarify, [REDACTED] Morrison is  
13 your legal name, but not the name you go by; is  
14 that correct?

15 A. Why --

16 Q. Because it says "pay to the order of," and  
17 I just want to clarify.

18 A. Well, that's the check. Yes, that's the  
19 check out to me.

20 Q. And you received that check?

21 A. I just said that.

22 Q. And then subsequently cashed it is my  
23 follow up?

24 A. Yes.

1 Q. All right. And then last exhibit is Board  
2 Exhibit -- is marked as Board of Ethics Exhibit-15.  
3 This is the \$4,000 check. Do you recognize this  
4 document?

5 A. Yes.

6 Q. This is the document you returned -- you  
7 brought to our office?

8 A. Uh-huh.

9 Q. And it's dated April 22, 2021.

10 And why did you bring this document to our  
11 office?

12 A. To deliver it to Ms. Stephens.

13 Q. And that was to repay the loan  
14 agreement --

15 A. Uh-huh.

16 Q. -- correct?

17 A. Yes.

18 MS. CURLEY: I don't have any  
19 other questions at this time.

20 THE WITNESS: Okay.

21 (At this time, documents were  
22 marked for identification as BOE-1 through  
23 BOE-15.)

24 (Witness was excused.)

1 (Deposition concluded at 11:25  
2 a.m.)

CELENA MORRISON

1

## C E R T I F I C A T I O N

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I hereby certify that the proceedings  
and evidence noted are contained fully and  
accurately in the notes taken by me on the  
deposition of the above matter, and that  
this is a correct transcript of the same.

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Kathleen M. Rigby,

Court Reporter

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(The foregoing certification of this  
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unless under the direct control and/or  
supervision of the certifying reporter.)

- - -



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	<b>Y</b> <b>yeah</b> 8:3,7 23:1 24:23 28:4 34:22 35:3,11 36:10 42:21 47:7,11 50:6,15,17,17 <b>year</b> 4:15 31:22,22 <b>years</b> 7:20 <b>yell</b> 20:1 <b>yelling</b> 20:19 22:1,13 25:5 <b>young</b> 37:24 38:19	<b>4</b> <b>4</b> 3:4 <b>4,000</b> 45:20,24 49:11 51:5 53:4,5,12 54:1 55:3 <b>4.15</b> 23:12 29:5
	<b>Z</b> <b>zoom</b> 1:10 2:5	<b>5</b> <b>55</b> 3:8,8,9,9,10,10,11,11,12 3:12,13,13,14,14,15 <b>564-1233</b> 1:23
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8/10/20 3:8

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9

9/2/20 3:12,12,13

9/3/20 3:13

5/20/2021

§ 4-2000. Creation.



PA &gt; Philadelphia &gt; The Philadelphia ... &gt; CHAPTER 20 OFFICE OF LGBT AFFAIRS

EXHIBIT

ED-2

12/15/21 csh

## CHAPTER 20

### OFFICE OF LGBT AFFAIRS 123

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#### Notes

123 Added by approval of the voters at the election held on November 3, 2015, and certified on November 23, 2015. See Bill No. [150216](#) (approved June 2, 2015); Resolution No. [150225](#) (adopted May 14, 2015). See Charter subsection [A-200\(13\)](#) for effective date. Enrolled resolution numbered this as Chapter 18; renumbered by Code editor.

#### § 4-2000. Creation. 124

The Office of Lesbian, Gay, Bisexual and Transgender (LGBT) Affairs is hereby created in the Office of the Mayor, headed by the Director of LGBT Affairs.

---

#### Notes

124 Enrolled resolution numbered this as Section 4-1800; renumbered by Code editor.

#### § 4-2001. Powers and Duties. 125

The Office of LGBT Affairs shall have the power and its duty shall be to perform the following functions:

- (a) Develop proposed City policy regarding civil rights issues affecting LGBT people;
- (b) Coordinate the implementation of policies and programs to meet the City's diversity and equality goals as expressed in this Charter, ordinances and Executive Orders;
- (c) Coordinate among City Departments, agencies and offices to improve LGBT access to City services, and to promote equality and safety for LGBT people;
- (d) Support the growth and development of the City's LGBT communities; and
- (e) Serve as liaison between the City's and region's LGBT communities and the City.

---

#### Notes

125 Enrolled resolution numbered this as Section 4-1801; renumbered by Code editor.

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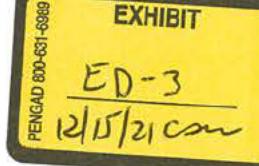
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ED-2

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**Caroline Curley**

**From:** kendall stephens [REDACTED]  
**Sent:** Monday, August 10, 2020 7:49 PM  
**To:** Adrian Lowe  
**Cc:** Celena Morrison  
**Subject:** Re: [heartsonawire] submissions

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Hello friends,

I spoke to Celena Morrison, who is the Director of LGBTQ Affairs with the Mayor's Office regarding a meeting with Hearts on a Wire concerning our incarcerated sisters, brothers, and others. She is excited to participate in a virtual meeting with her team and Hearts on a Wire ASAP, as such a meeting is already on her docket. Our meetings run from 530 to about 730 on Monday evenings, so hopefully the Mayor's Office can accommodate that timeframe, though we can be flexible if need be. Celena has been in communication with Kelly Burkhardt, who she considers an ally and a friend to build strong support in our cause. Let us continue this important dialogue and make this meeting happen very soon. Thank you!

Best,

Kendall Stephens

On Aug 10, 2020 at 4:21 PM, Adrian Lowe [REDACTED] wrote:

Hearts on a Wire:

I am new to transition and seeking advice and support. My relationship was separated by the facility. Now we're so far apart and I am breaking up emotionally and mentally. BJL I love you to the moon and back. I miss you dearly and you'll never lose me.

Yours,

~ Alexandria Fierro Rosealita

Hello.

We spent a week locked down fully when the protests started. I worry about a backlash. And I worry about people losing sight of holding police accountable. People get distracted by the DUkes of Hazzard, Gone with the Wind, or who doesn't become vocal or uses the wrong word or phrase. I believe in the right to protest and speak out, even if I disagree with what is being said. I am happy that people stand up to the jackbooted thugs, but hope they don't lose focus. The Police need to change, the Laws, the Court, Sentencing. So let's stay safe and focused and together.

~ Viktoria Petersburg

HOAW:

EAch and every contributor inspires me, lifts my spirits and puts smiles upon my face! The system is finally changing here in Kentucky and and I am proud of everyone's unity. HRT is now accessible, cosmetics and gender-appropriate clothes, and surgery requests are available! We fought for so long!

Never accept "NO" from our flawed system! Let George Floyd's soul shine down and pave the way for equality and an end to our corrupt system!

xoxo

Princess <3

Robert Baldwin [REDACTED]  
[REDACTED]

Brothers and Sisters of the HOAW family:

I have finally started my hormones! After a year long battle, and it feels amazing! People I never would have thought would accept, understand, and even care, have shown otherwise. Though the struggle with my mental health has continued to be constant, it has become easier to handle. *Jayme Elliott Patton*: I hope you are able to succeed in your battles with ADCRR soon. *Harley Quinn*: You're definitely not alone. BDP is cruel, but there are people here for you. I have BPD as well, so I get it. Keep your head up. *DeDe*: I'm sorry to hear all you're going through. Your words had an impact on me truly, about looking in the mirror and facing our fears. I hope you stay well, and remember that you're not alone. I continue to hope and pray that everyone stays safe with all the injustice and craziness amongst the COVID>

Until next time.

~ Jace C. Bonham

Waiting or the Breakdown  
Fighting to keep up my head  
never seemed this hard before  
Everything around me  
wants only to settle the score  
This way and that way  
the tattered emotions pull  
Another day yet again  
behind the fake mask is dull  
All the growth i've done  
Seems to start to fall apart  
Since yet again I rely on this  
Mask over myself just to get a start  
My skin starts to crawl  
when it begins to grow silent now  
the voices in my head stop  
Until I start to show them how  
How now I can thrive  
Instead of giving in once more  
My proof now that i can  
Be my true self down to my core

by Jace C. Bonham

written on the anniversary of a friend's suicide. Rest in Peace, my sweet Sadie.

--  
You received this message because you are subscribed to the Google Groups "hearts on a wire" group.

To unsubscribe from this group and stop receiving emails from it, send an email to  
[heartsonawire+unsubscribe@googlegroups.com](mailto:heartsonawire+unsubscribe@googlegroups.com).

To view this discussion on the web visit

[https://groups.google.com/d/msgid/heartsonawire/CAPL9CU%3DUmk2H1O4ZfM%2Bq3yLPmH2cktLGRmt\\_ir0L9m31NNE1JA%40mail.gmail.com](https://groups.google.com/d/msgid/heartsonawire/CAPL9CU%3DUmk2H1O4ZfM%2Bq3yLPmH2cktLGRmt_ir0L9m31NNE1JA%40mail.gmail.com).

**Caroline Curley**

**From:** Celena Morrison  
**Sent:** Wednesday, August 19, 2020 12:08 AM  
**To:** Naiymah Sanchez;Kelly Burkhardt;kstephens215  
**Cc:** Sayeeda Rashid;Erik Larson;Adrian Lowe;Naiymah Sanchez  
**Subject:** Re: Hearts on a Wire: Making Connections

I have some availability on Friday, August 28 after 1pm.

**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
Pronouns: she/her/hers



---

**From:** Naiymah Sanchez [REDACTED]  
**Sent:** Tuesday, August 18, 2020 10:47 AM  
**To:** Kelly Burkhardt [REDACTED]  
**Cc:** kstephens [REDACTED]; Adrian Lowe [REDACTED]; Naiymah Sanchez <nsanchez@aclupa.org>; Celena Morrison <Celena.Morrison@Phila.gov>  
**Subject:** Re: Hearts on a Wire: Making Connections

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Good morning All,

Thanks for your reply Kelly, I am Able to jump on a call whenever. Please send me over the details when available.

Talk soon,

**Naiymah A. Sanchez** (she/her)  
Community Activist

*"Our lives begin to end the day we become silent about things that matter."*  
-Dr. Martin Luther King jr.

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On Aug 18, 2020, at 9:54 AM, Kelly Burkhardt [REDACTED] wrote:

Hi everyone,

Please forgive my delayed reply from being on vacation last week. I believe there are a lot of opportunities to do work with the DOC because Amber and the Office of LGBTQ Affairs did some work regarding the wellness and safety of trans folks who are incarcerated. I am wondering if Sayeeda or Erik have any information surrounding this initiative because they were interning with Amber on some of these initiatives. It's best to not reinvent the wheel; rather, identify what was working or not and then create a plan from there.

Let's set up a call next week to start the process. The only day/times I am not available is Monday after 1pm and all day Tuesday.

Thank you and looking forward to speaking with you all!

Kelly

Kelly A. Burkhardt



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On Thu, Aug 13, 2020 at 11:20 AM Naiymah Sanchez [REDACTED] wrote:  
Good morning Kendall,

Thank you for your email and I hope you are doing well during these trying times.

As I expressed on our call, I would like to contribute in any capacity towards not just making prisons safer but reducing the numbers of those impacted by the criminal justice system as a whole. It is factual that there are race, ethnicity, and gender disparities within ALL channels of the Criminal justice system starting with law enforcement and ending with incarceration/ Monitoring. I would like to join this upcoming meeting at Hearts on the Wire to hear Kelly Burkhardt's presentation to see where I would be needed in this process. I have only one follow up question regarding data on incarcerated LGBT people, Is the Department of Correction collecting this information and if so, how?

Talk soon,

**Naiymah A. Sanchez (she/her)  
Community Activist**

*"Our lives begin to end the day we become silent about things that matter."*  
-Dr. Martin Luther King jr.

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On Wed, Aug 12, 2020 at 1:49 PM [kstephens](#) [REDACTED] wrote:  
Hello,

I am writing the response letter now. I spoke with Kelly Burkhardt and she would like to speak with Hearts on a Wire either this upcoming Monday or the next in regard to how she can assist our needs. She has some great ideas surrounding prison reform and establishing accountability structures in correctional facilities for the LGBTQ community. I also had a meeting with Celena and Naiymah and they are also interested in being involved in any capacity we feel they would be best utilized. At some point, I hope we can all get together and coordinate our efforts to end the oppressive tactics inherent in jail culture and provide LGBTQ services to the incarcerated community, as well as comprehensive trainings for correctional officers and staff. Also, I am working with Kelly to retrieve data from the

DOC on the total number of LGBTQ people (especially trans and nonbinary identified individuals) that have been and are currently incarcerated. Please let me know how else I can be of assistance.

Best,

Kendall Stephens

On Aug 11, 2020 at 10:19 AM, Adrian Lowe <[mr.adrian.lowe@gmail.com](mailto:mr.adrian.lowe@gmail.com)> wrote:

5/28/2021

Transgender woman says she was beaten in her Point Breeze home and called slurs

Friday, May 28, 2021

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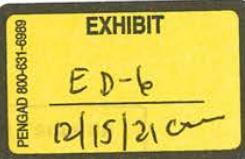
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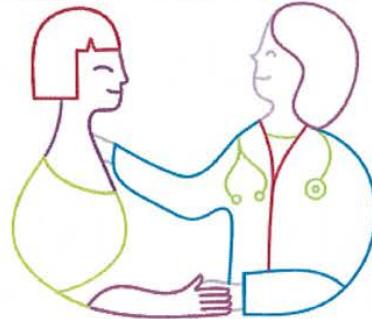
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News 

## Transgender woman says she was beaten in her Point Breeze home and called slurs

Kendall Stephens says what happened to her was a hate crime. While Philadelphia recognizes attacks on LGBTQ people as hate crimes, the state of Pennsylvania does not.



JOSE F. MORENO

Kendall Stephens stands near her Point Breeze home on Wednesday. Stephens, a transgender woman, said she was beaten inside her home Monday night by a group of women a ... [Read more](#)  
JOSE F. MORENO / Staff Photographer



by Julie Shaw

Published Aug 26, 2020

ED-6:1

5/28/2021

Transgender woman says she was beaten in her Point Breeze home and called slurs

On Monday night, Kendall Stephens opened the door of her Point Breeze home after hearing a ruckus outside and saw about 25 people standing around watching as a man and woman fought, she said.

▷ X

She told the crowd she was going to call the police and one woman cursed at her, then “just charges at me and just starts swinging at me with closed fists,” Stephens, a transgender woman, recalled Wednesday.

“She pushed her way into my home, then men and women started coming in, beating me,” said Stephens, 34.

“During this assault, they were screaming transphobic slurs to me,” she said of the group of about nine people who burst into her home. “They were calling me a [expletive] ‘tranny.’”



Courtesy Kendall Stephens

Ring doorbell video shows the moment Kendall Stephens says she was beaten inside of her home by a group of people who also called her transphobic slurs.

“This is a hate crime,” said Stephens. “For someone to come into your home and hurl transphobic slurs, that shows hateful intent.”

One of the women in the attack, which started about 10:15 p.m. picked up a square wooden planter in Stephens’ home and beat her in the head and face with it, Stephens said. Some women also pulled some of her hair out, she said.

ED-6:2

5/28/2021

Transgender woman says she was beaten in her Point Breeze home and called slurs

As she was being beaten, her two goddaughters, 12 and 16, looked on in horror, she recalled. Stephens said she was able to escape into her basement and lock the door. Seconds later, she said, one of her goddaughters told her the group had left.

Officer Miguel Torres, a Philadelphia police spokesperson, said Wednesday that detectives with the South Detective Division are investigating the reported assault.

Deja Lynn Alvarez, an advocate in the transgender community who serves as a liaison to the police, said Wednesday that the attack on Stephens underscores the lack of protection for LGBTQ people in Pennsylvania's hate-crime law.

In 2014, Philadelphia passed legislation that recognizes attacks based on gender identity or sexual orientation as hate crimes. That allows a crime targeting LGBTQ people in Philadelphia to be charged as a summary offense, said Jane Roh, spokesperson for Philadelphia District Attorney Larry Krasner.

Krasner supports expanding hate-crimes protection to LGBTQ people in state law, and urges the Pennsylvania legislature to do so, said Roh.

In Pennsylvania, a person can be charged with **ethnic intimidation** if an offense was committed with malicious intention toward a person based on race, color, religion, or national origin.

Stephens, a Temple University student who transferred from the Community College of Philadelphia, said after the assailants left her house, she went to her front door and saw the first woman who had punched her get into the back of a car. "We're coming back to finish the job," Stephens said the woman told her before the car left.

Meanwhile, she said the woman who had hit her with a wooden planter was standing outside a home about five doors down from hers "laughing" after the attack.

ED-6:3

5/28/2021

Transgender woman says she was beaten in her Point Breeze home and called slurs

She was treated at Jefferson Health's Methodist Hospital for various injuries — including a broken nose, cuts to her gums, mouth, and lips, and facial swelling.

She said she and her goddaughters feel traumatized.

"I don't understand why this would happen to me," she said. "This is very frightening."

Published Aug. 26, 2020



Julie Shaw

I cover crime and courts, with a focus on Philadelphia and South Jersey.

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ED-6:4

5/28/2021

Transgender woman says she was beaten in her Point Breeze home and called slurs

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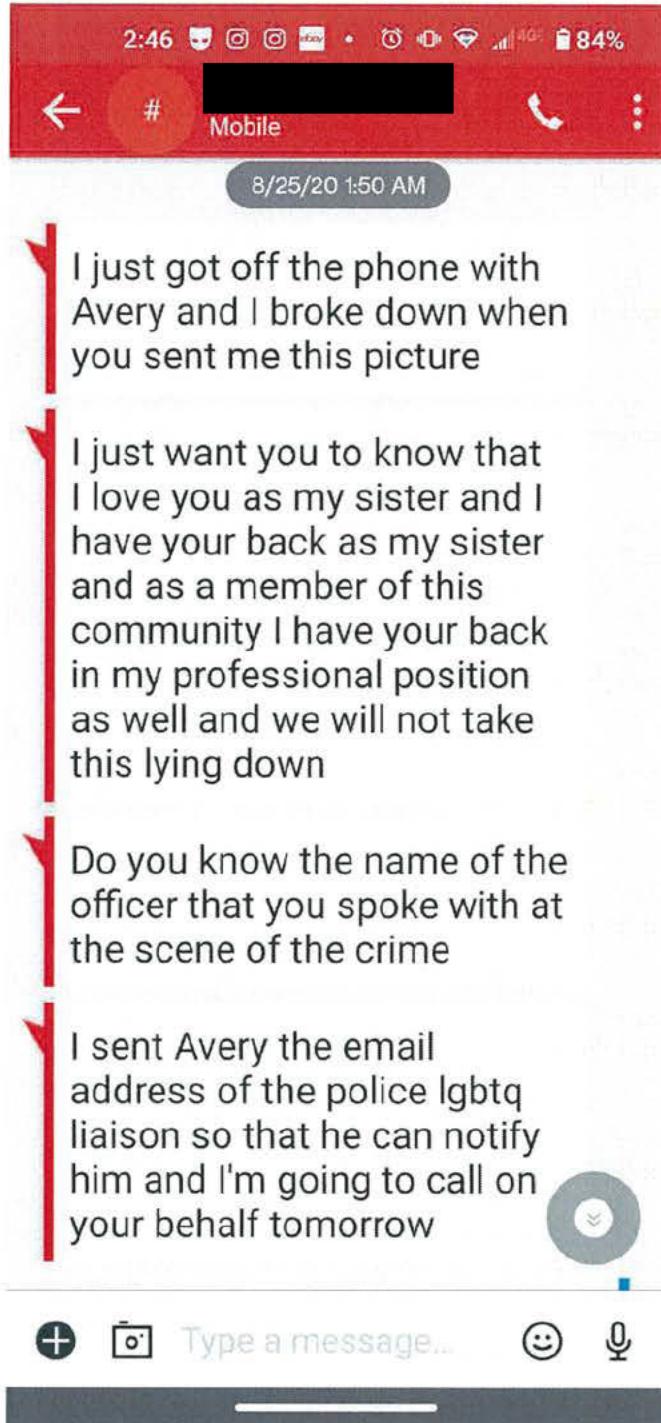
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ED-6:5

ED-7  
12/15/21 Cmu

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12/15/21 can

**Caroline Curley**

**From:** Robin Wimberly  
**Sent:** Wednesday, September 2, 2020 11:46 AM  
**To:** Celena Morrison  
**Subject:** Kendall

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Good morning,

I am reaching out to you concerning the incident that occurred at the 17<sup>th</sup> District with Kendall. I want to ensure Kendall understands the Complaint Against Police process is available. Please call me on my cell at 215-823-9551.

Thank you,

Deputy Commissioner Robin M. Wimberly

Office of Professional Responsibility

Philadelphia Police Department

Police Headquarters-Room 310A

750 Race Street

Philadelphia, PA. 19106

Phone: 215-686-1277

Fax: 215-925-0738

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**Caroline Curley**

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**From:** Robin Wimberly  
**Sent:** Tuesday, September 15, 2020 2:08 PM  
**To:** Celena Morrison  
**Subject:** RE: Kendall

Hi,

I just spoke will Kendall and walked her thru the process. Again thank you for your help.

RMW

**From:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Sent:** Thursday, September 10, 2020 11:15 PM  
**To:** Robin Wimberly <[Robin.Wimberly@phila.gov](mailto:Robin.Wimberly@phila.gov)>  
**Subject:** Re: Kendall

Hello ,

Thank you so much for following up. I spoke with Kendall and she does want to move forward with filing a Complaint Against Police.

She asked me to share her contact info with you. Her cell number is 267.888.0243

Let me know if there is anything else that I can do.

Warm regards,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
Pronouns: *she/her/hers*



---

**From:** Robin Wimberly <[Robin.Wimberly@phila.gov](mailto:Robin.Wimberly@phila.gov)>  
**Sent:** Wednesday, September 9, 2020 3:01 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** Kendall

Good afternoon,

Circling back, has Kendall changed her mind regarding filing a Complaint Against Police? Please let me know if I can be of service any manner.

Thanks,

Deputy Commissioner Robin M. Wimberly  
Office of Professional Responsibility  
Philadelphia Police Department  
Police Headquarters-Room 310A  
750 Race Street  
Philadelphia, PA. 19106  
Phone: 215-686-1277  
Fax: 215-925-0738

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**Caroline Curley**

**From:** Adam Geer [REDACTED]  
**Sent:** Wednesday, September 2, 2020 12:28 PM  
**To:** Celena Morrison  
**Cc:** Sayeeda Rashid; Erik Larson  
**Subject:** Re: Kendall Stephens Matter

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Thanks very much. I am aware of this info and I forwarded it to the assigned detective yesterday. I will keep updated and please continue to reach out to me with any new information.

Also, let me know if you and your team have a few dates to offer for that training!

Thanks!  
Adam

Adam N. Geer

On Sep 2, 2020, at 12:15 PM, Celena Morrison <Celena.Morrison@phila.gov> wrote:

Hello Adam,

I wanted to share some information that I was able to get. See the attached screenshots of the woman that was Kendall's main attacker. I am also including a link to an interview that she recently did with a local Instagram blogger. That video can be seen [here](#).

Let me know if you need any further information.

Thank you,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
Pronouns: she/her/hers



---

**From:** Adam Geer [REDACTED]  
**Sent:** Friday, August 28, 2020 2:37 PM

**Caroline Curley**

---

**From:** Adam Geer [REDACTED]  
**Sent:** Friday, August 28, 2020 2:37 PM  
**To:** Celena Morrison  
**Cc:** Sayeeda Rashid; Erik Larson; Adam Geer  
**Subject:** Re: Kendall Stephens Matter

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Yes. Just call.

Adam N. Geer

On Aug 28, 2020, at 2:27 PM, Celena Morrison <Celena.Morrison@phila.gov> wrote:

Hello Adam,

I have some availability at 3pm. Will that work?

Sent via the Samsung Galaxy Note10, an AT&T 5G Evolution capable smartphone  
Get [Outlook for Android](#)

---

**From:** Adam Geer <Adam.Geer@Phila.gov>  
**Sent:** Friday, August 28, 2020 2:25:28 PM  
**To:** Celena Morrison <Celena.Morrison@Phila.gov>; Sayeeda Rashid <Sayeeda.Rashid@Phila.gov>; Erik Larson <Erik.Larson@Phila.gov>  
**Subject:** Kendall Stephens Matter

Good afternoon Ms. Morrison,

I hope you are well. When you get a minute, can you call my cell so I can discuss the Kendall Stephens matter with you?

Thanks,  
Adam  
518-339-0100

**Adam N. Geer**  
Director of Diversity & Inclusion  
Assistant District Attorney  
Homicide Unit  
Philadelphia District Attorney's Office  
3 South Penn Square  
Philadelphia, PA 19107  
c: 518-339-0100

**Caroline Curley**

**From:** Mary Groce [REDACTED]  
**Sent:** Thursday, September 3, 2020 3:54 PM  
**To:** Celena Morrison  
**Cc:** Susan A  
**Subject:** Re: September JCAA Newsletter

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

Thank you, Celena.

You take care and stay safe too—and yes, we're looking forward to those better days!!

Mary & Suz

On Sep 2, 2020, at 11:13 PM, Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)> wrote:

Hello There Dear,

I hope that you are well and staying safe. Thank you again for sharing the Newsletter and the write up on Kendall was great. She is an amazing person and I would jump out of bed a thousand times to support her, you or any of the folks in this community. No one deserves to be treated so unfairly.

I have been working hard with the Police Commissioners and the District Attorneys Office to get all of this taken care of.

Take care and stay safe, better days are yet to come!

Warm regards,  
**Celena Morrison**  
*Executive Director*

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
Pronouns: she/her/hers



**From:** Mary Groce [REDACTED]  
**Sent:** Wednesday, September 2, 2020 5:05 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** September JCAA Newsletter

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

Hi Celena,

How are you doing? I understand you were there to help Kendall after she was attacked. Thank you for the work you do!

I mentioned you in this latest newsletter (front page article).

Sending hugs,

Mary

Mary Groce

[REDACTED]  
[MaryGroce.com](http://MaryGroce.com)

[REDACTED]  
[EmoryConradMalick.com](http://EmoryConradMalick.com)

[REDACTED]  
GroceM@si.edu

Search

How it works

Start a GoFundMe



Sign in

Share

# Support to End Violence Toward Black Transwomen



Kendall Stephens is organizing this fundraiser.

Transgender woman brutally beaten b



I am a black transwoman living below the poverty line who was recently brutally attacked inside of my own home. I was attacked by about 8 people who pushed themselves into my home and violently attacked me with wooden blocks, closed fists and their feet. Adding insult to injury, they stole my ring camera, which has now left me vulnerable to future

[https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm\\_campaign=p\\_cp\\_url&utm\\_medium=os&utm\\_source=customer](https://www.gofundme.com/f/support-for-beaten-black-transwomen?utm_campaign=p_cp_url&utm_medium=os&utm_source=customer)

**\$36,173** raised of  
\$35,000 goal

**1K** donors   **1.9K** shares   **1.1K** followers



Share



Donate now



Alexa Brady  
\$25 2 mos



Annie Alfstad  
\$20 3 mos



James Curry  
\$25 6 mos

See  
all

See top  
donations

ED-11:1

Fundraiser by Kendall Stephen | Support for Beaten Black Transwomen

attacks without a way to record any further transgressions. I am proud that I have thrived both personally and academically despite my circumstances, however (like most transwomen everywhere) danger always lurks around every corner of our lives. I want 50 % of the proceeds to go the William Way LGBTQ Center, a safe social community space for people to safely and confidently explore their identities in an affirming environment. William Way also connects vulnerable at-risk individuals with life-saving and life-sustaining resources. You may also donate to them directly as well. They just opened a Trans Resource Center and would like a significant portion to go toward resources dedicated to that space. I have serious damage to my face and right ribs, and needless to say I am very traumatized by the entire ordeal. Sadly, two children witnessed the ordeal are also traumatized by the ordeal. Currently, I am navigating my convalescence one day at a time. I am currently a student at Temple University and hope that I am not forced to drop out as a result of my injuries. I appreciate you so much. Each and every one of you!

Best, Kendall S.

How funds will be used: Half of the money will go to the operational costs associated with William Way's LGBT Community Center's trans Resource center and board member dues associated with my volunteering there. They do tremendous work within the LGBTQ community and have helped me and countless others, throughout my journey of self-discovery. The other half will go to establishing and updating security in my house, moving/relocation expenses, and medical, travel-related, and other miscellaneous expenses associated with my road to recovery. The plan: Though the funds will be sent directly to me, I will send 50% of the donations to

**ED-11:2**

William Way in the form of a certified check.  
Director of William Way, Chris Bartlett, is aware of  
my intention to donate half of all donation  
proceedings.

## Updates (4)

**NOVEMBER 24, 2020** by Kendall Stephens, Organizer

Thank you for your donations. A donation is being  
made to the William Way LGBTQ Community  
Center - Trans Resource Center.

[See older updates](#)

[Donate](#)[Share](#)

## Organizer



Kendall Stephens  
Organizer  
Philadelphia, PA

[Contact](#)

## Comments (33)



Chris Bell donated **\$10**

I wanted to support Kendall.

8 mos



Lars Stephenson donated **\$50**

You are beautiful. Thank you for your  
braveness. I wish you health and roses.

ED-11:3

Loan Agreement

Date: 9/23/2020

Loan Amount: Four Thousand Dollars and Zero Cents

For the above value received by Celena Morrison (The Borrower), agrees to pay Kendall Stephens (The Lender).

It is agreed between the parties that payment of the loan amount will be made in monthly

payments over a 12 month period. The first payment will be due on 10/23/20 in the amount of \$150.00 and subsequent payments will be in the amount of \$350 paid on the 23rd

day of each month ending on 10/23/21.

Borrower Signature: Celena Morrison

Date: 9/23/2020

Lender Signature: Kendall Stephens

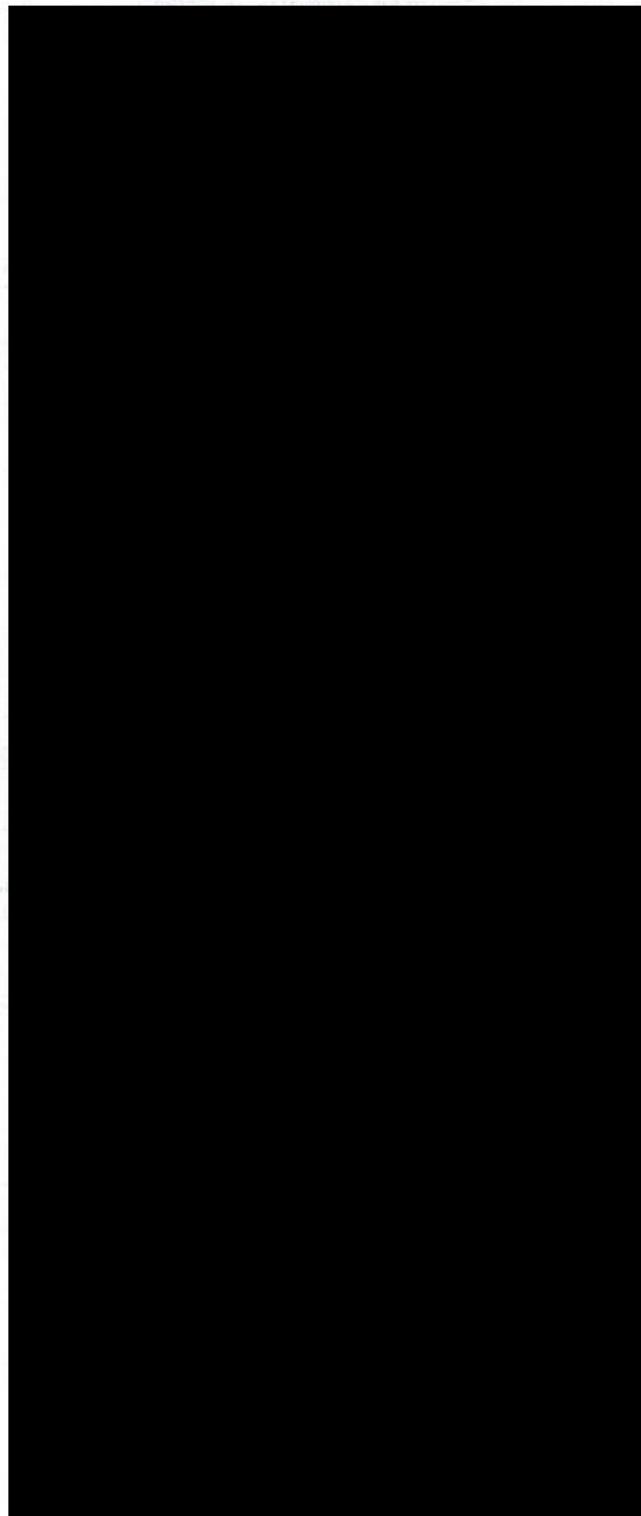
Date: 9/23/2020

EXHIBIT

ED-12  
12/15/21 cm

PENGAD 800-681-6889

ED-13  
12/15/21 Com



ED-14

ED-15

PENGAD 6000-631-6989  
12/15/21 CAC

CITY OF PHILADELPHIA  
**STATEMENT OF  
 FINANCIAL INTERESTS**

PHILADELPHIA BOARD OF ETHICS  
 DEPARTMENT OF RECORDS  
 ROOM 156, CITY HALL  
 PHILADELPHIA, PA 19107

All Statements of Financial  
 be made available for pu  
 and copying during regular office hours.

**INSTRUCTIONS:** Complete the entire form. Type or print in ink. Clearly enter your name in the space provided.  
 Attach the additional 8-1/2" x 11" sheets if necessary, identifying each item by number.  
 This form may be completed on line at <https://financial-disclosure.phila.gov>

AMENDED  
 STATEMENT

1. LAST NAME	FIRST NAME	MI	SUFFIX
Morrison	Celena		
2. STREET ADDRESS	CITY	STATE	ZIP CODE
CITY DEPARTMENT / AGENCY / COMMISSION / BOARD Mayors Office		3. TELEPHONE NUMBER	
4. NAME OF PUBLIC POSITION OR PUBLIC OFFICE YOU HOLD/HELD Executive Director (Currently Holding)		5. OCCUPATION OR PROFESSION	
<b>REMEMBER:</b> Items 6 THROUGH 12 - All information concerns the PRIOR CALENDAR YEAR. NO DOLLAR AMOUNTS are required except in Item 9. If answer is NONE, check the box where indicated. Information must be included for the filer only and not family members.			
6. REAL ESTATE INTERESTS: List any direct or indirect interest in any real estate as described in attached <b>Instructions</b> . If none, check: <input checked="" type="checkbox"/>			
ADDRESS	NATURE OF INTEREST		
7. CREDITORS: List each loan or debt over \$5,000 and the interest rate thereon as described in the attached Instructions. If none, check: <input checked="" type="checkbox"/>			
CREDITOR	ADDRESS	INTEREST RATE	
8. DIRECT OR INDIRECT SOURCES OF INCOME: List all sources of \$500 or more in the aggregate as described in the attached Instructions . If City is a source, list City. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF INCOME	ADDRESS		
<hr/> <hr/> <hr/>			
9. GIFTS: List sources of gifts with an aggregate value of \$200 or more as described in attached <b>Instructions</b> . If none, check: <input checked="" type="checkbox"/>			
SOURCE OF GIFT	ADDRESS		
VALUE OF GIFT	CIRCUMSTANCES OF GIFT		
10. HONORARIA: List sources over \$100 described in attached <b>Instructions</b> . If none, check: <input checked="" type="checkbox"/>			
SOURCE OF HONORARIUM	ADDRESS OF SOURCE		
11. OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS ENTITY: If none, check: <input checked="" type="checkbox"/>			
BUSINESS	POSITION HELD		
<hr/> <hr/>			
12. FINANCIAL INTEREST IN ANY BUSINESS ORGANIZED FOR PROFIT: (See attached <b>Instructions</b> .) If none, check: <input checked="" type="checkbox"/>			
<b>THIS FORM MUST BE SIGNED AND DATED IN ORDER TO BE ACCEPTED.</b>			
Information represents disclosure for the prior calendar year <b>2020</b> . False statements made herein are punishable as authorized by Section 20-612 of the Philadelphia Code and are subject to the penalties prescribed for perjury set forth in 18 Pa. C.S. § 4904.			
Signature <b>COMPLETED AND SIGNED ELECTRONICALLY</b> Date <b>05/18/2021</b>			

FIRST NAME

Celena

LAST NAME

Morrison

MI SUFFIX

---  
Positions continuation

Public Position: member

Affiliation Status: Held in Past

Governamental Entity: Comm Human Relations

Profession:

Address:

COMMONWEALTH OF PENNSYLVANIA  
SEC-1 (Rev. 01/21)PENNSYLVANIA S  
(717) 783-1610

PENGAD 800-631-6898

## STATEMENT OF FINANCIAL INTERESTS

PLEASE PRINT NEATLY

ED-1b

12/15/21 cm

01 LAST NAME

Morrison

FIRST NAME

Celine

MI

SUFFIX

02 ADDRESS office (business or governmental) or home

City

State

Zip Code

Area Code

Phone

NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBERS.

03 STATUS Check applicable block or blocks, more than one block may be marked. (See instructions on page 2)

A  Candidate (including write-in)  
B  NomineeC  Public Official (Current)  
D  Public Employee (Current)  
E  Check this block if you are filing as a solicitorC  Public Official (Former)  
D  Public Employee (Former) Check this block if you are amending an original filing04 PUBLIC POSITION OR PUBLIC OFFICE (administrator, member, Commissioner, job title, etc.)  seeking  hold  held

A Executive Director

 seeking  hold  held

B member

05 GOVERNMENTAL ENTITY in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept, agency, authority, borough, board, commission, county, school district, twp, etc.)

A Mayors Office

B Comm Human Relations

06 OCCUPATION OR PROFESSION (This may be the same as block 4)

07 YEAR SEE INSTRUCTIONS.

Information in Blocks 8 -15 represents disclosure for the calendar year listed here:

2020

08 REAL ESTATE INTERESTS (See instructions on page 2) If NONE, check this box. 09 CREDITORS (See instructions on page 2). Creditor (Name and Address) If NONE, check this box. 

Name:

Address:

Interest Rate

10 DIRECT OR INDIRECT SOURCES OF INCOME including (but not limited to) all employment. (See instructions on pg. 2) ONLY IF NONE, check this block. 

(OFFICIAL USE ONLY)

Name:

Address:

11 GIFTS (See instructions on page 2) If NONE, check this box. 

Source of Gift

Value of Gift

--	--	--	--	--	--	--	--

Address of Source of Gift

Circumstances (including description) of Gift

--	--	--	--

12 TRANSPORTATION, LODGING, HOSPITALITY (See instructions on page 2) If NONE, check this box. 

Source (Name and Address)

Value

--	--	--	--	--	--	--	--

13 OFFICE, DIRECTORSHIP, OR EMPLOYMENT IN ANY BUSINESS (See instructions on page 2) If NONE, check this box. 

Business Entity (Name and Address)

Position Held (i.e., officer, director, employee, etc.)

Name:

Address:

--	--	--	--	--	--	--	--

14 FINANCIAL INTEREST IN ANY LEGAL ENTITY IN BUSINESS FOR PROFIT (See instructions on page 2) If NONE, check this box. 

Name and Address of Business

Interest Held (i.e., 5%, 10%, etc.)

--	--	--	--	--	--	--	--

15 BUSINESS INTERESTS TRANSFERRED TO IMMEDIATE FAMILY MEMBER (See instructions on page 2) If NONE, check this box. 

Business (Name and Address)

Interest Held Relationship Date Transferred

Transferee (Name and Address)

he undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief; said affirmation being made subject to the penalties prescribed by 18 Pa.C.S. § 4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. § 1109(b).

Signature **COMPLETED AND SIGNED ELECTRONICALLY**

Enter Current Date 05/18/2021

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

ED-16

ED-17  
12/15/21Cm

**Caroline Curley**

**From:** Caroline Curley  
**Sent:** Thursday, June 3, 2021 1:52 PM  
**To:** Celena Morrison  
**Cc:** Bryan McHale; Shane Creamer  
**Subject:** Board of Ethics - Financial Disclosure Statement Corrections Needed by June 7  
**Attachments:** CelenaMorrison\_2020Info\_State\_5.18.21.pdf; CelenaMorrison\_2020Info\_City\_5.18.21.pdf; FDS City Form & Instructions.pdf  
**Importance:** High

Good afternoon Ms. Morrison:

Our office has reviewed your Financial Disclosure Statement filed with the City. We have found two omissions in need of correction:

- First, you failed to include your City salary as a source of income. You must report the name of any individual or entity from whom you directly or indirectly received \$500 or more in income in the reporting year (including the City of Philadelphia). (See Item 8 in the attached FDS City form instructions.)
- Second, you must report the name of each individual or entity that gave you gifts totaling \$200 or more in value in the reporting year. This would include the monetary gift received from Ms. Stephens (even though this gift was repaid). (See Item 9 in the attached FDS City form instructions.)

Please review the attached Financial Disclosure System Instructions for further reference on any other sources of income/creditors you may need to report. As always, you can contact us with any additional questions.

Please file an amended Financial Disclosure Statement no later than **5:00 pm** on **Monday, June 7, 2021**. Amendments can be filed through the same electronic filing system at: <https://financial-disclosure.phila.gov/>. Please do not use Internet Explorer to access this website; any other browser should work.

Please be aware that inaccurate or incomplete disclosures, or failing to file before the deadline, are violations of the City's Ethics Code. Failure to file before close of business on Monday will result in additional enforcement action and an additional civil penalty of up to \$2,000 per violation. As a reminder, when you submit the City Form, you certify that the information is true and correct under Pennsylvania's criminal provisions on unsworn falsification (18 Pa. C.S. § 4904).

Thank you,  
Caroline

--  
Caroline B. Curley  
Staff Attorney  
Board of Ethics  
One Parkway Building  
1515 Arch Street, 18<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 686-9460  
Cell Phone During Quarantine: (845) 527-0189

CITY OF PHILADELPHIA  
**STATEMENT OF  
 FINANCIAL INTERESTS**

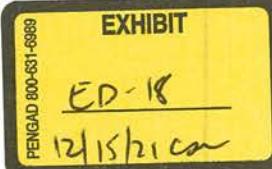
PHILADELPHIA BOARD OF ETHICS  
 DEPARTMENT OF RECORDS  
 ROOM 156, CITY HALL  
 PHILADELPHIA, PA 19107

*All Statements of Financial Interests shall  
 be made available for public inspection  
 and copying during regular office hours.*

**INSTRUCTIONS:** Complete the entire form. Type or print in ink. Clearly enter your name in the space provided.  
 Attach the additional 8-1/2" x 11" sheets if necessary, identifying each item by number.  
 This form may be completed on line at <https://financial-disclosure.phila.gov>

AMENDED  
 STATEMENT

1. LAST NAME	FIRST NAME	MI	SUFFIX
Morrison	Celena		
2. STREET ADDRESS	CITY	STATE	ZIP CODE
XXXXXXXXXX	XXXXXXXXXX	XX	XXXXXX
CITY DEPARTMENT / AGENCY / COMMISSION / BOARD	3. TELEPHONE NUMBER		
Mayors Office	XXXXXXXXXXXX		
4. NAME OF PUBLIC POSITION OR PUBLIC OFFICE YOU HOLD/HELD	5. OCCUPATION OR PROFESSION		
Executive Director (Currently Holding)			
<b>REMEMBER:</b> Items 6 THROUGH 12 - All information concerns the PRIOR CALENDAR YEAR. NO DOLLAR AMOUNTS are required except in Item 9. If answer is NONE, check the box where indicated. Information must be included for the filer only and not family members.			
6. REAL ESTATE INTERESTS: List any direct or indirect interest in any real estate as described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
ADDRESS	NATURE OF INTEREST		
7. CREDITORS: List each loan or debt over \$5,000 and the interest rate thereon as described in the attached Instructions. If none, check: <input type="checkbox"/>			
CREDITOR	ADDRESS	INTEREST RATE	
1st National Bank		11.7%	
8. DIRECT OR INDIRECT SOURCES OF INCOME: List all sources of \$500 or more in the aggregate as described in the attached Instructions . If City is a source, list City. If none, check: <input type="checkbox"/>			
SOURCE OF INCOME	ADDRESS		
City of Philadelphia	1400 John F Kennedy Blvd, Philadelphia, PA - 19107		
9. GIFTS: List sources of gifts with an aggregate value of \$200 or more as described in attached Instructions. If none, check: <input type="checkbox"/>			
SOURCE OF GIFT	ADDRESS		
Mr. Kendall Stephans	, Philadelphia, PA		
VALUE OF GIFT	CIRCUMSTANCES OF GIFT		
\$4000	Loan   Loan		
10. HONORARIA: List sources over \$100 described in attached Instructions. If none, check: <input checked="" type="checkbox"/>			
SOURCE OF HONORARIUM	ADDRESS OF SOURCE		
11. OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS ENTITY. If none, check: <input checked="" type="checkbox"/>			
BUSINESS	POSITION HELD		
12. FINANCIAL INTEREST IN ANY BUSINESS ORGANIZED FOR PROFIT: (See attached Instructions.) If none, check: <input checked="" type="checkbox"/>			
<b>THIS FORM MUST BE SIGNED AND DATED IN ORDER TO BE ACCEPTED.</b>			
Information represents disclosure for the prior calendar year <b>2020</b> . False statements made herein are punishable as authorized by Section 20-612 of the Philadelphia Code and are subject to the penalties prescribed for perjury set forth in 18 Pa. C.S. § 4904.			
Signature <b>COMPLETED AND SIGNED ELECTRONICALLY</b>		Date <b>06/04/2021</b>	



FIRST NAME

Celena

LAST NAME

Morrison

MI SUFFIX

---

Positions continuation

Public Position: member

Affiliation Status: Held in Past

Governamental Entity: Comm Human Relations

Profession:

Address:

R-1:2  
12/15/21CSL

Lauren Cox  
Deputy Communications Director  
Office of the Mayor  
215-686-6210  
[lauren.cox@phila.gov](mailto:lauren.cox@phila.gov)  
Pronouns: She/Her/Hers

**From:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Sent:** Tuesday, August 25, 2020 6:41 PM  
**To:** Press <[Press@Phila.gov](mailto:Press@Phila.gov)>; Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>  
**Subject:** Re: Media inquiry/follow-up, Phila. Gay News

Thank you Lauren.

Celena Morrison  
Executive Director

Office of LGBT Affairs  
Office of Mayor James F. Kenney  
City Hall, Room 110  
(215) 686-0330  
Pronouns: she/her/hers

---

**From:** Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>  
**Sent:** Tuesday, August 25, 2020 6:34:24 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>; Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Subject:** Re: Media inquiry/follow-up, Phila. Gay News

Uggh. That is terrible.

I'll draft something up in a bit and send your way.

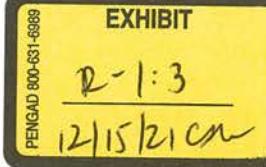
Lauren Cox  
Deputy Communications Director  
Office of the Mayor  
215-686-6210  
[lauren.cox@phila.gov](mailto:lauren.cox@phila.gov)  
Pronouns: She/Her/Hers

---

**From:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Sent:** Tuesday, August 25, 2020 6:19:10 PM  
**To:** Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>; Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Subject:** Re: Media inquiry/follow-up, Phila. Gay News

Hi Lauren,

A fight started outside her home. I was actually on the phone with her because she is a popular community activist. We were discussing prison policy when I heard her say that they were fight outside her house. I told her that I would catch up with her later and to be safe.



At some point the angry group turned on her when they were told that she was Trans. They forced themselves into her house and assaulted her. She even has a broken nose.

Celena Morrison

*Executive Director*

Office of LGBT Affairs

Office of Mayor James F. Kenney

City Hall, Room 110

(215) 686-0330

*Pronouns: she/her/hers*



---

**From:** Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>  
**Sent:** Tuesday, August 25, 2020 5:27 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>; Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Subject:** RE: Media inquiry/follow-up, Phila. Gay News

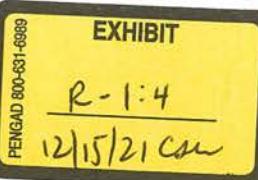
Thanks for adding that context, Celena. And sorry you are now dealing with this both personally and professionally.

I will draft up a general statement later this evening and have you review before I send to the reporter.

Based on what you know, were the attackers already in her home when an assault happened; or did they enter the home specifically to attack her.

Lauren Cox  
Deputy Communications Director  
Office of the Mayor  
215-686-6210  
[lauren.cox@phila.gov](mailto:lauren.cox@phila.gov)  
*Pronouns: She/Her/Hers*

**From:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Sent:** Tuesday, August 25, 2020 5:18 PM



To: Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>; Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
Subject: Re: Media inquiry/follow-up, Phila. Gay News

Lauren,

This is a close friend of mine that was assaulted last night by about about five guys and girls. I met her at the Police department and drove her to the hospital.

I honestly don't feel comfortable answering those questions. I will take your advice it differs.

Celena Morrison

*Executive Director*

Office of LGBT Affairs

Office of Mayor James F. Kenney

City Hall, Room 110

(215) 686-0330

*Pronouns: she/her/hers*



**From:** Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>  
**Sent:** Tuesday, August 25, 2020 4:47 PM  
**To:** Press <[Press@Phila.gov](mailto:Press@Phila.gov)>; Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>  
**Subject:** RE: Media inquiry/follow-up, Phila. Gay News

Dropping Michele.

Celena – We have no context for what this request is about, so can you please fill us in. I am out of the office starting tomorrow, so I'd like to be able to draft any responses tonight.

We generally cannot comment on open investigations, so we'll be limited in what you can say here. Michelle also sent a request to PPD about this.

Lauren Cox  
Deputy Communications Director  
Office of the Mayor  
215-686-6210

R-1:5  
12/15/21CSW

lauren.cox@phila.gov  
Pronouns: She/Her/Hers

**From:** Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Sent:** Tuesday, August 25, 2020 4:30 PM  
**To:** Mike Dunn <[Mike.Dunn@Phila.gov](mailto:Mike.Dunn@Phila.gov)>; Kelly Cofrancisco <[Kelly.Cofrancisco@Phila.gov](mailto:Kelly.Cofrancisco@Phila.gov)>; Sarah Reyes <[Sarah.Reyes@Phila.gov](mailto:Sarah.Reyes@Phila.gov)>; Deana Gamble <[Deana.Gamble@Phila.gov](mailto:Deana.Gamble@Phila.gov)>; Lauren Cox <[Lauren.Cox@phila.gov](mailto:Lauren.Cox@phila.gov)>; Irene Contreras Reyes <[Irene.Contreras.Reyes@Phila.gov](mailto:Irene.Contreras.Reyes@Phila.gov)>; Chelsea Reed <[Chelsea.Reed@Phila.gov](mailto:Chelsea.Reed@Phila.gov)>  
**Subject:** FW: Media inquiry/follow-up, Phila. Gay News

**From:** Michele Zipkin  
**Sent:** Tuesday, August 25, 2020 4:29:38 PM (UTC-05:00) Eastern Time (US & Canada)  
**To:** Celena Morrison; Press  
**Subject:** Media inquiry/follow-up, Phila. Gay News

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

Hi Celena,

Thanks so much for your willingness to send a statement for the story about the attack on Kendall Stephens that happened last night. My questions are below.

At what point in the evening did you come to Kendall's aid?

Kendall said that you were with her at one of the police precincts. How did the police officer(s) respond to Kendall's report of the assault?

Can you comment on the assault on the whole and how the police officers handled the incident? To your knowledge, was this a hate crime?

My deadline is tomorrow, Wednesday 8/26 at 1 p.m.

Thanks,

Michele

EXHIBIT  
R-2  
PENGAD 800-631-6889  
12/15/21 Caw

Celena Morrison  
Executive Director  
Office of LGBT Affairs | City of Philadelphia

Pronouns: She / Her / Hers

O 1400 JFK Blvd, Room 110 | Philadelphia, PA 19107

T (215) 686-0330 | [celenamorrison@phila.gov](mailto:celenamorrison@phila.gov)

 visit us online

Please see the emails below.

Celena Morrison  
Executive Director  
Office of LGBT Affairs | City of Philadelphia

Pronouns She / Her / Hers

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 visit us online



**From:** Celena Morrison  
[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)  
**Sent:** Monday, March 8, 2021 2:40 PM  
**To:** Caroline Curley  
[Caroline.Curley@Phila.gov](mailto:Caroline.Curley@Phila.gov)  
**Subject:** Fw: Media inquiry/follow-up, Phila. Gay News

**From:** Michele Zipkin  
[michele@eggn.com](mailto:michele@eggn.com)  
**Sent:** Wednesday, August 26, 2020 8:39 AM  
**To:** Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Cc:** Celena Morrison  
[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)  
**Subject:** Re: Media inquiry/follow-up, Phila. Gay News

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Thank you both for your help with this.

Take care,

Michele

On Tue, Aug 25, 2020 at 9:29 PM Press <[Press@phila.gov](mailto:Press@phila.gov)> wrote:

Hi Michele,

Celena joined Kendall following her assault as a personal friend. As such, she is not comfortable confirming any specific details of the incident.

However, the following statement can be attributed to Celena Morrison as Executive Director of the Office of LGBT Affairs: "While I'm not able to comment on the details of Kendall's experience, it is always troubling and deeply upsetting to see acts of violence carried out against my fellow trans Philadelphians. Our office will continue to do all we can to work with the Philadelphia Police Department, community members, and others to ensure that trans and non-binary folks are able to feel and be safe in their city."

Police public affairs will get back to you on the request you directed to them earlier.

Lauren Cox  
Deputy Communications Director  
Office of the Mayor  
215-686-6210  
[lauren.cox@phila.gov](mailto:lauren.cox@phila.gov)  
Pronouns: She/Her/Hers

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**From:** Michele Zipkin <[michele@epgn.com](mailto:michele@epgn.com)>  
**Sent:** Tuesday, August 25, 2020 4:30 PM  
**To:** Celena Morrison <[Celena.Morrison@Phila.gov](mailto:Celena.Morrison@Phila.gov)>; Press <[Press@Phila.gov](mailto:Press@Phila.gov)>  
**Subject:** Media inquiry/follow-up, Phila. Gay News

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Michele  
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