



CITY OF PHILADELPHIA

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

July 10, 2015

Via hand delivery

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

**Re: *Executive Director's Unilateral Pre-Hearing Memorandum for
Creamer v. Gordon, Matter No. 1412MU14***

Dear Maya:

Enclosed, please find the Executive Director's Unilateral Pre-Hearing Memorandum for the above captioned matter as well as copies of the exhibits he intends to offer at the hearing.

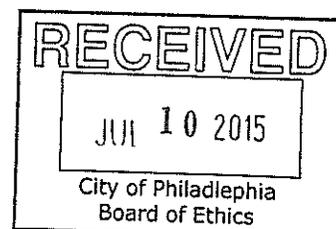
Sincerely,

A handwritten signature in black ink that reads "Michael J. Cooke".

Michael J. Cooke, Esq.
Director of Enforcement

Enclosures

cc Rania Major, Counsel for Tracey Gordon
(*via hand delivery and email, enclosures via email only*)



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

J. Shane Creamer, Jr. :
Executive Director :
Board of Ethics :
of the City of Philadelphia :
1515 Arch Street, 18th Floor :
Philadelphia, PA 19102 :
v. :
Tracey Gordon :
6543 Windsor Street :
Philadelphia, PA 19142 :
Respondent :

Matter No. 1412MU14

Date of Notice: December 11, 2014

EXECUTIVE DIRECTOR'S UNILATERAL PRE-HEARING MEMORANDUM

I. Statement of Undisputed Facts

1. J. Shane Creamer, Jr. is the Executive Director of the Board of Ethics.
2. Tracey Gordon was a Deputy City Commissioner for the City of Philadelphia from February 2011 to December 2014. The City Commissioners are responsible for administering all elections that occur in Philadelphia. Ms. Gordon worked in the office of City Commissioner Stephanie Singer.
3. On May 28, 2014, the City Commissioners suspended Ms. Gordon from her position without pay. On December 3, 2014, the City Commissioners terminated Ms. Gordon from her position.
4. On or about April 14, 2014, Leslie Miles came to Commissioner Singer's office seeking assistance for her candidacy for Resident Commissioner of the Philadelphia Housing Authority. She met with two employees in Commissioner Singer's office: Tracey Gordon and Jasmine Winfield, a temporary worker who performed clerical tasks in the office from mid-March to mid-June of 2014.

5. Ms. Miles asked Ms. Gordon and Ms. Winfield to help her type and format a letter she had written by hand.
6. Commissioner Singer encouraged employees in her office to assist members of the public with such tasks as part of their job duties.
7. Ms. Gordon agreed to type and format Ms. Miles' hand-written letter and Ms. Miles left the office. Later that day, Ms. Gordon emailed Ms. Miles a copy of the typed letter.
8. On or about April 15, 2014, Ms. Miles returned to Commissioner Singer's office. She spoke with Ms. Gordon and Ms. Winfield in the hallway outside of Commissioner Singer's office.
9. On or about April 16, 2014, Ms. Miles returned to Commissioner Singer's office with thank you cards for Ms. Gordon and Ms. Winfield.
10. Ms. Gordon was not present when Ms. Miles returned to Commissioner Singer's office. As a result, Ms. Miles left the cards on Ms. Gordon's and Ms. Winfield's desks.
11. On May 28, 2014, the City Commissioners suspended Ms. Gordon from her position without pay.
12. In order to raise money while she was suspended without pay from her City position, Ms. Gordon decided to hold a fundraiser on June 21, 2014 for herself. She posted a flyer promoting the event on Facebook. She also sent the flyer to people to people she knew.
13. Tickets to the fundraiser were sold for a minimum of \$20.
14. On or about June 12, 2014, Ms. Gordon sent Ms. Miles a message asking her to attend the fundraiser.
15. Ms. Miles did not buy a ticket for Ms. Gordon's fundraiser.

16. In the spring of 2014, Susan McCall served as a volunteer in Commissioner Singer's Office. She answered telephone calls from the public and answered inquiries regarding voting information.

17. In mid-April 2014, Ms. Gordon and Ms. McCall discussed elections for committeeperson and ward leader in the 32nd ward.

18. A committeeperson is the elected party representative of a ward division. The committeepersons in a ward elect the ward leader. Committee persons and ward leaders are officers of the Democratic and Republican parties in Philadelphia.

19. Gary Williams is the ward leader in the 32nd ward.

20. Commissioner Singer helped organize and participated in a May 28, 2014 workshop for recently elected committeepersons.

21. In 2012, Commissioner Singer launched the website patransparency.org to release election-related information to the public. The website includes a link to a Google calendar.

22. Commissioner Singer directed Ms. Gordon, as part of her job duties, to update the calendar on Patransparency.org.

II. Executive Director Witnesses

The Executive Director intends to call the following people as witnesses at the hearing

<p>1. Jeffrey Gardosh Chief Information Security Officer City of Philadelphia Office of Innovation and Technology 1234 Market Street, 15th Floor Philadelphia, PA 19107 215-686-8222</p>	<p>2. Susan McCall 1713 N. Dover St. Philadelphia, PA 19121 267-592-0891 SUBPOENA REQUESTED</p>
<p>3. Tracey Gordon 6543 Windsor Street Philadelphia, PA 19142 267-235-0091</p>	<p>4. Norys Gonzalez Deputy City Commissioner Room 132, City Hall Philadelphia, PA 19107 215-686-3460 SUBPOENA REQUESTED</p>
<p>5. Hon. Stephanie Singer City Commissioner Room 132, City Hall Philadelphia, PA 19107 215-686-3460 SUBPOENA REQUESTED</p>	<p>6. Seth Bluestein Deputy City Commissioner Room 134, City Hall Philadelphia, PA 19107 215-686-3464 SUBPOENA REQUESTED</p>
<p>7. Leslie Miles 7011 N. 15th St., Apt.2c3 Philadelphia, PA 19126 267-592-7187 484-280-6760 SUBPOENA REQUESTED</p>	<p>8. Bryan McHale Public Integrity Compliance Specialist 1515 Arch Street, 18th Floor Philadelphia, PA 19102 215-686-9450</p>
<p>9. Jasmine Winfield 161 N. Robinson Street Philadelphia, PA 19139 267-274-8952 SUBPOENA REQUESTED</p>	

III. Executive Director Exhibits

The Executive Director intends to introduce the following exhibits at the hearing, copies of which are enclosed with this memorandum:

1. Tracey.Gordon@phila.gov Email Mailbox Image (Requested May 29, 2014)
2. Selected emails from Tracey.Gordon@phila.gov email account
3. April 14, 2014 handwritten letter for Leslie Miles' candidacy for PHA Commissioner
4. April 28, 2014 Thank You Card provided by Leslie Miles to Tracey Gordon (2 pages)
5. July 30, 2014 affidavit of Jasmine Winfield
6. August 11, 2014 declaration of Leslie Miles
7. December 15, 2014 correspondence from Michael Cooke to Jasmine Winfield
8. December 15, 2014 money order from Jasmine Winfield to the City of Philadelphia
9. May 27, 2014-May 28, 2014 email chain between Michael Cooke and Seth Bluestein
10. June 3, 2014 Memorandum of Interview of Susan McCall by Board of Ethics enforcement staff
11. Screenshot from Facebook of Tracey Gordon June 21, 2014 fundraiser
12. February 20, 2015 Board of Ethics Administrative Subpoena served on Verizon Wireless Law Enforcement Resource Team for Leslie Miles phone records from June 1, 2014 to June 30, 2014
13. Leslie Miles phone records provided by Verizon Wireless Law Enforcement Resource Team on March 2, 2015 in response to Board of Ethics Administrative Subpoena with Certification of Authenticity of records provided by Verizon Wireless Law Enforcement Resource Team

14. February 20, 2015 Board of Ethics Administrative Subpoena served on T-Mobile Law Enforcement Relations Group for Tracey Gordon phone records from June 1, 2014 to June 30, 2014
15. Tracey Gordon phone records provided by T-Mobile Law Enforcement Relations Group in response to Board of Ethics Administrative Subpoena with Certification of Authenticity of records provided by T-Mobile Law Enforcement Relations Group
16. March 25, 2014-April 1, 2014 email chain between Karen Bojar, Stephanie Singer, and Tracey Gordon
17. May 7, 2014 email, with attachment: Karen Bojar to Tracey Gordon and Stephanie Singer
18. Screenshots from Facebook event page for Committee Persons workshop (6 pages)
19. September 11, 2013 Memorandum of Interview of Tracey Gordon
20. September 13, 2013 email from Hon. Stephanie Singer to Michael Cooke
21. Screenshots from patransparency.org front page and Google calendar (3 pages)
22. December 11, 2014 Notice of Administrative Enforcement Proceeding and Exhibits in Support of Notice of Administrative Enforcement Proceeding: Creamer v. Gordon
23. February 2, 2015 Response to Notice of Administrative Enforcement: Creamer v. Gordon
24. February 5, 2015 Supplemental Response to Notice of Administrative Enforcement: Creamer v. Gordon
25. November 10, 2014 affidavit of Norys Gonzalez
26. March 9, 2015 affidavit of Bryan McHale
27. November 20, 2012 Tracey Gordon settlement agreement

IV. Tracey Gordon Exhibits

To date, neither Ms. Gordon nor her counsel have provided to the Executive Director a list of witness she intends to call for the hearing. As such, the Executive Director will object if Ms. Gordon attempts to call any witnesses at the hearing.

V. Tracey Gordon Exhibits

On May 12, 2015, while she was *pro se*, Ms. Gordon provided the following exhibits that to the Executive Director. To date, Ms. Gordon's current counsel has not provided any proposed exhibits to the Executive Director.

Exhibit Number	Description	Executive Director Objection	Executive Director Basis for Objection
1	Letter written by Jasmine Winfield	Yes	Authenticity; Relevance; hearsay
2	Tracey Gordon May 2014 Google Calendar (2 pages)	No	N/A
3	Seven Thank You Cards from "Constituents" Provided to Ms. Gordon (6 pages)	Yes	Relevance; hearsay
4	Email from Tracey Gordon to Stephanie Singer dated April 11, 2014 (2 pages)	Yes	Relevance
5	Text Message between Commissioner Singer and State Senator Anthony Williams	Yes	Authenticity; Relevance; hearsay.
6	Email from Tracey Gordon to Stephanie Singer, Norys Gonzalez, Jasmine Winfield, and Dennis Lee dated May 1, 2014	Yes	Relevance
7	Email from Tracey Gordon to Stephanie Singer, Dennis Lee, and Norys Gonzalez dated May 8, 2014	Yes	Relevance

Exhibit Number	Description	Executive Director Objection	Executive Director Basis for Objection
8	Email from Stephanie Singer to Tracey Gordon dated May 21, 2014	No	N/A
9	Email from Tracey Gordon to Stephanie Singer dated May 28, 2014 (2 copies)	Yes	Relevance
10	Email from Stephanie Singer to Tracey Gordon and Alberta Walker	No	N/A
11	Letter from Michael Cooke to Tracey Gordon dated May 28, 2014	No	N/A
12	PA Transparency Google calendar screen shots (2 pages)	No	N/A
13	Philly.com news article pertaining to Commissioner Stephanie Singer (dated June 5, 2014)	Yes	Relevance
14	Screenshot from Tracey Gordon's Facebook account pertaining to Fish Fry Fundraiser on June 21, 2014	No	N/A
15	Affidavit of Stephanie Graham dated May 12, 2015	Yes	Relevance

VI. Time Estimate

The Executive Director anticipates that he will need approximately one and a half days to present his case.

VII. Unilateral Pre-Hearing Explanation

Board enforcement staff sent Ms. Gordon's lawyer, Rania Major, a letter on June 25, 2015 explaining that, as per paragraph 6(B) of the Board's supplemental memorandum, by Friday June 10, 2015, the parties were supposed to submit a joint pre-hearing memorandum to the Board. Enforcement staff suggested that the easiest way to collaborate on a joint memorandum would be to meet to discuss its contents. Enforcement staff asked Ms. Major to advise whether she would be free to meet on either July 6, 7, or 8. Ms. Major did not respond to this letter.

Not having heard from Ms. Major, on July 6, 2015, Board enforcement staff called her office and were informed that she was on vacation. Board enforcement staff were eventually able to reach Ms. Major on July 7, 2015. After briefly discussing the case and the status of Ms. Major's representation of Ms. Gordon, enforcement staff asked Ms. Major to let them know by July 9 whether she wanted to submit a joint memorandum. Ms. Major agreed to contact Board enforcement staff by July 9, but has not done so. Therefore, the Executive Director submits this unilateral pre-hearing memorandum

Date:

July 10, 2015

Respectfully submitted,



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

Michael J. Cooke, Esq.
Director of Enforcement

Jordan E. Segall, Esq.
Staff Attorney

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

CERTIFICATION OF SERVICE

I, Michael Cooke, hereby certify that on this date I caused a true and correct copy of the foregoing Executive Director's Unilateral Pre-Hearing Memorandum, with Exhibits, to be served upon the following:

By hand delivery and email:

Rania M. Major, Esq.
Rania Major P.C.
2915 North 5th Street
Philadelphia, PA 19133
allcourts@comcast.net

Counsel for Tracey Gordon

By hand delivery:

Maya Nayak
General Counsel
Board of Ethics
1515 Arch St., 18th Floor
Philadelphia, PA 19102
Maya.nayak@phila.gov

Date:

July 10, 2015

Michael Cooke

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

<u>J. Shane Creamer, Jr.</u>	:	
Executive Director	:	
Board of Ethics	:	
of the City of Philadelphia	:	
1515 Arch Street, 18 th Floor	:	
Philadelphia, PA 19102	:	
	:	Matter No. 1412MU14
v.	:	
	:	Date of Notice: December 11, 2014
Tracey Gordon	:	
6543 Windsor Street	:	
Philadelphia, PA 19142	:	
	:	
<u>Respondent</u>	:	

EXECUTIVE DIRECTOR'S EXHIBITS

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27. November 20, 2012 Tracey Gordon settlement agreement

Date: July 10, 2015

EXHIBIT 1

(mailbox provided via CD)

EXHIBIT 2

From: [Tracey Gordon](#)
To: milessteps@gmail.com
Subject: Your PHA questionnaire
Date: Monday, April 14, 2014 4:01:22 PM
Attachments: [Leslie Miles PHA Answers.docx](#)

Please proof this

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

Leslie Miles
267-592-7187
milessteps@gmailcom

April 14, 2014

PHA Resident Commissioner Election Questionnaire

(1) Name on Life experience that has prepared you to be a Commissioner

Homelessness and being a Hurricane Katrina survivor in 2005 has prepared me for this seat. My plight with the struggles of homeless issues that impacted my life and others who found us in this dilemma have really opened my eyes on the importance of quality housing that people can afford. After Katrina it made me really appreciate and understand the issue of quality housing for people who are displaced. It really hit home for me and became a reality that challenges your (my) efforts to define how to navigate through a process of finding shelter while at the same time dealing with the trauma Hurricane Katrina caused me and my family. I then became a part of Project Thrive, a support system created by a group of Katrina survivors in January 2010 and I was the first homeless founding member of the One Step Away, the first "Homeless" street newspaper.

One Step Away is an information newspaper circulated here in Philadelphia to bring attention to homelessness and other issues that plague the homeless. I serve on the editorial board. I am also CEO of Community Change National Support Agency. I also was honored with the most valuable writer award for One Step Away and was recently honored by Councilwoman Jannie Blackwell for my community service to the City.

(2) List two goals that you would like to accomplish in your first year, if elected Commissioner

My first goal is to serve PHA residents and HCV residents to the best of my abilities that will ensure equality, affordable housing and dignity in the future missions and visions. The second thing I would to help our residents understand their value and make sure they learn about all the programs we have to offer to support their families. I would also like to see more organized activities for the children of PHA and I would like to help the heads of the households of PHA get information to help them improve their families.

(3) What is the biggest challenge facing a public housing and HCV resident and how do your propose to address it?

The budget cuts of 2013 has eliminated and limited PHA staff (administrative) which has affected the intake service of residents when having to visit the headquarters to discuss some there challenges. Also the utility allowance cuts have affected maintenance bills for residents. And lastly we definitely need to do better dealing with the crime. My approach to these issues is to seek out other alternatives (programs) that would help in dealing with these issues and concerns.

From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: RE: Flyer
Date: Tuesday, May 06, 2014 9:58:08 AM

no but I will get one for you today okay?

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Verna Brown-Tyner
Sent: Monday, May 05, 2014 10:06 AM
To: Tracey Gordon
Subject: Flyer

Do you have a flyer about the new committee people workshop?

From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: FW: flyer for May 28
Date: Thursday, May 08, 2014 4:36:24 PM
Attachments: [Ward Reorganization Workshop.doc](#)

there you go

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: tracey gordon [reachingback@aol.com]
Sent: Thursday, May 08, 2014 4:34 PM
To: Tracey Gordon
Subject: Fwd: flyer for May 28

-----Original Message-----

From: kbojar1 <kbojar1@verizon.net>
To: reachingback <reachingback@aol.com>; sfsinger <sfsinger@campaignscientific.com>
Sent: Wed, May 7, 2014 7:28 pm
Subject: flyer for May 28

Tracey,
Here's the flyer you requested.
Karen



Make a Difference!
How You Can Strengthen Democracy in Philadelphia

The Philadelphia Chapter of the National Organization for Women and the Philadelphia Chapter of the Coalition of Labor Union Women will conclude its series of workshops on HOW TO RUN FOR COMMITTEEPERSON AND FOR ELECTION BOARD with

**A WORKSHOP FOR NEW COMMITTEEPEOPLE: THE
WARD RE-ORGANIZATION PROCESS**

No later than the third Monday after the primary election, each ward will hold its re-organization meeting. This is the meeting at which committeepeople are officially seated and the ward leader is elected. This can be a very confusing experience for new committeepeople who might not know the party rules and not know what to expect. Come and learn how this re-organization should work and learn how the Democratic Party and the Republican Party are governed.

When: Wednesday, May 28 2014 from 5:30-7:30 pm
Where: 1606 Walnut Street, Philadelphia, PA

Speakers:
Stephanie Singer, City Commissioner
Tracey Gordon, Deputy City Commissioner

RSVP to kbojar1@verizon.net or at our Facebook page at
<https://www.facebook.com/events/761022263910504>

For more information, contact Karen Bojar at kbojar1@verizon.net or Kathy Black at
kblackphilly@yahoo.com
(Labor donated)

From: [Gloria M. Gilman, Esq.](#)
To: [karen bojar](#); ["Stephanie Singer"](#); [Tracey Gordon](#)
Subject: how to be a committeeperson workshop
Date: Thursday, May 15, 2014 3:31:21 PM

Hi all,

I just got a call from someone running for committeeperson for the first time who did not know about the workshop on the 28th. It would probably be good for you all to send out notices to your lists of those running again.

Gloria

Gloria M. Gilman, Esquire
Two Penn Center
1500 J.F.K. Boulevard Suite 1230
Philadelphia, PA 19102
215-568-4990
(f)215-640-0596
gmgilman@igc.org

From: [Rebecca Poyourow](#)
To: [Tracey Gordon](#)
Subject: Re: Workshop tonight
Date: Wednesday, May 28, 2014 1:56:53 PM

Thanks, Tracey. -R

On Wed, May 28, 2014 at 1:45 PM, Tracey Gordon <Tracey.Gordon@phila.gov> wrote:

yes you are correct

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: [215-686-3460](tel:215-686-3460)
F: [215-587-9107](tel:215-587-9107)
www.patransparency.org

From: Rebecca Poyourow [rebeccapoyourow@gmail.com]

Sent: Wednesday, May 28, 2014 11:24 AM

To: Tracey Gordon; Stephanie Singer

Subject: Workshop tonight

Hi there,

I intend to come to tonight's meeting. Am I correct that the new location is 250 S. 17th Street?

Rebecca

From: [Micah Mahjoubian](#)
To: [Tracey Gordon](#)
Subject: Write In Instructions
Date: Thursday, May 08, 2014 4:59:15 PM
Attachments: [WriteIn Instructions.pdf](#)

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

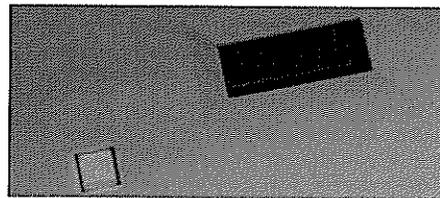
HOW TO CAST A WRITE IN VOTE

- ☑ Press the write-in button in the box.

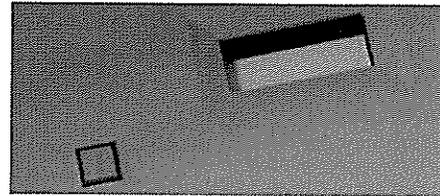
WARD EXECUTIVE COMMITTEE <small>(Vote for not more than 2)</small>	LISA S KATURAH	12		KAREN K MALONE	133	
	JOHN F BURKE JR	13		SONNE KARAN	134	
Barrio Ejectivo Comité <small>(Vote por no más de 2)</small>			Write In Por escrito	GEORGE K BEZANIS	135	Write In Por escrito

PRESS HERE 

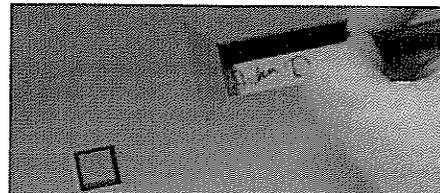
- ☑ Then press the large flashing red button at the top of the machine.



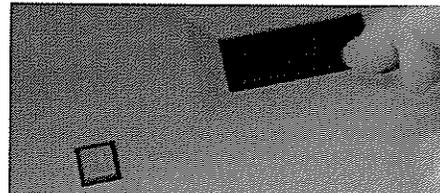
- ☑ The write-in window will open.



- ☑ Write or stamp your candidates name on the exposed paper in the window.

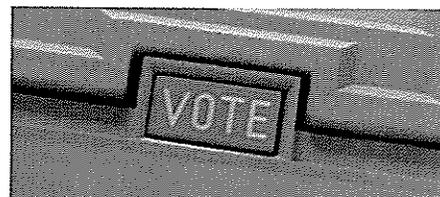


- ☑ Then pull the black shutter down over the name you have written, closing the window.



- ☑ If you would like to write-in another candidate for Ward Executive Committee, repeat the process.

- ☑ Once you are finished making your candidate selections, cast your ballot by pressing the big green button at the bottom of the screen.



From: [Tracey Gordon](#)
To: [Stephanie Singer](#); [Norys Gonzalez](#); [Dennis Lee](#)
Subject: FW: Write In Instructions
Date: Thursday, May 08, 2014 5:18:31 PM
Attachments: [WriteIn Instructions.pdf](#)

Commissioner:

Look what Micah sent to me

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:13 PM
To: Verna Brown-Tyner
Subject: FW: Write In Instructions

Just got this in fresh off the press

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: FW: Write In Instructions
Date: Thursday, May 08, 2014 5:14:00 PM
Attachments: [WriteIn_Instructions.pdf](#)

Just got this in fresh off the press

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

From: [Stephanie Singer](#)
To: [Tracey Gordon](#)
Subject: RE: Write In Instructions
Date: Friday, May 09, 2014 1:31:56 PM

Great! I posted it here for the general public: <http://www.patransparency.org/index.php/how-to/run-a-write-in-campaign/>

Stephanie Singer
Philadelphia City Commissioner
City Hall, Room 132
Philadelphia, PA 19107
215-686-3460
www.PhiladelphiaVotes.com
www.PATransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:19 PM
To: Stephanie Singer; Norys Gonzalez; Dennis Lee
Subject: FW: Write In Instructions

Commissioner:

Look what Micah sent to me

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:13 PM
To: Verna Brown-Tyner
Subject: FW: Write In Instructions

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Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Micah Mahjoubian [micah@soapboxsolutions.com]

Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: FW: Write In Instructions
Date: Saturday, May 10, 2014 8:12:20 AM

something else for you how to do a write in by video and a one page instruction sheet

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Stephanie Singer
Sent: Friday, May 09, 2014 1:31 PM
To: Tracey Gordon
Subject: RE: Write In Instructions

Great! I posted it here for the general public: <http://www.patransparency.org/index.php/how-to/run-a-write-in-campaign/>

Stephanie Singer
Philadelphia City Commissioner
City Hall, Room 132
Philadelphia, PA 19107
215-686-3460
www.PhiladelphiaVotes.com
www.PATransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:19 PM
To: Stephanie Singer; Norys Gonzalez; Dennis Lee
Subject: FW: Write In Instructions

Commissioner:

Look what Micah sent to me

Tracey Gordon
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From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:13 PM
To: Verna Brown-Tyner
Subject: FW: Write In Instructions

Just got this in fresh off the press

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Deputy Commissioner
Office of City Commissioner Stephanie Singer
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From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

From: Tracey Gordon
To: Verna Brown-Tyner
Subject: RE: Write In Instructions
Date: Wednesday, May 14, 2014 9:31:32 AM

I'll make it

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Verna Brown-Tyner
Sent: Tuesday, May 13, 2014 11:04 PM
To: Tracey Gordon
Subject: RE: Write In Instructions

Will someone from your office be joining us tomorrow night from 6 to 8 at the Venango House, 2104 W. Venango Street for Candidates and Voters Information Night? If so can you please bring all kinds of information, please.

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Subject: Write In Instructions

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From: Tracey Gordon
To: Verna Brown-Tyner
Subject: RE: Write In Instructions
Date: Wednesday, May 14, 2014 9:33:05 AM

what ward and council district are you in?

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From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: RE: Write In Instructions
Date: Thursday, May 15, 2014 9:56:27 AM

I will be joining you tonight what Ward are you in again

Tracey Gordon
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Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

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267-239-0662 (f)
www.soapboxsolutions.com

From: [Tracey Gordon](#)
To: [Verna Brown-Tyner](#)
Subject: FW: Write In Instructions
Date: Thursday, May 15, 2014 11:18:41 AM

Dear Verna:

I am coming to your event please give me the Ward and the address again

Tracey Gordon
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From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

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From: [Tracey Gordon](#)
To: nehru31@gmail.com
Subject: FW: Write In Instructions
Date: Thursday, May 08, 2014 9:21:17 PM
Attachments: [WriteIn Instructions.pdf](#)

Tracey Gordon
Deputy Commissioner
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From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

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267-239-0662 (f)
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From: [Tracey Gordon](#)
To: vernonvprice@gmail.com
Subject: FW: Write In Instructions
Date: Tuesday, May 13, 2014 11:59:39 AM
Attachments: [WriteIn_Instructions.pdf](#)

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Deputy Commissioner
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Philadelphia, PA 19107
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F: 215-587-9107
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From: Tracey Gordon
Sent: Thursday, May 08, 2014 9:21 PM
To: nehru31@gmail.com
Subject: FW: Write In Instructions

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From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

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www.soapboxsolutions.com

From: Tracey Gordon
To: shawnbreaan@verizon.net
Subject: FW: Write In Instructions
Date: Thursday, May 15, 2014 11:58:47 AM

Shawn:

Nice talking to you and I will add your name to our Southwest Partners list

Tracey Gordon
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Sent: Friday, May 09, 2014 1:31 PM
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From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:19 PM
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Subject: FW: Write In Instructions

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Subject: FW: Write In Instructions

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From: Micah Mahjoubian [micah@soapboxsolutions.com]
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Hope this helps!

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From: [Tracey Gordon](#)
To: seamonia48@yahoo.com
Subject: FW: Write In Instructions
Date: Thursday, May 08, 2014 9:10:41 PM
Attachments: [WriteIn Instructions.pdf](#)

This is the flyer

Tracey Gordon
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From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:19 PM
To: reachingback@aol.com
Subject: FW: Write In Instructions

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Deputy Commissioner
Office of City Commissioner Stephanie Singer
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From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:18 PM
To: Stephanie Singer; Norys Gonzalez; Dennis Lee
Subject: FW: Write In Instructions

Commissioner:

Look what Micah sent to me

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From: [Tracey Gordon](mailto:Tracey.Gordon)
To: reachingback@aol.com
Subject: FW: Write In Instructions
Date: Thursday, May 08, 2014 5:19:06 PM
Attachments: [WriteIn_Instructions.pdf](#)

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Sent: Thursday, May 08, 2014 4:59 PM
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Subject: Write In Instructions

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From: Tracey Gordon
To: rebecca.poyourow@gmail.com
Subject: FW: Write In Instructions
Date: Thursday, May 15, 2014 10:04:37 AM

Dear Rebecca:

Good seeing you again and thank you for letting my boss know that I am your "hero", and thank you for being so kind. Here is the video and "How to Write In" form for your record and review.

Good Luck

Tracey Gordon
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Hope this helps!

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From: [Tracey Gordon](#)
To: ctinad4067aa@gmail.com
Subject: FW: Write In Instructions
Date: Tuesday, May 13, 2014 12:27:53 PM

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
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267-239-0662 (f)
www.soapboxsolutions.com

From: Tracey Gordon
To: mlhayman09@gmail.com
Subject: FW: Write In Instructions
Date: Monday, May 12, 2014 1:53:50 PM

Please scroll down and you will see write in instructions

Tracey Gordon
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Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

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From: Tracey Gordon
To: lindaconradfuller@comcast.net
Subject: FW: Write In Instructions
Date: Monday, May 12, 2014 1:03:51 PM

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Subject: Write In Instructions

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www.soapboxsolutions.com

From: Tracey Gordon
To: Ed.Loyd4thepeople@yahoo.com
Subject: FW: Write In Instructions
Date: Thursday, May 15, 2014 5:01:01 PM

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Stephanie Singer
Sent: Friday, May 09, 2014 1:31 PM
To: Tracey Gordon
Subject: RE: Write In Instructions

Great! I posted it here for the general public: <http://www.patransparency.org/index.php/how-to/run-a-write-in-campaign/>

Stephanie Singer
Philadelphia City Commissioner
City Hall, Room 132
Philadelphia, PA 19107
215-686-3460
www.PhiladelphiaVotes.com
www.PAtransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:19 PM
To: Stephanie Singer; Norys Gonzalez; Dennis Lee
Subject: FW: Write In Instructions

Commissioner:

Look what Micah sent to me

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Tracey Gordon
Sent: Thursday, May 08, 2014 5:13 PM
To: Verna Brown-Tyner
Subject: FW: Write In Instructions

Just got this in fresh off the press

Tracey Gordon
Deputy Commissioner
Office of City Commissioner Stephanie Singer
132 City Hall
Philadelphia, PA 19107
P: 215-686-3460
F: 215-587-9107
www.patransparency.org

From: Micah Mahjoubian [micah@soapboxsolutions.com]
Sent: Thursday, May 08, 2014 4:59 PM
To: Tracey Gordon
Subject: Write In Instructions

Hope this helps!

Micah Mahjoubian
Soapbox Solutions, LLC
215-432-1068 (c)
267-239-0662 (f)
www.soapboxsolutions.com

EXHIBIT 3

Leslie Miles
267-592-7187
milesstep@gmail.com

April 14, 2014

PHA Resident Commissioner Election QUESTIONNAIRE

① NAME ONE LIFE experience that has prepared you to be a commissioner..

ANSWER Homelessness and Katrina ~~survivor~~
* SURVIVOR of Hurricane Katrina 2005 and Homelessness.

My plight with the struggles of homeless issues that impacted my life and others who found ~~themselves~~ ourselves in this dilemma after Katrina. The awareness of housing (lack of) became a reality that challenges you (my) efforts to define how to navigate through the process's ~~disaster~~ disaster. I became a part of Project Thrive a support system created by a group of Katrina survivors. January 2010 I was the first homeless founding member of ONE STEP AWAY, Philadelphia First Homeless Historic Street Newspaper. Still serving on the editorial board. Founder/CEO of Community Change National Support Agency. Most Valuable ~~Writer~~ Writer Award for ONE STEP AWAY. Honored by Councilwoman Janice Blackwell with

② List two goals that you would like to accomplish in your first year, if elected commissioner:

ans. ① To be a viable team competent on the PHA Board.

X ② To serve PHA residents and HCV residents to the best of my abilities that will ensure equality, affordable, ^{and} dignity in the future missions and visions

② To serve PHA residents and HCV residents to the best of my abilities that will ensure equality, affordable and dignity housing. As well as moving forward with the vision and mission for the future.

③ What is the biggest challenge facing a public housing and HCV resident and how do you propose to address it.

answer The ~~budget~~ budget cuts of 2013 has eliminated and limited PHA staff (administrative staff) which has affected the intake service of residents, when having to visit the head quarters to be assisted with problems and concerns.

Landlord/Property Owners Liency. Safety
of residents. Crime

ANSWER My approach to these issues are to seek out
other alternatives ^{programs} that would accommodate
majority of issues and concerns.

CAMPAIGN MANAGER / Would you please email
Kiarra Solomon ^{to her} Thank you
email - Kiarra.solomon@gmail.com

DEAR TRACEY,

I appreciate you for everything.
I promise to make it up to you. You
deserve it. Thanks a million. I
am going to pick up some materials
for campaign. Call me or I will
~~call~~ call u later.

Jestie

EXHIBIT 4

*"A time for thanks,
a time to say
God bless you now
and every day."*

Tender Thoughts

16441113



4702704

\$1.95 TETY99874-04F

TENDER THOUGHTS GREETINGS
1820 MATHESON BLVD MISSISSAUGA, ONTARIO L4W 0B3
©AGC, LLC MADE IN U.S.A.

PENGAD 800-631-6999
EXHIBIT
10
10/31/14

APRIL 28, 2014

"Dearest Tracey"

Thank you
and bless you
for being so special.

Gratefully Yours,
Jodie Miles

2014 PFA Commissioner
WINNER

"Thanks for Believing in
ME"

EXHIBIT 5

AFFIDAVIT OF JASMINE WINFIELD

I, Jasmine Winfield, hereby swear and affirm that the following statement is true and correct:

1. From mid-March to mid-June of 2014, I worked for the City Commissioners. Until early June, I worked in the office of Commissioner Stephanie Singer. While working in Commissioner Singer's office, I performed basic clerical tasks.
2. In mid-April, Leslie Miles came to Commissioner Singer's office seeking assistance. She spoke with Deputy City Commissioner Tracey Gordon who helped her type and format a letter. I also spoke with Ms. Miles when she came in.
3. The day after Ms. Gordon helped her with the letter, Ms. Miles returned to the office to thank me and Ms. Gordon for the assistance we had given her. Ms. Gordon went out into the hallway with Ms. Miles and I followed her out. Ms. Gordon told Ms. Miles that she thought she should give me and Ms. Gordon money for the work we had done for her.
4. The day after Ms. Gordon spoke to me and Ms. Miles in the hall, I saw Ms. Miles on her way in to City Hall. She told me she had something for me. I told her that she didn't need to give me anything. Later that day, when I returned to the office from lunch, I found a card from Ms. Miles on my desk. The card had a \$20 in it. I saw a similar card on Ms. Gordon's desk. I looked inside the card and saw a \$10. I closed the card and put it back on the desk. When Ms. Gordon came back into the office, she opened her card and snorted. She didn't tell anyone in the office about the \$10 inside it.

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

Date: *July 30, 2014*

Jasmine Winfield

Jasmine Winfield

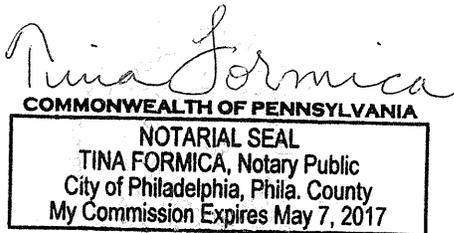


EXHIBIT 6

DECLARATION OF LESLIE MILES

I, Leslie Miles, hereby depose and declare that the following statement is true and correct:

1. I am a writer and reporter for the newspaper One Step Away.
2. On April 14, 2014 I met with Deputy City Commissioner Tracey Gordon in the Office of City Commissioner Stephanie Singer. I asked Ms. Gordon to help me type and format a letter. Ms. Gordon said that she could assist and that she would have the work completed before 5:00 pm that day. I left a hand-written copy of the letter with her and left her office. While I was there, I also spoke with Jasmine Winfield. Ms. Gordon e-mailed me the formatted letter later in the day.
3. I returned the next day to Commissioner Singer's to thank Ms. Winfield and Ms. Gordon for their assistance. Ms. Gordon spoke to me and Ms. Winfield in the hallway and told me "When you come asking us for favors I expect you to pay for the services done for you." Ms. Gordon then told me I should pay Ms. Winfield for the work she had done. I was shocked by Ms. Gordon's tone and by what she was asking me. I asked her if she also expected payment. She told me "I'd appreciate it, and don't forget us."
4. On April 16, 2014, day I returned to Commissioner Singer's office. I bought thank you cards for Ms. Winfield and Ms. Gordon. I put \$20 in the card to Ms. Winfield and \$10 in the card to Ms. Gordon. Neither Ms. Winfield nor Ms. Gordon was present, so I left the cards on their respective desks.
5. On June 12, 2014 I received a text from Ms. Gordon including a flier for a fundraiser. I called Ms. Gordon to ask for an explanation, and Ms. Gordon told me that she was hosting a fundraiser for herself on June 21, 2014 on the 5000 block of Springfield Avenue with tickets sold for \$20 each. She said that she was contacting all of the people who she had helped in her role as Deputy Commissioner so they could help her now. Ms. Gordon then demanded to know how many tickets I was going to purchase.

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

Date:

08/11/14


Leslie Miles

EXHIBIT 7



CITY OF PHILADELPHIA

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

December 15, 2014

Via hand delivery

Jasmine Winfield
161 N. Robinson Street
Philadelphia, PA 19139

Re: Acceptance of gratuity

Dear Jasmine:

In May of this year, you contacted our office and disclosed that you and another City employee had accepted gratuities from a member of the public. At the time, you were a temporary employee working for the City Commissioners. Today, you disgorged to the City \$20, the amount of the gratuity you received. You have also provided extensive cooperation to us in our investigation of the other employee. Because you self-reported your acceptance of the gratuity, voluntarily disgorged the money you had accepted, and have cooperated with us, we will not pursue enforcement against you.

Please do not hesitate to contact me if you have any questions.

Regards,

A handwritten signature in black ink that reads "Michael J. Cooke".

Michael J. Cooke
Director of Enforcement

EXHIBIT 8

Received
 DEC 15 2014
 Philadelphia Board of Ethics

2 +
 MONEYGRAM PAYMENT SYSTEMS, INC. DRAWER
 P.O. BOX 9476
 MINNEAPOLIS, MN 55480
 PLEASE READ REVERSE SIDE www.moneygram.com/moneyorder DATE/AMOUNT

10552209623 12/15/2014
 129 NN \$20.00
 55172262242622 00

RECEIPT
RECIBO

R 1055 22096230 EMPLOYEE
 715 (12/12) 700/14000
 M 70741-U

KEEP A COPY OF THIS STUB
 FOR RECORDS /
 MANTENGA UNA COPIA DE
 ESTE RECIBO PARA SUS ARCHIVOS

INTERNATIONAL MONEY ORDER 75-1618 919

12/15/2014
 10552209623
 MONEY ORDER 0109

10552209623
 TWENTY DOLLARS +
 00 CENTS *****

PAY EXACTLY

Payable Through
 Citizens Alliance Bank
 Clara City, MN

ISSUER/DRAWER:
 MONEYGRAM PAYMENT SYSTEMS, INC.

Payable Through
 Citizens Alliance Bank
 Clara City, MN

10552209623

Valid Money Order includes: 1. Heat sensitive, red stop sign AND 2. Contains a True Watermark hold up to light to view.



To Validate: Touch the stop sign,
 then watch it fade and reappear

PAY TO THE ORDER OF / PAGAR A LA ORDEN DE: *City of Philadelphia*

IMPORTANT - SEE BACK BEFORE CASHING

PURCHASER, SIGNER FOR DRAWER / COMPRADOR, FIRMA DEL LIBRADOR
 PURCHASER BY SIGNING YOU AGREE TO THE SERVICE CHARGES AND OTHER TERMS ON THE REVERSE SIDE

ADDRESS: *1610 N. Robinson St. Philadelphia, PA 19109*

Payable Through
 Citizens Alliance Bank
 Clara City, MN

1055 22096 230 90

MONEY ORDER NUMBER
 R105522096230

DETACH HERE

EXHIBIT 9

Michael Cooke

From: Seth Bluestein
Sent: Wednesday, May 28, 2014 8:08 AM
To: Michael Cooke
Subject: RE: Susan McCall

Yes, After speaking with Susan yesterday I immediately sent the following email to my supervisor, Don Garecht:

Don,

Susan, a volunteer in Commissioner Singer's Office, approached me when I was speaking with Jasmine and made the following allegation:

She said that Tracey Gordon encouraged her to run for committeeperson and to support a specific individual for Ward Leader against Gary Williams. She had written a letter and wanted to give it to the Ethics Board but somebody was telling her not to do so. I told her I would give her Michael Cooke's phone number. She said that she just had to get her son from Singer's Office and then she would come do so. In that time Tracey Gordon took her aside and had a private conversation with her.

After that conversation ended Susan told me the following, "Tracey told me not to go to the ethics board and that I was next in line for a temp job. She then made me rip up my letter to the ethics board in front of her."

Susan said she had to get her son home and wasn't feeling well. So she left, but said she would call Michael Cooke.

Seth Bluestein
Deputy Commissioner
Office of City Commissioner Al Schmidt
134 City Hall
Philadelphia, PA 19107
P: 215-686-3464, 67
F: 215-686-3472
www.philadelphiovotes.com

-----Original Message-----

From: Michael Cooke
Sent: Tuesday, May 27, 2014 7:15 PM
To: Seth Bluestein
Subject: Susan McCall

Seth,
Can you please send me an email describing your interactions with Susan McCall today?

Thank you,
Michael J. Cooke, Esq.
Director of Enforcement
Board of Ethics
of the City of Philadelphia
1515 Arch St., 18th Floor

EXHIBIT 10

Chicken AND Fish FRY
FUNDRAISER FOR TRACEY GORDON
 COMMUNITY ACTIVIST and STRATEGIST

Join us for good food, and enjoy great music and networking!

Saturday, June 21, 2014 | 1:00 - 4:00 PM
 African Cultural Center
 5000 Springfield Avenue, Philadelphia, PA 19143

TRACEY GORDON has worked for the city of Philadelphia as a community volunteer, black captain and has served as a Deputy Commissioner for Voter's Education and Outreach. Please help us support Tracey, our sister, our neighbor and friend as she continues her services for members of Philadelphia in the best way she knows how: FROM THE HEART. Tracey needs our help now.

\$20 Minimum Ticket Cost, which includes a dinner platter and beverage
Contribution Levels - \$50 Supporter | \$75 Friend | \$100 Patron
 Please make all checks payable to **Tracey Gordon**

For contributions/ticket purchase and additional information contact Salima Suswell at salima@evolutionsonline.com or **215-430-2441**

****If unable to attend, kindly send your contribution to 6543 Windsor Street, Philadelphia, PA 19142****

Tracey Gordon
June 19

Share

18 people like this.



Arlean J. Worthy Hi. So this is a fundraiser for community projects?
June 21 at 1:27am



Tracey Gordon Arlean J. Worthy read the flyer? Its for Community Service and Supporting Tracey Gordon
June 21 at 9:46am

Sponsored by

Your First Box is Free!
julep.com



Monthly delivery of colors from Julep that are SO YOU. Use code FREEBOX.

Create Ad

Running Windows XP?
microsoft.com



Support for Windows XP ends in April. Find a modern device to match your business needs.

Designer Bags at Gilt
gilt.com



Access Top Designers at Insider Prices. Join Gilt Today!

The Inquirer
myaccount.inquirer.com



More Content & Free Digital Access. Get the redesigned Inquirer at 50% off

EXHIBIT 11



CITY OF PHILADELPHIA

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

February 20, 2015

Via U.S. mail and fax

Verizon Wireless Law Enforcement Resource Team
180 Washington Valley Road
Bedminster, NJ 07921
FAX: (888)-667-0028

To Whom It May Concern:

Enclosed is an Administrative Subpoena that requires you to produce the documents and things identified on the attached Schedule of Requested Documents to the Philadelphia Board of Ethics by **March 6, 2015 at 05:00pm.**

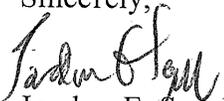
You may send the records by express mail, U. S. Mail, or courier if you include a sworn certification that true copies of all responsive documents have been produced.

These records are necessary for the Board to pursue a confidential investigation of potential violations of the City's public integrity laws. Section 4-1100 of the Philadelphia Home Rule Charter charges the Board, an independent City agency, with administering and enforcing the City's public integrity laws. This Administrative Subpoena is issued pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, §§ 20-606 and 20-1008 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555.

Please note that § 20-606(1)(i) of the Philadelphia Code provides that “[n]o person shall disclose or acknowledge to any other person any information relating to a complaint, investigation, referral or pending adjudication, except as provided by law.”

Thank you for your anticipated cooperation. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,


Jordan E. Segall
Staff Attorney

Enclosure(s)

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: VERIZON WIRELESS LAW ENFORCEMENT RESOURCE TEAM
180 Washington Valley Road
Bedminster, NJ 07921

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, §§ 20-606 and 20-1008 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded:

To testify under oath regarding

Place of testimony:
Date: _____ Time: _____

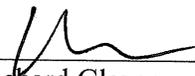
To produce the documents identified on the attached schedule.

Place of production: Board of Ethics, 1515 Arch Street,
18th Floor, Philadelphia, PA 19102
Date: February 27, 2015 Time: 05:00 PM
March 6, 2015

Witness the BOARD OF ETHICS of the City of Philadelphia,

at Philadelphia this 19 day of February, 2015.

ATTEST:


Richard Glazer
Hearing Officer

Inquiries concerning this Administrative Subpoena should be addressed to:

Jordan E. Segall, Esq.
Board of Ethics
1515 Arch Street, 18th Floor, Philadelphia, PA 19102
215 686-9457

SCHEDULE OF REQUESTED DOCUMENTS
Law Enforcement Resource Team, Verizon Wireless
For production by ~~February 27, 2015~~

March 6

Documents and Things Requested

1. Records of all telephone calls (but not the content of those calls) to and from telephone # (484) 280-6760 in your company's possession for the dates:

June 1, 2014 – June 30, 2014

2. Text message communications (but not the content of those communications) to and from telephone # (484) 280-6760 in your company's possession for the dates:

June 1, 2014 – June 30, 2014

Definitions

As used in this subpoena, the following terms mean:

1. "You" and "your," mean the subpoenaed individual and/or the subpoenaed individual's political committee and includes any agents, representatives and anyone acting on the subpoenaed individual's or the political committee's behalf.
2. The term "document" or "documents" means any writing, electronic file or recording, computer data, or thing including, but not limited to, memoranda, correspondence, reports, notes, invoices, bills, letters, emails (including associated attachments), communications, drawings, diagrams, mock-ups, order forms, print samples, bank records and statements, canceled checks, books, magazines, writings, microfilm, graphs, photographs, charts, tape recordings, videotapes, information stored electronically on digital media, and every other data compilation from which information can be obtained.
3. As used herein, the term "communications" means all means and methods by which information can be exchanged, including but not limited to written correspondence, pictures, photographs, electronic correspondence (e.g., electronic mail or "e-mail" (including associated attachments), text messages, or facsimile transmissions), oral exchanges of information, including without limitation telephone conversations and voice messaging systems, and notes reflecting such communications.
4. As used herein, the term "relating" means referring to, reflecting, containing, pertaining, indicating, showing, concerning, constituting, evidencing, describing, discussing or mentioning.
5. "Any" shall include "all" and "all" shall include "any."
6. "And" and "or" shall mean both the conjunctive and the disjunctive, and wherever the disjunctive is used, responses shall be given separately for each element.

EXHIBIT 12

(phone records provided via CD)

EXHIBIT 13



CITY OF PHILADELPHIA

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

February 20, 2015

Via U.S. mail, email, and fax

T-Mobile Law Enforcement Relations Group
4 Sylvan Way
Parsippany, NJ 07054
EMAIL: lerinbound@t-mobile.com
FAX: (973) 292-8697

To Whom It May Concern:

Enclosed is an Administrative Subpoena that requires you to produce the documents and things identified on the attached Schedule of Requested Documents to the Philadelphia Board of Ethics by **March 6, 2015 at 05:00pm**.

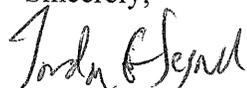
You may send the records by express mail, U. S. Mail, or courier if you include a sworn certification that true copies of all responsive documents have been produced.

These records are necessary for the Board to pursue a confidential investigation of potential violations of the City's public integrity laws. Section 4-1100 of the Philadelphia Home Rule Charter charges the Board, an independent City agency, with administering and enforcing the City's public integrity laws. This Administrative Subpoena is issued pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, §§ 20-606 and 20-1008 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555.

Please note that § 20-606(1)(i) of the Philadelphia Code provides that "[n]o person shall disclose or acknowledge to any other person any information relating to a complaint, investigation, referral or pending adjudication, except as provided by law."

Thank you for your anticipated cooperation. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,


Jordan E. Segall
Staff Attorney

Enclosure(s)

COMMONWEALTH OF PENNSYLVANIA :

S.S.

City and County of Philadelphia

ADMINISTRATIVE SUBPOENA

To: **T. MOBILE LAW ENFORCEMENT RELATIONS GROUP**
4 Sylvan Way
Parsippany, NJ 07054

Pursuant to §§ 8-409 and 4-1100 of the Philadelphia Home Rule Charter, §§ 20-606 and 20-1008 of The Philadelphia Code, and the Local Agency Law, 2 Pa. C. S. §§ 551-555, you are hereby commanded:

To testify under oath regarding

Place of testimony:
Date: Time:

To produce the documents identified on the attached schedule.

Place of production: Board of Ethics, 1515 Arch Street,
18th Floor, Philadelphia, PA 19102
Date: ~~February 27, 2015~~ MARCH 6, 2015 RCG Time: 05:00 PM

Witness the BOARD OF ETHICS of the City of Philadelphia,
at Philadelphia this 19 day of February, 2015.

ATTEST:


Richard Glazer
Hearing Officer

Inquiries concerning this Administrative Subpoena should be addressed to:

Jordan E. Segall, Esq.
Board of Ethics
1515 Arch Street, 18th Floor, Philadelphia, PA 19102
215 686-9457

SCHEDULE OF REQUESTED DOCUMENTS
Law Enforcement Relations Group, T. Mobile
For production by February 27, 2015

March 6

Documents and Things Requested

1. Records of all telephone calls (but not the content of those calls) to and from telephone # (267) 235-0091 in your company's possession for the dates:

June 1, 2014 – June 30, 2014

2. Text message communications (but not the content of those communications) to and from telephone # (267) 235-0091 in your company's possession for the dates:

June 1, 2014 – June 30, 2014

Definitions

As used in this subpoena, the following terms mean:

1. "You" and "your," mean the subpoenaed individual and/or the subpoenaed individual's political committee and includes any agents, representatives and anyone acting on the subpoenaed individual's or the political committee's behalf.
2. The term "document" or "documents" means any writing, electronic file or recording, computer data, or thing including, but not limited to, memoranda, correspondence, reports, notes, invoices, bills, letters, emails (including associated attachments), communications, drawings, diagrams, mock-ups, order forms, print samples, bank records and statements, canceled checks, books, magazines, writings, microfilm, graphs, photographs, charts, tape recordings, videotapes, information stored electronically on digital media, and every other data compilation from which information can be obtained.
3. As used herein, the term "communications" means all means and methods by which information can be exchanged, including but not limited to written correspondence, pictures, photographs, electronic correspondence (e.g., electronic mail or "e-mail" (including associated attachments), text messages, or facsimile transmissions), oral exchanges of information, including without limitation telephone conversations and voice messaging systems, and notes reflecting such communications.
4. As used herein, the term "relating" means referring to, reflecting, containing, pertaining, indicating, showing, concerning, constituting, evidencing, describing, discussing or mentioning.
5. "Any" shall include "all" and "all" shall include "any."
6. "And" and "or" shall mean both the conjunctive and the disjunctive, and wherever the disjunctive is used, responses shall be given separately for each element.

EXHIBIT 14

**(phone records and certification provided via
CD)**

EXHIBIT 15

Fwd: Re: Re: Re: One more workshop for our committeeperson project—what to expect at the reorganization meeting.

kbojar1@verizon.net

Sent: Tuesday, August 26, 2014 5:29 PM

To: Michael Cooke

-----Original Message-----

From: kbojar1@verizon.net

Date: Apr 1, 2014 6:43:17 PM

Subject: Re: Re: Re: One more workshop for our committeeperson project—what to expect at the reorganization meeting.

To: kbojar1@verizon.net, sfsinger@campaignscientific.com

Cc: reachingback@aol.com, kblack@dc47.org, willsresearch@yahoo.com

Kathy has reserved Wed., May 28 for the workshop on "What to Expect from the Re-organization Meeting."

I can set up FB page and do the publicity, but I think Stephanie should be the one write a few sentences describing the content.

On 03/30/14, kbojar1@verizon.net wrote:

Let's try for May 28 as May 27 is probably part of some folk's extended memorial day weekend.

Kathy will be back in the office on Monday, so we can find out about room availability.

On 03/30/14, Stephanie Singer<sfsinger@campaignscientific.com> wrote:

May 29-31 is out but otherwise I'm pretty free.

On Mar 28, 2014, at 12:03 PM, kbojar1@verizon.net wrote:

I think we need something on our calendars soon as end of May is a very busy time.

Stephanie's schedule is critical here. Stephanie, what dates work for you??

On 03/25/14, kbojar1@verizon.net wrote:

Hi all,

One more workshop for our committeeperson project—what to expect at the reorganization meeting.

At our February workshop Stephanie suggested that we hold a workshop on the reorganization meeting which is held after the election to seat duly elected committeepeople and to elect a ward leader. This is a time when all kinds of evil-doing occurs. It's important that new committeepeople understand the process, so they know what to expect.

I think we owe this to the people we've recruited. Finding a date is a challenge. The re-organization meeting has historically been the beginning of June, so to be safe, we should have this in the last week in May. How about Wed May 28 or Thursday, May 29?

Given that this is such a busy time, the sooner we have this on folk's calendars the better.

We have spent the Bread and Roses grant so there's nothing to fund this workshop, but we don't need it as hopefully we can get free space at DC 47.

Karen

EXHIBIT 16

From: <kbojar1@verizon.net>
Date: Tuesday, August 26, 2014 5:30 PM
To: <michael.cooke@phila.gov>
Attach: Ward Reorganization Workshop.doc
Subject: Fwd: flyer for May 28

-----Original Message-----

From: kbojar1@verizon.net
Date: May 7, 2014 7:28:41 PM
Subject: flyer for May 28
To: reachingback@aol.com, sfsinger@campaignscientific.com

Tracey,
Here's the flyer you requested.
Karen



Make a Difference!
How You Can Strengthen Democracy in Philadelphia

The Philadelphia Chapter of the National Organization for Women and the Philadelphia Chapter of the Coalition of Labor Union Women will conclude its series of workshops on HOW TO RUN FOR COMMITTEEPERSON AND FOR ELECTION BOARD with

**A WORKSHOP FOR NEW COMMITTEEPEOPLE: THE
WARD RE-ORGANIZATION PROCESS**

No later than the third Monday after the primary election, each ward will hold its re-organization meeting. This is the meeting at which committeepersons are officially seated and the ward leader is elected. This can be a very confusing experience for new committeepersons who might not know the party rules and not know what to expect. Come and learn how this re-organization should work and learn how the Democratic Party and the Republican Party are governed.

When: Wednesday, May 28 2014 from 5:30-7:30 pm

Where: 1606 Walnut Street, Philadelphia, PA

Speakers:

Stephanie Singer, City Commissioner

Tracey Gordon, Deputy City Commissioner

RSVP to kbojar1@verizon.net or at our Facebook page at

<https://www.facebook.com/events/761022263910504>

For more information, contact Karen Bojar at kbojar1@verizon.net or Kathy Black at kblackphilly@yahoo.com

(Labor donated)

EXHIBIT 17



MAY 28

PLEASE NOTE CHANGE OF PLACE: A workshop for committeepeople: The ward re-organization process

Public · Hosted by Karen Bojar and 5 others

Join Save

Wednesday, May 28 at 5:30pm - 7:30pm
1 day ago

250 S. 17th Street Phila PA. Please ask at desk for room number.

No later than the third Monday after the primary election, each ward will hold its re-organization meeting. This is the meeting at which committeepeople are officially seated and the ward leader is elected. This can be a very confusing experience for new committeepeople who might not know the party rules and not know what to expect. Come and learn how this reorganization should work and learn how the Democratic Party and the Republican Party are governed.

The workshop will be conducted by City Commissioner Stephanie Singer and Tracey Gordon

POSTS



David Brian Raletson
May 28 at 6:34pm · Philadelphia, PA

Full house....

Like · Comment · Share

Karen Bojar and 6 others like this.

View 1 more comment



John J. Mulholland Jr. There was a wealth of information given out at tonight's event.

May 28 at 6:42pm · Like · 3



Tracey Gordon well I know you all are not surprised are you that's what we do, we give out information so now its up to you all to go share the information

May 28 at 7:02pm · Like · 3



Tracey Gordon I am sorry I could not attend this meeting tonight, but I know it was so informative



Karen is going

GUESTS

46 going
10 maybe
407 invited

SUGGESTED EVENTS



7TH Annual Roots Picnic x Sn...
Tomorrow at The Festival Pier a...
Concert · 258 guests
Join · Save



7th Annual Roots Picnic
Tomorrow at The Festival Pier a...
Concert · 10 guests
Join · Save



Let's Dance 4 Life
Tomorrow at Delaware Swim an...
Dancing · 4 guests
Join · Save



Rockstar Energy Drink Maybe...
Fri, Aug 1 at Camden, New Jersey
Bryan Annmuth is going
Join · Save



Cocktails & Candidates
Fri, Jun 6 at Rosewood
Stephen Rudman is going
Join · Save



Bop Kabbalah's Philly CD Rel...
Tue, Jun 10 at Congregation Sh...



do, we give our information so now it's up to you air to go share the information



Tracey Gordon I am sorry I could not attend this meeting tonight, but I know it was so informative
May 28 at 10:37pm · Like · 1



Write a comment...



Karen Bojar changed the name of the event to "PLEASE NOTE CHANGE OF PLACE: A workshop for committeepople: The ward re-organization process".
May 27 at 6:25pm

Like · Comment



Maureen Esther
May 26 at 3:17pm

I may not be able to make it, but please look for my friend Lynette Notte, she's been thinking about this for some time, I told her about this, and she said she's definitely coming!

Like · Comment · Share



Write a comment...



Shannon Marietta is going.
May 24 at 9:33am

Like · Comment

2 people like this.



Write a comment...



Tracey Gordon updated the event photo in PLEASE NOTE CHANGE OF PLACE: A workshop for committeepople: The ward re-organization process.
May 21 at 1:22pm



Karen is going

GUESTS

46 going

10 maybe

407 invited

SUGGESTED EVENTS



7th Annual Roots Picnic x Sn...
Tomorrow at The Festival Pier a...
Concert · 258 guests
Join · Save



7th Annual Roots Picnic
Tomorrow at The Festival Pier a...
Concert · 10 guests
Join · Save



Let's Dance 4 Life
Tomorrow at Delaware Swim an...
Dancing · 4 guests
Join · Save



Rockstar Energy Drink Mayhe...
Fri, Aug 1 at Camden, New Jersey
Bryan Anmuth is going
Join · Save



Cocktails & Candidates
Fri, Jun 6 at Rosewood
Stephen Rudman is going
Join · Save



Bop Kabbalah's Philly CD Rel...
Tue, Jun 10 at Congregation Sh...
Concert · 1 friend is going
Join · Save



Tracey Gordon updated the event photo in PLEASE NOTE CHANGE OF PLACE: A workshop for committeepoople: The ward re-organization process.

May 21 at 1:22pm



Like · Comment · Share

6 people like this.



Ernie Brooklyn-Gurl Bristolow Thanks for the invite. ...next time Tracey! Thanks

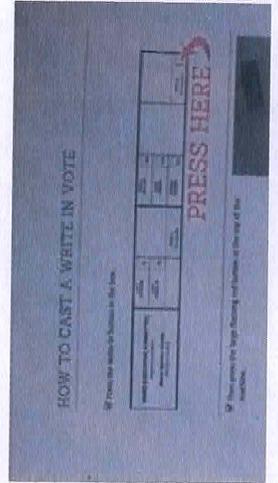
May 21 at 2:11pm · Like · 2



Write a comment...



Tracey Gordon May 9 at 10:14pm



Karen is going

GUESTS

46 going

10 maybe

407 invited

SUGGESTED EVENTS



7TH Annual Roots Picnic x Sn... Tomorrow at The Festival Pier a... Concert · 258 guests Join · Save



7th Annual Roots Picnic Tomorrow at The Festival Pier a... Concert · 10 guests Join · Save



Let's Dance 4 Life Tomorrow at Delaware Swim an... Dancing · 4 guests Join · Save



Rockstar Energy Drink Mayhe... Fri, Aug 1 at Camden, New Jersey Bryan Annuath is going Join · Save



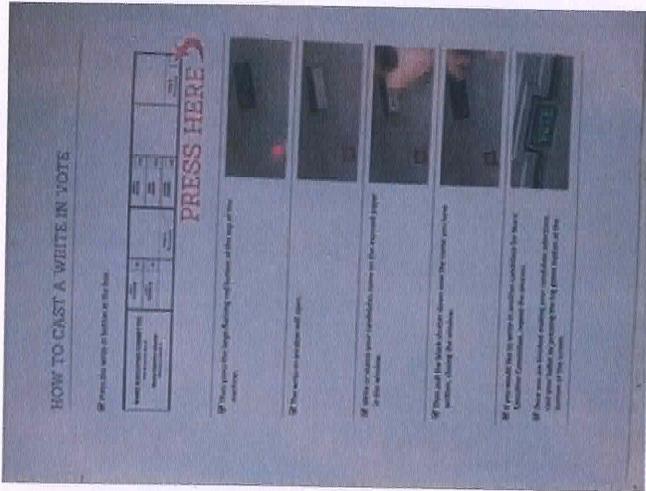
Cocktails & Candidates Fri, Jun 6 at Rosewood Stephen Rudman is going Join · Save



Bop Kabbalah's Philly CD Rel... Tue, Jun 10 at Congregation Sh... Concert · 1 friend is going Join · Save



Tracey Gordon
May 9 at 10:14pm



Like · Comment · Share

6 people like this.

View 2 more comments



Joseph Driscoll I was just making one...it was not half as good and it was taking me forever. and im so happy right now!!!! ahhh!
May 9 at 10:20pm · Like · 1



Tracey Gordon Glad to make you happy Joseph Driscoll
May 9 at 11:06pm · Like · 1



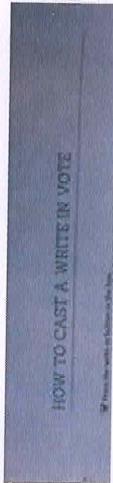
Barbara Daniel-Cox Best wishes for a productive session.
May 14 at 6:28pm · Like



Write a comment...



Tracey Gordon
May 9 at 10:56pm



Karen is going

GUESTS

46	10	407
going	maybe	invited

SUGGESTED EVENTS



7TH Annual Roots Picnic x Sh...
Tomorrow at The Festival Pier a...
Concert · 258 guests
Join · Save



7th Annual Roots Picnic
Tomorrow at The Festival Pier a...
Concert · 10 guests
Join · Save



Let's Dance 4 Life
Tomorrow at Delaware Swim an...
Dancing · 4 guests
Join · Save



Rockstar Energy Drink Maybe...
Fri, Aug 1 at Camden, New Jersey
Bryan Anmuth is going
Join · Save



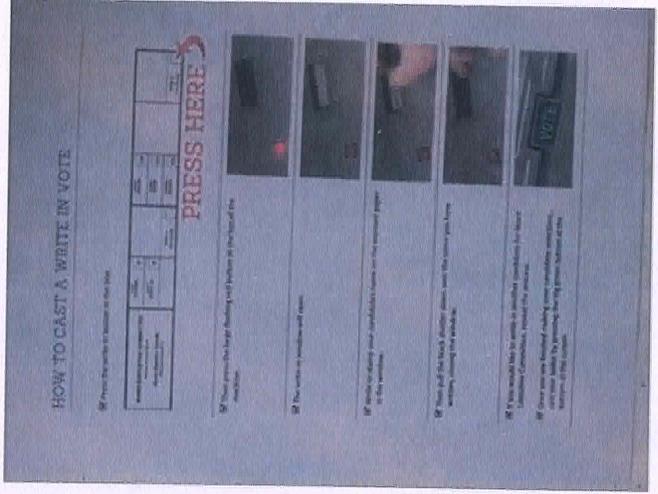
Cocktails & Candidates
Fri, Jun 6 at Rosewood
Stephen Rudman is going
Join · Save



Bop Kabbalah's Philly CD Rel...
Tue, Jun 10 at Congregation Sh...
Concert · 1 friend is going
Join · Save



Tracey Gordon
May 9 at 10:56pm



Like · Comment · Share

4 people like this.



Write a comment...



Tracey Gordon
May 9 at 10:11pm · Philadelphia, PA

How to do a Write in Vote for a Committeeperson

[http://www.patransparency.org/files/4313/9965/6537/Writein_Instructions.p](http://www.patransparency.org/files/4313/9965/6537/Writein_Instructions.pdf)
df

www.patransparency.org
PATRANSPARENCY.ORG

Like · Comment · Share

3 people like this.



Write a comment...



Karen is going

GUESTS

46 going
10 maybe
407 invited

SUGGESTED EVENTS



7th Annual Roots Picnic x Sn...
Tomorrow at The Festival Pier a...
Concert · 258 guests
Join · Save



7th Annual Roots Picnic
Tomorrow at The Festival Pier a...
Concert · 10 guests
Join · Save



Let's Dance 4 Life
Tomorrow at Delaware Swim an...
Dancing · 4 guests
Join · Save



Rookstar Energy Drink Maybe...
Fri, Aug 1 at Camden, New Jersey
Bryan Anmuth is going
Join · Save



Cocktails & Candidates
Fri, Jun 6 at Rosewood
Stephen Rudman is going
Join · Save



Bop Kabbalah's Philly CD Rel...
Tue, Jun 10 at Congregation Sh...
Concert · 1 friend is going
Join · Save



Bryan McHale
Edit Profile

EVENTS

- 30 My Events
- Calendar
- Create

MAY 28

PLEASE NOTE CHANGE OF PLACE: A workshop for committeepeople: The ward re-organ...

Public · Hosted by Karen Bojar

Wednesday, May 28 at 10:00am
1 day ago

250 S. 17th Street Philadelphia, PA

No later than the third Monday of the month, committeepeople will hold its re-organization meeting. This meeting can be a very confusing experience for those who do not know the party rules and this reorganization should with the Republican Party are going to be...

The workshop will be conducted by City Commissioner Stephanie Singer and Tracey Gordon

POSTS



David Brian Ralston
May 28 at 6:34pm · Philadelphia, PA

Full house...

Like · Comment · Share

Karen Bojar and 6 others like this.

X

Guests

Going (46)



Karen Bojar
Works at Professor, Retired

✓ Friends



Tracey Gordon
Community Leader at SW Philly Community...

➤ Add Friend



Kathy Black
Health & Safety Director at A.F.S.C.M.E. Dis...

➤ Add Friend



Nina Ahmad
University of Pennsylvania

➤ Add Friend



Danielle Shari Moskowitz
Philadelphia, Pennsylvania

➤ Add Friend



Jon Geeting
Philadelphia, Pennsylvania

➤ Add Friend



Concert - 25th guests
Join · Save



7th Annual Roots Picnic
Tomorrow at The Festival Pier a...
Concert - 10 guests
Join · Save



Starwood/ The Tea Club / Drow...
Sat, Jun 14 at Boot & Saddle
Ellen Oh is going
Join · Save



Cocktails & Candidates
Fri, Jun 6 at Rosewood

EXHIBIT 18

From: [Stephanie Singer](#)
To: [Michael Cooke](#)
Subject: I removed the offending posts
Date: Friday, September 13, 2013 2:57:43 PM

Just wanted to let you know that after our most recent conversation at your office I removed the two inappropriate posts from the calendar referenced on PAtransparency.org.

By the way, check out the new Commissioners website: [PhiladelphiaVotes.com](#)

Stephanie Singer
Philadelphia City Commissioner
City Hall, Room 132
Philadelphia, PA 19107
215-686-3460
www.patransparency.org

EXHIBIT 19

PA Transparency Project



Home About Blog Search How To

Welcome to the Pennsylvania Transparency Project!

The purpose of the Pennsylvania Transparency Project (formerly the Pennsylvania Election Transparency Project) is to collect, analyze and disseminate publicly available election-related data and knowledge in Pennsylvania.

**Precinct Election Board Candidates by Precinct
Department of State Instructions on Voter ID
Candidates for Open Seats in 2013 General
Election**

**Poll Worker Training Schedule for 2013 General
Election
Judicial Retention Races on Nov 5 Ballot
Possible Ballot Question for Council to Have Its
Own Budget Office**

**Divisions lacking party nominations for poll
worker**

**Possible Ballot Question Regarding Minimum
Wage for Nov 5**

**Possible Ballot Question for City to Borrow
Money Stated for Nov 5 Election**

Poll Worker Training Materials On Line

Emergency Absentee Ballots

Data and Information

- Google Calendar of public events for voters (e.g., candidate forums)
- PA Voter Protection Laws in a Nutshell (pdf from the Advancement Project)
- The Sunshine Act of Pennsylvania
- Warsaw Declaration Toward a Community of Democracies
- Philadelphia Election Results (bulk download or easy look-up)
- Philadelphia Campaign Finance Reports
- Pennsylvania Campaign Finance Reports
- Federal Campaign Finance Data
- Philadelphia City Commissioner meeting transcripts
- Pennsylvania Election Calendar 2013
- How-To guides
- Phila Division maps

Contact Us!

Name *

Browser tabs: Bryan, Search, Images, Maps, Play, YouTube, News, Gmail, Drive, Calendar, More

Address bar: <https://www.google.com/calendar/render?feeds=6VVd00w0WtPmRfucT0zhhb...>

Navigation: Back, Forward, Home, Refresh, Stop

Search: Google

Notification: Bryan Michale

Share: + Share

Change time zone to (GMT-05:00) Eastern Time? Yes No Never ask again Settings

More Actions

Democratic City Committee Party

Mon, May 13, 5:30pm - 7:00pm

Where Sheet Metal Hall 1301 S. Columbus Blvd
map

Calendar Phila Voter Information Forums

Created by traceygordoncitycommission@gmail.com

Description Tickets required, \$150/person. Contact 215-241-7804

Reminders No reminders set
Add a reminder

[Want to add attachments? Learn how to enable the lab!](#)

System tray: Network, Volume, Battery, Date/Time: 1:52 PM 8/20/2013

EXHIBIT 20

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

J. Shane Creamer, Jr. :
Executive Director :
Board of Ethics :
of the City of Philadelphia :
1515 Arch Street, 18th Floor :
Philadelphia, PA 19102 :
 :
 :
v. :
 :
Tracey Gordon :
6543 Windsor Street :
Philadelphia, PA 19142 :
 :
 :

Respondent :

Matter No. 1412MU14

Date of Notice: December 11, 2014

NOTICE OF ADMINISTRATIVE ENFORCEMENT PROCEEDING

By serving this Notice on you, the Executive Director of the Board of Ethics initiates an administrative enforcement proceeding against you. The Executive Director is asking the Board to find that you have violated: a) the gratuity provisions of Philadelphia's Home Rule Charter (Charter § 10-105); b) the political activity restrictions of Philadelphia's Home Rule Charter (Charter § 10-107); and c) the cooperation provisions of Philadelphia's Ethics Code. (Code § 20-606).

If you wish to submit a written Response to this Notice, you must do so within 20 days of the date of the Notice. You have the right to request a hearing before the Board. If you wish to request a hearing, you must include the request in your written Response to the Notice. If you fail to request a hearing in a written Response to this Notice, you will waive your right to a hearing.

Board Regulation No. 2 and the Memorandum on Procedures for Administrative Enforcement Proceedings set forth the rules and procedures for administrative enforcement proceedings before the Board. A copy of each is enclosed.

As set forth in Regulation No. 2, administrative enforcement proceedings are confidential, unless you request a public hearing in your Response to this Notice. *See* Board Regulation 2, ¶2.15.

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

I. RELEVANT LAW

Subsection 10-107(3) of the Philadelphia Home Rule Charter prohibits a City officer or employee from directly or indirectly demanding, soliciting, collecting or receiving, or being in any manner concerned in demanding, soliciting, collecting or receiving, any assessment, subscription or contribution intended for any political purpose.

Subsection 10-107(4) of the Philadelphia Home Rule Charter prohibits a City appointed officer or employee from taking any part in the management or affairs of any political party or in any political campaign. The Board has further specified that this prohibition means that an appointed officer or employee shall not engage in any political activity that is performed in concert or coordination with a political party, candidate, or partisan political group. *See* Board Regulation 8, ¶8.11.

Subsection 10-105 of the Philadelphia Home Rule Charter prohibits a City officer or employee from soliciting or accepting any gratuity for any act or omission in the course of his or her public work.

A violation of Section 10-107 or 10-105 of the Philadelphia Home Rule Charter imposed by an administrative adjudication of the Board of Ethics is subject to a civil penalty of \$300. *See* Charter § 10-109; Board Regulation 8, ¶ 8.26.

Section 20-606(2) of the Philadelphia Code requires all City officers and employees to cooperate fully with any request of the Board of Ethics made pursuant to the execution of its powers and duties and that any City officer or employee who fails to or refuses to cooperate with the Board shall be deemed to be in violation of the City Ethics Code. The Board has further specified that failure to cooperate with the Board includes telling another person not to meet with Board staff or answer questions relating to an investigation. *See* Board Regulation 2, ¶2.8.

A violation of Section 20-606(2) of the Philadelphia Code is subject to a civil penalty of \$1,000 which may be increased to \$2,000 if an aggravating factor is present or decreased to as low as \$250 if mitigating factors are present. *See* Code §§ 20-612(1); 20-1302. Pursuant to Code § 20-1302(1)(b)(iii), obstruction of a Board investigation is an aggravating factor.

II. PARTIES

1. J. Shane Creamer, Jr. is the Executive Director of the Board of Ethics.
2. Tracey Gordon was a Deputy City Commissioner for the City of Philadelphia from February 2011 to December 2014. The City Commissioners are responsible for administering all elections that occur in Philadelphia. Ms. Gordon worked in the office of City Commissioner Stephanie Singer. On May 28, 2014, the City Commissioners suspended Ms. Gordon from her position without pay. On December 3, 2014, the City Commissioners terminated Ms. Gordon from her position.

III. FACTUAL ALLEGATIONS

a. Gordon Solicits and Accepts a Gratuity from Leslie Miles in April of 2014

3. Leslie Miles is a writer and reporter for the newspaper One Step Away.
4. On or about April 14, 2014, Ms. Miles came to Commissioner Singer's office seeking assistance for her candidacy for Resident Commissioner of the Philadelphia Housing Authority. She met with two employees in Commissioner Singer's office: Tracey Gordon and Jasmine Winfield, a temporary worker who performed clerical tasks in the office from mid-March to mid-June of 2014.
5. Ms. Miles asked Ms. Gordon and Ms. Winfield to help her type and format a letter she had written by hand. Commissioner Singer encouraged employees in her office to assist members of the public with such tasks as part of their job duties.
6. Ms. Gordon agreed to type and format Ms. Miles' hand-written letter and Ms. Miles left the office. Later that day, Ms. Gordon emailed Ms. Miles a copy of the typed letter.
7. On or about April 15, 2014, Ms. Miles returned to Commissioner Singer's office. She spoke with Ms. Gordon and Ms. Winfield in the hallway outside of Commissioner Singer's office.
8. Ms. Miles mistakenly thought that both Ms. Gordon and Ms. Winfield worked on the letter for her.
9. Ms. Gordon told Ms. Miles that if Ms. Miles was going to ask for help, she should pay for the help she received. Ms. Gordon specifically asked Ms. Miles to give Ms. Winfield money for the work done on her letter.

10. Ms. Miles asked Ms. Gordon if she also expected payment and Ms. Gordon replied "I'd appreciate it, and don't forget us."

11. On or about April 16, 2014, Ms. Miles returned to Commissioner Signer's office with thank you cards for Ms. Gordon and Ms. Winfield.

12. Neither Ms. Gordon nor Ms. Winfield were present when Ms. Miles returned to Commissioner Singer's office. As a result, Ms. Miles left the cards on Ms. Gordon's and Ms. Winfield's desks.

13. The card for Ms. Winfield contained \$20 in cash.

14. The card for Ms. Gordon contained \$10 in cash.

15. Ms. Winfield returned to the office before Ms. Gordon. She opened her card and found the \$20 in cash in it. She then opened Ms. Gordon's card and saw the \$10 in cash in it. Ms. Winfield closed Ms. Gordon's card and put it back on her desk.

16. When Ms. Gordon came back to the office, she opened her card. A copy of the card Ms. Miles gave Ms. Gordon is attached hereto as Exhibit A.

b. Gordon Solicits a Gratuity from Leslie Miles in June of 2014

17. On May 28, 2014, the City Commissioners suspended Ms. Gordon from her position without pay.

18. In order to raise money while she was suspended without pay from her City position, Ms. Gordon decided to hold a fundraiser on June 21, 2014 for herself. She created a flyer promoting the event and posted it on Facebook. She also sent the flyer to people by text message. Tickets to the fundraiser were sold for a minimum of \$20. A copy of the flyer is attached hereto as Exhibit B.

19. On or about June 12, 2014, Ms. Gordon sent Ms. Miles a text message asking her to attend the fundraiser.

20. After receiving the text message, Ms. Miles telephoned Ms. Gordon for an explanation of the message. Ms. Gordon told her that she was contacting all of the people who she had helped in her role as Deputy Commissioner so they could help her now.

21. Ms. Gordon then demanded to know how many tickets Ms. Miles was going to purchase for her fundraiser, at which point Ms. Miles ended the call.

22. Ms. Miles did not buy a ticket for Ms. Gordon's fundraiser.

c. Gordon Recruits Susan McCall to Run as a Candidate for Committeeperson

23. In the spring of 2014, Susan McCall served as a volunteer in Commissioner Singer's Office. She answered telephone calls from the public and answered inquiries regarding voting information.

24. In mid-April 2014, Ms. Gordon approached Ms. McCall and discussed with her elections for committeeperson and ward leader in the 32nd ward.

25. A committeeperson is the elected party representative of a ward division. The committeepersons in a ward elect the ward leader. Committee persons and ward leaders are officers of the Democratic and Republican parties in Philadelphia. Gary Williams is the ward leader in the 32nd ward.

26. During their conversation, Ms. Gordon asked Ms. McCall to run for committeeperson in the 32nd ward with the understanding that, if elected, she would support a candidate who planned to run against Mr. Williams for ward leader.

27. After speaking with a committeeperson in the 32nd Ward, Ms. McCall told Ms. Gordon that she was not interested in running.

d. Gordon prevents Susan McCall from Submitting a Complaint to the Board of Ethics

28. After informing Ms. Gordon of her decision not to run for committeeperson, Ms. McCall drafted a letter to the Board of Ethics describing Ms. Gordon's recruitment of her to run for committeeperson. Ms. McCall showed the letter to Norys Gonzalez, a Principal Assistant to Commissioner Singer.

29. On or about May 27, 2014, shortly after drafting the letter, Ms. McCall approached Seth Bluestein, a Deputy City Commissioner, outside Commissioner Singer's office holding the letter. She told him she had written to the Board and asked for his help. Mr. Bluestein said he would speak further with her as soon as possible.

30. In the interim, Ms. Gordon approached Ms. McCall and said that she needed to speak privately with her. Before Mr. Bluestein returned, Ms. Gordon and Ms. McCall went out to the City Hall courtyard to speak.

31. In the courtyard, Ms. Gordon asked Ms. McCall not to submit the letter she had written to the Board.

32. Ms. Gordon told Ms. McCall that if she submitted the letter to the Ethics Board she would never be hired again. Ms. Gordon also told Ms. McCall that she was next in line for a job with Commissioner Singer's office.

33. Ms. Gordon then asked Ms. McCall to tear up her letter to the Board, which she did.

e. Gordon Participates in a Workshop for Committeepersons

34. From March through May of 2014, Ms. Gordon participated in the planning and promotion of a workshop for recently elected committeepersons. The workshop was held on May 28, 2014.

35. The workshop instructed the new committeepersons on party rules, party governance, ward reorganization, and the election of ward leaders.

36. Ms. Gordon was scheduled to participate as a speaker at the workshop.

37. She decided not to participate after she was suspended from her job by the City Commissioners.

38. Ms. Gordon promoted the event via email and social media.

f. Gordon Promotes a Democratic City Committee Fundraiser

39. In 2012, Commissioner Singer launched the website patransparency.org to release election-related information to the public. The website includes a link to a Google calendar. *See* Screen shot of patransparency.org front page, attached hereto as Exhibit C.

40. Commissioner Singer directed Ms. Gordon, as part of her job duties, to update the calendar on Patransparency.org with any event that might be of interest to voters.

41. In May of 2013, Ms. Gordon created a calendar entry for the Democratic City Committee's annual fundraising dinner which was scheduled for May 13, 2013. *See* Screen shots of patransparency.org calendar, attached hereto as Exhibit D.

IV. ALLEGED VIOLATIONS

**COUNT 1 – VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-105**

42. By asking Leslie Miles to provide her a payment on or about April 14, 2014 for work she had done in her official capacity, Tracey Gordon solicited a gratuity from Miles and thereby violated Philadelphia Home Rule Charter § 10-105.

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

**COUNT 2 –VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-105**

43. By accepting \$10 in cash from Leslie Miles on or about April 14, 2014 as payment for work she had done in her official capacity, Tracey Gordon accepted a gratuity from Miles and thereby violated Philadelphia Home Rule Charter § 10-105.

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

**COUNT 3 –VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-105**

44. By asking Leslie Miles to provide her a payment on or about June 12, 2014 for work she had done in her official capacity, Tracey Gordon solicited a gratuity from Miles and thereby violated Philadelphia Home Rule Charter § 10-105.

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

**COUNT 4 –VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-107(4)**

45. By recruiting Susan McCall to run for committee person so that she could support a specific candidate for ward leader, Ms. Gordon violated Philadelphia Home Rule Charter § 10-107(4).

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

COUNT 5 –VIOLATION OF PHILADELPHIA CODE SECTION 20-606(2)

46. Tracey Gordon failed to cooperate with the Board and obstructed the Board's investigation into her potential violations of the Ethics Code and Home Rule Charter by:

- a. Telling Susan McCall not to provide information to the Ethics Board about her potential violations of the Home Rule Charter;
- b. Telling McCall to destroy the letter she had written to the Board about her potential violations of the Home Rule Charter; and
- c. Suggesting that McCall would receive a position with Commissioner Singer's Office if she agreed not to provide information to the Board of Ethics.

WHEREFORE, pursuant to Philadelphia Code §§ 20-612(1), 20-1302 and 20-1302(1)(b)(iii), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$2,000.

**COUNT 6 –VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-107(4)**

47. By participating in the planning and promotion of a workshop for committeepersons held on May 28, 2014, Ms. Gordon violated Philadelphia Home Rule Charter § 10-107(4).

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

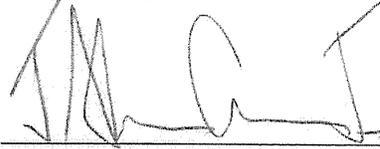
**COUNT 7 –VIOLATION OF PHILADELPHIA HOME RULE CHARTER
SUBSECTION 10-107(3)**

48. By creating and posting a public calendar entry for the Democratic City Committee's May 2013 annual fundraiser, Ms. Gordon violated Philadelphia Home Rule Charter § 10-107(3).

WHEREFORE, pursuant to Philadelphia Home Rule Charter § 10-109 and Philadelphia Code § 20-606(1)(h), the Executive Director requests that the Board impose upon Tracey Gordon a civil penalty of \$300.

Date: 12/11/14

Respectfully submitted,



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

Michael J. Cooke, Esq.
Director of Enforcement

Jordan E. Segall, Esq.
Staff Attorney

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

CERTIFICATION OF SERVICE

I, Michael Cooke, hereby certify that on this date I caused a true and correct copy of the foregoing Notice of Administrative Enforcement Proceeding, with Exhibits, to be served upon the following:

By hand delivery:

Tracey Gordon
6543 Windsor Street
Philadelphia, PA 19142

By email:

Michael Coard
One Liberty Place
1650 Market St., Suite 3652
Philadelphia, PA 19103
michaelcoard@msn.com
Counsel for Tracey Gordon

Maya Nayak
General Counsel
Board of Ethics
1515 Arch St., 18th Floor
Philadelphia, PA 19102
Maya.nayak@phila.gov

Date:

12/11/14



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

J. Shane Creamer, Jr. :
Executive Director :
Board of Ethics :
of the City of Philadelphia :
1515 Arch Street, 18th Floor :
Philadelphia, PA 19102 :
v. :
Tracey Gordon :
6543 Windsor Street :
Philadelphia, PA 19142 :
Respondent :

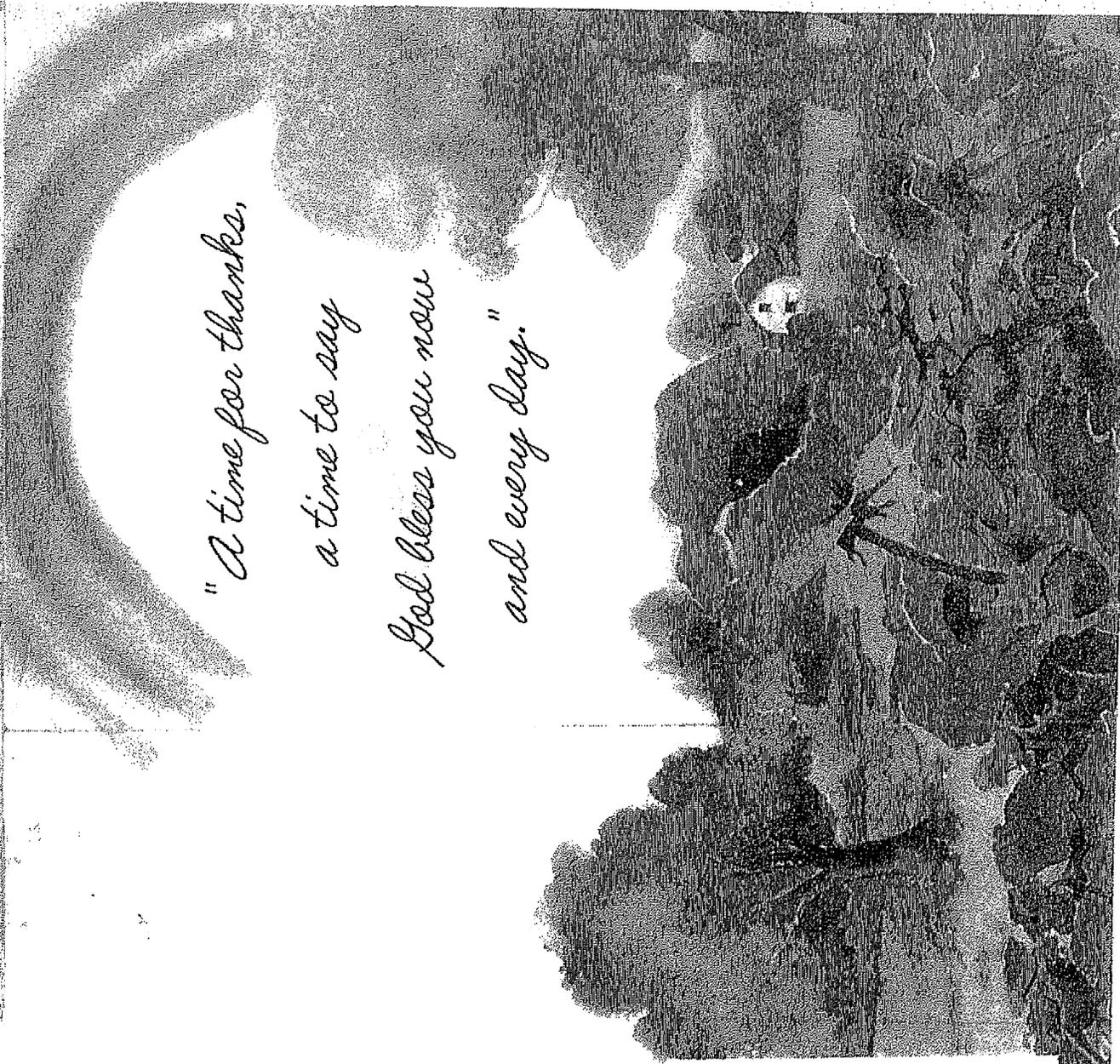
Matter No. 1412MU14

Date of Notice: December 11, 2014

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

- Exhibit A Thank You Card provided by Leslie Miles to Tracey Gordon
- Exhibit B June 21, 2014 Tracey Gordon Fundraiser Flyer
- Exhibit C Screen shot of patransparency.org front page
- Exhibit D Screen shots of patransparency.org calendar

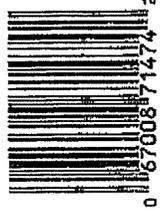
EXHIBIT A



*"A time for thanks,
a time to say
God bless you now
and every day."*

Tender Thoughts

18441113



4702704

\$1.95 TETY99874-04F

TENDER THOUGHTS GREETINGS
1820 MATTHEWSON BLVD. MISSISSAUGA, ONTARIO L4W 0G3
©AGC, LLC MADE IN U.S.A.



April 28, 2014

"Dearest Tracey"

Thank you
and bless you
for being so special.

Gratefully Yours,
Jesie Mills

2014 PHA Commissioner
Winner

"Thanks for Believing in
ME"

EXHIBIT B

Chicken AND fish FRY



FUNDRAISER FOR TRACEY GORDON
COMMUNITY ACTIVIST and STRATEGIST

Join us for good food, and enjoy
great music and networking!

Saturday, June 21, 2014 | 1:00 - 4:00 PM
African Cultural Center
5000 Springfield Avenue, Philadelphia, PA 19143

TRACEY GORDON has worked for the City of Philadelphia as a community volunteer, block captain and has served as a Deputy Commissioner for Youth Education and Outreach. Please help us support Tracey, our sister, our neighbor and friend as she continues her services for members of Philadelphia in the best way she knows how: FROM THE HEART. Tracey needs our help now.

\$20 Minimum Ticket Cost, which includes a dinner platter and beverage
Contribution Levels - \$50 Supporter | \$75 Friend | \$100 Patron
Please make all checks payable to Tracey Gordon

For contributions/ticket purchase and additional information, contact Solma Sewell at salma@evolvesolutionsonline.com or 215-430-2441

****If unable to attend, kindly send your contribution to
6543 Windsor Street, Philadelphia, PA 19142****

Tracey Gordon
June 19 at 12:00pm

Share

18 people like this.

Arlan J. Worley Hi. So this is a fundraiser for community projects?
June 21 at 12:26pm

Tracey Gordon Arlan J. Worley read the flyer? Its for Community Service and Supporting Tracey Gordon
June 21 at 9:46am

Sponsored by

Create Ad

Your First Box is Free!

freebox.com



Monthly delivery of colors from Julie that are SO YOU. Use code FREEBOX

Running Windows XP?

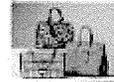
microsoft.com



Support for Windows XP ends in April. Find a modern device to match your business needs.

Designer Bags at Gift

g3.com



Access Top Designers at Insider Prices. Join Gift Today!

The Inquirer

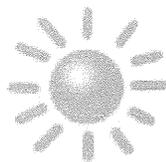
philly.com Request copy



More Content & Free Digital Access. Get the redesigned Inquirer at 50% off.

EXHIBIT C

PA Transparency Project



[Home](#) [About](#) [Blog](#) [Search](#) [How To](#)

Welcome to the Pennsylvania Transparency Project!

The purpose of the Pennsylvania Transparency Project (formerly the Pennsylvania Election Transparency Project) is to collect, analyze and disseminate publicly available election-related data and knowledge in Pennsylvania.

[Precinct Election Board Candidates by Precinct](#)
[Department of State Instructions on Voter ID](#)
[Candidates for Open Seats in 2013 General Election](#)

[Poll Worker Training Schedule for 2013 General Election](#)

[Judicial Retention Races on Nov 5 Ballot](#)

[Possible Ballot Question for Council to Have Its Own Budget Office](#)

[Divisions lacking party nominations for poll worker](#)

[Possible Ballot Question Regarding Minimum Wage for Nov 5](#)

[Possible Ballot Question for City to Borrow Money Slated for Nov 5 Election](#)

[Poll Worker Training Materials On Line](#)

[Emergency Absentee Ballots](#)

Data and Information

- [Google Calendar of public events for voters \(e.g., candidate forums\)](#)
- [PA Voter Protection Laws in a Nutshell \(pdf from the Advancement Project\)](#)
- [The Sunshine Act of Pennsylvania](#)
- [Warsaw Declaration Toward a Community of Democracies](#)
- [Philadelphia Election Results \(bulk download or easy look-up\)](#)
- [Philadelphia Campaign Finance Reports](#)
- [Pennsylvania Campaign Finance Reports](#)
- [Federal Campaign Finance Data](#)
- [Philadelphia City Commissioner meeting transcripts](#)
- [Pennsylvania Election Calendar 2013](#)
- [How-To guides](#)
- [Phila Division maps](#)

Contact Us!

Name *

EXHIBIT D

EXHIBIT 21

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

J. Shane Creamer Jr.	:	
Executive Director	:	
Board of Ethics	:	
of the City of Philadelphia	:	
1515 Arch Street, 18 th Floor	:	
Philadelphia, PA 19102	:	
Petitioner	:	
	:	Matter No. 1412MU14
v.	:	
	:	Date of Notice: 12/11/14
Tracey Gordon	:	
6543 Windsor Street	:	
Philadelphia, PA 19142	:	
Respondent	:	

**RESPONSE TO
NOTICE OF ADMINISTRATIVE ENFORCEMENT PROCEEDING**

III. Factual Allegations

a. Gordon Solicits and Accepts a Gratuity from Leslie Miles in April of 2014

-
3. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment in Petitioner's corresponding paragraph and she therefore denies it.
 4. Admitted.
 5. Admitted.
 6. Admitted.
 7. Admitted.
 8. Respondent cannot know what Leslie Miles knew or did not know. Therefore, she is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment in Petitioner's corresponding paragraph and she therefore denies it.
-

9. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. At no time did Respondent ask, demand, suggest, intimate, imply, or otherwise mention anything whatsoever regarding payment or any other consideration. Strict proof of this averment is demanded at all hearings and other legal proceedings.
 10. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. At no time did Respondent and Ms. Miles have any discussion whatsoever regarding payment or any other consideration. Strict proof of this averment is demanded at all hearings and other legal proceedings.
 11. Admitted.
 12. Admitted in part and denied in part. While it is admitted that Respondent was not present when Ms. Miles returned with a card, Respondent cannot know who was or was not present in her absence. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment in Petitioner's corresponding paragraph and she therefore denies it.
 13. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment regarding Jasmine Winfield as set forth in Petitioner's corresponding paragraph and she therefore denies it. Also, see paragraph 12 above.
 14. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. There was no \$10 cash or any other consideration in the card to Respondent. Strict proof of this averment is demanded at all hearings and other legal proceedings.
-

15. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment regarding what Ms. Winfield did or did not do or did or did not see (about which Respondent cannot know since she was not present) as set forth in Petitioner's corresponding paragraph and she therefore denies it. Respondent again notes that she never asked for, demanded, suggested, intimated, implied, mentioned, or received any money or other consideration.
16. Admitted. But here was no \$10 or any other consideration in the card. See paragraph 14 above.

b. Gordon Solicits a Gratuity from Leslie Miles in June of 2014

17. Admitted.
18. Admitted.
19. Admitted in part and denied in part. While it is admitted that Respondent sent Ms. Miles a text message asking her to attend the fundraiser, it is denied that the message was sent exclusively to Ms. Miles. To the contrary, that particular text message was among the hundreds sent to many persons who just happened to be on Respondent's voluminous text and email listserv as part of her Public Service Announcement-type informational outreach notifications. While sending such notifications, Respondent was not at all aware that Ms. Miles was involved in any ethics investigation regarding Respondent or anyone else for that matter.
20. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. There was no telephone or other conversation wherein Respondent asked, demanded, suggested, intimated, implied, or otherwise mentioned anything

whatsoever regarding any type of quid pro quo concerning previous assistance provided by Respondent in her role as Deputy Commissioner or anything else. Strict proof of this averment is demanded at all hearings and other legal proceedings.

21. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. There was no telephone or other conversation wherein Respondent asked, demanded, suggested, intimated, implied, or otherwise mentioned anything whatsoever regarding the purchase of tickets or any type of financial or other quid pro quo. Strict proof of this averment is demanded at all hearings and other legal proceedings.

22. Admitted.

c. Gordon Recruits Susan McCall to Run as a Candidate for Committeeperson

23. Admitted.

24. Admitted in part and denied in part. While it is admitted that there was a conversation, it is denied that it was initiated by Respondent, In fact, it was Ms. McCall who approached Respondent

25. Admitted.

26. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. At no time did Respondent ever ask Ms. McCall to run for committeeperson or any other position. In fact, Respondent informed Ms. McCall that the filing deadline had already passed. Therefore, it would have been meaningless for- and accordingly impossible for- Respondent to have asked Ms. McCall to run for

anything. Strict proof of this averment is demanded at all hearings and other legal proceedings.

27. Denied. See 26 above.

d. Gordon Prevents Susan McCall from Submitting a Complaint to the Board of Ethics

28. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment regarding what Ms. McCall did or did not draft as set forth in Petitioner's corresponding paragraph and she therefore denies it. Moreover, Respondent notes that Ms. McCall came to Respondent as Ms. McCall's supervisor and said that Nora Gonzales asked Ms. McCall to file a complaint but that Ms. McCall felt uncomfortable doing so. At that time, Respondent was not aware that she was under investigation by the Ethics Board.

29. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment regarding who Ms. McCall approached or did not approach, where she approached or did not approach, whom she spoke with or did not speak with, and what was said or not said as set forth in Petitioner's corresponding paragraph and she therefore denies it. At that time, Respondent was not aware that she was under investigation by the Ethics Board.

30. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. At no time did Respondent approach Ms. McCall and ask to speak privately

with her in connection with Seth Bluestein or the ethics investigation. Strict proof of this averment is demanded at all hearings and other legal proceedings.

31. Denied. See paragraph 30 above.
32. Denied. See paragraphs 30 and 31 above.
33. Denied. See paragraphs 30, 31, and 32 above.

e. Gordon Participates in a Workshop for Committeeperson

34. Denied. The averment in Petitioner's corresponding paragraph is specifically denied. At no time did Respondent participate in the "planning and promotion" of a workshop for recently elected committeepersons. In fact, she merely supported the efforts of NOW and CLEW via limited multi-media channels during her personal time. And she did so in response to a request from a member of Councilman William Grenlee's staff. Moreover, Commissioner Stephanie Singer attended the workshop and no ethical violation was ever alleged against that staffer or the Commissioner because there was such violation by them. Accordingly, there should be no allegation against Respondent. Strict proof of this averment is demanded at all hearings and other legal proceedings.
35. After reasonable investigation, Respondent is without appropriate knowledge sufficient to form an adequate belief as to the truth of the averment regarding what actually was "instructed" at the workshop and that is because Respondent did not attend and she therefore denies it.
36. Denied. The averment in Petitioner's corresponding paragraph is specifically denied in regard to Respondent having actually agreed to be a speaker at the workshop. In

fact, she did even attend the workshop. Strict proof of this averment is demanded at all hearings and other legal proceedings.

37. Admitted.

38. See paragraph 34 above.

f. Gordon Promotes a Democratic City Committee Fundraiser

39. Admitted.

40. Admitted in part and denied in part. It is admitted that Commissioner Singer directed Respondent, as part of her job duties, to update the calendar on Patransparency.org, several other persons were directed to do the same. However, it is denied that Respondent was the only person responsible for such updates. In fact, the Commissioner's office engaged in a shared calendar process. Emails were communally shared amongst staff with each member having access to all staff calendars in order to provide a more efficient constituent service model. The particular entry at issue was made by Nora Gonzales. Respondent used that site only from February 1, 2012 until her first ethics violation.

41. See paragraph 40 above.

WHEREFORE, **respondent** specifically **requests a hearing** to present and/or refute testimony, documentation, and/or other evidence and also seeks the dismissal of all allegations against her. And Respondent requests permission to supplement (and/or revise) this Response as necessary in a timely manner prior to the requested hearing.

Michael Coard, Esquire
Pro Bono Counsel

Date: 2/1/15

CERTIFICATE OF SERVICE

I hereby certify that on the 2d day of February, 2015, the foregoing Response was served upon the following persons via email and postal mail:

Maya Nayak, Esquire
General Counsel
City of Philadelphia Board of Ethics
1515 Arch Street, 18th Floor
Philadelphia, PA 19102
maya.nayak@phila.gov

Hortencia Vasquex
Clerical Assistant
City of Philadelphia Board of Ethics
1515 Arch Street, 18th Floor
Philadelphia, PA 19102
hortencia.vasquez@phila.gov

Shane Creamer, Esquire
City of Philadelphia Board of Ethics
1515 Arch Street, 18th Floor
Philadelphia, PA 19102
Shane.creamer@phila.gov

Michael J. Cooke, Esquire
Director of Enforcement
City of Philadelphia Board of Ethics
1515 Arch Street, 18th Floor
Philadelphia, PA 19102
michael.cooke@phila.gov

Michael Coard, Esquire
Pro Bono Counsel

2/2/15
Date

EXHIBIT 22

Michael Cooke

From: MICHAEL COARD [michaelcoard@msn.com]
Sent: Thursday, February 05, 2015 5:28 PM
To: Maya Nayak
Cc: Hortencia Vasquez; Shane Creamer; Michael Cooke; Elizabeth Downey; reachingback@aol.com
Subject: Supplement/Revision To Filed Response- Creamer v. Gordon #1412MU14

Dear Ms. Nayak, Esquire,

Although I no longer represent Tracey Gordon, I nonetheless, at her request today, am now forwarding this verbatim supplement/revision to the timely filed Response.

15. "Norys Gonzales was present at the time that Ms. Gordon opened the card."
 16. "There is a credibility issue regarding why a temporary worker would open city department commission mail without permission."
 18. "Ms. Gordon did not create the flyer."
 - 20? "Resumes are in the confiscated computer, which can be used as evidence regarding non-gratuity activities."
 29. "Seth Bluestein is needed to testify at the hearing."
 - 30? "Ms. McCall is a volunteer."
- "Phone messages for 6/12/14 are needed."
"Why would Ms. McCall contact Ms. Gordon if she is part of an ethics violation investigation? And Ms. Gordon did not know that Ms. McCall was part of an investigation."

Please submit all inquiries regarding clarification and all other matters directly to Ms. Gordon and none to me because I am no longer involved in this case in any capacity.

Thank you.

Sincerely,
Michael Coard, Esquire

From: michaelcoard@msn.com
To: maya.nayak@phila.gov
CC: hortencia.vasquez@phila.gov; shane.creamer@phila.gov; michael.cooke@phila.gov; elizabeth.downey@phila.gov

EXHIBIT 23

AFFIDAVIT OF NORYS GONZALEZ

I, Norys Gonzalez, hereby swear and affirm that the following statement is true and correct.

1. I am a Principal Assistant in City Commissioner Stephanie Singer's office. I have worked in that position since January 2012.
2. While working for Commissioner Singer, I met Leslie Miles, a writer and reporter for the newspaper One Step Away.
3. In the spring of 2014, Ms. Miles visited Commissioner Singer's office and asked Ms. Gordon for help with a letter.
4. Shortly after Ms. Gordon had helped her with the letter, in April of 2014, Ms. Miles came to Commissioner Singer's office with envelopes for Ms. Gordon and Jasmine Winfield, a clerical assistant in Commissioner Singer's office. Since Ms. Gordon and Ms. Winfield were not in the office, Ms. Miles left the envelopes on Ms. Winfield's and Ms. Gordon's desks.
5. When Ms. Winfield returned to the office, she looked inside the envelope Ms. Miles gave her. She told me that there was money in the envelope. Ms. Winfield also looked in Ms. Gordon's envelope and told me that there was money in that envelope as well.
6. When Ms. Gordon returned to the office, she looked inside the envelope Ms. Miles gave her and then spoke with Ms. Winfield in the back of the office. After she spoke with Ms. Gordon in the back of the office, Ms. Winfield told me that Ms. Gordon was annoyed because Ms. Winfield received more money than Mr. Gordon.
7. In the spring of 2014, Susan McCall worked as a volunteer with Commissioner's Singer's office answering the telephone and voter inquiries.
8. In mid April 2014, Ms. McCall approached me and was upset. She told me that Ms. Gordon was mad at her because Ms. Gordon had asked her to run for committeeperson in the 32nd ward but she refused to run.
9. In late May, Ms. McCall drafted and showed me a letter she was going to send to the Board of Ethics complaining about Ms. Gordon asking her to run for committeeperson.
10. Shortly after showing me the letter, Ms. Gordon and Ms. McCall met outside of Commissioner Singer's office.

11. Ms. McCall returned from her meeting with Ms. Gordon very upset and sick. She wasn't going to submit the letter she had written to the Ethics Board because Ms. Gordon had asked her not to go to the Board about her. She said Ms. Gordon had told her that she would be next in line for a job with Commissioner Singer's office.
12. Ms. McCall remained upset and tore up the letter she was going to submit to the Board of Ethics.
13. I did not post the City Committee's Annual Fundraising notice on the Google calendar associated with patransparency.org.
14. I do not know the password for the email account:
traceygordoncitycommision@gmail.com.

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

Date:

Nov. 10, 2014

Norys Gonzalez
Norys Gonzalez

*Signed and sworn to
before me on
Nov. 10, 2014*

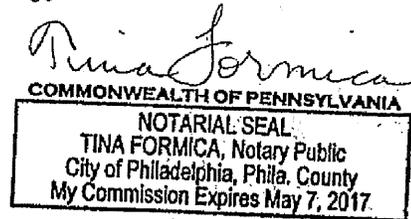


EXHIBIT 24

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made and entered into by the Board of Ethics of the City of Philadelphia, the Executive Director of the Board, and Tracey Gordon, jointly referred to as “the Parties.”

RECITALS

- A. The Board of Ethics of the City of Philadelphia is a five-member, independent board established by ordinance, approved by Philadelphia voters in May 2006, and installed on November 27, 2006. Pursuant to section 4-1100 of the Home Rule Charter, the Board is charged with, among other things, enforcing the sections of the Philadelphia Home Rule Charter that impose restrictions on the political activity of City employees.
- B. Tracey Gordon is a City employee who works in the office of City Commissioner Stephanie Singer. Ms. Gordon's title is Deputy Commissioner of Voter Outreach and Voter Education. Her duties are to increase voter participation throughout the City of Philadelphia. She is supervised in performing these duties by Commissioner Singer. Ms. Gordon has worked for the City since early 2012.
- C. Section 10-107(4) of the Philadelphia Home Rule Charter provides that a City employee may not engage in certain types of political activity. The political activity restrictions in the Home Rule Charter ensure that government operates effectively and fairly and that employees are free from improper influences and perform their duties without bias or favoritism for or against any political party, candidate, or partisan political group.
- D. Ethics Board Regulation No. 8, which became effective on March 28, 2011, provides a detailed interpretation of the Charter's prohibitions on political activity. Pursuant to Regulation No. 8, a City employee may not engage in political activity while on duty, in City Hall, or while using City resources such as printers or computers.

- E. Subpart H of Regulation No. 8 provides detailed guidance on the use by City employees of social media such as Facebook. Paragraph 8.19(b) provides:

An appointed officer or employee may express support or opposition to political parties, candidates, or partisan political groups in posts to a social networking website so long as he or she:

- i. Does not make such posts to the website while on duty, in any City-owned or leased building, property, or office space, or while using any City resources;
 - ii. Does not use his or her title or status as a City officer or employee in such posts to the website;
 - iii. Does not include in such posts anything that was created by, or links to information created by, a political party, candidate, or partisan political group; and
 - iv. Does not suggest, encourage or ask others to make contributions intended for a political purpose.
- F. If the Board finds a violation of § 10-107(4) of the Home Rule Charter through an administrative adjudication, it may impose a civil penalty of \$300.
- G. In early 2012, at the request of the City Commissioners, Board staff provided ethics training to employees of the City Commissioners office. The training covered the Charter's political activities restrictions. However, Ms. Gordon did not join the City Commissioners office until after the training. No one at the City Commissioners office told her that she should receive ethics training, nor did anyone give her any information about the Charter's political activity restrictions or the use of social media by City employees.
- H. On nine separate occasions from August 10 through September 19, 2012, Ms. Gordon accessed her Facebook page on her City computer and either shared links from or expressed support for or disagreement with the views of candidates or partisan political groups.
- I. In early September of 2012, Board enforcement staff received information that Ms. Gordon was using Facebook to make partisan political posts. Enforcement staff initiated an investigation in which they interviewed witness and obtained documents and computer data. Enforcement staff also interviewed Ms. Gordon.
- J. At all times, Ms. Gordon fully cooperated with the Board's investigation. After being informed that her use of Facebook violated § 10-107(4), Ms. Gordon immediately changed the settings of her account so that members of the public cannot see her posts. Ms. Gordon also stopped using her City computer to access Facebook for any purpose.

K. The Parties desire to enter into this Agreement in order to resolve the matters described herein.

AGREEMENT

The Parties agree that:

1. Each time Ms. Gordon accessed her Facebook page on her City computer and either shared links from or expressed support for or disagreement with the views of candidates or partisan political groups, she violated § 10-107(4) of the Philadelphia Home Rule Charter. The aggregate civil penalty for these nine separate violations is \$2,700. However, the penalty is reduced to \$675 to reflect Ms. Gordon's prompt remedial action and her cooperation with the Board's investigation.
2. Ms. Gordon shall pay the aggregate civil penalty of \$675 on the following schedule:
 - 2.1. \$200 within 14 days of the effective date of the Agreement;
 - 2.2. \$225 by January 15, 2013; and
 - 2.3. \$250 by April 15, 2013.
3. Payment shall be made by check or money order made out to the City of Philadelphia and delivered to the offices of the Board.
4. Ms. Gordon will attend ethics training within 30 days of the effective date of the Agreement.
5. Ms. Gordon will not access Facebook from her City computer for any purpose.
6. Ms. Gordon releases and holds harmless the Board and its staff from any potential claims, liabilities, and causes of action arising from the Board's investigation, enforcement, and settlement of the matters described in the Agreement.
7. In consideration of the above and in exchange for Ms. Gordon's compliance with all of the terms of the Agreement, the Board waives any further penalties or fines against her for the violations described in the Agreement.
8. The Parties will not make any public statements that are inconsistent with the terms of the Agreement.
9. If the Ethics Board is forced to seek judicial enforcement of the Agreement, and prevails, Ms. Gordon shall be liable for attorneys' fees and costs reasonably expended in enforcing compliance with the Agreement. Fees for time spent by Board staff attorneys shall be calculated based upon standard and customary billing rates in Philadelphia for attorneys with similar experience.
10. The Agreement contains the entire agreement between the Parties.
11. The Parties will submit a signed copy of the Agreement to the Board for approval.

12. The Agreement shall become effective upon approval by the Board. The effective date of the Agreement shall be the date the Board approves the Agreement.
13. If the Board rejects the proposed Agreement, presentation to and consideration of the Agreement by the Board shall not preclude the Board or its staff from participating in or considering or resolving of an administrative adjudication of the matters described in the Agreement.
14. If the Board rejects the proposed Agreement, nothing in the proposed Agreement shall be considered an admission by either party and, except for paragraph 13, nothing in the Agreement shall be effective.

By the Executive Director of the
Board of Ethics:

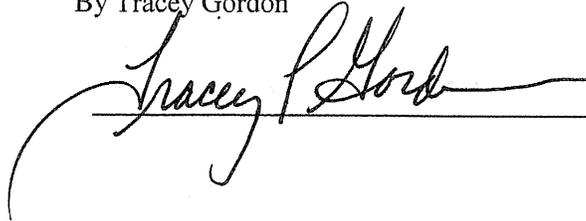
Dated: 11/20/12



J. Shane Creamer, Jr., Esquire

By Tracey Gordon

Dated: 11/15/12



Approved by the Board of Ethics:

Dated: 11/20/12



Richard Glazer, Esquire
Chair

2



LAW ENFORCEMENT RESOURCE TEAM - SUBPOENA COMPLIANCE GROUP

MAILING ADDRESS: 180 WASHINGTON VALLEY ROAD | BEDMINSTER, NEW JERSEY 07921

LERT HOTLINE: 800-451-5242

From: Cristina
LERT Case: 150040904

Date: 03/03/15

To: Jordan E. Segall, Esq
Board of Ethics
1515 Arch Street
18th FL
Philadelphia, PA 19102

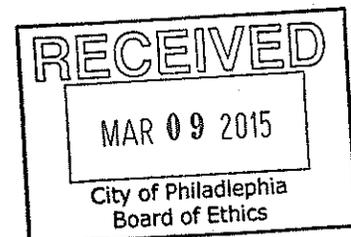
Message: enclosed are the records you requested

Law Enforcement Resource Team
180 Washington Valley Road | Bedminster, New Jersey 07921

THE INFORMATION CONTAINED IN THIS MESSAGE AND ANY ATTACHMENT MAY BE PROPRIETARY, CONFIDENTIAL AND PRIVILEGED OR SUBJECT TO THE WORK PRODUCT DOCTRINE AND THUS PROTECTED FROM DISCLOSURE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR AN EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THIS MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY ME IMMEDIATELY BY REPLYING TO THIS MESSAGE AND DELETING IT AND ALL COPIES AND BACKUPS THEREOF.

PLEASE NOTE THAT THE TIME REFLECTED ON ANY CALL DETAIL REPORT OR BILL COPY IS REFLECTIVE OF THE SWITCH THAT PROCESSED THE CALL, WHICH MAY NOT BE THE SAME AS THE CLOCK TIME AT THE CELL SITE WHERE THE CALL WAS INITIATED.

SOCIAL SECURITY NUMBERS DO NOT CONSTITUTE BASIC SUBSCRIBER INFORMATION, PLEASE INCLUDE A SPECIFIC REQUEST FOR SOCIAL SECURITY NUMBER(S) IN THE BODY OF THE LEGAL PROCESS



Affidavit of Custodian of Business Records

State of New Jersey

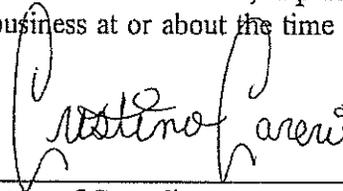
County of Somerset

I, Cristina Careri, being first duly sworn, on oath, depose and say that:

(1) I am a duly authorized custodian of the business records of Verizon Wireless and have the authority to certify those records.

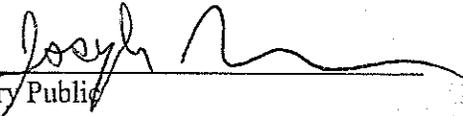
(2) The copy of the records attached to this affidavit is a true copy of the records described in the subpoena.

(3) The records were prepared by the personnel or staff of the business, or persons acting under their control, in the regular course of the business at or about the time of the act, condition or event recorded.



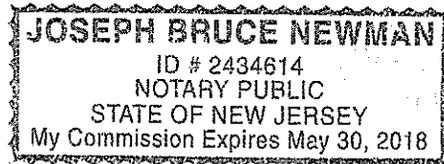
Signature of Custodian

Subscribed and sworn to before the undersigned on 03/03/15



Notary Public

My commission expires:



Diana Lin

Subject: Corrected exhibit list
Attachments: ED Exhibit List - Creamer v Gordon - 7-13-2015.pdf

From: Michael Cooke
Sent: Monday, July 13, 2015 10:50 AM
To: Maya Nayak; allcourts@comcast.net
Cc: Jordan Segall; Shane Creamer
Subject: Corrected exhibit list

Maya and Rania,

We erroneously used a prior exhibit list for the pre-hearing memo we sent on Friday. A corrected exhibit list is attached. The corrected list does not include the following items that were on the list we sent on Friday:
Ex. 10. June 3, 2014 Memorandum of Interview of Susan McCall by Board of Ethics enforcement staff;
Ex. 19. September 11, 2013 Memorandum of Interview of Tracey Gordon;
Ex. 26. March 9, 2015 affidavit of Bryan McHale.

The hard copies of the exhibits we provided on Friday are correct.

Please do not hesitate to contact us if you have any questions.

Regards,

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

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

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J. Shane Creamer, Jr.	:	
Executive Director	:	
Board of Ethics	:	
of the City of Philadelphia	:	
1515 Arch Street, 18 th Floor	:	
Philadelphia, PA 19102	:	
	:	Matter No. 1412MU14
v.	:	
	:	Date of Notice: December 11, 2014
Tracey Gordon	:	
6543 Windsor Street	:	
Philadelphia, PA 19142	:	
	:	
<hr/>	:	
<u>Respondent</u>	:	

EXECUTIVE DIRECTOR'S EXHIBITS

1. Tracey.Gordon@phila.gov Email Mailbox Image (Requested May 29, 2014)
2. Selected emails from Tracey.Gordon@phila.gov email account
3. April 14, 2014 handwritten letter for Leslie Miles' candidacy for PHA Commissioner
4. April 28, 2014 Thank You Card provided by Leslie Miles to Tracey Gordon (2 pages)
5. July 30, 2014 affidavit of Jasmine Winfield
6. August 11, 2014 declaration of Leslie Miles
7. December 15, 2014 correspondence from Michael Cooke to Jasmine Winfield
8. December 15, 2014 money order from Jasmine Winfield to the City of Philadelphia
9. May 27, 2014-May 28, 2014 email chain between Michael Cooke and Seth Bluestein
10. Screenshot from Facebook of Tracey Gordon June 21, 2014 fundraiser

11. February 20, 2015 Board of Ethics Administrative Subpoena served on Verizon Wireless Law Enforcement Resource Team for Leslie Miles phone records from June 1, 2014 to June 30, 2014
12. Leslie Miles phone records provided by Verizon Wireless Law Enforcement Resource Team on March 2, 2015 in response to Board of Ethics Administrative Subpoena with Certification of Authenticity of records provided by Verizon Wireless Law Enforcement Resource Team
13. February 20, 2015 Board of Ethics Administrative Subpoena served on T-Mobile Law Enforcement Relations Group for Tracey Gordon phone records from June 1, 2014 to June 30, 2014
14. Tracey Gordon phone records provided by T-Mobile Law Enforcement Relations Group in response to Board of Ethics Administrative Subpoena with Certification of Authenticity of records provided by T-Mobile Law Enforcement Relations Group
15. March 25, 2014-April 1, 2014 email chain between Karen Bojar, Stephanie Singer, and Tracey Gordon
16. May 7, 2014 email, with attachment: Karen Bojar to Tracey Gordon and Stephanie Singer
17. Screenshots from Facebook event page for Committee Persons workshop (6 pages)
18. September 13, 2013 email from Hon. Stephanie Singer to Michael Cooke
19. Screenshots from patransparency.org front page and Google calendar (3 pages)
20. December 11, 2014 Notice of Administrative Enforcement Proceeding and Exhibits in Support of Notice of Administrative Enforcement Proceeding: Creamer v. Gordon

21. February 2, 2015 Response to Notice of Administrative Enforcement: Creamer v. Gordon
22. February 5, 2015 Supplemental Response to Notice of Administrative Enforcement: Creamer v. Gordon
23. November 10, 2014 affidavit of Norys Gonzalez
24. November 20, 2012 Tracey Gordon settlement agreement

Date: July 13, 2015