

SETTLEMENT AGREEMENT

This Settlement Agreement (the “Agreement”) is made and entered into by and among the City of Philadelphia Board of Ethics (the “Board”); J. Shane Creamer, Jr., Executive Director of the Board (the “Executive Director”); and the District 1199C Political Action Fund (the “1199C Fund”), collectively referred to herein as “the Parties,” each a “Party.”

RECITALS

- A. The Board.** The Board is an independent, five-member City of Philadelphia (the “City”) board established in 2006 by voter approval of an amendment to the Philadelphia Home Rule Charter (the “Charter”). Under Section 4-1100 of the Charter and Chapter 20-1008 of the Philadelphia Code (the “Code”), the Board is charged with administering and enforcing the City’s Campaign Finance Law.
- B. 1199C Fund.** The 1199C Fund is a political committee located in Philadelphia, Pennsylvania and registered with the Philadelphia City Commissioners.
- C. Previous Settlements.** The 1199C Fund previously entered into three (3) settlement agreements with the Board in 2015, 2018, and 2019, each for the late filing of campaign finance reports.
- D. Campaign Finance Law.** The City’s campaign finance laws are governed by Chapter 20-1000 of the Code and Board Regulation No. 1. The following rules pertain to the matter described in this Agreement:
- 1. Campaign finance reports:**
 - a.** Under Code § 20-1006(1)(a)(.2)(.a) and Regulation No. 1, Paragraph 1.20(a)(i) any time a political committee is required by the Pennsylvania Election Code to file a campaign finance report with the City Commissioners or the Secretary of State, that committee shall file a copy of that report with the Board of Ethics if the report discloses expenditures made to influence the outcome of a covered election. Code § 20-1001(8) defines covered elections as every primary, general, or special election for City elective office.
 - b.** Under Code § 20-1006(4) and Regulation No. 1, Paragraph 1.47, a political committee’s failure to file a campaign finance report as required is a violation of the Campaign Finance Law. Under Code § 20-1301(2) and Regulation No. 1, Paragraph 1.47, such a violation is subject to a civil monetary penalty of \$250 for each day the report is late, with maximum total penalties of \$2,000 for the first thirty days the report remains unfiled, plus \$1,000 for each additional thirty-day period, or part thereof, the report remains unfiled.
 - c.** Under Regulation No. 1, Paragraph 1.47, both the political committee and its treasurer are jointly and severally liable for such penalties.
 - 2. Material misstatements and omissions:**
 - a.** Under Code § 20-1006(4) and Regulation No. 1, Paragraph 1.48, the making of a material misstatement or omission in a campaign finance report filed with the Board is a violation of the Campaign Finance Law.

- b. Under Code § 20-1302 and Regulation No. 1, Paragraph 1.48, each material misstatement or omission is a violation subject to a civil monetary penalty of \$1,000, which may be modified for mitigating and aggravating factors, and for which both the political committee and the person who filed the report are jointly and severally liable.

E. Investigation History and Findings. The factual history of the investigation and the violations resolved by the Agreement is as follows:

1. **Opening of Investigation.** In 2019, the Board received a referral from another government agency that the 1199C Fund may have engaged in violations of the City’s Campaign Finance Law. The Executive Director opened an investigation in which the Board’s enforcement staff communicated with witnesses, reviewed campaign finance filings, subpoenaed the 1199C Fund’s bank records, and sent interrogatories and subpoenas to produce documents to the 1199C Fund. The referring agency requested that the Executive Director defer any enforcement of campaign finance violations until after 2022.
2. **Unfiled Reports.** The investigation found that the 1199C Fund made expenditures to influence the outcome of covered elections, but did not file with the Board nine (9) campaign finance reports that should have disclosed those expenditures (the “Unfiled Reports”). The Unfiled Reports are listed below along with the expenditures that triggered the filing obligation:
 - a. **Cycle 11 2019:** On November 5, 2019, the 1199C Fund made a payment in the amount of \$1,280 to a canvasser to engage in get-out-the-vote activities supporting candidates for City office. This expenditure required the 1199C Fund to file a 24-hour Cycle 11 2019 report with the Board no later than November 6, 2019 disclosing this expenditure.
 - b. **Cycle 10 2021:** On May 14, 2021, the 1199C Fund contributed \$2,500 to the 48th Ward Democratic Committee for the purpose of influencing the outcome of the May 2021 Philadelphia municipal primary election. This expenditure required the 1199C Fund to file a 24-hour Cycle 10 2021 report with the Board no later than May 15, 2021 disclosing this expenditure.
 - c. **Cycle 3 2021:** The expenditures described in the immediately preceding subsection also required the 1199C Fund to file a Cycle 3 2021 report with the Board disclosing this expenditure and all other relevant campaign finance information during that reporting cycle no later than June 17, 2021.
 - d. **Cycle 4 2021:** On August 10, 2021, the 1199C Fund contributed \$400 to the Philadelphia Democratic Campaign Committee for the purpose of influencing the outcome of the November 2021 Philadelphia municipal general election. This expenditure required the 1199C Fund to file a Cycle 4 2021 report with the Board disclosing this expenditure no later than September 21, 2021.
 - e. **Cycle 5 2021:** On October 11, 2021, the 1199C Fund contributed \$1,500 to the Philadelphia Democratic Campaign Committee for the purpose of influencing the outcome of the November 2021 Philadelphia municipal general election. This

expenditure required the 1199C Fund to file a Cycle 5 2021 report with the Board disclosing this expenditure no later than October 22, 2021.

- f. **Cycle 4 2023:** On August 7, 2023, the 1199C Fund paid \$225 to a canvasser to engage in get-out-the-vote activities supporting candidates for City office. Although disclosed on the 1199C Fund's Cycle 7 2023 report filed with the Board, this expenditure also required the 1199C Fund to file a Cycle 4 2023 report with the Board disclosing this expenditure no later than September 26, 2023.
- g. **Cycle 5 2023:** On October 18, 2023, the 1199C Fund made payments to canvassers to engage in get-out-the-vote activities supporting candidates for City office. Although disclosed on the 1199C Fund's Cycle 7 2023 report filed with the Board, these expenditures required the 1199C Fund to file a Cycle 5 2023 campaign finance report with the Board disclosing these expenditures no later than October 27, 2023.
- h. **Cycle 11 2023:** On October 25, 2023 and November 1, 2023, the 1199C Fund made payments to canvassers in excess of \$500 to engage in get-out-the-vote activities supporting candidates for City office. Although disclosed on the 1199C Fund's Cycle 7 2023 report filed with the Board, these expenditures also required the 1199C Fund to file 24-hour Cycle 11 2023 reports with the Board during that time disclosing these expenditures.
- i. **Cycle 6 2023:** The expenditures described in the preceding subsection also required the 1199C Fund to file a Cycle 6 2023 campaign finance report with the Board disclosing these expenditures no later than December 7, 2023.

3. Material Misstatements and Omissions. The investigation also found that the 1199C Fund made a total of two (2) material misstatements and one hundred and forty-seven (147) omissions in the following campaign finance reports filed with the Board between 2017 and October 11, 2021 (the "Material Misstatements and Omissions"):

- a. One (1) expenditure omitted from its Cycle 7 2017 report in the amount of \$2,500;
- b. One (1) expenditure omitted from its Cycle 7 2018 report in the amount of \$500;
- c. Two (2) expenditures omitted from its Cycle 1 2019 report for a total amount of \$1,000;
- d. Five (5) expenditures omitted from its Cycle 3 2019 report for a total amount of \$3,860;
- e. One hundred and thirty-seven (137) expenditures omitted from its Cycle 6 2019 report for a total amount of \$15,120, representing payments made to get-out-the-vote canvassers;
- f. One (1) \$9,700 received contribution with a material misstatement incorrectly identifying the contributor in its Cycle 5 2020 report;
- g. One (1) \$11,770 received contribution with a material misstatement incorrectly identifying the contributor in its Cycle 6 2020 report;
- h. One (1) expenditure omitted from its Cycle 7 2020 report for a total amount of \$1,500.

A list of the Material Misstatements and Omissions is attached hereto as Exhibit A and made a part hereof.

- F. Settlement.** The Parties desire to enter into this Agreement to resolve the violations described herein.

AGREEMENT

The Parties hereby agree to the following:

- 1. Recitals.** The Recitals paragraphs above are made part of this Agreement as if fully set forth herein.
- 2. Civil Monetary Penalties.** The total civil monetary penalty for the violations described in Paragraphs E(2)-(3) is \$22,000.00.
- 3. Unfiled Reports.** The 1199C Fund violated Code § 20-1006(4) and Regulation No. 1, Paragraph 1.47 by failing to file each of the nine (9) Unfiled Reports with the Board. The total civil monetary penalties for these nine (9) violations are \$18,000, representing \$2,000 per reporting cycle..
 - a. Material Misstatements and Omissions.** The 1199C Fund violated Code § 20-1006(4) and Regulation No. 1, Paragraph 1.48 because of the Material Misstatements and Omissions set forth in Exhibit A. The total civil monetary penalties for these violations are \$4,000, representing \$1,000 per year for each of the four (4) years (2017-2020) in which the Material Misstatements and Omissions were required to have been accurately reported. The 1199C Fund is liable for all \$4,000 of these penalties.
 - b. Penalty Table.** In addition to the descriptions set forth above, a table summarizing the civil monetary penalties is attached hereto as Exhibit B, made a part hereof.
- 4. Payment.** The 1199C Fund shall pay the aggregate civil monetary penalties of \$22,000 on the following schedule:
 - a.** \$11,000 within fourteen (14) calendar days following the Effective Date of the Agreement;
 - b.** An additional \$5,500 within ninety (90) calendar days of the Effective Date of the Agreement; and
 - c.** An additional \$5,500 within one hundred and eighty (180) calendar days of the Effective Date of the Agreement.

Any payments due on a weekend or holiday shall be delivered no later than the next business day after such weekend or holiday. Payment shall be made by check or money order made payable to the City of Philadelphia and delivered pursuant to the above schedule to the Board's office at the following address:

City of Philadelphia
Board of Ethics
One Parkway Building
1515 Arch Street 18th Floor
Philadelphia, PA 19102

- 5. Additional Remedies.**

a. Campaign Finance Reporting. Within sixty (60) calendar days following the Effective Date, the 1199C Fund shall submit to the Board the Unfiled Reports and amend its campaign finance reports to accurately disclose all of the Material Misstatements and Omissions.

b. Training.

Within ninety (90) calendar days following the Effective Date, the 1199C Fund's Treasurer Dionne Gary shall schedule and attend campaign finance training provided by Board staff.

Until December 31, 2028, if the 1199C Fund appoints a different Treasurer, it shall cause that person to attend a Board campaign finance training within or no later than 60 days before the next covered election following their appointment.

Scheduling shall be initiated via email to BOE.Training@phila.gov. Proof of attendance shall be submitted to the Executive Director within 30 days of completion.

- 6. Future Compliance.** The 1199C Fund understands Philadelphia's campaign finance disclosure requirements and will make all necessary efforts in the future to comply therewith.
- 7. Respondents Release.** The 1199C Fund 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.
- 8. Board Release.** In consideration of the above and in exchange for the compliance of the 1199C Fund with the terms of the Agreement, the Board waives any further penalties or fines against the 1199C Fund for the violations described in the Agreement.
- 9. Public Statements.** The Parties shall not make any public statements that are inconsistent with the terms of the Agreement.
- 10. Fees and Costs of Judicial Enforcement.** If the Board is forced to seek judicial enforcement of any part of this Agreement, and prevails, the 1199C Fund shall be liable for attorneys' fees and costs reasonably expended in enforcing compliance with the Agreement. Fees for time spent by Board or City attorneys shall be calculated based upon standard and customary billing rates in Philadelphia for attorneys with similar experience.
- 11. Integration.** The Agreement contains the entire agreement between the Parties.
- 12. Board Approval.** The Executive Director shall submit a signed copy of the Agreement to the members of the Board for approval.
- 13. Effective Date.** The Agreement shall become effective only upon approval by the members of the Board. The effective date of the Agreement is the date the Board Chair signs the Agreement.
- 14. Board Rejection.** If the Board rejects the proposed Agreement, presentation to and consideration of this Agreement by the Board shall not preclude the Board or its staff from participating in, considering, or adjudicating an administrative enforcement action relating to matters described in this Agreement. If the Board rejects the proposed Agreement, nothing in the proposed Agreement shall be considered an admission by any party and, except this paragraph, nothing in this Agreement shall be effective.

15. Publication. If the Board approves the proposed Agreement, the Board shall make the Agreement available to the public as required by Board Regulation No. 2, Paragraph 2.27 by posting a copy to the Board's website.

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In witness whereof, the Parties hereto have executed the Agreement on the dates set forth below:

**CITY OF PHILADELPHIA
Board of Ethics:**

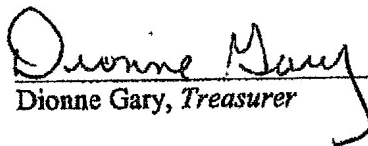
Date: 4/2/26



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

DISTRICT 1199C POLITICAL ACTION FUND

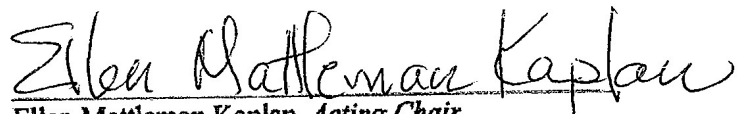
Date: 4-2-26



Dionne Gary, *Treasurer*

**Approved by the City of Philadelphia Board of
Ethics:**

Date: 5/26/26



Ellen Mattleman Kaplan, *Acting Chair*

EXHIBIT A

**DISTRICT 1199C POLITICAL ACTION FUND
MATERIAL MISSTATEMENTS AND OMISSIONS**

Material Misstatements:

No.	Date	Named Contributor	Correct Contributor	Amount	Report
1	9/30/2020	AFSCME	NUHHCE District 1199C	\$9,700	Cycle 5 2020
2	10/30/2020	AFSCME	NUHHCE District 1199C	\$11,770	Cycle 6 2020

Omissions – 1199C Expenditures:

No.	Date Made	Recipient	Amount	Omitted Report
1	7/11/17	Friends of Curtis Jones Jr.	\$2,500	Cycle 7 2017
2	12/10/18	Citizens for Isaiah Thomas	\$500 In-Kind Contribution: Announcement Event	Cycle 7 2018
3	2/19/19-2/21/19	Citizens for Isaiah Thomas	\$500 In-Kind Contribution: Petition Signing Event	Cycle 1 2019
4	3/22/19	Citizens for Isaiah Thomas	\$500 In-Kind Contribution: Hall Rental	Cycle 1 2019
5	5/20/19	Ward 1 Executive Committee	\$1,500	Cycle 3 2019
6	5/20/19	Ward 2 Democrats	\$1,500	Cycle 3 2019
7	5/20/19	Jewel Alford	\$240	Cycle 3 2019
8	5/21/19	Citizens for Isaiah Thomas	\$500 In-Kind Contribution: Victory Party	Cycle 3 2019
9	6/3/19	Jewel Alford	\$120	Cycle 3 2019
10	10/29/19	Lee Grant McClenad	\$100	Cycle 6 2019
11	10/29/19	Denise Clayton	\$100	Cycle 6 2019
12	10/29/19	Jacquelyn Clayton	\$100	Cycle 6 2019
13	10/29/19	Jim Robinson	\$100	Cycle 6 2019
14	10/29/19	Bryan Maddox	\$120	Cycle 6 2019
15	10/29/19	Carmen Hall	\$120	Cycle 6 2019
16	10/29/19	Norma Johnson	\$100	Cycle 6 2019
17	10/29/19	Donna Boyer	\$100	Cycle 6 2019

18	10/29/19	Donna Wells	\$100	Cycle 6 2019
19	10/29/19	Bernard Clayton	\$120	Cycle 6 2019
20	10/29/19	Janice Gray	\$100	Cycle 6 2019
21	10/29/19	Tysha Lightfoot	\$100	Cycle 6 2019
22	10/29/19	Rakel Rogers	\$100	Cycle 6 2019
23	10/29/19	Daisha Maddox	\$100	Cycle 6 2019
24	10/29/19	Patricia Maddox	\$120	Cycle 6 2019
25	10/30/19	Lee Grant MCClenad	\$100	Cycle 6 2019
26	10/30/19	Jim Robinson	\$100	Cycle 6 2019
27	10/30/19	Bryan Maddox	\$120	Cycle 6 2019
28	10/30/19	Janice Gray	\$100	Cycle 6 2019
29	10/30/19	Shawn Bohennan	\$120	Cycle 6 2019
30	10/30/19	Rakel Rogers	\$100	Cycle 6 2019
31	10/30/19	Donna Wells	\$100	Cycle 6 2019
32	10/30/19	Donna Boyer	\$100	Cycle 6 2019
33	10/30/19	Carmen Hall	\$100	Cycle 6 2019
34	10/30/19	Valda Xavier	\$100	Cycle 6 2019
35	10/30/19	Denise Clayton	\$100	Cycle 6 2019
36	10/30/19	Jaculyn Clayton	\$100	Cycle 6 2019
37	10/30/19	Bernard Clayton	\$120	Cycle 6 2019
38	10/30/19	Lakasha Hines	\$100	Cycle 6 2019
39	11/1/19	[Unrecorded GOTV canvasser]	\$50	Cycle 6 2019
40	11/1/19	Carol Gilmore	\$50	Cycle 6 2019
41	11/1/19	Joyce Washington	\$50	Cycle 6 2019
42	11/1/19	Sharon Rucker	\$50	Cycle 6 2019
43	11/1/19	Gregory Jakes	\$50	Cycle 6 2019
44	11/1/19	Andrea Bowen	\$50	Cycle 6 2019
45	11/1/19	Gladys Thomas	\$50	Cycle 6 2019
46	11/1/19	Juanita Jordan	\$50	Cycle 6 2019
47	11/1/19	Margaret Jackson	\$50	Cycle 6 2019
48	11/1/19	Semeria Robinson	\$50	Cycle 6 2019
49	11/2/19	Alfreda Ghilyard	\$140	Cycle 6 2019
50	11/2/19	Lakeia Jamison	\$100	Cycle 6 2019
51	11/2/19	Khylee Allen	\$100	Cycle 6 2019
52	11/2/19	Kaleesha Allen	\$100	Cycle 6 2019
53	11/2/19	Norman Rollins	\$100	Cycle 6 2019
54	11/2/19	Stazola Anthony	\$100	Cycle 6 2019
55	11/2/19	Shania Blount	\$100	Cycle 6 2019
56	11/2/19	Samirah Anthony	\$100	Cycle 6 2019
57	11/2/19	Jill Rollins	\$100	Cycle 6 2019
58	11/2/19	Carolyn Robinson	\$100	Cycle 6 2019
59	11/2/19	Elizabeth Lassiter	\$100	Cycle 6 2019
60	11/2/19	Lamar Neal	\$140	Cycle 6 2019
61	11/2/19	Basir McCoy	\$100	Cycle 6 2019

62	11/2/19	Therman Williams	\$140	Cycle 6 2019
63	11/2/19	Carmen Rollins	\$160	Cycle 6 2019
64	11/3/19	Stazola Anthony	\$100	Cycle 6 2019
65	11/3/19	Norman Rollins	\$100	Cycle 6 2019
66	11/3/19	Lamar Neal	\$140	Cycle 6 2019
67	11/3/19	Samirah Anthony	\$100	Cycle 6 2019
68	11/3/19	Shania Blount	\$100	Cycle 6 2019
69	11/3/19	Carmen Rollins	\$120	Cycle 6 2019
70	11/3/19	Kaleesha Allen	\$100	Cycle 6 2019
71	11/3/19	Lakeia Jamison	\$100	Cycle 6 2019
72	11/3/19	Khylee Allen	\$100	Cycle 6 2019
73	11/3/19	Elizabeth Lassiter	\$100	Cycle 6 2019
74	11/3/19	Carolyn Robinson	\$100	Cycle 6 2019
75	11/3/19	Darlene Brown	\$100	Cycle 6 2019
76	11/3/19	Jill Rollins	\$100	Cycle 6 2019
77	11/3/19	Alfreda Ghilyard	\$140	Cycle 6 2019
78	11/3/19	Therman Williams	\$140	Cycle 6 2019
79	11/4/19	Juanita Jordan	\$50	Cycle 6 2019
80	11/4/19	Gladys Thomas	\$50	Cycle 6 2019
81	11/4/19	Andrea Bowen	\$50	Cycle 6 2019
82	11/4/19	Joyce Washington	\$50	Cycle 6 2019
83	11/4/19	Semeria Robinson	\$50	Cycle 6 2019
84	11/4/19	Gregory Jakes	\$50	Cycle 6 2019
85	11/4/19	Carol Gilmore	\$50	Cycle 6 2019
86	11/4/19	Sharon Rucker	\$50	Cycle 6 2019
87	11/4/19	Margaret Jackson	\$50	Cycle 6 2019
88	11/4/19	Mark Lawrence	\$50	Cycle 6 2019
89	11/4/19	Denise Cossie	\$100	Cycle 6 2019
90	11/4/19	Bernard Clayton	\$120	Cycle 6 2019
91	11/4/19	Jacquelyn Clayton	\$100	Cycle 6 2019
92	11/4/19	Valda Xavier	\$100	Cycle 6 2019
93	11/4/19	Norma Johnson	\$100	Cycle 6 2019
94	11/4/19	Stacey Campbell	\$100	Cycle 6 2019
95	11/4/19	Daisha Maddox	\$100	Cycle 6 2019
96	11/4/19	Janice Gray	\$100	Cycle 6 2019
97	11/4/19	Kaleeha Allen	\$100	Cycle 6 2019
98	11/4/19	Shawn Bohennan	\$120	Cycle 6 2019
99	11/4/19	Lakasha Hines	\$100	Cycle 6 2019
100	11/4/19	Patricia Maddox	\$120	Cycle 6 2019
101	11/5/19	Sharon Rucker	\$100	Cycle 6 2019
102	11/5/19	Andrea Bowen	\$100	Cycle 6 2019
103	11/5/19	Janice Armour	\$100	Cycle 6 2019
104	11/5/19	Gregory Jakes	\$100	Cycle 6 2019
105	11/5/19	Margaret Jackson	\$100	Cycle 6 2019
106	11/5/19	Carol Gilmore	\$100	Cycle 6 2019

107	11/5/19	Mark Lawrence	\$100	Cycle 6 2019
108	11/5/19	Jeffrey Alston	\$100	Cycle 6 2019
109	11/5/19	Joyce Washington	\$100	Cycle 6 2019
110	11/5/19	Semeria Robinson	\$100	Cycle 6 2019
111	11/5/19	Juanita Jordan	\$100	Cycle 6 2019
112	11/5/19	Gladys Thomas	\$100	Cycle 6 2019
113	11/5/19	Linda Barnes	\$50	Cycle 6 2019
114	11/5/19	Stacey Campbell	\$150	Cycle 6 2019
115	11/5/19	La'Kasha Hines	\$200	Cycle 6 2019
116	11/5/19	Valda Xavier	\$150	Cycle 6 2019
117	11/5/19	Brian Maddox	\$200	Cycle 6 2019
118	11/5/19	Donna Boyer	\$150	Cycle 6 2019
119	11/5/19	Simone Barnes	\$150	Cycle 6 2019
120	11/5/19	Ron Champion	\$150	Cycle 6 2019
121	11/5/19	Jimmy Robinson	\$150	Cycle 6 2019
122	11/5/19	Kaleesha Allen	\$150	Cycle 6 2019
123	11/5/19	Khylee Allen	\$150	Cycle 6 2019
124	11/5/19	Lakeia Jamison	\$150	Cycle 6 2019
125	11/5/19	Shaila Green	\$100	Cycle 6 2019
126	11/5/19	Carmen Hall	\$200	Cycle 6 2019
127	11/5/19	Donna Wells	\$150	Cycle 6 2019
128	11/5/19	Juanita Parker	\$100	Cycle 6 2019
129	11/5/19	Daisha Maddox	\$150	Cycle 6 2019
130	11/5/19	Tysha Lightfoot	\$150	Cycle 6 2019
131	11/5/19	Jill Rollins	\$150	Cycle 6 2019
132	11/5/19	Samirah Anthony	\$150	Cycle 6 2019
133	11/5/19	Stazola Anthony	\$150	Cycle 6 2019
134	11/5/19	Rakel Rogers	\$150	Cycle 6 2019
135	11/5/19	Shawn Bohennan	\$200	Cycle 6 2019
136	11/5/19	Carmen Rollins	\$200	Cycle 6 2019
137	11/5/19	Patricia Maddox	\$200	Cycle 6 2019
138	11/5/19	Henry James	\$150	Cycle 6 2019
139	11/5/19	Darlene Brown	\$150	Cycle 6 2019
140	11/5/19	Elizabeth Lassiter	\$150	Cycle 6 2019
141	11/5/19	Alfreda Ghilyard	\$200	Cycle 6 2019
142	11/5/19	Plummer Parker	\$150	Cycle 6 2019
143	11/5/19	Norma Johnson	\$150	Cycle 6 2019
144	11/5/19	Jacquelyn Clayton	\$150	Cycle 6 2019
145	11/5/19	Bernard Clayton	\$200	Cycle 6 2019
146	11/5/19	Janice Gray	\$150	Cycle 6 2019
147	2/12/20	Phila. Democratic Campaign Committee	\$1,500	Cycle 7 2020

EXHIBIT B
Penalty Table

<u>Violation No.</u>	<u>Recital Paragraph</u>	<u>Agreement Section</u>	<u>Description</u>	<u>Provision Violated</u>	<u>Penalty</u>
1	E(2)(a)	2(a)	Unfiled Cycle 11 2019 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
2	E(2)(b)	2(a)	Unfiled Cycle 10 2021 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
3	E(2)(c)	2(a)	Unfiled Cycle 3 2021 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
4	E(2)(d)	2(a)	Unfiled Cycle 4 2021 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
5	E(2)(e)	2(a)	Unfiled Cycle 5 2021 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
6	E(2)(f)	2(a)	Unfiled Cycle 4 2023 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
7	E(2)(g)	2(a)	Unfiled Cycle 5 2023 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
8	E(2)(h)	2(a)	Unfiled Cycle 11 2023 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
9	E(2)(i)	2(a)	Unfiled Cycle 6 2023 Report	Philadelphia Code § 20-1006(a).(2).(a) and Board Regulation No. 1, Paragraph 1.47	\$2,000
10	E(3)(a)	2(b)	2017 Material Misstatements and Omissions	Philadelphia Code § 20-1006(4) and Board Regulation No. 1, Paragraph 1.48	\$1,000
11	E(3)(b)	2(b)	2018 Material Misstatements and Omissions	Philadelphia Code § 20-1006(4) and Board Regulation No. 1, Paragraph 1.48	\$1,000
12	E(3)(c)-(e)	2(b)	2019 Material Misstatements and Omissions	Philadelphia Code § 20-1006(4) and Board Regulation No. 1, Paragraph 1.48	\$1,000
13	E(3)(f)-(h)	2(b)	2020 Material Misstatements and Omissions	Philadelphia Code § 20-1006(4) and Board Regulation No. 1, Paragraph 1.48	\$1,000