

## **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., the Executive Director of the Board (the “Executive Director”); and Karl Kriegh (“Kriegh” or “Respondent”), collectively referred to as “the Parties,” each a “Party.”

### **RECITALS**

- A. The Board is an independent, five-member board of the City of Philadelphia established in 2006 by voter approval of an amendment to the Philadelphia Home Rule Charter (the “Charter”). Pursuant to Section 4-1100 of the Charter and Chapter 20-600 of the Philadelphia Code (the “Code”), the Board is charged with administering and enforcing the standards of governmental conduct and ethics for members and executive directors of City boards and commissions, including the requirement that such individuals file an annual Statement of Financial Interests.
- B. Karl Kriegh is a member of the Board of Surveyors.

### **The City’s Statements of Financial Interests Law: Code Chapter 20-610 and Board Regulation No. 3<sup>1</sup>**

- C. Philadelphia’s law obligating certain individuals to file a Statement of Financial Interests (“City Form”) is found at Chapter 20-610 of the Code. Board Regulation No. 3 (“Regulation No. 3”) provides a detailed interpretation of Chapter 20-610.
- D. Regulation No. 3, Paragraph 3.5 requires members and executive directors of the Board of Surveyors to file a City Form. As described in Subpart D of Regulation No. 3, the City Form requires disclosure of certain information about the preceding calendar year.
- E. An individual who is required to file a City Form must do so by the first day of May in any year in which they hold office and by the first day of May of the year after they leave such office, except that those who take office after April 1 must file within thirty days of taking office. Regulation No. 3, Paragraph 3.7.
- F. The maximum penalty for failing to timely file a City Form is a civil monetary penalty of \$2,000 per violation. Code 20-1302; Regulation No. 3, ¶ 3.19. The Board may adjust the penalty up or down from a base penalty of \$1,000 based on aggravating or mitigating factors.  
*Id.*

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<sup>1</sup> The Pennsylvania State Ethics Act, 65 Pa. C.S. §1101, et seq., requires persons identified as “public officials” or “public employees” to file a state Statement of Financial Interests (“State Form”). 65 Pa. C.S. §1104. Nothing in this Agreement is intended to address Kriegh’s potential obligations under State law.

## Background

- G. Kriegh is currently a member of the Board of Surveyors.
- H. As a member of the Board of Surveyors, who held that office at any point between January 1, 2024 and April 1, 2025, Kriegh was required to file a City Form for 2024 by May 1, 2025.
- I. Kriegh did not file a City Form by May 1, 2025.
- J. Board staff contacted Kriegh and alerted Kriegh on multiple occasions to the failure to file.
- K. Kriegh filed the 2024 City Form on August 13, 2025.
- L. The Parties desire to enter into the Agreement in order to resolve the issues described herein.

## AGREEMENT

The Parties hereby agree to the following:

- 1) **Recitals.** The Recitals above are made part of this Agreement as if fully set forth herein.
- 2) **Civil Monetary Penalties.** The total civil monetary penalty for the violation described below is \$250.00.
  - Failure to Timely File City Form.** By failing to timely file a 2024 City Form with the Board, Kriegh violated Board Regulation No. 3, Paragraph 3.7.
- 3) **Payment.** Within 14 days of the effective date of this Agreement, Kriegh agrees to pay the civil penalty of \$250.00. 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 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
- 4) **Respondent Release.** Kriegh 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 matter described in this Agreement.
- 5) **Board Release.** In consideration of the above and in exchange for Kriegh compliance with the terms of this Agreement, the Board waives any further penalties or fines against Kriegh for the violation described in this Agreement.

- 6) **Public Statements.** The Parties shall not make any public statements that are inconsistent with the terms of the Agreement.
- 7) **Fees and Costs of Judicial Enforcement.** If the Board is forced to seek judicial enforcement of any part of this Agreement, and prevails, Kriegh 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.
- 8) **Integration.** This Agreement contains the entire agreement between the Parties.
- 9) **Board Approval.** The Executive Director or their designee shall submit a signed copy of the Agreement to the Board for approval.
- 10) **Effective Date.** The Agreement shall become effective only by approval of the Board. The effective date of the Agreement shall be the date the Board Chair signs the Agreement.
- 11) **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.
- 12) **Publication.** If the Board approves the proposed Agreement, the Board shall make this Agreement available to the public as required by Board Regulation 2.27 by posting a copy to the Board's website.

*{The remainder of this page has been intentionally left blank; the signature page follows}*

In witness of the foregoing, the Parties hereto have caused their duly authorized representatives to execute this Agreement on the dates set forth below:

**By the Executive Director of  
the Board of Ethics:**

09/09/2025

Date

J. Shane Creamer Jr

J. Shane Creamer, Jr. (Sep 9, 2025 10:45:52 EDT)

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

**By Karl Kriegh:**

8-29-2025

Date

Karl E. Kriegh

Karl Kriegh, *Respondent*

**Approved by the members of  
the Board of Ethics:**

9/17/2025

Date

Michael H. Reed

Michael H. Reed, *Chair*