

Philadelphia Board of Ethics
Meeting Minutes
December 17, 2025 – 1:00 p.m.
One Parkway Building, 18th Floor
1515 Arch Street

Board Present

Michael H. Reed, Esq., Chair
Ellen Mattleman Kaplan, Esq., Vice-Chair
Dr. Valerie Harrison, Esq. (*via Zoom*)
Judge Nelson Diaz (Ret.)
James Engler, Esq.

Staff Present

J. Shane Creamer, Jr., Esq.
Jordana L. Greenwald, Esq.
Thomas Klemm, Esq.
Michael Gutierrez, Esq.
Richard Barzaga, Esq.
Chioma Azi, Esq.
Dakota Baeringer, Esq.
Julia Sheppard, Esq.
Erin Ambrose, Esq.
Bryan McHale
Hortencia Vasquez
Diana Gavrykh
Alexander Kramer

Approved by the Board on 01/14/2026

The meeting was conducted with Board members Reed, Kaplan, Diaz, and Engler attending in person and Board member Harrison attending via Zoom. Staff and other attendees participated both in person and electronically via Zoom.

Chair Reed convened the Public Session Meeting at approximately 1:00 p.m. At this time, he announced the presence of a quorum.

I. Meeting Minutes

By a 5-0 vote, the Board approved the draft minutes of the Public Session Meeting held on November 19, 2025, as presented.

A video recording of the November 19, 2025 meeting can be found at: ethics.pub/111925.

II. Executive Director's Report

Mr. Creamer presented to the Board his Executive Director's Report, a copy of which is attached hereto as Attachment A.

III. General Counsel's Report

Ms. Greenwald presented to the Board the General Counsel's Report, a copy of which is attached hereto as Attachment B.

IV. 2025 Board Meeting Schedule

Chair Reed asked the Board for a motion to approve a proposed Board Meeting Schedule for 2026. After a motion was made and duly seconded, the Board voted 5-0 to approve dates of the 2026 Board meetings as follows:

- January 14th
- February 18th
- March 18th
- April 22nd
- May 27th
- June 24th
- July 15th
- August 19th
- September 16th
- October 21st
- November 18th
- December 16th

V. Protocols for the Administrative Assessment of Late Filings Penalties

After a presentation by Mr. McHale, the Board voted 5-0 to approve a motion to authorize Staff to resolve administratively non-filing violations of the City's Financial Disclosure Law occurring within 30 days of a filing deadline with penalties consistent with the schedules submitted to the Board.

VI. Resign-to-Run Legislation

Ms. Greenwald proposed that the Board, pursuant to its authority under City Code Section 20-606(1)(.2), make legislative recommendations to City Council regarding Bill No. 241056 and Resolution No. 241070, which propose changes to the resign-to-run rule found at Section 10-107(5) of the City's Home Rule Charter. Ms. Greenwald's presentation outlined the following recommendations:

- Require that elected officers allowed to run for state or federal office be only permitted to run for one public office per ballot.
- Clarify and enhance provisions within Section 10-107 to protect City workers from undue political pressure.
- Amend the language of Section 10-107(5) to make clear that the Mayor cannot run for other offices. This can be done either by affirmatively listing the offices that may run for state or federal positions, or by stating that the exception does not apply to the Mayor.
- Update Section 10-109 to clarify the remedies available to the Board in enforcement matters.

After a motion to approve these recommendations was made and was duly seconded, the Board voted 5-0 to approve the motion.

VII. New Business

No new business was presented.

VIII. Questions & Comments

On behalf of the Office of the Chief Integrity Officer, Krystle Baker responded to Board members' earlier inquiry about what information is provided to exiting City officials about the requirement to file a Statement of Financial Interests for their final year with the City (*see* Agenda Item V).

IX. Sunshine Act

Chair Reed, pursuant to Sections 708 and 716 of the Pennsylvania Sunshine Act, announced that the Board would meet in executive session after the current public meeting to address non-public advice, confidential enforcement matters, pending litigation, and personnel matters.

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The Public Session Meeting of the Board was adjourned at approximately 2:10 p.m.

ATTACHMENT A

To Dec. 17, 2025 Public Session Minutes

Dec. 17, 2025 Exec. Dir. Report

**Philadelphia Board of Ethics
Executive Director's Report
December 17, 2025**

A. Settlement Agreements

Since the November Board meeting, the Board has approved two settlement agreements. The first agreement with **John L. Braxton**, a member of the Board of Revision of Taxes in 2024, resolves a violation of Philadelphia Code Section 20-610 for failing to timely file a City Statement of Financial Interest (the "City form"). Mr. Braxton has since filed a City form and agreed to pay \$250 in civil monetary penalties.

The second settlement agreement with **Team Clean** resolves a violation of Philadelphia Code Chapter 20-1200 and Regulation No.9 for failure of a registered lobbying principal to timely file a lobbying expense report for the Second Quarter of 2025. Team Clean has since filed the expense report and agreed to pay \$2,000 in civil monetary penalties.

B. COGEL Update

Several staff members attended the annual COGEL conference this year in Atlanta, Georgia from December 7 through December 10. As reported in November, several current and former staff members participated in panels at this year's event. Also, former Board Director of Enforcement and General Counsel, Michael Cooke, was appointed to the COGEL Board of Directors to serve a four-year term.

This year's COGEL Award went to Merom Brachman, who was one of the first members of the Ohio Ethics Commission in 1975, served until 1988, was reappointed in 1993 and continues to serve to this day as Chair of the Commission. The COGEL Outstanding Service Award went to Mike Kelly, Senior Researcher for Nielsen Merksamer, LLP, who has worked with COGEL for many years on multiple committees as well as being responsible for assembling the COGEL Campaign Finance Blue Book and working to implement the non-conference programming which has expanded to become COGEL Connect.

Next year's conference will take place in Denver, Colorado from December 6 through December 9, 2026.

ATTACHMENT B

To Dec. 17, 2025 Public Session Minutes
Dec. 12, 2025 Gen. Counsel Report



**CITY OF PHILADELPHIA
BOARD OF ETHICS**

DECEMBER 2025 GENERAL COUNSEL REPORT

TO: Board Members
FROM: Jordana L. Greenwald, General Counsel
DATE: December 12, 2025

I. Advisory Opinions

We have not issued any advisory opinions since the last public meeting.

II. Training

We continue to see strong attendance at our General Ethics sessions. Stay tuned for our 2026 training schedule!

a. Training activity 11.15.25 through 12.12.25

Sun	Monday	Tuesday	Wednesday	Thursday	Friday	Sat
16	17 General Ethics (OHR Orientation) TK & CA	18 General Ethics (Fire & EMS cadets) TK & CA General Ethics JS & TK	19	20 Holiday Gifts CA & JS (with CIO)	21	22
23	24	25	26	27	28	29
30	1	2 General Ethics TK & DB	3	4	5	6
7	8	9 General Ethics (OHR Orientation) JG & JS	10	11 General Ethics CA & TK	12	

JG: Jordana Greenwald | TK: Tom Klemm | BM: Bryan McHale | DB: Dakota Baeringer | JS: Julia Sheppard | CA: Chioma Azi
 OHR: Office of Human Resources | CIO: Chief Integrity Officer

Training Activity 11.15.25 through 12.12.25

325 people @ 7 sessions

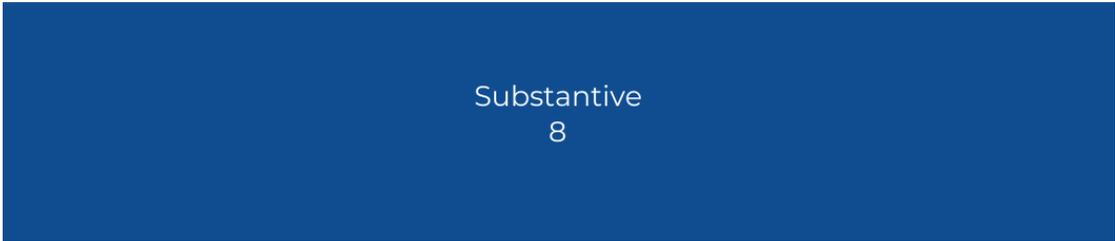
General Ethics
325



III. Informal Guidance

Total Requests Resolved Nov 2025

Substantive
8



Total Requests Resolved 2025 YTD

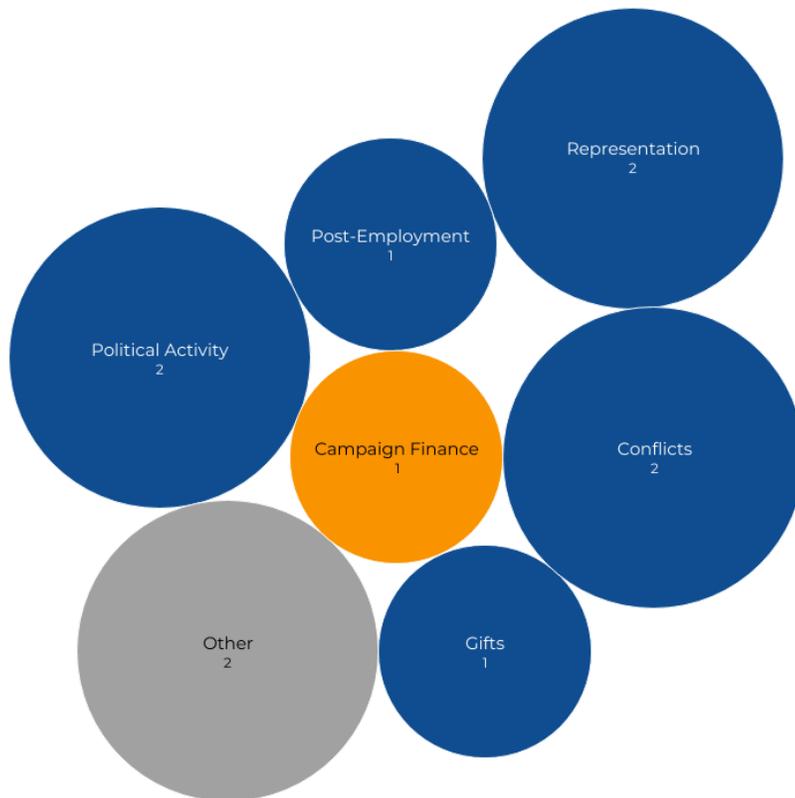
Substantive
293

Filing
240



Topics Covered

Nov 2025



Question of Note:

Can a member of a City board or commission contribute to a federal campaign?

For the most part, yes. Other than a small number of entities (including the Board of Ethics) that have specific restrictions in the Charter or Code, members of City boards and commissions may make political contributions. Members of all non-advisory boards and commissions may not, however, have any role in political fundraising.