

IN THE COMMONWEALTH OF PENNSYLVANIA

IN RE: NOMINATION PETITION OF  
 AMEN BROWN, CANDIDATE FOR  
 REPRESENTATIVE IN THE GENERAL  
 ASSEMBLY – 10<sup>TH</sup> LEGISLATIVE DISTRICT

ELECTION MATTER

No. 152 MD 2022

PETITION OF: AUDRA TRAYNHAM,  
 THOMAS SMITH, and RIKEYAH LINDSAY

**PETITION TO SET ASIDE NOMINATION PETITION OF AMEN BROWN**

The Petitioners, by and through counsel, Ryan Allen Hancock, Esq. and Marni Jo Snyder, Esq., respectfully request that this Court set aside Amen Brown’s nomination petition because the candidate is (1) not eligible to run in the 10<sup>th</sup> Legislative District pursuant to Article II, Section 5 of the Pennsylvania Constitution and (2) knowingly and materially misrepresented information on his SOFI in bad faith to deceive the electorate. In support of the Petition, Petitioners aver that:

**JURISDICTION**

1. Exclusive jurisdiction over the subject matter of this Petition is vested in the Commonwealth Court of Pennsylvania by the provisions of the Pennsylvania Election Code, 25 P.S. § 2937, and the provisions of the Judicial Code, 42 Pa. C.S.A. § 764.

**PARTIES**

2. The Petitioner, Audra Traynham, is a duly qualified elector, lives at 140 N. Yewdall St., City of Philadelphia, County of Philadelphia, Pennsylvania 19139. The Petitioner is a registered Democrat.

3. The Petitioner, Thomas Smith, is a duly qualified elector, lives at 5517 Spring Street, City of Philadelphia, County of Philadelphia, Pennsylvania 19139. The Petitioner is a registered Democrat.

4. The Petitioner, Rikeyah Lindsay, is a duly qualified elector, lives at 3836 Aspen Street, City of Philadelphia, County of Philadelphia, Pennsylvania 19104. The Petitioner is a registered Democrat.

5. Amen Brown is currently the Representative in the General Assembly for the 190<sup>th</sup> Legislative District.

6. Amen Brown is also a current candidate for Representative in the General Assembly for the 10<sup>th</sup> Legislative District.

#### COUNT I

7. Section 907 of the Election Code requires that nomination petitions be completed “in [the] form prescribed by the Secretary of the Commonwealth [.]” 25 P.S. § 2867.

8. Section 910 of the Election Code states that “[e]ach candidate for any [s]tate...office..shall file with his nomination petition his affidavit stating—(a) his residence, with street and number, if any, and his post-office address[.]” 25 P.S. § 2870.

9. Amen Brown’s 2022 affidavit states that his address is 33 S. Ruby Street, Apt. 1, Philadelphia, PA 19139. A copy of his affidavit is attached as Exhibit A.

10. Amen Brown’s filed 2022 filed Statement of Interest Form (“SOFI”), also list his address as 33 S. Ruby Street, Apt. 1, Philadelphia, PA 19139. A copy of his affidavit is attached as Exhibit B.

11. Amen Brown's 2020 filed SOFI, listed his address as 3600 Conshohocken Ave., Apt. 710, Philadelphia, PA 19131.<sup>1</sup> A copy of Amen Brown's 2020 SOFI is attached as Exhibit C.

12. 3600 Conshohocken Ave., Apt. 710, Philadelphia, PA 19131 is located in the 190<sup>th</sup> Legislative District.

13. Amen Brown lived at the address at all times while serving as Representative in the General Assembly for the 190<sup>th</sup> Legislative District.

14. On or about December 20, 2021, shortly after the Pennsylvania Legislative Reapportionment Commission released their House and Senate District maps, Amen Brown changed his voter registration address to reflect an address of 33 S. Ruby Street, Apt. 1, Philadelphia, PA 19139. A copy of Amen Brown's voter registration record is attached as Exhibit D.

15. 33 S. Ruby Street, Apt. 1, Philadelphia, PA 19139 is located in the 10<sup>th</sup> Legislative District.

16. Throughout 2021, 33 S. Ruby Street, Philadelphia, PA 19139 was under construction and the City of Philadelphia, through the Department of Licenses & Inspections granted multiple permits to complete work in the subject property.<sup>2</sup> A list of permits granted by the City of Philadelphia is attached as Exhibit E.

17. Pursuant to Philadelphia License & Inspection records, which are public documents and available on their website, 33 S. Ruby Street, Philadelphia, PA 19139 passed

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<sup>1</sup><https://www.ethicsrulings.pa.gov/WebLink/DocView.aspx?id=420487&dbid=0&repo=Ethics&searchid=b59d2a6f-9661-409e-919a-eb641a136f4e> (last visited March 30, 2022).

<sup>2</sup><https://eclipse.phila.gov/phillylmsprod/pub/lms/Default.aspx?PossePresentation=PermitSearchByAddress> (last visited March 30, 2020).

final inspection (Inspection No. CP-2020-002930-12) on December 29, 2021. A list of property inspections is attached as Exhibit F.

18. Pursuant to Philadelphia License & Inspection records, which are public documents, the owner of 33 S. Ruby Street, Philadelphia, PA 19139 received its Certificate of Occupancy on January 24, 2022.

19. Pursuant to Philadelphia License & Inspection records, which are public documents and available on their website, the owner of 33 S. Ruby Street, Philadelphia, PA 19139 was first granted a rental license (License No. 887097) on February 3, 2022.<sup>3</sup> A copy is attached as Exhibit G.

20. Amen Brown has not lived in nor established a residence in the 10<sup>th</sup> Legislative District for one (1) year.

21. Therefore, Amen Brown fails to meet the residency requirement as required by the Pennsylvania Constitution which requires that state representatives “shall have been...inhabitants of their respective districts for one year next before their election (unless absent on the public business of the United States or of his State), and shall be a resident in their respective districts during the terms of service.” Pa. Const. Art. II, § 5.

22. Accordingly, the Candidate’s affidavit contains a false statement in that he swore that he is eligible for the office of Representative in the General Assembly for the 10<sup>th</sup> Legislative District, when in fact, he is not eligible pursuant to Article II, Section 5 of the Pennsylvania Constitution.

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<sup>3</sup> <https://li.phila.gov/property-history/search/business-license-detail?address=603133500&Id=887097> (last visited March 30, 2022).

WHEREFORE, Petitioners pray this Honorable Court to issue a Rule to Show Cause upon the Candidate to show cause why the Nomination Petition of the above referenced Candidate should not be set aside, and the Candidate's name shall not appear on the 2022 primary ballot.

## COUNT II

23. Amen Brown knowingly and materially misrepresented information on his SOFI in bad faith to deceive the electorate.

24. Amen Brown failed to list *any* creditors in box No. 9 of his SOFI. Despite the fact that he previously listed creditors on his previous 2021 SOFI. *See* Exhibit B.

25. Moreover, Amen Brown failed to list any of the twenty-six (26) judgments and/or liens that have been entered against him or his businesses for failure to pay real estate taxes, state taxes, and contract disputes. For example, *see* Philadelphia Court of Common Pleas: Case No. 210500936 (reflecting a judgment of \$11,499.31 to Reliance Federal Credit Union); Case No. 201200899 (reflecting a judgment of \$64,453.13 to J. Lynn Enterprises, LLC); Case No. 150903536 (reflecting a judgment of \$26,500.00 to Zlotnikov Realty); and Case No. 220201141 (reflecting a judgment of \$31,136.17 to the City of Philadelphia for taxes).

26. Amen Brown failed to list \$11,000.00 owed for his purchase of a 2015 Cadillac Escalade that his counsel admitted was still outstanding as of June 2021.<sup>4</sup>

27. Amen Brown failed to list *any* direct or indirect sources of income in box No. 10 of his SOFI, despite the fact that he is the owner of West Oak Lane Beacon and which he listed in his 2018, 2019, and 2020 SOFIs. On January 14, 2020, a judgment was issued against West Oak Lane Beacon for \$12, 268.75 for non-payment of rent. *See* Complaint No. LT-19-12-09-4188.

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<sup>4</sup> <https://billypenn.com/2021/06/30/amen-brown-deed-fraud-philadelphia-corruption-190th-district-pennsylvania-state-house/> (last visited March 31, 2022).

28. Amen Brown failed to include Education Nation Learning Academy in box No. 10 of his SOFI, despite the fact that he derives a direct source of income from and which lists Amen Brown as a management employee. A copy of their website reflecting Amen Brown as a management employee is attached as Exhibit H. On March 22, 2022, a judgment was issued against the Education Nation Learning Academy, Allan Rothwell, and Amen Brown for \$31,136.17 for unpaid rent. *See* Case No. 22021141.

29. Amen Brown failed to include *any* office, directorship, or employment in any business in Box No. 13, despite the above.

WHEREFORE, Petitioners pray this Honorable Court to issue a Rule to Show Cause upon the Candidate to show cause why the Nomination Petition of the above referenced Candidate should not be set aside, and the Candidate's name shall not appear on the 2022 primary ballot.

Respectfully submitted,



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Ryan Allen Hancock, Esq.  
ID # 92590  
rhancock@wwdlaw.com  
WILLIG, WILLIAMS & DAVIDSON  
1845 Walnut Street, 24<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 656-3679

Marni Jo Snyder, Esq.  
ID # 204377  
marni@snyderlawyer.com  
Law Offices of M.J. Snyder, LLC  
Land Title Building  
100 South Broad Street, Suite 1910  
Philadelphia, PA 19110  
(215) 515-3360

**CERTIFICATE OF SERVICE**

Pursuant to the Court's March 25, 2022 Order (126 Mis. Dkt. No. 3), the Petition to Set Aside was filed electronically and a courtesy copy was mailed to Amen Brown at

ABROWN@PAHOUSE.NET

AMENBROWN@GMAIL.COM

CITIZENSFORAMENBROWN@GMAIL.COM

AMENBROWN4HD190@GMAIL.COM.<sup>5</sup>

A copy of the Petition to Set Aside was served upon the Secretary of the Commonwealth by hand delivery at the following address:

Secretary of the Commonwealth  
305 North Office Building  
Harrisburg, PA 17120-0029



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Ryan Allen Hancock, Esq.  
ID # 92590  
rhancock@wwdlaw.com  
WILLIG, WILLIAMS & DAVIDSON  
1845 Walnut Street, 24<sup>th</sup> Floor  
Philadelphia, PA 19103

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<sup>5</sup> In abundance of caution Petitioner's are serving Amen Brown at the addresses listed above because Amen Brown failed to identify a current email address for him of his candidate affidavit. *See* Exhibit A.

IN THE COMMONWEALTH OF PENNSYLVANIA

IN RE: NOMINATION PETITION OF  
AMEN BROWN, CANDIDATE FOR  
REPRESENTATIVE IN THE GENERAL  
ASSEMBLY – 10<sup>TH</sup> LEGISLATIVE DISTRICT

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ELECTION MATTER

No.

PETITION OF: AUDRA TRAYNHAM,  
THOMAS SMITH, and RIKEYAH LINDSAY

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, following a hearing on the petition to set aside the Nomination Certificate of Amen Brown (Candidate) filed by Audra Traynham, Thomas Smith, and Rikeyah Lindsay, it is hereby ORDERED:

1. The petition to set aside Candidate’s Nomination Certificate is hereby GRANTED.
2. The Secretary of the Commonwealth is directed to remove the name of Amen Brown, Candidate for State Representative in the 10<sup>th</sup> Legislative District, from the May 17, 2022 ballot.

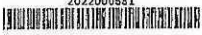
BY THE COURT

\_\_\_\_\_

J.



# EXHIBIT A

CANDIDATE'S AFFIDAVIT	PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF ELECTIONS 210 NORTH OFFICE BLDG. HARRISBURG, PA 17120	OFFICE USE ONLY 202200681 
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Name: Brown, Amen  
Last Name First Name Middle Name or Initial Suffix

Residential Address: 33 S Ruby Street, APT 1  
Street Address

City: Philadelphia State: PA Zip Code: 19139

Municipality (City, Boro, or Township): Philadelphia Gender: F  M  NB

Mailing Address (if different from residential): \_\_\_\_\_  
Street Address

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Voting Precinct Name (including Ward & Division, if applicable): Philadelphia 60th Ward 4th Division

Office for which you are seeking nomination: REPRESENTATIVE IN THE GENERAL ASSEMBLY


District Number (if applicable): 10th Legislative District

Email address: \_\_\_\_\_

Name as it is to appear on the Ballot: Amen Brown

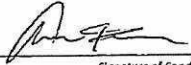
CANDIDATE AFFIDAVIT - I do swear (or affirm) that my residence, my election district and the title of the office for which I desire to be a candidate are as specified above, that I am eligible for said office, that I will not knowingly violate any election law or any law regulating and limiting nomination and election expenses, and prohibiting corrupt practices in connection therewith; that I am aware of the provisions of Section 1626 of the Pennsylvania Election Code requiring pre-election and post-election reporting of campaign contributions and expenditures; that unless I am a candidate for Judge of a Court of Common Pleas, the Philadelphia Municipal Court or the office of school board in a district where that office is elective or the office of magisterial district judge, my name has not been presented as a candidate by nomination petitions of any other party for the same office; that if I am a candidate for any office of a political party I am a registered and enrolled member of such party; that if I am a candidate for Committee Delegate or Alternate Delegate to the National Convention the name of the candidate to whom I am committed is as indicated on my nomination petition and that my signature on the Delegate's Statement was affixed to each page of my nomination petition prior to circulation of same; that I am not a candidate for an office which I already hold, the term of which is not set to expire on the same year as the office subject to this affidavit.

Sworn to and subscribed before me this 21st day of March 2022

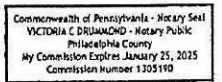
  
 Signature of Officer Administering Affirmation  
Notary Public  
 Official Title

My commission expires 1-25-2025

I swear (or affirm) to the above part(s) as required by the law(s) applicable to the office I am seeking.

  
 Signature of Candidate  
267 581 8127  
 Telephone Number

PHILADELPHIA  
 County of Residence



# EXHIBIT B

STATEMENT OF FINANCIAL INTERESTS

PLEASE PRINT NEATLY

01 LAST NAME FIRST NAME MI SUFFIX  
Brown Amen R

02 ADDRESS office (business or governmental) or home City State Zip Code Area Code Phone  
33 South Arby St Phila PA 19139 (267) 531-8127

NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBERS.

03 STATUS Check applicable box or boxes, more than one box may be marked. (See instruction page)  
A  Candidate (including write-in) C  Public Official (Current) D  Public Employee (Current) E  Check this box if you are filing as a solicitor  Check this box if you are amending an original filing  
B  Nominee C  Public Official (Former) D  Public Employee (Former)

04 PUBLIC POSITION OR PUBLIC OFFICE (administrator, member, Commissioner, job title, etc.)  seeking  hold  held  
A Member  seeking  hold  held

05 POLITICAL SUBDIVISION in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept, agency, authority, borough, board, commission, county, school district, township, etc.)  
A House of Representatives HD 10

06 OCCUPATION OR PROFESSION (This may be the same as block 4) 07 YEAR SEE INSTRUCTIONS.  
State Rep Information in blocks 8-15 represents disclosure for the calendar year listed here: 2021

08 REAL ESTATE INTERESTS (See instruction page) If NONE, check this box.

09 CREDITORS (See instruction page) If NONE, check this box.   
Name: Address: Interest Rate

10 DIRECT OR INDIRECT SOURCES OF INCOME including (but not limited to) all employment. (See instruction page) If NONE, check this box.   
Name: House of Representatives State Capital Address: State Capitol

11 GIFTS (See instruction page) If NONE, check this box.   
Source of Gift: Unknown Value of Gift: 3,000  
Address of Source of Gift: Unknown Circumstances (including description) of Gift: Unknown donation left at door donated to Belmont Alliance nonprofit

12 TRANSPORTATION, LODGING, HOSPITALITY (See instruction page) If NONE, check this box.   
Source (Name and Address):

13 OFFICE, DIRECTORSHIP, OR EMPLOYMENT IN ANY BUSINESS (See instruction page) If NONE, check this box.   
Business Entity (Name and Address): Name: Address: Position Held (i.e., officer, director, employee, etc.)

14 FINANCIAL INTEREST IN ANY LEGAL ENTITY IN BUSINESS FOR PROFIT (See instruction page) If NONE, check this box.   
Name and Address of Business: Interest Held (i.e., 5%, 10%, etc.)

15 BUSINESS INTERESTS TRANSFERRED TO IMMEDIATE FAMILY MEMBER (See instruction page) If NONE, check this box.   
Business (Name and Address): Transferee (Name and Address): Interest Held Relationship Date Transferred

The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief, said affirmation being made subject to the penalties prescribed by 18 Pa.C.S. §4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. §1109(b).

Signature: [Signature] Enter Current Date: 3/21/22

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

# EXHIBIT C

# Statement of Financial Interests

IN ORDER TO FUNCTION PROPERLY, THIS FORM REQUIRES INTERNET EXPLORER 9 AND ABOVE, GOOGLE CHROME, OR MOZILLA FIREFOX.

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK IS NOT COMPLETED OR IF CONFIRMATION OR SIGNATURE IS MISSING.

AFTER SUBMITTING THE FORM, YOU CAN OBTAIN AN OFFICIAL COPY FROM THE STATE ETHICS COMMISSION'S E-LIBRARY. YOU MAY ALSO SUPPLY YOUR E-MAIL ADDRESS BELOW FOR AN OFFICIAL COPY TO BE SENT VIA E-MAIL.

PRINTING THIS FORM FROM YOUR WEB BROWSER DOES NOT CONSTITUTE AN OFFICIAL COPY OF YOUR FILING.

THOSE REQUIRED TO FILE FOR MORE THAN ONE POSITION MUST FILE IN ALL FILING LOCATIONS FOR ALL SUCH POSITIONS.

THIS FORM MUST BE COMPLETED AND FILED BY:

A: Candidates - Persons seeking elected state, county and local public offices, including first-time candidates, incumbents seeking re-election, and write-in candidates who do not decline nomination/election within 30 days of official certification of same.

B: Nominees - Persons nominated for public office subject to confirmation.

C: Public Officials - Persons serving as current state/county/local public officials (elected or appointed). The term includes persons serving as alternates/designees. The term excludes members of purely advisory boards.

D: Public Employees - Individuals employed by the Commonwealth or a political subdivision who are responsible for taking or recommending official action of a non-ministerial nature with regard to: contracting or procurement; administering or monitoring grants or subsidies; planning or zoning; inspecting, licensing, regulating or auditing any person; or any other activity where the official action has an economic impact of greater than a de minimis nature on the interests of any person. The term does not include individuals whose activities are limited to teaching.

A former public official or former public employee must file the year after termination of service with the governmental body.

E: Solicitors - Persons elected or appointed to the office of solicitor for political subdivision(s).

**Important:** Please read all instructions carefully prior to completion of form. To see detailed instructions, hover the cursor over the "(?)" icon in each section or, to view the entire set of instructions in a second browser window, click "here". Any questions may be directed to the State Ethics Commission at (717) 783-1610 or Toll Free at 1-800-932-0936.

This Form is required to be filed pursuant to the provisions of the Public Official and Employee Ethics Act, 65 Pa C.S. § 1101 et seq.

Please check below if you have read and understand the above terms. \*

Yes I have read and understand the above the terms.

Are you amending a prior filing? \*

No

01 Name

First Name \* (?) Amen

Last Name \* (?) Brown

Middle Initial R

Suffix

## 02 Address

**Business, Governmental, Home, or Postal Address**\* (?)  
Street Address  
3600 Conshohocken Avenue  
Address Line 2  
Apt. 710  
City  
Philadelphia  
State / Province / Region  
PA  
Postal / Zip Code  
19131  
Country

**Telephone**\* (?) 215-520-5033  
Telephone Number ###-###-####

## 03 - 05 Public Position or Public Office and Governmental Entity in which you are/were an Official, Employee, Candidate, Nominee, or Solicitor

**Status**\* (?) Public Official (Current)  
**State or County/Local**\* (?) State  
**State Entity**\* (?) Pennsylvania House of Representatives  
**Position**\* (?) State Representative

Do you have an additional Public Position or Public Office and Governmental Entity to add to this filing? \*  
No  
Selecting "Yes" will allow for additions below.

## 06 Occupation or Profession

**Current Occupation or Profession**\* (?) Government Official

## 07 Year

**Year**\* (?) 2020  
The calendar year for which this form is being filed.

## 08 Real Estate Interests

Do you have reportable real estate interests? \*  
(?) No

## 09 Creditors

Do you have reportable creditors? \*  
(?) Yes

Creditors

Name \* (?) Ally Financial  
Address (?)  
City\* Bloomington  
State \* MN  
Zip Code 55438  
Interest Rate \* 6  
Exclude the "%" symbol

### 10 Direct or Indirect Sources of Income

Do you have any reportable direct or indirect sources of income? \* (?)

Yes

#### Source of Income

Name \* (?) West Oak Lane Beacon  
Address \* (?)  
Street Address 6401 E Wister  
Address Line 2  
City Philadelphia State / Province / Region PA  
Postal / Zip Code 19138 Country

### 11 Gifts

Have you received any reportable gifts? \* (?)

No

Gifts Disclaimer \* By selecting "No" above, you are indicating that you did not receive any reportable gift(s) during the calendar year for which you are filing this Statement of Financial Interests. By checking the "I Accept" checkbox below, you are acknowledging your understanding that if reportable gift(s) were received and are not included on this form, you are subject to all applicable penalties.

I Accept

### 12 Transportation, Lodging, Hospitality

Do you have any reportable transportation, lodging, or hospitality? \* (?)

No

Transportation, Lodging, & Hospitality Disclaimer \* By selecting "No" above, you are indicating that you did not receive any reportable transportation, lodging or hospitality during the calendar year for which you are filing this Statement of Financial Interests. By checking the "I Accept" checkbox below, you are acknowledging your understanding that if reportable transportation, lodging or hospitality was received and is not included on this form, you are subject to all applicable penalties.

I Accept

### 13 Office, Directorship, or Employment in any Business



Did you hold any office, directorship, or employment in any business for the calendar year for which you are reporting? \* (?)

No

#### 14 Financial Interest in any Legal Entity in Business for Profit

Do you have a reportable financial interest in any legal entity in business for profit? \* (?)

Yes

#### Business Entity

Name * (?)	Brown Property Group		
Address * (?)	Street Address		
	3600 Conshohocken Avenue		
	Address Line 2		
	City	State / Province / Region	
	Philadelphia	PA	
	Postal / Zip Code	Country	
	19131		
Interest Held * (?)	100	Exclude the "%" symbol	

#### 15 Business Interests Transferred to Immediate Family Member

Did you transfer any business interests to an immediate family member during the calendar year which you are reporting? \* (?)

No

Additional comments or explanations about any of the above sections: While I do own Brown Property Group 100%, I did not make any income off of this business for 2020 - have no tenants, leases etc.

Confirmation\* The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information, and belief; said affirmation being made subject to the penalties prescribed by 18 Pa.C.S § 4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S § 1103(b).

I Confirm

Signature \* (?)

Date

Amen R. Brown

2021-04-29

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

# EXHIBIT D

Voters Find/Modify Voter

BROWN AMENIR

02071651751

Security Not Restricted

Last Changed 12/20/2021 10:26:25

Voter Hall of Fame

Federal Voter

- General
- Districts
- Votes
- Correspondence
- Petitions
- Changes
- Documents
- Other
- Application

Changes Made to Voter Record

County	Type	Date/Time	User	Station ID
51	CHG	12/28/2021 12:33 PM	c-krichard	DOSSUREAPP0
51	CHG	12/20/2021 10:26 AM	c-aswilson	DOSSUREAPP1
51	CHG	12/20/2021 10:26 AM	c-aswilson	DOSSUREAPP1
51	CHG	12/20/2021 10:26 AM	c-aswilson	DOSSUREAPP1
51	CHG	12/20/2021 10:26 AM	c-aswilson	DOSSUREAPP1

Record 4 of 63

Change Description

- [ApplicationSource] was changed from OLV to DOTIC
- [CityID] was changed from 5082 to 5113
- [DateLastChanged] was changed from Nov 4 2021 4:13PM to Dec 20 2021 10:26AM
- [HouseNum] was changed from 3600 to 33
- [IsSendIDCard] was changed from False to True
- [LastIDReason] was changed from VPC to VAC
- [Line2] was changed from RIVERPARK HOUSE to NULL
- [PostalCode] was changed from 19131 to 19139
- [Precinct SplitCode] was changed from 5202-1 to 6004-1

OK

Cancel

Record 1 of 1

# EXHIBIT E



### Commercial Building Permit CP-2020-002930 (Completed)

**Status:** Completed

**Application Date:** Jun 30, 2020

**Issue Date:** Sep 9, 2020

**Completed Date:** Jan 24, 2022

**Expiration Date:** Jun 29, 2022

**Description:** Commercial - New Construction

Inspections    Contractors    Subcontractors

Inspection Number	Inspection Type	Result	Completed Date
CP-2020-002930-001	Permit Issuance Notification	Passed	Sep 25, 2020
CP-2020-002930-002	Soils - Existing Site Soils conditions, Fill Placement, and Load-Bearing Capacit	Waived	Dec 29, 2021
CP-2020-002930-003	Reinforced Concrete	Waived	Dec 29, 2021
CP-2020-002930-004	Initial Site Inspection	Passed	Jan 22, 2021
CP-2020-002930-005	Foundation Footing Inspection	Passed	Jan 28, 2021
CP-2020-002930-006	Foundation Wall Inspection	Passed	Feb 9, 2021
CP-2020-002930-007	Dampproofing & Backfill Inspection	Passed	Feb 24, 2021
CP-2020-002930-008	Underslab Inspection	Passed	Mar 1, 2021
CP-2020-002930-009	In Wall Framing Inspection	Passed	Jul 28, 2021
CP-2020-002930-010	Insulation Inspection	Passed	Aug 3, 2021
CP-2020-002930-011	Prefinal Walkthrough Inspection	Waived	Dec 27, 2021
CP-2020-002930-012	Final Inspection	Passed	Dec 29, 2021

Screen ID: 972087

# EXHIBIT F



# Commercial Building Permit CP-2020-002930 (Completed)

**Status:** Completed

**Application Date:** Jun 30, 2020

**Issue Date:** Sep 9, 2020

**Completed Date:** Jan 24, 2022

**Expiration Date:** Jun 29, 2022

**Description:** Commercial - New Construction

Inspections

Inspection Number	Inspection Type	Result	Completed Date
CP-2020-002930-001	Permit Issuance Notification	Passed	Sep 25, 2020
CP-2020-002930-002	Soils - Existing Site Soils conditions, Fill Placement, and Load-Bearing Capacit	Waived	Dec 29, 2021
CP-2020-002930-003	Reinforced Concrete	Waived	Dec 29, 2021
CP-2020-002930-004	Initial Site Inspection	Passed	Jan 22, 2021
CP-2020-002930-005	Foundation Footing Inspection	Passed	Jan 28, 2021
CP-2020-002930-006	Foundation Wall Inspection	Passed	Feb 9, 2021
CP-2020-002930-007	Damproofing & Backfill Inspection	Passed	Feb 24, 2021
CP-2020-002930-008	Underslab Inspection	Passed	Mar 1, 2021
CP-2020-002930-009	In Wall Framing Inspection	Passed	Jul 28, 2021
CP-2020-002930-010	Insulation Inspection	Passed	Aug 3, 2021
CP-2020-002930-011	Prefinal Walkthrough Inspection	Waived	Dec 27, 2021
CP-2020-002930-012	Final Inspection	Passed	Dec 29, 2021

Screen ID: 972087



# EXHIBIT G



# Property History

Permits, licenses, violations & appeals by address

**3202 RENTAL**

**Active**

**LICENSE NUMBER: 887097**

**L&I District: WEST**

**OPA Account #: 603133500**

33 S RUBY ST

Philadelphia, PA 19139-3322

License number	887097
License type	3202 Rental (3 Units)
Status	Active
Date issued	Feb. 03, 2022
Inactive date	Not Available
Contact	CBA DEVELOPMENT GROUP I, LLC
Contact address	1602 FRANKFORD AVE #3757 Philadelphia, PA 19125 USA
Contact type	Company



# EXHIBIT H

### Management Team



Both principals of the Education National Learning Academy are experienced educators and social workers. Allan Rothwell and Amen Brown, as successful, intelligent African-American males, hope their example will help provide the role models often lacking in the educational experience.

Allan E. Rothwell, Jr MSW received his Masters of Social Work from Temple University and his BS in Health Science from Lincoln University. For years in the School District of Philadelphia he concentrated his efforts improving student behavioral plans, coordinating with social service agencies and assisting teachers in the re-integration of students. Moreover, he has provided intensive individual and group counseling and therapeutic services to children related to the family environment.



Amen R. Brown is completing a degree in Elementary Education at Community College of Philadelphia and has more than 12 years working with the University of Pennsylvania creating and leading summer and afterschool programs affecting hundreds of students. This included coordinating the Sayre Beacon program with curriculum and community involvement meetings designed to increase attendance and discipline for students and being the "Community Engagement Specialist" which designed and implemented programs that facilitated student attendance by uncovering root causes and providing inspirational activities such as carnivals, talent shows and transportation to encourage students to attend.



**VERIFICATION**

I, hereby verify that the facts contained in the within Petition are true and correct to the best of my knowledge or information and belief.

I understand that the statements made herein are made subject to the provisions of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

4/1/2022 | 3:40 PM EDT

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Date

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*Thomas Smith*  
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Thomas Smith

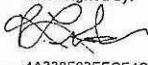
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4/1/2022 | 2:13 PM PDT

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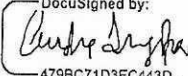
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4/1/2022 | 12:06 PM EDT

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Date

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Audra Trayham