

**CITY OF PHILADELPHIA
BOARD OF ETHICS**

COMPLAINT

COMPLAINANTS:

1. Chenjerai Kumanyika -- [REDACTED] Phila, PA, 19119
2. Mindy Isser -- [REDACTED], Phila, PA, 19145
3. Kathleen Melville -- [REDACTED] Phila, PA, 19147
4. Alison Stohr -- [REDACTED] Phila, PA 19146
5. Duong Lý -- [REDACTED], PA, 19145
6. Antione Little - [REDACTED] Phila, PA, 19132
7. David Thompson -- [REDACTED] 1R, Philadelphia, PA, 19143
8. Ben Miller -- [REDACTED] Philadelphia PA, 19147

SUBJECT OF COMPLAINT:

1. Allan Domb – [REDACTED] Philadelphia, PA, 19103

SUMMARY OF COMPLAINT:

The above-mentioned complainants call on the Philadelphia Board of Ethics to initiate an investigation into violations of the Public Integrity Laws by Councilman At-Large Allan Domb. The complainants include homeowners, Philadelphia public school parents, Philadelphia educators, graduates of the School District of Philadelphia, and small business owners. On Thursday, April 18th, 2019, Philly Power Research and 215 People’s Alliance, a public research group and a community group, released [a report](#)¹ investigating Councilman Allan Domb’s connections to the 10-year tax abatement.² That report highlighted important facts that have prompted this call for an investigation from the Board of Ethics.

PUBLIC INTEGRITY LAWS AT ISSUE:

1. The complainants believe that Councilman at-large Allan Domb is in violation of Philadelphia Code §§ 20-607, 608. Under Regulation 2C of the Philadelphia Board of Ethics, the complainants call on the Philadelphia Board of Ethics to initiate an investigation.
2. Section 20-607 of the Philadelphia Code states that “unless there is a public disclosure . . . no member of Council . . . shall be financially interested in any legislation including ordinances

¹ Available to read at: <http://215pa.com/dombabatementprofits/>

² All references to abatements in this document refers to the 10-year tax abatement that is Ordinances 961, 1130 and 1456-A.

and resolutions . . . made by him in his official capacity or by any board or body of which he is a member.”

3. Under Philadelphia Code § 20-608, in the event that a City Council member has a financial interest, he or she “shall make public the nature and extent of such interest Thereafter, such person shall disqualify himself or herself from any further official action regarding legislation including ordinance and resolutions.”

FACTS DESCRIBING ALLEGED VIOLATIONS:

1. Allan Domb is the owner of Allan Domb Real Estate, a real estate firm that specializes in the brokerage of luxury condominiums, development of new condo projects, and leasing and management of luxury apartments.
2. According to Allan Domb Real Estate’s website, the firm rents and sells luxury apartments and condominiums in 48 buildings across Center City.³
3. Of these 48 condominium/apartment buildings, 22 buildings contained units that utilized the ten-year tax abatement program in 2018, as per the Office of Property Assessment’s list of all certified properties making use of the ten-year tax abatement in 2018.
4. In 2018, units in these 22 buildings (in which Allan Domb Real Estate rents and sells luxury apartments) received \$12.3 million total in abatements, \$6.8 million of which would have gone to the School District of Philadelphia. That \$6.8 million is more than 10% of the total amount (\$58.5 million) the School District lost out on last year due to the 10-year tax abatement.
5. In addition to being a real estate broker, Allan Domb owns a significant amount of Center City real estate.
6. Using the Office of Property Assessment’s “Properties” dataset available on Open Data Philly,⁴ we found that Domb and LLCs affiliated with his real estate company owned at least 437 properties in Philadelphia as of April 2019.
7. Of those 437 properties, 16 properties utilized the ten-year tax abatement program in 2018, according to the Office of Property Assessment’s list of all certified properties making use of the ten-year tax abatement in 2018. These 16 properties received \$54,985 in abatements combined in 2018.
8. From 2008-2019, properties owned by Allan Domb received at least \$541,473 in abatements, according to the Office of Property Assessment’s “Properties” dataset available on Open Data Philly and the Office of Property Assessment’s list of all certified properties making use of the ten-year tax abatement from 2008-2019.

³ “Center City Condo Buildings,” Allan Domb Real Estate. Accessed 30 April 2019. <https://allandomb.com/buildings/>.

⁴ “Property Assessments,” Open Data Philly. Accessed 30 April 2019. <https://www.opendataphilly.org/dataset/opa-property-assessments>

9. Allan Domb Real Estate also develops new condo projects. According to his website, Domb's portfolio of development properties includes Parc Rittenhouse, The Warwick, The Bank Building Residences, The Lanesborough, 220 West Washington Square, and the Barclay.⁵
10. In 2018, five properties developed by Allan Domb utilized the ten-year tax abatement program. Units in The Lanesborough (1601 Locust Street), The Warwick Condominiums (1701-15 Locust Street), Parc Rittenhouse (219-29 S 18th Street), The Barclay (237-47 S 18th Street), and The Bank Building (421 Chestnut Street) were abated.⁶
11. In 2018, units in those five Allan Domb development properties received \$1.1 million in abatements combined, \$605,707 of which would have gone to the School District of Philadelphia.
12. After the Philly Power Research and 215 People's Alliance report was released on April 18th, 2019, Allan Domb said the following statements in an interview to reporter Jake Blumgart: "Since I've been in office, I haven't developed any buildings on a large scale that have gotten an abatement. I got one, maybe two buildings that got an abatement, the Warwick and Parc."⁷
13. Units in the Warwick (1701-1715 Locust Street) received \$911,471.78 in tax abatements in 2017 and 2018 according to the Office of Property Assessments' data.
14. Units in Parc (219-229 S 18th Street) received \$1,356,990.11 in tax abatements in 2017 and 2018 according to the Office of Property Assessments' data.
15. Through a combination of real estate brokerage, real estate management and direct ownership, Allan Domb clearly has a financial interest in the tax abatement.
16. Councilman Domb has not publicly reported his financial interests in the tax abatement, in violation of Philadelphia Code § 20-608(a).
17. While in office, Councilman Domb has introduced two bills seeking to amend the tax abatement--one in March 2016⁸ and one in February 2019.⁹
18. Domb's introduction of two bills regarding the abatement is a clear violation of Philadelphia Code § 20-607.

⁵ "About Allan Domb--Premier Philadelphia Realtors," Allan Domb Real Estate. Accessed 30 April 2019.

<https://allandomb.com/about-allan-domb/>

⁶ "Property Assessments," Open Data Philly. Accessed 30 April 2019.

<https://www.opendataphilly.org/dataset/opa-property-assessments>

⁷ "Allan Domb has made millions selling Philly real estate. Now critics want him to recuse himself on the city's tax abatement," WHYY. 18 April 2019.

<http://planphilly.com/articles/2019/04/18/allan-domb-has-made-millions-selling-philly-real-estate-now-critics-want-him-to-recuse-himself-on-the-city-s-tax-abatement>

⁸ "Councilman Domb calls for 20-year tax abatement on homes under \$250,000," Jared Brey, PlanPhilly. 10 March 2016.

<http://planphilly.com/articles/2016/03/10/councilman-domb-calls-for-20-year-tax-abatement-on-homes-under-250-000>

⁹ "Domb proposes 10-year tax abatement reform," Jake Blumgart, WHYY. 28 Feb. 2019.

<https://whyy.org/articles/domb-proposes-10-year-tax-abatement-reform/>