

Commonwealth of Pennsylvania

COUNTY OF Allegheny

APPLICATION FOR
SEARCH WARRANT
AND AUTHORIZATIONDocket Number
(Issuing Authority):Police Incident
Number: I-281-2023Warrant Control
Number:

Kevin P. Flanigan

ACDAI

(412) 388-5300

03/23/2026

AFFIANT NAME

AGENCY

PHONE NUMBER

DATE OF APPLICATION

IDENTIFY ITEMS TO BE SEARCHED FOR AND SEIZED (Be as specific as possible):

City of Pittsburgh records related to the City of Pittsburgh's relationships with Matrix, Poise Foundation, "10 Weeks Parties for Peace", 1Hood Media, Homewood Community Sports Program and/or Complex, Four Amigos, East Side Sports Program, Center that CARES, Cohen Law Group (related to a telecommunication asset study), Tree Pittsburgh, Athletic Association, Bike Pittsburgh, Pittsburgh Park Conservancy, and Operation Better Block from 1/1/22 through 12/31/25. Records requested should include requests for contracts or payments, contracts, payments, bid or no-bid documentation, budgets, records related to sub recipients of City of Pittsburgh payments, communications, results and/or supporting documentation of work performed, etc.

SPECIFIC DESCRIPTION OF PREMISES AND/OR PERSON TO BE SEARCHED (Street and No., Apt. No., Vehicle, Safe Deposit Box, etc.):

Social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account number must be established, list only the last four digits. 204 Pa.Code §§ 213.1 - 213.7.

City of Pittsburgh c/o City of Pittsburgh Solicitor
Mayor Corey O'Connor
The City-County Building
414 Grant Street
Pittsburgh, PA 15219

NAME OF OWNER, OCCUPANT OR POSSESSOR OF SAID PREMISES TO BE SEARCHED (If proper name is unknown, give alias and/or description):

City of Pittsburgh c/o City of Pittsburgh Solicitor

VIOLATION OF (Describe conduct or specify statute):

18 P.S. Section 4113(a)

DATE(S) OF VIOLATION:

1/1/2022 - 12/31/2025

☒ **Warrant Application Approved by District Attorney – DA File No.** _____
(If DA approval required per Pa.R.Crim.P. 202(A) with assigned File No. per Pa.R.Crim.P. 507)

☐ **Additional Pages Attached (Other than Affidavit of Probable Cause)**

☒ **Probable Cause Affidavit(s) MUST be attached (unless sealed below) Total number of pages: 10**

TOTAL NUMBER OF PAGES IS SUM OF ALL APPLICATION, PROBABLE CAUSE AND CONTINUATION PAGES EVEN IF ANY OF THE PAGES ARE SEALED

The below named Affiant, being duly sworn (or affirmed) before the Issuing Authority according to law, deposes and says that there is probable cause to believe that certain property is evidence of or the fruit of a crime or is contraband or is unlawfully possessed or is otherwise subject to seizure, and is located at the particular premises or in the possession of the particular person as described above.

 ACDAI

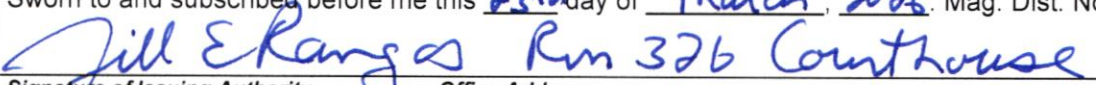
Detective

Signature of Affiant

Agency or Address if Private Affiant

Badge Number

Sworn to and subscribed before me this 23rd day of March, 2026. Mag. Dist. No. _____

 Rm 326 Courthouse (SEAL)

Signature of Issuing Authority

Office Address

SEARCH WARRANT

TO LAW ENFORCEMENT

OFFICER:

WHEREAS, facts have been sworn to or affirmed before me by written affidavit(s) attached hereto from which I have found probable cause, I do authorize you to search the premises or person described, and to seize, secure, inventory and make return according to the Pennsylvania Rules of Criminal Procedure.

☐ This Warrant shall be served as soon as practicable and shall be served only between the hours of 6AM to 10PM but in no event later than: *

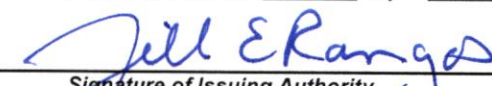
☒ This Warrant shall be served as soon as practicable and may be served any time during the day or night but in no event later than: **
2:00 P M, o'clock March 25, 2026

☐ This Warrant shall be returned to judicial officer _____

* The issuing authority should specify a date not later than two (2) days after issuance. Pa.R.Crim.P. 205(4).

** If the issuing authority finds reasonable cause for issuing a nighttime warrant on the basis of additional reasonable cause set forth in the accompanying affidavit(s) and wishes to issue a nighttime warrant, then this block shall be checked. Pa.R.Crim.P. 206(7).

Issued under my hand this 23rd day of March, 2026 at 2:00 P M, o'clock.

 5th Jud. Dist. 1/1/34 (SEAL)

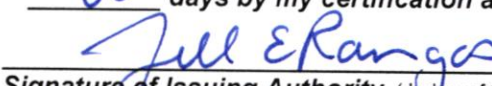
Signature of Issuing Authority

Mag. Dist. or Judicial Dist. No.

Date Commission Expires

Title of Issuing Authority: ☐ Magisterial District Judge ☒ Common Pleas Judge ☐ _____

For good cause stated in the affidavit(s) the Search Warrant Affidavit(s) are sealed for
60 days by my certification and signature. (Pa.R.Crim.P. 211)

 3/23/26 (Date) (SEAL)

Signature of Issuing Authority (Judge of the Court of Common Pleas or Appellate Court Justice or Judge).



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Your Affiant, Kevin P. Flanigan is a Detective with the Allegheny County District Attorney's Office and has been so for the past 18 years. Your Affiant is also a Certified Public Accountant and has assisted in the investigation, detection and prosecution of financial crimes for the Allegheny County District Attorney's Office for four years prior to becoming a Detective and as such has extensive experience in the investigation and prosecution of white-collar crime. The information contained in this affidavit is based on evidence and/or information obtained from participants and eyewitnesses including evidence and/or information obtained, observed and/or documented during this investigation by your Affiant and/or by other investigators directly involved in this investigation and subsequently reviewed by your Affiant and incorporated herein.

On September 1, 2023, and December 8, 2023, your Affiant along with Detective JR Smith and Deputy District Attorney Jon Pittman met with Dan Friedson, attorney for the City of Pittsburgh Council. Friedson was employed by the City of Pittsburgh Council and was looking into possible bid rigging within the City of Pittsburgh. The scope of the bid rigging expands beyond the one contract seen in the media related to a company called Matrix. Friedson's LinkedIn page shows Friedson graduated from the University of Pittsburgh School of Law in 1998, Friedson was involved with Municipal law as early as 1997 while working with Susman, Schermer, Rimmel & Shiffrin. In 2000, Friedson began his own law group and practiced under his law group for over 15 years. In May 2015, Friedson became an Assistant City Solicitor and practiced in this role for four and a half years. Starting in December 2021, Friedson became the solicitor to Pittsburgh City Council until November 2024 when he became the City of Pittsburgh Senior Policy Advisor until January 2026.

Friedson stated the following:

Friedson showed an example of the City of Pittsburgh providing no bid contracts to subcontractors and vendors. It was then explained that these subcontractors and vendors are providing money to organizations like the SEIU (Service Employees International Union) and WF (Working Families Party) and the SEIU and WF provide political support back to the candidates that assist in issuing the no-bid contracts. Examples of the subcontractors and vendors are the Matrix and Stop the Violence groups. The Stop the Violence funding, at that time, came from the Public Safety Budget and a portion of this money was provided to the Poise Foundation. A portion of the City Code, 161.02B, was referred to by Friedson as the "Exemption Buffet".

Friedson explained that the no-bid contracts were assisted by the change in a "Waiver Form" that was used in obtaining no-bid contracts. The waiver form was changed under the Mayor William Peduto Administration but was taken advantage of by the Mayor Gainey Administration. Friedson stated, at that time, Jake Pawlak, Deputy Mayor & Director of the Office of Management and Budget, was the face of the City of Pittsburgh because Mayor Gainey was not around. Pawlak was handling most inquiries related to the City of Pittsburgh and Pawlak would bring in Lisa Frank, Chief Operating and Administrative Officer, if he was being questioned about his decisions and Frank would support Pawlak. Friedson stated that the Controller's Office has requested copies of all contracts and waiver forms submitted. The old waiver forms had a section where the requester could check a box if they attempted to call vendors to obtain bids through a less formal bidding process, but this option was not available on the new form. All waivers used to be provided to the legal department prior to accepting a contract without the bidding process or for not taking the lowest bidder, which was also required under the home rule charter. This was no longer occurring. Friedson, at that time, was not sure if there was a meeting to change the waiver form and if so, when did the change go into effect. Friedson knew that the change to the form did not occur during the Gainey Administration. It appeared to Friedson that the Gainey Administration had successfully taken the Law Department out of the process. After the Law Department's involvement, the OMB should sign off on the contracts, but at that time was only reviewed by Pawlak.

Friedson was having a hard time explaining to council members that just because a document or form stated that something was okay, doesn't mean it was okay and does not need to be questioned or reviewed. Because procedures put in place by the prior administration were being taken advantage of by the Gainey Administration, no-bid contracts



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were being abused in the City of Pittsburgh. Friedson stated that approximately 20% of the city's contracts were no-bid contracts and prior to the Gainey Administration the percentage was less than 10%. Friedson stated that these no-bid contracts were surreptitiously benefiting Mayor Gainey or Pawlak. Not just has the percentage of contracts increased but the cost of these contracts were also larger than in the past. As far as purchasing policies were concerned, OMB sets their own policies and does not have a policy that was written down for them to follow. Council does not scrutinize the expenses and contracts of the City of Pittsburgh and relies on the administration's judgement.

It also appeared to Friedson that the City of Pittsburgh Solicitor under the Gainey Administration was not performing the duties of her office as she should. Krysia Kubiak was the Solicitor and had explained to Friedson that she was okay with the fact that the Gainey Administration was not forwarding contracts to them to review. Kubiak said that the City of Pittsburgh was not covered under the bid rigging laws. Friedson provided your Affiant with an August 28, 2023 email from Kubiak to Friedson and City Council stating, "After review, we don't believe that the state Anti-Bid Rigging Act, 62 Pa. C.S.A. 4501-4509, is pertinent to Bill 2023-1834 or Code Section 161.02B. That is a criminal statute outlawing collusion amongst bidders of competitively bid government contracts. It doesn't contain any obligations for how government entities themselves procure services, be it through competitive bidding or otherwise". Pawlak explained to Friedson multiple times that the no-bid contracts were because of the "sole source" exception. Friedson explained to Pawlak that he does not understand this exception and that it only applies in instances of copyrighted or patented services or under emergencies. Under the example of Matrix, Matrix obtained RFP for every other city in which they were awarded work and in this case an RFP was not issued by the City of Pittsburgh. Pawlak stated to Friedson that Matrix was a sole source provider, which is not true. Friedson explained that the Matrix report told the public the City of Pittsburgh had too many police officers. Friedson stated that, at that time, one hundred police officers left in one day and there was no reason anyone would believe that the city does not need more police officers. The most recent police academy class, at that time, had less than twenty cadets. Matrix was listed as a sole source vendor, but this could not be true because the City of Pittsburgh had other contractors do the same work in the past. It was explained that most of the cities in which this company conducted business was in areas in which the "Defund the Police" movement was growing. A review of a May 31, 2022 letter written from the City of Pittsburgh's Equal Opportunity Review Commission Department to the City of Pittsburgh's Director of Public Safety stated that it found it satisfactory to approve the "Waiver Request" for Matrix because, "They are comprised of highly experienced management consultants, specializing in law enforcement services. Matrix Consulting Group will be dealing with confidential Police data that we would not want shared outside their firm with any sub-contractor, as well as the fact that their work is so specialized". Your Affiant also reviewed City of Pittsburgh Request for Waiver of Competitive Process #WCP22-020 which states, "Matrix Consulting Group is a consultant of the City with regards to police-related litigation, so a public solicitation could potentially result in sensitive information being made public. Additionally, they are the only known company in this space that utilizes city-specific data as part of their reporting and recommendations". Representatives from Matrix stated that they started work in March and the contract was only approved in June or July. Your Affiant reviewed a July 12, 2022 "Professional Service Agreement" between the City of Pittsburgh and the Matrix Consulting Group for \$180,000.00. The final report issued by Matrix was issued very quickly.

Friedson stated that the Working Families organization shares an address with the SEIU. It was also explained that Frank does work for Working Families but was employed with the City of Pittsburgh. Friedson mentioned the organization "10 Weeks Parties for Peace" and Friedson believed that, at the time of these interviews, this organization will invoice the City of Pittsburgh and no bidding process was ever entered. Khari Mosley was running for the City of Pittsburgh District 9 Council spot and was also the owner and operator of "1Hood Media" which was benefiting from no-bid contracts.

The Poise Foundation had received a lot of city money, and it was anticipated that they would continue to receive money from the City of Pittsburgh. Friedson explained that the City of Pittsburgh had not received any documentation regarding grants distributed through subcontracts from the money provided. The Poise Foundation did submit a Request for Proposal as opposed to other no-bid contracts. Your Affiant reviewed a June 8, 2022 "Professional Service Agreement" between the City of Pittsburgh and Poise Foundation for \$2,000,000.00. Exhibit A of this document states,



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"Working closely with the City's Department of Public Safety, POISE Foundation ("POISE") will: (iii) Report results to the Department of Public Safety, City Controller and the Council of the City of Pittsburgh". Eight percent of the Public Safety budget was provided to the Poise Foundation. The Homewood Community Sports Program applied for a \$300,000.00 grant from the Poise Foundation and was turned down. It was believed that the foundation denied the request because the Homewood Community Sports Program was known for trying to create a monopoly in their field. Your Affiant reviewed an application submitted by the Homewood Community Sports organization on or about June 23, 2022 to the City of Pittsburgh STOP the Violence Community Investment Grants with a "Poise Program/Project Budget" for \$500,000.00. This was when the Homewood Community Sports Program then applied for a grant with the City of Pittsburgh. Six to Eight percent of taxes received by the City of Pittsburgh were provided under the Stop the Violence Ordinance. It was believed that 60 percent of this money was to be distributed to the Poise Foundation. No one could apply for the Stop the Violence money through the City of Pittsburgh's website, at the time of these interviews. If someone wanted this money, they needed to request an application through the Poise Foundation. It seemed to Friedson that this was a way to prescreen requests for people they want to provide the money to and ignore those that are not known to members of the foundation. It seemed like you needed to be known by them prior to requesting an application but the process was supposed to be a blind pick by the grantor. Friedson was asked about the donation made from the Poise Foundation to 1Hood Media and he stated that Khari Mosley, owner of 1Hood Media, would not have received this money nor would he have been elected as a councilmember if he did not previously work for Mayor Gainey.

Your Affiant reviewed the 2022 Form 990 for the Poise Foundation and noted over \$10 million in payments from this foundation to multiple organizations including \$275,000.00 to 1Hood Media. The 2024 Form 990 for the Poise Foundation showed \$30,000.00 paid to 1Hood Media, and \$15,000.00 paid to Operation Better Block Inc.

Friedson spoke about the Center that CARES and stated that they had received between \$2,000,000.00 and \$9,000,000.00 from the City of Pittsburgh. Your Affiant reviewed a document provided by Friedson from "Open Book Pittsburgh" that shows the Center that C.A.R.E.S. received \$9,010,417.00 from January 20, 2022 through December 31, 2025. Friedson stated that a company called Four Amigos was receiving the money for the Homewood Community Sports Program. Mubarik Ismaeli, Executive Director of the HCSP, applied for the Stop the Violence money and stated on the application that the grant was "preapproved". The money was received by Araina Graham, a former spouse for Ismaeli. The grant was expected to be \$500,000.00 even though their current year's budget was only \$50,000.00. Your Affiant reviewed the "Youth Sports Agreement" made on June 27, 2022 between the City of Pittsburgh and the Homewood Community Sports organization and noted Exhibit C states that Ismaeli had 15 years of experience working with youth and families and explained that Ismaeli had managed a \$50,000.00 annual budget.

Homewood Community Sports Complex, dba East Side Sports Program in Penn Hills was to receive \$300,000.00 from the City of Pittsburgh and had been listed as a "Sole Source" provider. This meant that they were the only company capable of providing a specific service to the City of Pittsburgh and this was not true. Your Affiant reviewed an email from Pawlak to Friedson on August 3, 2023 explaining that the Homewood Community Sports organization would qualify under 161.02B Exemptions from Competitive Process under category 3(iii) which states, "Single source contracts, defined as: Contracts involving services documented to fall within one (1) of three (3) categories" including "where an item required for the service has design and/or performance features that are essential to the department, including due to compatibility with services or goods currently in use, and no other source satisfies the City's requirements".

Most of the no-bid exemptions had stated that they were sole source providers and "professional services". If the City of Pittsburgh Administration was trying to claim "Single Source" provider for the exemptions, specific documents would be required, and Friedson believed that someone would have had to lie on the documentation submitted. The vendors obtaining these exemptions should not qualify for either sole source or single source.

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No contract can be located regarding the Homewood Community Sports Complex. Grant paperwork related to the money provided by the City of Pittsburgh does not say what the grant was for, but a grant provided by the Heinz Endowment states that money was provided to care for turf and other field-related expenses. Your Affiant reviewed the Grant Agreement provided by the Heinz Endowment to the City of Pittsburgh for the \$2,000,000.00 grant signed by Mayor Gainey on December 12, 2022 which stated the purpose "to support the construction of Homewood Park, an expansion and complete redevelopment of a public park, sports field, pool and fieldhouse/locker rooms in Homewood". Another document showed that this organization provided an after-school program and Friedson believed that this was an issue when multiple documents showed different descriptions of the organization's services or function. It was stated that it would cost \$1,200,000.00 to maintain the sports fields which would include the \$300,000.00 already offered by the City of Pittsburgh. Councilwoman Barb Warwick was trying to get the council to move forward with paying \$300,000.00 but it had not been fully approved at the time of these interviews. At the time of these interviews, the City of Pittsburgh Administration was not receiving and/or providing to anyone, including council, anything explaining why the organization qualified for an exemption under the sole source or single source exemptions. Friedson had not even seen an "Invitation to Qualify" submitted by a vendor to prove a reason for their exemption.

Another organization that received money from the City of Pittsburgh was Operation Better Block. Friedson saw the grant and explained to Council that the wrong box was checked. No one listened to him and eventually someone questioned the error and forced them to correct the form to what Friedson originally stated. This correction finally allowed them to be selected by the grantor.

At the time of these interviews, the City of Pittsburgh had a \$100,000,000.00 hole in its budget but showed that it had a \$3,000,000.00 surplus. The main reason for this was because the City of Pittsburgh was advancing the cost of new vehicles for the Pittsburgh Water and Sewer Authority and the PWSA was responsible for repaying the City of Pittsburgh over time. Friedson had been able to put a hold on the vehicle issue at that time, but this was going to be revisited. Another issue associated with the budget was that certain pay increases for specific unions were not considered when creating the budget. The City of Pittsburgh Gainey Administration had stated that projected Real Estate taxes and Deed Taxes would go up at that time but had no support for this thought process and it was well known that these taxes were going to be dropping.

Friedson explained that these professional services contracts were the Gainey Administration's way of benefiting their friends and supporters and assisting in circumventing the campaign finance laws. Most payments to and from supporters usually were handled by lobbyists and this helped hide payments to supporters.

Friedson explained that what appeared to be happening in the City of Pittsburgh could be explained under the term, Regulatory Capture. (Wikipedia – "Regulatory Capture is a form of corruption of authority that occurs when a political entity, policymaker, or regulator is co-opted to serve the commercial, ideological, or political interests of a minor constituency, such as a particular geographic area, industry, profession, or ideological group.")

On September 19, 2024, your Affiant along with DDA Pittman traveled to meet with Friedson for a prearranged meeting. Friedson stated the following:

Friedson was still the Solicitor for City Council and was an attorney for the Office of Management and Budget for five years. Friedson confirmed that the initial issues which Friedson brought to the Allegheny County District Attorney's Office were still ongoing at the City of Pittsburgh. Friedson first began by discussing a Bond issue. Friedson stated that those in charge of the City of Pittsburgh financials were committing Security and Exchange Commission violations with every bond issuance because they were providing improper financial information. Those in the City of Pittsburgh financial departments were not using Generally Acceptable Accounting Principles or Governmental Accounting Standards Board. The City of Pittsburgh was not providing an itemized budget as required by the Home Rule Charter. Friedson found out that most of the City Council Members had never even read the Home Rule Charter and did not realize this was an issue. Friedson explained that the City of Pittsburgh was overestimating their Real Estate Taxes



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and were including the "Jock Tax" in their calculations for estimated revenues and these were both violations when presenting financials for bond issuances. The Real Estate Taxes were not accounting for the decline in revenues that were known to the City of Pittsburgh. The "Jock Tax" was being included in budgeted revenues but the tax was not itemized and was being hidden for those that would review the City of Pittsburgh's finances. The "Jock Tax" had already been appealed and been ruled by Commonwealth Court as being unallowable. The City of Pittsburgh had filed for the Commonwealth of Pennsylvania's Supreme Court to review the case but since the City of Pittsburgh already lost in Commonwealth Court, they should not have been using this revenue source in their calculations. It was also explained by Friedson that if the Supreme Court finds that the "Jock Tax" was unconstitutional, they must change this tax to a 1% Earned Income Tax payment to the City of Pittsburgh and a 2% Earned Income Tax payment to the City of Pittsburgh School District. Friedson had found that the City of Pittsburgh believes that they do not have to pay money to the City of Pittsburgh School District if they lose and have not been preparing to pay if they lose the case. Your Affiant found in September 2025, the Pennsylvania Supreme Court struck down the "Jock Tax" finding that it violated the Uniformity Clause of the Pennsylvania Constitution.

Friedson explained that the law firm of Clark Hill hired a Certified Public Accountant to certify the numbers that were being used for the bonds. Friedson believed that if asked, the CPA would state that they relied on the management of the City of Pittsburgh that the numbers were correct and this was why they certified the numbers.

Friedson stated that one change that was made since the last interview was that the Law Department was signing off on the no-bid contracts. Friedson stated that the Law Department was signing off on contracts but it was more of a "rubber stamp" because the Law Department would do anything that the Gainey Administration told them to do. The City of Pittsburgh changed their purchasing law/procedures in March 2020 under a bill sponsored by Corey O'Connor under the Mayor Bill Peduto Administration. This change in law removed certain safeguards over the bidding and recording process and Friedson explained that the new procedures were opening the City of Pittsburgh to possible fraudulent activity. The City of Pittsburgh was utilizing open-ended professional contracts. These contracts had been provided to approximately eight vendors and were capped at \$1,000,000.00 per contract but it does not limit this to one contract per vendor. That meant that one vendor could have a contract that reached their limit of \$1,000,000.00 but only needed to obtain a new contract to continue receiving more money. Friedson also explained that there were additional open-ended professional contracts that were capped at \$500,000.00 but these were provided to the same eight vendors. With there being no limit on the number of contracts, a vendor could continue receiving money on these contracts without question. An August 30, 2023 letter prepared by Mayor Gainey directed to Members of Pittsburgh City Council related to Open-Ended Professional Service Contracts stated, "I respectfully recommend that Council reject the adoption of the proposed ordinance for the reasons explained below". This letter continues by stating, "The proposed ordinance would end the City's ability to enter into open-ended service contracts. These contracts are directly linked to the invitation to qualify ("ITQ") and work order processes."

City Council was currently approving contracts without even reading them. The current City Solicitor, Krysia Kubiak, had told City Council that they were not allowed to read any city contract and must just approve them if the Solicitor says they were legal.

Friedson stated that the Cohen Law Group was hired to conduct a telecommunication asset study for approximately \$1,500,000.00 and the City of Pittsburgh had received nothing in return. No reports, at the time of this interview, had ever been provided for this contract. From Dentons Cohen & Grigsby's website, "Cohen & Grigsby, a leading provider of business-critical legal services with more than 140 lawyers" has "developed specialty areas across four broad service sectors to meet client demands - business services, commercial and complex litigation, workforce solutions and private wealth management".

The City of Pittsburgh attempted to utilize money donated by the Heinz Endowment for payments to the Homewood Community Sports organization. Money donated by the Heinz Endowment were earmarked for specific purposes and the Gainey Administration was told that the Heinz Endowment must approve the change in use of their donation. The



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Gainey Administration stated that they do not need to get approval for this. Friedson stated that other actions also taken by the Gainey Administration should be reviewed by your Affiant and DDA Pittman because it appeared as if Gainey used official acts and economic retaliation against people who had spoken out against Gainey.

On or about March 12, 2026, newly elected Mayor Corey O'Connor announced that his administration was re-opening the City of Pittsburgh's 2026 budget to address serious concerns with the accuracy of the budget and the 5-year financial projections. This announcement explained that despite last year's projections that showed the City of Pittsburgh would close 2025 with a small surplus, current indications are that there was an \$8.6 million deficit. It was revealed by the current Administration that certain areas were "underfunded, improperly funded or not funded at all".

On March 19, 2026, your Affiant along with Deputy District Attorney Jon Pittman traveled to the City of Pittsburgh Controller's Office and met with Rachael Heisler, City of Pittsburgh Controller and Namita Dwarakanath, Solicitor for the City of Pittsburgh Controller's Office. Heisler and Dwarakanath stated the following:

Heisler was sworn in as the City of Pittsburgh Controller in 2024 and from 2021 through 2023 was the Deputy Controller under Controller Michael Lamb. Heisler has a background in public finance and policies and has a broad knowledge of the City of Pittsburgh's finances. Heisler explained to your Affiant that the Controller's Office has a lot of "blindness" when it comes to the City of Pittsburgh's finances. The Controller's Office is the last step of the process when it comes to expenses. City of Pittsburgh expenses are not known to the Controller's Office until they are routed to their office.

Heisler explained that her office had concerns last year during the budgeting cycle when it appeared that the 2026 budget was misrepresenting expenses. Dwarakanath was not sure if this misrepresentation was due to differences of opinion to contain costs or if there was another reason for the misrepresentation. Dwarakanath was not aware of any one individual that would be responsible for this misrepresentation.

It was noted that after the snowstorm in January 2026, the fleet was left in bad shape by the prior administration and should have been addressed earlier. Heisler was made aware of a snow preparedness fleet study conducted for the City of Pittsburgh. After the January snowstorm, Heisler requested a copy of this study and no one has been able to find the study for her. Heisler explained that if a study is conducted for a specific department, that department should have received a copy of the study but there are no requirements to share this study with any other agency in the City of Pittsburgh. Heisler believes the snowstorm study should have been provided to the Department of Innovation & Performance. A lot of people in the City of Pittsburgh remember this study being conducted but no one has a copy of the study.

Heisler stated that they have been notified recently that a new police study has been performed in the City of Pittsburgh by a state entity and this study was not conducted by Matrix which was explained by the prior administration as being a sole source provider.

On March 19, 2026, your Affiant along with Deputy District Attorney Jon Pittman spoke with Anthony Coghill, City of Pittsburgh District 4 Councilmember. Coghill stated the following:

A lot of the problems regarding no-bid contracts and the financial irregularities within the City of Pittsburgh revolve around the Stop the Violence money. The City of Pittsburgh provides over \$10 million per year in funding from Stop the Violence and the Gainey Administration knew a lot of the entities that ended up receiving money from the City of Pittsburgh. At one point, there were rumors that Coghill and another councilperson were looking to stop these payments and take back the Stop the Violence money to be used by the City of Pittsburgh. Coghill explained that at the next council meeting, Mayor Ed Gainey filled the room with members from these organizations to argue and protest these changes in the use of this money. Coghill stated that he never expressed to anyone that he wanted to pull funding from these entities and the members from these entities began attempting to intimidate City Council into not touching the funding. Coghill told your Affiant that this council meeting was recorded and could be viewed to see the



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comments that were being made and each member that spoke identified themselves for the records. Coghill explained that it was a dangerous situation that he believed was caused by Mayor Gainey and stated that there were racial accusations being made by members of these organizations towards councilmembers over something that was not even the intention of City Council. Coghill explained that nothing serious ever happened but there were members of City Council that were intimidated by the situation.

Coghill was aware that entities who receive Stop the Violence money would request amounts like \$25,000.00 and be awarded a grant for \$70,000.00. Coghill believed this to be a slush fund for Mayor Gainey. Coghill believes that City Council asked for accountability over these funds. Coghill does not believe anything was received showing the usage of these funds for most of the groups who received money. Within the first year of the Gainey administration utilizing the Stop the Violence money, grants were just being dilled out without any contracts. It appeared to Coghill that until 2026, this money was just being given out to anyone Mayor Gainey's administration wanted to give money to. Coghill stated that it would not be a surprise to anyone that Mayor Gainey and himself did not get along, and Coghill does not believe that any of the Stop the Violence money was provided to organizations in his district.

Coghill does not believe that Kahil Mosley was the owner of 1Hood Media but knows that there is some sort of tie because Mosley recuses himself every time there is a vote related to 1Hood Media. When asked about Jake Pawlak, Deputy Mayor for the City of Pittsburgh, Coghill stated that he was the "de facto" mayor.

Coghill noted the \$40 million deficit that had been highlighted by Mayor Corey O'Connor and explained that there is no accounting for how money was spent by the Mayor Gainey administration. Coghill referred to federal ARPA (American Rescue Plan Act) money and stated that the Gainey administration "squandered" over \$100 million to affordable housing in the City of Pittsburgh when the vehicle fleet was wasting away and needed addressed.

On March 20, 2026, your Affiant contacted Blake Plavchak, Chief of Staff to City Councilmember Anthony Coghill, to discuss previously raised issues with the City of Pittsburgh's prior administration, the current budget deficit, and the use of Stop the Violence money. Plavchak spoke with your Affiant on the phone and traveled to the District Attorney's Office Investigation Unit to speak with your Affiant and Detective Will Minett. Plavchak emailed your Affiant records related to this investigation and stated the following:

Plavchak mentioned that there was one "quarterly report" provided regarding the use of Stop the Violence money but no additional reports were ever provided. Plavchak remembers councilmembers Coghill and Rickey Burgess introduced legislation to tighten up the bidding process.

Plavchak emailed your Affiant a forwarded September 9, 2025 email from Williams to City of Pittsburgh Controller Rachael Heisler. This email included two PDFs were attached with one being a September 8, 2025 email from Controller Heisler to Councilmembers about the Stop the Violence Trust Fund and the other being an April 23, 2025 letter from Controller Heisler to Councilmembers about the Stop the Violence Trust Fund. The email received from Plavchak also referenced 13 links to "Pittsburgh Legistar" including information related to Matrix, Annual Budget, Stop the Violence Trust Fund, the only quarterly report ever received by council, etc.

Plavchak has worked for Councilmember Coghill since August 2018 and was the Chief of Staff since February 2020. Matrix was one of the first issues related to the contract waivers for bidding. Plavchak stated that Matrix did obtain a waiver and it listed Matrix as a sole source provider. Matrix would have been listed as a company being the only one able to provide a specific service, but Plavchak stated that this was "very thin". Plavchak stated that it is hard to believe that Matrix was the only company that could perform a study like the one provided for the City of Pittsburgh.

Plavchak was asked about the Poise Foundation and explained to your Affiant that the Stop the Violence Trust Fund was administered by Poise. Plavchak stated that there were concerns, as mentioned in the previously mentioned September 8, 2025 email from Controller Heisler, that the best community groups were not being selected after



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reviewing each entity. The email explained, "Thirty-nine groups received funding, yet at least three of the top twenty highest-scoring applicants were bypassed while nine of the lowest-scoring were awarded grants". Plavchak understands that any type of evaluation could be slanted to select specific organizations so not selecting all of the top organizations would be understandable, but it does not explain why any of the lowest-scoring organizations would have been picked. Controller Heisler mentions in this email, "This is the third time our office has raised these concerns with Council this year".

Plavchak stated that he has heard of examples when an organization received money in excess of what was requested but stated that this should never happen because everyone would have access to see what was being requested, the organization's annual budget, and what was being voted on. Former Councilmember Theresa Kail-Smith in 2023 introduced legislation that required reporting for Stop the Violence Trust Fund grantees and only one quarterly report was ever provided.

Khari Mosley, principal in 1Hood Media and City of Pittsburgh Councilmember, would recuse himself from votes associated with 1Hood Media. There was a lot of controversy surrounding the City of Pittsburgh Comprehensive Plan because they paid more per person for this plan than what a plan generally costs. This plan was conducted by HR&A Advisors and Public Engagement which would have included consultants like Sasaki and Common Cause. 1Hood Media is a sub consultant under Common Cause which is why Mosley recuses himself from the vote related to the Comprehensive Plan.

Your Affiant began asking about the recently announced \$40 million deficit. Plavchak stated that there was an overreliance on specific revenues like the "Jock Tax" but it was the Gainey administration's position that they did not care the likelihood of success, they are advised to continue filing claims and appeals. At one point, Plavchak heard that the Gainey administration just wanted to push things to the future and stated that it can be "Corey's problem".

Your Affiant reviewed the only quarterly report provided to the City of Pittsburgh Controller's Office, Council, and Mayor's Office from the Department of Public Safety Office of Community Services and Violence Prevention that was prepared on or about May 10, 2023. This 40-page report began by stating, "This is the quarterly report required by the Agreement between the City of Pittsburgh and the POISE Foundation dated June 8, 2022, pursuant to which POISE became the administrator for the City's Stop the Violence Community Investment Grants program". This report explained that the POISE Foundation received \$975,025 on August 9, 2022 for awarding 35 subcontractors (grantees). Western Pennsylvania Youth Sports Association sponsored 10 sports programs. POISE began distributing funds around October 31, 2022 and prior to receiving funds, each subcontractor was required to submit a "goal sheet" for the funds awarded. Your Affiant reviewed the June 8, 2022 contract with POISE and noted a 90-day requirement stating, "POISE staff will work with the Department of Public Safety to provide a summary of the results of the various projects during each funding round".

On March 20, 2026, your Affiant along with DDA Pittman met with Theresa Kail-Smith, former City of Pittsburgh Councilmember, and Kail-Smith stated the following:

When the contract with the Homewood Community Sports organization was repealed, the owner of this organization was questioning why City of Pittsburgh Council was "holding up my money". It was believed that those who aligned themselves with the Gainey administration would get money from the City of Pittsburgh.

To verify proper organizations were receiving money from the City of Pittsburgh, requirements were put in place to ensure organizations that received money should be an active 501(c)(3) who has filed their Form 990s on time and are in good standing. Unfortunately, the Gainey administration told the public the reason these restrictions were being put in place was to prevent the black community from receiving money.

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Khari Mosley, current City of Pittsburgh Councilmember, helped create 1Hood Media, an organization that receives money from the City of Pittsburgh. It has been rumored in the community that money provided to 1Hood Media by the City of Pittsburgh has been used for personal trips and for political purposes. An accounting of money provided from Stop the Violence funds was requested but the source of information does not believe any accounting was provided and if it was provided, it would have been worded to avoid any suspicion by anyone reviewing records.

Your Affiant asked Kail-Smith about some of the community organizations that have been mentioned in this Affidavit. Your Affiant was told that he should not just investigate these no-bid contracts but should also look at other organizations like Tree Pittsburgh, Athletic Association operated by Marty Langford, Bike Pittsburgh, and Pittsburgh Park Conservancy. It was explained that Tree Pittsburgh received millions of dollars and says that they give back information, but Kail-Smith has not seen any documentation on how their money was spent.

It was noted by one or more witnesses that there was a fear of retaliation, political or physical, and your Affiant is requesting this search warrant be sealed. Your Affiant requests that this search warrant be sealed so as to prevent possible targets from identifying cooperating witnesses in this investigation in the event that some form of coercion or retaliation might occur, to prevent potential future witnesses and/or co-conspirators from structuring statements to law enforcement based on the knowledge contained within this affidavit, conduct electronic surveillance, preserve remaining assets, prevent the destruction or creation of documents, and/or otherwise protect the integrity of the investigation.

Your Affiant asserts, under the former Gainey Administration, specific procedures were being exploited to the detriment of the City of Pittsburgh by funding specific organizations without following proper procedures. Your Affiant asserts that the exploited procedures, including the use of no-bid contracts, assisted the City of Pittsburgh into the financial issues of the past including the recently announced 2025 deficit. Your Affiant asserts that the former Gainey Administration was supposed to receive quarterly reports from organizations like the Poise Foundation and did not question when these documents were not received or received these reports and did not share them with City of Pittsburgh Councilmembers. Your Affiant asserts records maintained by the City of Pittsburgh for relationships with Matrix, Poise Foundation, "10 Weeks Parties for Peace", 1Hood Media, Homewood Community Sports Program and/or Complex, Four Amigos, East Side Sports Program, Center that CARES, Cohen Law Group (related to a telecommunication asset study), Tree Pittsburgh, Athletic Association, Bike Pittsburgh, Pittsburgh Park Conservancy, and Operation Better Block are evidence of criminal activity (18 P.S. Section 4113 (a)), and as such are subject to search and seizure. Your Affiant asserts probable cause exists for the issuance of process, namely a search warrant for the herein named records.

I, THE AFFIANT, BEING DULY SWORN ACCORDING TO LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

[Signature]
Affiant Signature

3/23/2026
Date

[Signature]
Issuing Authority Signature

3/23/26
Date

(SEAL)