

Top 10 Administrative Penalties
Approved by the Ethics Commission (1992-present)

| Rank | Case | Violation / Legal Citation* | Penalty | Date Approved |
|------|---|--|--------------|---------------|
| 1 | Evergreen America Corporation <i>Case # 1992-103/3</i> | Excess Contributions (Charter § 312(c)(5)). | \$447,500.00 | 8/23/1993 |
| 2 | Mark Abrams <i>Case # 2003-57 [In Collections]</i> | Excess Aggregate Contributions (Charter § 470(c)(6)). Excess Contributions (Charter §§ 470(c)(3), 470(c)(4), 470(c)(5)). Money Laundering (Charter § 470(k)). | \$270,000.00 | 3/8/2005 |
| 3 | In the Matter of Alexander Hugh, et al. <i>Case # 2010-12</i> | Excess Contributions (Charter §§ 470 (c)(4), 470 (c)(6)). Money Laundering (Charter § 470(k)). | \$183,750.00 | 10/11/2011 |
| 4 | In the Matter of Peter L. Barker <i>Case # 2013-04</i> | Money Laundering (Charter § 470(k)). | \$170,000.00 | 2/14/2013 |
| 5 | In the Matter of Advanced Development and Investment, Inc.; Pacific Housing Diversified, Inc.; Ajit Mithaiwala; and Salim Karimi; et al. <i>Case # 2012-06 [In Collections]</i> | Money Laundering (Charter § 470(k)). | \$165,000.00 | 12/13/2012 |
| 6 | Pierce O'Donnell <i>Case # 2003-56-A</i> | Money Laundering (Charter § 470(k)). | \$147,000.00 | 3/14/2006 |
| 7 | Fermin Cuza <i>Case # 2001-18-B</i> | Excess Aggregate Contributions (Charter § 470(c)(6)). Excess Contributions (Charter §§ 470(c)(3), 470(c)(4)). Money Laundering (Charter § 470(k)). | \$110,000.00 | 12/17/2002 |
| 8 | Sean Anderson and Richard Manhire <i>Case # 2005-03</i> | Money Laundering (Charter 470(k)). | \$108,000.00 | 4/14/2009 |
| 9 | Martin G. Ludlow and Martin Ludlow for City Council <i>Case # 2004-20</i> | Cash Payment of Campaign Expenditure (Charter § 470(g)). Excess Contributions (Charter § 470(c)(3)). | \$105,271.00 | 3/14/2006 |
| 10 | Los Angeles Police Protective League and Los Angeles Protective League and Los Angeles Political Action Committee <i>Case # 2000-24-A</i> | Excess Contributions (Charter § 470(c)(3)). Failure to provide campaign literature (LAMC § 49.7.11(C)). Failure to report independent expenditure (LAMC § 49.7.26). | \$98,898.80 | 5/12/2005 |

* Citations are those that existed on the date the penalty was approved.