

Top 10 Administrative Penalties

Approved by the Ethics Commission (1992-present)

	Penalty	Respondents	Violation	Law*	Case No.	Date Approved
1	\$447,500	Evergreen America Corporation	Excess contributions	Charter § 312(c)(5)	1992-103/3	8/23/1993
2	\$270,000	Mark Abrams	Excess aggregate contributions; excess contributions; money laundering	Charter §§ 470(c)(3), 470(c)(4), 470(c)(5), 470(c)(6), 470(k)	2003-57	3/8/2005
3	\$183,750	Alexander Hugh, et al.	Excess contributions; money laundering	Charter §§ 470(c)(4), 470(c)(6), 470(k)	2010-12	10/11/2011
4	\$170,000	Peter L. Barker	Money laundering	Charter § 470(k)	2013-04	2/14/2013
5	\$165,000	Advanced Development and Investment, Inc.; Pacific Housing Diversified, Inc.; Ajit Mithaiwala; Salim Karimi; et al.	Money laundering	Charter § 470(k)	2012-06	12/13/2012
6	\$147,000	Pierce O'Donnell	Money laundering	Charter § 470(k)	2003-56-A	3/14/2006
7	\$110,000	Fermin Cuza	Excess aggregate contributions; excess contributions; money laundering	Charter §§ 470(c)(3), 470(c)(4), 470(c)(6), 470(k)	2001-18-B	12/17/2002
8	\$108,000	Sean Anderson; Richard Manhire	Money laundering	Charter § 470(k)	2005-03	4/14/2009
9	\$105,271	Martin G. Ludlow; Martin Ludlow for City Council	Excess contributions; cash payment of campaign expenditure	Charter §§ 470(c)(3), 470(g)	2004-20	3/14/2006
10	\$100,000	Refugio Rodriguez; Elizabeth Melendrez	Money laundering and aiding and abetting money laundering	Charter §§ 706, 803(j)	2015-12	7/23/2018

* Citations as of the date the penalty was approved.