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7  
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
9 STATE OF CALIFORNIA

10  
11 In the Matter of:

12 THE HUNTLEY HOTEL,

13 Respondent.

FPPC Case No. 15/246

14 STIPULATION, DECISION AND ORDER

15 INTRODUCTION

16 Respondent the Huntley Hotel (“The Huntley”) is a luxury hotel located in Santa Monica,  
17 California.

18 The Political Reform Act (the “Act”)<sup>1</sup> prohibits contributions made in the name of another. The  
19 Huntley made 62 campaign contributions totaling \$97,350 in the names of other people to various  
20 candidate controlled committees and general purpose committees over the course of two local election  
21 cycles.

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27 <sup>1</sup> The Act is contained in Government Code sections 81000 through 91014. All statutory references are to the  
28 Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in  
Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2,  
Division 6 of the California Code of Regulations, unless otherwise indicated.

1 **SUMMARY OF THE LAW**

2 **Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act**

3 When enacting the Political Reform Act, the people of California found and declared that  
4 previous laws regulating political practices suffered from inadequate enforcement by state and local  
5 authorities.<sup>2</sup> For this reason, the Act is to be construed liberally to accomplish its purposes.<sup>3</sup>

6 One purpose of the Act is to promote transparency by ensuring that receipts and expenditures in  
7 election campaigns are fully and truthfully disclosed so that voters are fully informed and improper  
8 practices are inhibited.<sup>4</sup> Along these lines, the Act includes a comprehensive campaign reporting  
9 system—and the true sources of campaign contributions may not be concealed.<sup>5</sup> Another purpose of the  
10 Act is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”<sup>6</sup>

11 **Prohibition Against Making Contributions in the Name of Another**

12 No campaign contribution may be made in the name of another person.<sup>7</sup> This prohibition helps  
13 keep the public informed as to the actual sources of campaign contributions—and helps to prevent  
14 circumvention of campaign contribution limits. When a person makes a contribution on behalf of  
15 another, that person’s intermediary relationship with the actual contributor must be disclosed to the  
16 recipient of the contribution—and the recipient’s campaign filings must disclose both by the intermediary  
17 and the actual contributor.<sup>8</sup>

18 **SUMMARY OF THE FACTS**

19 The Huntley is located on 2nd Street in Santa Monica, California, directly behind the Fairmont  
20 Miramar Hotel (the “Miramar”). The Huntley is owned and operated by the 2nd Street Corporation.  
21 Sohrab Sassounian (“Sassounian”) is the co-owner of 2nd Street Corporation and is the President/General  
22 Manager of The Huntley Hotel. Manju Raman (“Raman”) has served as The Huntley’s Assistant  
23 General Manager since 1998. In 2012, the Miramar was actively pursuing plans before the Planning  
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25 <sup>2</sup> Section 81001, subdivision (h).

26 <sup>3</sup> Section 81003.

27 <sup>4</sup> Section 81002, subdivision (a).

28 <sup>5</sup> Sections 84200, *et seq.* and 84301.

<sup>6</sup> Section 81002, subdivision (f).

<sup>7</sup> Section 84301.

<sup>8</sup> Section 84302.

1 Commission of Santa Monica that involved a significant expansion and redevelopment of its property,  
2 constructing three new buildings (including a 21-story high-rise tower), adding private condominiums,  
3 affordable housing, and commercial development to the existing hotel facilities, and more than doubling  
4 the Miramar's above grade floor area. As did many other businesses and residents in the immediate  
5 neighborhood and throughout the city, The Huntley took issue with the Miramar's proposed expansion,  
6 primarily due to its adverse impacts on local traffic, its blocking of the sunlight and views of adjacent and  
7 nearby buildings, and the disruption to the quality of life that would be caused by its lengthy construction  
8 timetable.

9 The Huntley had not previously been involved in local land use controversies or governmental  
10 advocacy, so shortly after the Miramar's expansion plans were announced, The Huntley retained a  
11 prominent Los Angeles law firm with extensive land use and government relations experience, Latham &  
12 Watkins, to advise it with respect to opposing the Miramar's proposal before the Santa Monica Planning  
13 Commission and City Council. One of the law firm's initial recommendations was for The Huntley to  
14 select an individual who would serve as a liaison with other interested community members and who  
15 could represent the hotel in helping to organize the community's opposition to the Miramar project and  
16 in communicating with the relevant governmental personnel. The Huntley selected Raman to be its  
17 liaison with the law firm, the city's agencies, and the community, even though she had no previous  
18 experience in performing these functions.

19 Upon the recommendation of the Latham & Watkins attorneys, the Huntley also agreed to hire  
20 Susan Burnside ("Burnside"), a local political consultant, to assist in organizing and coordinating the  
21 community's opposition to the Miramar project, with Raman also serving as The Huntley's liaison to  
22 Burnside, even though Raman had no prior political or campaign experience. Burnside planned to  
23 achieve this objective by organizing and advising a coalition of residents that shared The Huntley's  
24 concerns about the Miramar's expansion, which was called Santa Monicans Against Miramar Expansion  
25 (the "Coalition"). The Coalition met approximately monthly, generally at The Huntley's facilities.

26 In August of 2012, Burnside and two local residents, Ivan Perkins and Susan Scarafia, opened a  
27 political committee named Santa Monicans for Responsible Growth (the "Committee"). The purpose of  
28 the Committee was to provide the Coalition with a vehicle to support candidates in Santa Monica who

1 favored a slow-growth position with respect to development in downtown Santa Monica and who might  
2 be expected to oppose the Miramar's significant expansion proposal. Raman as The Huntley's liaison to  
3 Burnside, was aware of the Committee's activities, but played no active role in its management.

4 Santa Monica holds its regular municipal elections in November of even-numbered years.  
5 According to Raman, sometime in the late Summer or Fall of 2012, The Huntley's attorneys suggested to  
6 Raman that the hotel should try to raise approximately \$10,000 to support two City Council candidates,  
7 Richard McKinnon and Ted Winterer, who were running on a slow-growth platform. The attorneys also  
8 suggested raising a lesser amount, \$5,000, for each of the two incumbent councilmembers who were  
9 running for re-election, Terry O'Day and Glean Davis. The attorneys explained that The Huntley should  
10 collect checks for the campaign contributions from different individuals and present them together to the  
11 candidates. According to Raman, she had not previously made or raised campaign contributions and was  
12 not personally familiar with all of the applicable campaign finance rules and restrictions. Raman  
13 solicited contributions from various individuals, including Sassounian's relatives, friends and associates,  
14 but when she realized that she was falling short of the assigned goals, she asked several hotel employees  
15 and their spouses if they could write checks to the candidates and offered to reimburse them for their  
16 contributions. All the contributions made by The Huntley through these intermediaries were either the  
17 maximum contribution limit in Santa Monica of \$325, or the maximum of \$250 that a person could  
18 contribute to a candidate serving on a planning commission when the person has business before the  
19 planning commission.<sup>9</sup> The Huntley, through Raman, reimbursed these intermediaries for making the  
20 contributions. These contributions were reported on campaign statements filed by the candidates.  
21 However, the individual intermediaries were reported as the contributors, and The Huntley was not  
22 identified as the true source of the contributions. In total, The Huntley reimbursed forty contributions  
23 totaling \$11,650 to the above-named candidates. Each of those contributions is detailed in the chart  
24 below.

25 Around this same time period in September of 2012, The Huntley's attorneys and Burnside  
26 informed Raman that they needed to quickly raise about \$75,000 to \$100,000 for the Committee, which  
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28 <sup>9</sup> § 84308.

1 the Committee planned to use for independent expenditures in the November election. According to  
2 Raman, Burnside and the attorneys suggested that it would be best if the funding could come from a  
3 broader segment of the community, not just from The Huntley, so that it reflected the broader  
4 community's opposition to Miramar's development proposal. Raman contends she did not know whom  
5 she could turn to outside of The Huntley in order to raise that amount of money, and she was not  
6 comfortable asking others for large sums of money. Instead, Raman's immediate reaction was to think of  
7 who, among those who opposed the Miramar's expansion project, might be willing to put their name on a  
8 check and be reimbursed for their contribution by The Huntley. Raman approached Louretta Walker  
9 ("Walker"), a friend and the owner of Body Z Alive, which is located adjacent to The Huntley. Raman  
10 asked Walker to make a \$15,000 campaign contribution in the name of Body Z Alive to the Committee  
11 with the understanding that The Huntley would give her the money to make the contribution. In order to  
12 secure payment from The Huntley, Raman helped to prepare three invoices in the name of Body Z Alive  
13 for \$5,000 each. The invoices to The Huntley were dated for September 16, 2012, September 17, 2012,  
14 and September 18, 2012 and were described as for meditation services, even though no services were  
15 actually provided. On October 16, 2012, The Huntley issued three checks of \$5,000 apiece to Walker,  
16 and on that same date, Walker wrote a check for \$15,000 to the Committee. Walker's contribution was  
17 reported on campaign statements filed by the Committee with Body Z Alive reported as the contributor.  
18 The Huntley was not identified as the true source of the \$15,000 contribution.

19 In October of 2012, Raman approached Nimish Patel ("Patel"), a friend and long-time business  
20 counsel for The Huntley, to ask if Patel's firm, Richardson Patel, could make a \$10,000 campaign  
21 contribution to the Committee in the name of Richardson Patel with the understanding that The Huntley  
22 would give it the money to make the contribution. On October 15, 2012, Richardson Patel invoiced The  
23 Huntley \$20,000, of which \$10,000 was for the firm's monthly retainer and the additional \$10,000 was to  
24 constitute payment for the contribution. On October 16, 2012, The Huntley issued a check for \$10,000 to  
25 Richardson Patel for the contribution to the Committee. On October 18, 2012, Doug Gold, Chief  
26 Financial Officer of the law firm, wrote a check for \$10,000 to the Committee. Gold wrote the check  
27 from a checking account belonging to Pure Pilates, a business owned by Gold's wife, Amanda Gold. On  
28 October 19, 2012, Richardson Patel wire transferred \$10,000 to Pure Pilates with the description reading,

1 “expense reimbursement.” The \$10,000 contribution was reported on campaign statements filed by the  
2 Committee with Pure Pilates reported as the contributor. The Huntley was not identified as the true  
3 source of the \$10,000 contribution, nor was Richardson Patel identified as an intermediary. Neither  
4 Raman nor anyone else at The Huntley was aware at the time how Richardson Patel intended to make the  
5 contribution to the Committee.

6         Around the same time Raman secured the contributions from Body Z Alive and Richardson Patel,  
7 Raman also asked Chris Sennings (“Sennings”), a friend and the owner of Playground Consulting, The  
8 Huntley’s long-time Information Technology consultant, to make a campaign contribution of \$50,000 to  
9 the Committee with the understanding that The Huntley would give Sennings the money to make the  
10 contribution. Sennings sent four invoices to The Huntley for a total of \$50,025 worth of work he did not  
11 perform. On October 12, 2012, The Huntley issued a check to Playground Consulting for \$50,025. On  
12 that same date, Sennings signed a check for \$25,000 on behalf of Playground Consulting to the  
13 Committee. On October 24, 2012, Sennings signed a second \$25,000 check on behalf of Playground  
14 Consulting to the Committee. The Committee reported receiving the contributions from Sennings with  
15 Playground Consulting as the contributor for both contributions. The Huntley was not identified as the  
16 true source of the two contributions totaling \$50,000.

17         The Huntley’s contributions to the Committee were used to make expenditures in support of  
18 Richard McKinnon’s and Ted Winterer’s bids for the Santa Monica City Council. Burnside as the  
19 political consultant for the Committee designed four mailers to support these candidates. On the semi-  
20 annual campaign statement covering the reporting period of October 21, 2012 – December 31, 2012, the  
21 Committee reported making approximately \$71,875 in expenditures in support of Winterer and  
22 McKinnon. In 2013, The Huntley also contributed \$23,927.36 to Committee in its own name, effectively  
23 paying off the Committee’s debt from the 2012 election.

24         In total in 2012, The Huntley made 44 contributions that totaled \$86,650 in the names of others  
25 rather than its own name.

26         The Huntley was also involved in making campaign contributions in the name of another during  
27 the 2014 election cycle. The largest such contribution again went through Body Z Alive. Raman asked  
28 Walker if she would make a \$5,000 contribution to the Santa Monica Coalition for a Livable City

1 (“SMCLC”), explaining that The Huntley would give her the money to make the contribution. On  
 2 September 19, 2014, Walker invoiced The Huntley for \$5,000 for services that she did not perform. On  
 3 October 16, 2014, The Huntley wrote a check to Body Z Alive for \$5,000, and on October 21, 2014,  
 4 Walker wrote a check from Body Z Alive’s checking account to SMCLC for \$5,000. SMCLC reported  
 5 Body Z Alive as the contributor. The Huntley was not identified as the true source of the \$5,000  
 6 contribution.

7 In 2015, Raman was asked if she and the Huntley could raise \$10,000 to help pay down the  
 8 campaign debt of Richard McKinnon, who had run unsuccessfully for election to the Santa Monica City  
 9 Council in 2014. According to Raman, as before, she raised what she could from others, but when she  
 10 fell short of her goal, she once again offered to reimburse various hotel employees and friends for their  
 11 contributions. Those 16 contributions, totaling \$5,200, are detailed in the chart below. McKinnon’s  
 12 committee reported the intermediaries as the contributors. The Huntley was not identified as the true  
 13 source of these contributions.

14 **VIOLATIONS**

15 **Counts 1- 62**

16 Counts 1 – 62: Making a Contribution in the Name of Another

17 The Huntley made the following contributions in the names of other persons in violation of  
 18 Government Code section 84301:

COUNT	NAME	DATE CHECK RECEIVED BY RECIPIENT	AMOUNT	RECIPIENT
1	Rochelli Fernandez (Silver)	9/16/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
2	Michelle Sennings	9/18/2012	\$325.00	Gleam Davis for City Council 2012
3	Diane Nomura	9/18/2012	\$325.00	Gleam Davis for City Council 2012
4	Rochelli Fernandez (Silver)	9/18/2012	\$325.00	Gleam Davis for City Council 2012
5	Manju Raman	9/18/2012	\$325.00	Gleam Davis for City Council 2012
6	Elisa A. Dadian	9/18/2012	\$325.00	Gleam Davis for City Council 2012
7	Mandana Amini	9/18/2012	\$325.00	Gleam Davis for City Council 2012
8	Helal El-Sherif	9/18/2012	\$325.00	Gleam Davis for City

				Council 2012
9	Diane Nomura	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
10	Douglas F. Ewer	9/23/2012	\$325.00	Gleam Davis for City Council 2015
11	Douglas F. Ewer	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
12	Manju Raman	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
13	Elisa A. Dadian	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
14	Jessica E. Perahia,	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
15	Mandana Amini	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
16	Helal El-Sherif	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
17	Michelle Sennings	9/23/2012	\$325.00	Re-Elect City Councilmember Terry O'Day 2012
18	Jessica E. Perahia,	9/24/2012	\$325.00	Gleam Davis for City Council 2012
19	David Cohen	10/12/2012	\$250.00	McKinnon for City Council 2012
20	Body Z Alive, Attn Louretta Walker	10/18/2012	\$15,000.00	Santa Monicans for Responsible Growth
21	Adriana Moreno	10/19/2012	\$250.00	McKinnon for City Council 2012
22	Michelle Sennings	10/19/2012	\$325.00	McKinnon for City Council 2012
23	Rochelli Fernandez (Silver)	10/19/2012	\$250.00	McKinnon for City Council 2012
24	Elisa A. Dadian	10/19/2012	\$250.00	McKinnon for City Council 2012
25	Rodney Prechel	10/19/2012	\$250.00	McKinnon for City Council 2012
26	Playground Consulting, Inc.	10/19/2012	\$25,000.00	Santa Monicans for Responsible Growth
27	Manju Raman	10/19/2012	\$250.00	McKinnon for City Council 2012
28	Dillon M Silver DBA Silver Ent	10/19/2012	\$325.00	McKinnon for City Council 2012
29	Helal M. El-Sherif	10/19/2012	\$250.00	McKinnon for City Council 2012
30	Adrian Perez	10/19/2012	\$250.00	McKinnon for City Council 2012



1	31	Elizabeth Sanchez	10/23/2012	\$250.00	McKinnon for City Council 2012
2	32	Richardson & Patel	10/24/2012	\$10,000.00	Santa Monicans for Responsible Growth
3	33	Michelle Sennings	10/25/2012	\$325.00	Ted Winterer for City Council 2012
4	34	David Cohen	10/25/2012	\$250.00	Ted Winterer for City Council 2012
5	35	Rochelli Fernandez (Silver)	10/25/2012	\$250.00	Ted Winterer for City Council 2012
6	36	Elisa A. Dadian	10/25/2012	\$250.00	Ted Winterer for City Council 2012
7	37	Rodney Prechel	10/25/2012	\$250.00	Ted Winterer for City Council 2012
8	38	Manju Raman	10/25/2012	\$250.00	Ted Winterer for City Council 2012
9	39	Dillon M Silver DBA Silver Ent	10/25/2012	\$325.00	Ted Winterer for City Council 2012
10	40	Helal M. El-Sherif	10/25/2012	\$250.00	Ted Winterer for City Council 2012
11	41	Adrian Perez	10/27/2012	\$250.00	Ted Winterer for City Council 2012
12	42	Elizabeth Sanchez	10/29/2012	\$250.00	Ted Winterer for City Council 2012
13	43	Adriana Moreno	10/30/2012	\$250.00	Ted Winterer for City Council 2012
14	44	Playground Consulting, Inc.	11/5/2012	\$25,000.00	Santa Monicans for Responsible Growth
15	45	Manju Raman	6/29/2013	\$500.00	Santa Monicans for Renters' Rights
16	46	Body Z Alive, Attn Loretta Walker	10/21/2014	\$5,000.00	SMCLC – PAC
17	47	Marschinda Felix	11/18/2015	\$325.00	McKinnon for City Council 2014
18	48	Linda Jane Miller	11/23/2015	\$325.00	McKinnon for City Council 2014
19	49	Elisa A. Dadian	11/23/2015	\$325.00	McKinnon for City Council 2014
20	50	Elizabeth Sanchez	11/23/2015	\$325.00	McKinnon for City Council 2014
21	51	Manju Raman	11/23/2015	\$325.00	McKinnon for City Council 2014
22	52	Francisco Carbaial	11/23/2015	\$325.00	McKinnon for City Council 2014
23	53	Guillermo R De La Torre	11/23/2015	\$325.00	McKinnon for City Council 2014
24	54	Donald W. Eehalt	11/23/2015	\$325.00	McKinnon for City Council 2014
25	55	Akemi S. Nakamoto	11/23/2015	\$325.00	McKinnon for City Council 2014
26	56	Jason Zucker	11/23/2015	\$325.00	McKinnon for City Council 2014
27	57	Diane Nomura	11/23/2015	\$325.00	McKinnon for City Council 2014
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58	Shemaa Masry	11/23/2015	\$325.00	McKinnon for City Council 2014
59	Asa Nomura, Allan C. Nomura	11/23/2015	\$325.00	McKinnon for City Council 2014
60	Staci Nakamoto	11/24/2015	\$325.00	McKinnon for City Council 2014
61	Rochelli Silver, Dillon Silver	11/25/2015	\$325.00	McKinnon for City Council 2014
62	David Cohen	12/23/2015	\$325.00	McKinnon for City Council 2014
		<b>TOTAL:</b>	\$97,350	

### PROPOSED PENALTY

This matter consists of 62 counts. The maximum penalty that may be imposed is \$5,000 per count. Thus, the maximum penalty that may be imposed is \$310,000.<sup>10</sup>

In determining the appropriate penalty for a particular violation of the Act, the Commission considers the facts of the case, the public harm involved, and the purposes of the Act. Also, the Commission considers factors such as: (a) the seriousness of the violation; (b) the presence or absence of any intention to conceal, deceive or mislead; (c) whether the violation was deliberate, negligent or inadvertent; (d) whether the violation was isolated or part of a pattern; (e) whether corrective amendments voluntarily were filed to provide full disclosure; and (f) whether the violator has a prior record of violations.<sup>11</sup> Additionally, the Commission considers penalties in prior cases with comparable violations.

Making a campaign contribution in the name of another is one of the most serious violations of the Act. It deceives the public as to the true source of contributions, and as occurred with certain of the contributions in this case, it allows for the circumvention of local contribution limits. Recent stipulations show that the Commission views these types of cases as warranting the maximum penalty of \$5,000 per count. For example:

□ In the Matter of AB&I Foundry, A Division of McWane, Inc., FPPC Case No. 15/74 (approved on July 21, 2016), the Commission imposed a penalty of \$100,000 against AB&I Foundry for laundering 37 contributions through employees and their spouses, totaling \$23,900 from 2012 - 2014. For purposes

<sup>10</sup> See Section 83116, subdivision (c).

<sup>11</sup> Regulation 18361.5, subdivision (d).

1 of settlement and in consideration of mitigating factors, only 20 counts were charged. One of the  
2 mitigating circumstances in this case was that AB&I Foundry cooperated with the Enforcement Division.  
3 This included an immediate admission that the violations occurred – and the disclosure of other  
4 violations that were not yet discovered. Additionally, the respondents did not have a history of violating  
5 the Act.

6 □ In the Matter of Moo Han Bae, FPPC Case No. 13/203 (approved on Aug. 20, 2015), the  
7 Commission imposed a penalty of \$45,000 against Moo Han Bae for laundering nine contributions that  
8 totaled \$10,550. The respondent in this case initially refused to cooperate with the investigation and there  
9 was evidence that the respondent was intimidating witnesses and pressured them to lie about the facts.

10 In the current case, The Huntley cooperated with the Enforcement Division after retaining  
11 counsel, has conducted its own internal review of the events, and has admitted that the violations  
12 occurred, while disclosing other violations that were not yet discovered. Respondent also has no history  
13 of any prior violations of the Act. Moreover, Raman — who was responsible for making the  
14 reimbursements at issue — contends she had no prior involvement with political campaigns or  
15 fundraising and insists that she did not appreciate the illegality of the reimbursements. While she is now  
16 aware of the law and accepts full responsibility for her prior actions, Raman contends that neither the  
17 attorneys nor the political consultant she worked with had suggested that she was doing anything illegal  
18 at the time, and that her own attorneys participated in one of the reimbursements without objection,  
19 leading her to believe that her actions in reimbursing others' contributions were not unlawful or  
20 inappropriate.

21 In other respects, however, there are fewer mitigating circumstances in the current case. The  
22 violations in this case were part of a pattern that took place over two election cycles from 2012 through  
23 2015. The contributions reimbursed by The Huntley concealed the full extent of The Huntley's financial  
24 support for the Committee and created an impression that the Committee enjoyed broader financial  
25 support. In addition, the number of reimbursements and the amount of money involved is greater here  
26 than in each of these prior cases.

27 Based on the totality of the circumstances in this matter, the mitigating factors in *AB&I Foundry*  
28 that justified the consolidation of some counts are overcome by the other circumstances present in this

1 case so that a maximum fine for each count is justified to deter this type of conduct in the future. For the  
2 foregoing reasons, a penalty in the amount of \$5,000 per count is recommended for Counts 1 through 62  
3 — for a total administrative penalty in the amount of \$310,000.

#### 4 **CONCLUSION**

5 Complainant, the Enforcement Division of the Fair Political Practices Commission, and  
6 Respondent The Huntley hereby agree as follows:

7 1. Respondent violated the Act as described in the foregoing pages, which are a true and  
8 accurate summary of the facts in this matter.

9 2. This stipulation will be submitted for consideration by the Fair Political Practices  
10 Commission at its next regularly scheduled meeting—or as soon thereafter as the matter may be heard.

11 3. This stipulation resolves all factual and legal issues raised in this matter—for the purpose  
12 of reaching a final disposition without the necessity of holding an administrative hearing to determine the  
13 liability of Respondent pursuant to Section 83116.

14 4. Respondent understands, and hereby knowingly and voluntarily waives, any and all  
15 procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9.  
16 This includes, but is not limited to the right to appear personally at any administrative hearing held in this  
17 matter, to be represented by an attorney at Respondent’s own expense, to confront and cross-examine all  
18 witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an impartial  
19 administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially  
20 reviewed.

21 5. Respondent agrees to the issuance of the decision and order set forth below. Also,  
22 Respondent agrees to the Commission imposing against it an administrative penalty in the amount of  
23 \$310,000. One or more cashier’s checks or money orders totaling said amount—to be paid to the  
24 General Fund of the State of California—is/are submitted with this stipulation as full payment of the  
25 administrative penalty described above, and same shall be held by the State of California until the  
26 Commission issues its decision and order regarding this matter.

27 6. If the Commission refuses to approve this stipulation—then this stipulation shall become  
28 null and void, and within fifteen business days after the Commission meeting at which the stipulation is

1 rejected, all payments tendered by Respondent in connection with this stipulation shall be reimbursed to  
2 Respondent. If this stipulation is not approved by the Commission, and if a full evidentiary hearing  
3 before the Commission becomes necessary, neither any member of the Commission, nor the Executive  
4 Director, shall be disqualified because of prior consideration of this Stipulation.

5 7. The parties to this agreement may execute their respective signature pages separately. A  
6 copy of any party's executed signature page including a hardcopy of a signature page transmitted via fax  
7 or as a PDF email attachment is as effective and binding as the original.

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9 Dated: \_\_\_\_\_

10 Galena West, Chief of Enforcement  
11 Fair Political Practices Commission

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15 Dated: \_\_\_\_\_

16 Manju Raman, Assistant General Manager, on behalf of  
17 Respondent The Huntley Hotel.

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1           The foregoing stipulation of the parties “In the Matter of The Huntley Hotel,” FPPC Case No.  
2 15/246 is hereby accepted as the final decision and order of the Fair Political Practices Commission,  
3 effective upon execution below by the Chair.

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5           IT IS SO ORDERED.

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7 Dated: \_\_\_\_\_

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8           Joann Remke, Chair

9           Fair Political Practices Commission

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