

1 STACEY FULHORST, Executive Director  
2 City of San Diego Ethics Commission  
3 1010 Second Avenue, Suite 1530  
4 San Diego, CA 92101  
5 Telephone: (619) 533-3476  
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7 Petitioner

8 **BEFORE THE CITY OF SAN DIEGO**  
9 **ETHICS COMMISSION**

10 In re the Matter of: ) Case No.: 2013-26 (MZ)  
11 )  
12 MARIA LUISA ZARATE LAJUD, ) **STIPULATION, DECISION, AND**  
13 ) **ORDER**  
14 )  
15 Respondent. )  
16 )  
17 )

18 **STIPULATION**

19 **THE PARTIES STIPULATE AS FOLLOWS:**

20 1. Petitioner Stacey Fulhorst is the Executive Director of the City of San Diego Ethics  
21 Commission [Ethics Commission]. The Ethics Commission is charged with a duty to administer,  
22 implement, and enforce local governmental ethics laws contained in the San Diego Municipal  
23 Code [SDMC] relating to, among other things, the provisions of the City's Election Campaign  
24 Control Ordinance [ECCO].

25 2. At all times mentioned herein, Maria Luisa Zarate Lajud was self-employed as an  
26 interior designer and worked part-time as the personal assistant to Marc Chase [Chase], the owner  
27 of Symbolic Motor Car Company, a luxury automobile dealership doing business in La Jolla,  
28 California. Ms. Zarate is referred to herein as "Respondent."

3. This Stipulation will be submitted for consideration by the Ethics Commission at its  
next scheduled meeting, and the agreements contained herein are contingent upon the approval of  
the Stipulation and the accompanying Decision and Order by the Ethics Commission.



1           9.       In order to prevent circumvention of the \$500 contribution limit, ECCO prohibits  
2 any person from making a contribution on behalf of another, or while acting as an intermediary or  
3 agent of another, without disclosing to the recipient the true source of the funds. SDMC §  
4 27.2944. Requiring the identity of the true source making a contribution serves to ensure that no  
5 one contributes more than \$500 to a candidate. Making a contribution on behalf of another  
6 without the requisite disclosure is commonly known as money laundering, and is prohibited by  
7 ECCO because it deprives the public of important information concerning the identity of  
8 campaign donors.

9           10.      In December of 2011, Chase asked Respondent to contribute \$500 to the Bonnie  
10 Dumanis for Mayor 2012 committee [Dumanis Mayoral Committee] with the understanding that  
11 Respondent would be reimbursed in full for the contribution from funds Chase had received from  
12 Jose Susumo Azano Matsura [Azano], a customer of Symbolic Motor Car Company. Respondent  
13 agreed to this arrangement. Respondent then wrote a \$500 check to the Dumanis Mayoral  
14 Committee, and, in exchange, Chase gave Respondent \$500 in cash. Neither Respondent nor  
15 Chase informed the Dumanis Mayoral Committee that the source of the \$500 contribution was  
16 anyone other than Respondent. The Dumanis Mayoral Committee filed a campaign disclosure  
17 statement reflecting receipt of a \$500 contribution from Respondent on December 29, 2011.

18           11.      As described above, Azano was the source of the \$500 cash that Chase gave to  
19 Respondent. Consequently, at the time Respondent made her \$500 contribution to the Dumanis  
20 Mayoral Committee, Azano was the true source of the contribution, and Respondent was acting as  
21 an intermediary for Azano, a fact that was not disclosed to the Dumanis Mayoral Committee.  
22 Additionally, by failing to disclose that she was not the true source of the \$500 contribution,  
23 Respondent (and a series of other straw donors) enabled Azano to make contributions to the  
24 Dumanis Mayoral Committee far in excess of the City's contribution limit.

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1 Counts

2 Count 1 - Violation of SDMC section 27.2944

3 12. Respondent violated SDMC section 27.2944 when she made a \$500 contribution to  
4 the Dumanis Mayoral Committee on behalf of someone else without disclosing that she was not  
5 the true source of the funds.

6 Factors in Mitigation

7 13. Respondent cooperated with the Ethics Commission’s investigation.

8 Conclusion

9 14. Respondent agrees to take necessary and prudent precautions to ensure compliance  
10 with all provisions of ECCO in the future.

11 15. Respondent acknowledges that the Ethics Commission may impose increased fines  
12 in connection with any future violations of the City’s campaign laws.

13 16. Respondent agrees to pay a fine in the amount of \$5,000 for violating SDMC section  
14 27.2944. This amount must be paid no later than July 3, 2014, by check or money order made  
15 payable to the City Treasurer. The submitted payment will be held pending Commission approval  
16 of this Stipulation and execution of the Decision and Order portion set forth below.

17 [REDACTED]

18 DATED: \_\_\_\_\_

19 \_\_\_\_\_  
20 STACEY FULHORST, Executive Director  
ETHICS COMMISSION, Petitioner

21 [REDACTED]

22 DATED: \_\_\_\_\_

23 \_\_\_\_\_  
24 MARIA LUISA ZARATE LAJUD, Respondent

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1 **DECISION AND ORDER**

2 The Ethics Commission considered the above Stipulation at its meeting on July 10,  
3 2014. The Ethics Commission hereby approves the Stipulation and orders that, in accordance  
4 with the Stipulation, Respondent pay a fine in the amount of \$5,000.

5  
6 [REDACTED]

7 DATED: \_\_\_\_\_

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9 JOHN C. O'NEILL, Chair  
10 SAN DIEGO ETHICS COMMISSION  
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