



**MEMORANDUM**

**To:** Chair Remke, Commissioners Casher, Eskovitz, Wasserman, and Wynne

**From:** Gary S. Winuk, Chief of Enforcement  
Adam Silver, Commission Counsel

**Subject:** In the Matter of Archway Property Services, LLC, and Andrew Hawkins Cohen;  
(Fair Political Practices Commission Case No. 11/1056)

**Date:** February 5, 2015

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This matter is submitted for informational purposes only. No action is required by the Commission.

On October 16, 2014, the Fair Political Practices Commission (“Commission”) approved agenda item number 3, *In the Matter of Archway Property Services, LLC, and Andrew Hawkins Cohen*; FPPC Case No. 11/1056, imposing a penalty in the amount of \$40,000 for eight counts of campaign money laundering. Attached hereto as Exhibit A is a copy of the Commission’s Default, Decision and Order.

In this matter, Respondents Archway Property Services, LLC (“Respondent Archway”) and Andrew Hawkins Cohen (“Respondent Cohen”) directed seven of their contractors to make eight separate \$500 contributions to 2011 San Francisco Mayoral Candidates Edwin M. Lee and Phil Ting. The contractors were later reimbursed by Respondents for their contributions. The amounts laundered to Candidates Lee and Ting totaled \$3,500 and \$500, respectively. All contributions provided to Candidate Lee at Respondents’ direction were reimbursed on or about October 31, 2011 – approximately two weeks after they were received. The contribution provided to Candidate Ting at Respondents’ direction was not reimbursed.

Following the Commission’s approval of the foregoing Default, Decision and Order, the Enforcement Division contacted Candidate Ting to request that his 2011 campaign turn over the laundered funds to the General Fund of the State of California, pursuant to Government Code section 85701. On December 18, 2014, the Enforcement Division received full payment from Candidate Ting for the \$500 laundered contribution that had not been reimbursed by Candidate Ting’s 2011 campaign.

As required by law, the funds provided by Candidate Ting will be turned over to the General Fund of the State of California in connection with the complete resolution of this matter.

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