1	STACEY FULHORST, Executive Director		
2	1 1010 Second Avenue, Suite 1330		
3	San Diego, CA 92101 Telephone: (619) 533-3476		
4	Facsimile: (619) 533-3448		
5	Petitioner		
6			
7	BEFORE THE CITY OF SAN DIEGO		
8	ETHICS COMMISSION		
9			
10	In re the Matter of:) Case Nos.: 2011-71	
11	BERTHA ALICIA GONZALEZ,) STIPULATION, DECISION, AND ORDER	
12	Respondent.) ORDER)	
13))	
14	STIPULATION		
15	THE PARTIES STIPULATE AS FOLLOWS:		
16	Petitioner Stacey Fulhorst is the Executive Director of the City of San Diego Ethics		
17	Commission [Ethics Commission]. The Ethics Commission is charged with a duty to administer		
18	implement, and enforce local governmental ethics laws contained in the San Diego Municipal		
19	Code [SDMC] relating to, among other things, the filing of Statements of Economic Interests		
20	[SEIs] as required by the City's Ethics Ordinance.		
21	2. At all times mentioned herein, Bertha Alicia Gonzalez was a member of the San		
22	Ysidro Redevelopment Project Area Committee. Gonzalez is referred to herein as		
23	"Respondent."		
24	3. This Stipulation will be submitted	ed for consideration by the Ethics Commission at its	
25	next scheduled meeting, and the agreements contained herein are contingent upon the approval		
26	of the Stipulation and the accompanying Decision and Order by the Ethics Commission.		
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28	111		

STIPULATION, DECISION, AND ORDER

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- 4. This Stipulation resolves all factual and legal issues raised in this matter by the Ethics Commission without the necessity of holding an administrative hearing to determine Respondent's liability.
- 5. Respondent understands and knowingly and voluntarily waives any and all procedural rights under the SDMC, including, but not limited to, a determination of probable cause, the issuance and receipt of an administrative complaint, the right to appear personally in any administrative hearing held in this matter, the right to confront and cross-examine witnesses testifying at the hearing, the right to subpoena witnesses to testify at the hearing, and the right to have the Ethics Commission or a volunteer hearing officer hear this matter. Respondent agrees to hold the City of San Diego harmless from any and all claims or damages resulting from the Commission's investigation or this stipulated agreement, or any matter reasonably related thereto. Respondent further agrees that the terms of this Stipulation constitute compliance with the provisions of SDMC section 26.0450 in that the Stipulation includes a recitation of facts, a reference to each violation, and an order.
- 6. The Respondent acknowledges that this Stipulation is not binding upon any other law enforcement or government agency and does not preclude the Ethics Commission from cooperating with or assisting any other law enforcement or government agency with regard to this or any other related matter.
- 7. The parties agree that in the event the Ethics Commission refuses to accept this Stipulation, it shall become null and void. Respondent further agrees that in the event the Ethics Commission rejects the Stipulation and a full evidentiary hearing before the City Ethics Commission becomes necessary, no member of the Ethics Commission or its staff shall be disqualified because of prior consideration of this Stipulation.

Summary of Law and Facts

8. As a member of the San Ysidro Redevelopment Project Area Committee, Respondent is a "Local Code Filer" as that term is defined by SDMC section 27.3503, and is required to file SEIs in the time and manner set forth in SDMC section 27.3510.

1	<u>Conclusion</u>	
2	14. Respondent agrees to pay a fine in the amount of \$200 for violating SDMC	
3	section 27.3510. This amount must be paid by check or money order made payable to the City	
4	Treasurer no later than March 30, 2012. Respondent acknowledges that if the fine is not timely	
5	paid in full, the Commission may refer the collection of the fine to the City Treasurer's	
6	Collection Division, which may pursue any or all available legal remedies to recover late	
7	penalties, interest, and costs, in addition to seeking the outstanding balance owed.	
8		
9	DATED:	
10	STACEY FULHORST, Executive Director ETHICS COMMISSION, Petitioner	
11		
12	DATED:BERTHA ALICIA GONZALEZ, Respondent	
13		
14	DECISION AND ORDER	
15	The Ethics Commission considered the above Stipulation at its meeting on,	
16	2012. The Ethics Commission hereby approves the Stipulation and orders that, in accordance	
17	with the Stipulation, Respondent pay a fine in the amount of \$200.	
18	with the Supulation, Respondent pay a line in the amount of \$200.	
19	DATED:	
20	Clyde Fuller, Chair	
21	SAN DIEGO ETHICS COMMISSION	
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