



FAIR POLITICAL PRACTICES COMMISSION

128 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

March 26, 2013

Greg Krikorian
Greg Krikorian for State Assembly 2012

REDACTED

Pam Corradi, Assistant Treasurer
Greg Krikorian for State Assembly 2012

REDACTED

RE: Warning Letter
FPPC File No. 12/410; Greg Krikorian, Candidate and Treasurer; Greg Krikorian for State Assembly 2012; and Pam Corradi, Assistant Treasurer

Dear Mr. Krikorian and Ms. Corradi:

The Fair Political Practices Commission ("FPPC") enforces the provisions of the Political Reform Act ("Act"),¹ found in Government Code section 81000, et seq. This letter is in response to a sworn complaint filed against you and your committee that alleged you violated the campaign filing provisions of the Act. We are closing this matter with a warning letter.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you and your committee failed to file 90-Day Election Cycle Reports, Form 497, within 24 hours of when your campaign received contributions of \$1,000 or more during the 90-day election cycle reporting period.

The Act requires that candidates and their committees file 90-Day Election Cycle Reports within 24 hours, when the committee triggers electronic filing and receives a contribution of \$1,000 or more. (Section 85309(a).) A committee triggers the electronic filing threshold when contributions received or expenditures made total \$25,000 or more. (Section 84605.)

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the 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.

Your actions violated the Act because you failed to file the 90-Day Election Cycle Reports within 24 hours of receiving contributions of \$1,000 or more after you triggered the electronic filing requirement. However, because the contributions were reported on your committee's pre-election statement prior to the election, and the 90-day reports were filed upon contact from the Enforcement Division, we are closing this matter with a warning letter.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an FPPC case resolution without administrative prosecution or fine. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Fair Political Practices Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the FPPC's website ten (10) days from the date of this letter.

The FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms, amendments or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact Teri Rindahl at (916) 327-2018, with any questions you may have regarding this letter.

Sincerely,

REDACTED

Gary S. Winuk
Chief, Enforcement Division

GSW/tr

Cc: Angela Amirkhanian
Daniel Chesler