



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
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October 1, 2010

Mr. Chahe Keuroghelian
Chahe Keuroghelian for Assembly 2010

REDACTED

**Warning Letter Re: FPPC No. 10/472, Chahe Keuroghelian for Assembly 2010;
Chahe Keuroghelian, Respondent(s)**

Dear Mr. Keuroghelian:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act"),¹ found in Government Code section 81000, et seq. This letter is as a result of a pro-active investigation begun against you by the FPPC concerning your failure to disclose donor information on your campaign disclosure statements.

The FPPC has completed its investigation of the facts in this case. Specifically, the FPPC found that you failed to report the street address, or employer and occupation information, or both the street address and employer and occupation information, for contributions reported on your pre-election and your semi-annual campaign statements filed in connection with the April 13, 2010 Special Election.

Specifically the Act provides that for every person who contributes a cumulative amount of \$100 or more, a campaign statement must disclose the person's full name, street address, and occupation and employer, or if self employed, the name of the business. (Section 84211(f).)

Your actions violated the Act because the following contributions are lacking either the street address or the occupation and employer for a contributor, or in some instances lacking both the street address and occupation and employer information:

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 18109 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.

<u>Received</u>	<u>Name of Contributor</u>	<u>Amount of Contribution</u>
February 28, 2010	Liana Serobian	\$200
March 11, 2010	Sahag K. Ketefian	\$150
March 12, 2010	Justin Welch	\$500
April 4, 2010	Zaruhi Tekelyan	\$300
April 4, 2010	Anni Vass	\$100
April 4, 2010	Aram Asatryan	\$100
April 4, 2010	Anahit Nalbandian	\$100
April 15, 2010	Tigran Kazarian	\$100

Since the total amounts of these contributions represent a relatively small amount of the overall contributions you received during this period, we are closing our file on this matter.

However, your campaign statements must be amended to correct the omissions described above. The amendments must be filed with the Office of the Secretary of State, as well as with the Los Angeles County Registrar-Recorder.

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.

Please feel free to contact me with any questions you may have regarding this letter.

Sincerely,

REDACTED 

 Gary S. Winuk, Chief
Enforcement Division

GSW/jt