



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

November 17, 2022

[REDACTED]
Seda Khachaturian, individually and
O/B/O Glendale Coalition for Better Government; FPPC 2017-00379

RE: Warning Letter
FPPC Case No. 2017/00379; In the Matter of Glendale Coalition for Better Government and
Seda Khachaturian

Dear Seda Khachaturian:

As you know, the Enforcement Division of the California Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to our investigation concerning a complaint in connection with the above referenced case, in which Glendale Coalition for Better Government (the “Coalition”) was named as a respondent, alleging the Coalition qualified as a committee and failed to properly file campaign statements as a multipurpose organization (MPO) and violated campaign disclosure provisions of the Act. The Enforcement Division found that the Coalition was required to file as a recipient committee. As such, the Coalition failed to timely file three semi-annual campaign statements and two preelection campaign statements. The Enforcement Division entered into a tolling agreement in this matter, effectively tolling the statute of limitations for the filings named in this warning letter. The Enforcement Division has decided to close the above referenced case in connection with allegations through 2019 with this Warning Letter.

An MPO is an organization, association, or group of persons acting in concert, that is operating for purposes other than making contributions or expenditures.² An MPO may qualify as a recipient committee if, among other things, it makes contributions totaling more than \$50,000 in a period of 12 months or more than \$100,000 in a period of four consecutive calendar years, unless it makes contributions with nondonor funds, which are investment income or income earned from providing goods, services, or facilities, whether related or unrelated to the MPO’s program, sale of assets, or other receipts that are not donations.³ Such MPO recipient committees must comply with the registration and reporting requirements of the Act as would any other recipient committee.⁴

Our investigation determined that the Coalition became a recipient committee under the Act. The Enforcement Division verified with records obtained during the investigation that the Coalition

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of Title 2 of the California Code of Regulations.

² Section 84222, subdivision (a).

³ Section 84222, subdivision (c)(5)(B).

⁴ Section 84222, subdivision (e)(1).

used donor funds to make political expenditures. The investigation determined the Coalition failed to timely file semi-annual campaign statements for the periods ending June 30, 2016; December 31, 2016; and June 30, 2017. Further, the Coalition failed to timely file pre-election campaign statements for the periods ending February 18, 2017 and March 18, 2017. However, the Enforcement Division has decided to close this case, as to these violations, with this warning letter because our investigation determined that the Coalition filed as an independent expenditure committee disclosing some of the required activity prior to the relevant elections, has now filed as a recipient committee, has filed the required campaign statements, and has no prior history of violating the Act.

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 Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide the Foundation with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If the Foundation wish to avail itself of these proceedings by requesting that this 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 Enforcement Division 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 Commission's website ten (10) days from the date of this letter.

Should you have any questions regarding this letter, please feel free to contact me at (916) 324-8787 or bcastillo@fppc.ca.gov.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division

cc: Maro Yacoubian @ maroyacoubian@aol.com