



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

November 29, 2022

David Cruise Chechakli
[REDACTED]

Warning Letter: FPPC No. 2018-00247; David Cruise Chechakli

Dear David Cruise Chechakli:

The Enforcement Division of the Fair Political Practices Commission (“Commission”) enforces the provisions of the Political Reform Act (the “Act”)¹ and has limited jurisdiction under Government Code Section 1090 *et seq.* (“Section 1090”).² This letter is in response to an anonymous complaint received by the Enforcement Division alleging you violated Section 1090 by influencing contracts regarding San Francisco Fleet Week Association (“Association”) while working as a Program Manager 1 with the Office of Emergency Services (“OES”) at the same time as providing consulting work to the Association and violated the Statement of Economic Interests (“SEI”) disclosure requirements. The Enforcement Division did not find a violation of Section 1090, as discussed below. However, the Enforcement Division found that as a result of your position as a Program Manager 1 for the Office of Emergency Services, you failed to timely file your 2017 Annual and Leaving Office SEIs.

After a full investigation, the Enforcement Division found insufficient evidence that you participated in or influenced any contract between the OES and the Association, in your capacity as a Program Manager 1 with OES. As such, the Enforcement Division has determined there is insufficient evidence of a Section 1090 violation and we are closing this matter without further action regarding the Section 1090 allegation. Regarding this determination, for purposes of Section 1090, we are required to advise you that this “decision applies only to proceedings brought by the Commission.”³

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individuals who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.⁴ Individuals required to file SEIs must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.⁵

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² All further statutory references are to the Government Code unless otherwise indicated.

³ Section 1097.1, subdivision (d).

⁴ Section 87302, subd. (b).

⁵ Section 87302, subd. (b).

The Enforcement Division found that your actions violated the Act by failing to timely file your 2017 Annual and Leaving Office SEIs by the specified deadlines. But since you had a low level of experience, the public harm was minimal, you are no longer in office and have not had a prior violation of this section, the Enforcement Division has decided to close your case with this warning letter rather than a fine.

This letter serves as a written warning for your late-filed 2017 Annual and Leaving Office SEIs. 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.

Although the Enforcement Division is closing this case without seeking a penalty, you are still required to file all outstanding SEIs and pay any late filing fees assessed by your filing officer. Please contact your filing officer, the Office of Emergency Services, for further information about your required filings. Any future non-filings may result in monetary penalties and this warning letter may be considered in any future enforcement actions.

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 you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the 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 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.

If you have any questions regarding this letter, please contact Bridgette Castillo at (916)324-8787 or Bcastillo@fppc.ca.gov.

Sincerely,

Bridgette Castillo

Bridgette Castillo
Senior Commission Counsel
Enforcement Division