



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

July 21, 2023

Sent via Email: contact@3nlaw.com

Edvard Nazaryan
Nickens & Nazaryan, Inc
O/B/O David Gutierrez

RE: Closure Letter: FPPC Case No. 2019/00967; In the Matter of David Gutierrez

Dear Edvard Nazaryan:

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 case concerning a sworn complaint regarding your client, David Gutierrez, alleging conflicts of interests when overseeing oil and gas permits in the position of the Assistant Director of the Department of Conservation’s Division of Oil, Gas and Geothermal Resources at a time Gutierrez owned stock in Exxon Mobile and Magellan Midstream Partners.

The Enforcement Division investigation found no evidence that Gutierrez made, participated in or oversaw the approval of oil and gas permits. The investigation found insufficient evidence that there was a violation of the Act. As such, the Enforcement Division has decided to close this matter without further action.

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

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.