



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811

April 22, 2024

Krikorian for City Clerk 2022
Greg Krikorian, Candidate
Yvette Davis, Treasurer

Sent via email: krik@businesslife.com

Warning Letter: FPPC No. 2022-00563 Krikorian for City Clerk 2022, Greg Krikorian

Dear Respondents,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ This letter is in response to two complaints regarding a video posted to the Armenian Media Group of American TV Facebook page, which featured Greg Krikorian hosting a weekly program. The complaints alleged the video violates the Act's advertisement disclosure requirements and alleged your candidate controlled committee, Krikorian for City Clerk 2022 ("the Committee"), "is clearly using the facility of the GUSD Board Room (he is a current board member) to film advertisements." The misuse of public funds is not within the jurisdiction of the Fair Political Practices Commission; therefore it was not investigated. However, an investigation was opened to determine if the Committee violated the Act's advertisement disclosure requirements with regard to the video. The Enforcement Division has determined that the Committee failed to include the words "Ad paid for by" on a video advertisement the Committee disseminated prior to the November 8, 2022 General Election.

The Act requires video advertisements disseminated by candidate-controlled committees to include the words "Ad paid for by" and the name of the Committee as it appears on the most recent statement of organization.² The Committee violated the Act by failing to include the words "Ad paid for by" on the video shown on the Armenian Media Group of American TV show hosted by Greg Krikorian. The Enforcement Division has determined that mitigating circumstances are present here. The Committee's video included the words "Paid for by" instead of "Ad paid for by," the advertisement was reported timely on the appropriate campaign statement, the candidate was unsuccessful, and all respondents have no prior history of violating this section of the Act.

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 18104 through 18998 of Title 2 of the California Code of Regulations.

² Sections 84502 and 84504.4, subd. (b).

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. Although the Enforcement Division is closing this case without seeking a penalty, the Committee is still required to pay any late filing fees assessed by the filing officer. Please contact the Committee's filing officer for further information about 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 yourselves 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.

If you have any questions regarding this letter, please contact me at (279) 237-5932 or MCorona@fppc.ca.gov.

Sincerely,

Marissa Corona

Marissa Corona
Commission Counsel
Enforcement Division