

1 ANGELA J. BRERETON
Chief of Enforcement
2 THERESA GILBERTSON
Senior Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 323-6421
5 Email: tgilbertson@fppc.ca.gov

6 Attorneys for Complainant

7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

9
10 STATE OF CALIFORNIA

11 In the Matter of

12
13 ARMENIAN NATIONAL COMMITTEE
POLITICAL ACTION COMMITTEE
14 ANCPAC and VIKEN K. PAKRADOUNI,

15 Respondents.
16

) FPPC No.: 2018-01139
)
)

) DEFAULT DECISION AND
) ORDER

) (Government Code Sections 11506
) and 11520)
)

17
18 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
19 submits this Default Decision and Order for consideration by the Fair Political Practices Commission at
20 its next regularly scheduled meeting.

21 Pursuant to the California Administrative Procedure Act,¹ Armenian National Committee
22 Political Action Committee ANCPAC (the “Committee”) and Viken K. Pakradouni (“Pakradouni”) have
23 been served with all of the documents necessary to conduct an administrative hearing regarding the
24 above-captioned matter, including the following:

- 25 1. An Order Finding Probable Cause;
26 2. An Accusation;
27 3. A Notice of Defense (Two Copies per Respondent);

28 ¹ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code.


1 4. A Statement to Respondent; and

2 5. Copies of Sections 11506, 11507.5, 11507.6 and 11507.7 of the Government Code.

3 Government Code Section 11506 provides that failure of a respondent to file a Notice of Defense
4 within fifteen days after being served with an Accusation shall constitute a waiver of respondent's right
5 to a hearing on the merits of the Accusation. The Statement to Respondent, served on the Committee and
6 Pakradouni, stated that a Notice of Defense must be filed in order to request a hearing. The Committee
7 and Pakradouni failed to file a Notice of Defense within fifteen days of being served with an Accusation.
8 Government Code Section 11520 provides that, if the respondent fails to file a Notice of Defense, the
9 Commission may take action, by way of a default, based upon the respondent's express admissions or
10 upon other evidence, and that affidavits may be used as evidence without any notice to the respondent.

11 The Committee and Pakradouni violated the Political Reform Act as described in Exhibit 1, which
12 is attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and
13 accurate summary of the law and evidence in this matter. This Default Decision and Order is submitted
14 to the Commission to obtain a final disposition of this matter.

15
16 Dated: 2/24/2021



Angela J. Breerton, Chief of Enforcement
Fair Political Practices Commission

17
18
19
20 **ORDER**

21 The Commission issues this Default Decision and Order and imposes a total administrative
22 penalty of \$9,400 upon Armenian National Committee Political Action Committee ANCPAC and Viken
23 K. Pakradouni, payable to the "General Fund of the State of California."

24 IT IS SO ORDERED, effective upon execution below by the Chair of the Fair Political Practices
25 Commission at Sacramento, California.

26
27 Dated: _____

Richard C. Miadich, Chair
Fair Political Practices Commission

EXHIBIT 1

INTRODUCTION

Respondent Armenian National Committee Political Action Committee ANCPAC (the “Committee”) is a state general purpose committee. Respondent Viken K. Pakradouni (“Pakradouni”) is the Committee’s current treasurer.

The Political Reform Act (the “Act”)¹ requires a general purpose committee to timely file semi-annual campaign statements and pay \$50 annual fees to the Secretary of State (the “SOS”).

This matter arose out of filing officer referrals filed by the SOS with the Fair Political Practices Commission’s (the “Commission”) Enforcement Division.

As a general purpose committee and its treasurer, the Committee and Pakradouni failed to timely file three semi-annual campaign statements and failed to timely pay the \$50 annual fees to the SOS for 2015 and 2019.

DEFAULT PROCEEDINGS UNDER THE ADMINISTRATIVE PROCEDURE ACT

When the Commission determines that there is probable cause for believing that the Act has been violated, it may hold a hearing to determine if a violation has occurred.² Notice of the hearing, and the hearing itself, must be conducted in accordance with the Administrative Procedure Act (the “APA”).³ A hearing to determine whether the Act has been violated is initiated by the filing of an accusation, which shall be a concise written statement of the charges, specifying the statutes and rules which the respondent is alleged to have violated.⁴

Included among the rights afforded a respondent under the APA, is the right to file the Notice of Defense with the Commission within 15 days after service of the accusation, by which the respondent may (1) request a hearing; (2) object to the accusation on the ground it does not state acts or omissions upon which the agency may proceed; (3) object to the form of the accusation on the ground that it is so indefinite or certain that the respondent cannot identify the transaction or prepare a defense; (4) admit the accusation in whole or in part; (5) present new matter by way of a defense; or (6) object to the accusation on the ground that, under the circumstances,

¹ The 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 (“Commission”) are contained in Sections 18110 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.

² Section 83116.

³ The California Administrative Procedure Act, which governs administrative adjudications, is contained in Sections 11370 through 11529 of the Government Code; Section 83116.

⁴ Section 11503.

compliance with a Commission regulation would result in a material violation of another department's regulation affecting substantive rights.⁵

The APA provides that a respondent's failure to file a Notice of Defense within 15 days after service of an accusation constitutes a waiver of the respondent's right to a hearing.⁶ Moreover, when a respondent fails to file a Notice of Defense, the Commission may take action based on the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to the respondent.⁷

PROCEDURAL REQUIREMENTS AND HISTORY

A. Initiation of the Administrative Action

The service of the probable cause hearing notice, as required by Section 83115.5, upon the person alleged to have violated starts the administrative action.⁸

A finding of probable cause may not be made by the Commission unless the person alleged to have violated the Act is 1) notified of the violation by service of process or registered mail with return receipt requested; 2) provided with a summary of the evidence; and 3) informed of his or her right to be present in person and represented by counsel at any proceeding of the Commission held for the purpose of considering whether probable cause exists for believing the person violated the Act.⁹ Additionally, the required notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office.¹⁰

No administrative action pursuant to Chapter 3 of the Act alleging a violation of any of the provisions of the Act may be commenced more than five years after the date on which the violation occurred.¹¹

Documents supporting the procedural history are included in the attached Certification of Records ("Certification") filed herewith at Exhibit 1, A-1 through A-20, and incorporated herein by reference.

In accordance with Sections 83115.5 and 91000.5, the Enforcement Division initiated the administrative action against the Committee and Pakradouni in this matter by serving them with a Report in Support of a Finding of Probable Cause (the "Report") (Certification, Exhibit A-1) by certified mail.¹² The Committee and Pakradouni were served with the Report on July 29, 2019.

⁵ Section 11506, subd. (a)(1)–(6).

⁶ Section 11506, subd. (c).

⁷ Section 11520, subd. (a).

⁸ Section 91000.5, subd. (a).

⁹ Section 83115.5.

¹⁰ Section 83115.5.

¹¹ Section 91000.5.

¹² Section 83115.5.

(Certification, Exhibit A-2.) The administrative action commenced on July 29, 2019, and the five-year statute of limitations was effectively tolled on this date.

As required by Section 83115.5, the packet served on the Committee and Pakradouni contained a cover letter and a memorandum describing probable cause proceedings, advising that the Committee and Pakradouni had 21 days in which to request a probable cause conference and/or to file a written response to the Report. (Certification, Exhibit A-3.) The Committee and Pakradouni did not request a probable cause conference or submit a written response to the Report.

B. Ex Parte Request for a Finding of Probable Cause

Because the Committee and Pakradouni failed to request a probable cause conference or submit a written response to the Report by the statutory deadline, the Enforcement Division submitted an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served to the Hearing Officer of the Commission on August 20, 2019. (Certification, Exhibit A-4.)

On August 21, 2019, the Hearing Officer, Legal Division, issued a Finding of Probable Cause and an Order to Prepare and Serve an Accusation on the Committee and Pakradouni. (Certification, Exhibit A-5.)

C. The Issuance and Service of the Accusation

Under the Act, if the Hearing Officer makes a finding of probable cause, the Enforcement Division must prepare an accusation pursuant to Section 11503 of the APA, and have it served on the persons who are the subject of the probable cause finding.¹³

Section 11503 states:

A hearing to determine whether a right, authority, license, or privilege should be revoked, suspended, limited, or conditioned shall be initiated by filing an accusation or District Statement of Reduction in Force. The accusation or District Statement of Reduction in Force shall be a written statement of charges that shall set forth in ordinary and concise language the acts or omissions with which the respondent is charged, to the end that the respondent will be able to prepare his or her defense. It shall specify the statutes and rules that the respondent is alleged to have violated, but shall not consist merely of charges phrased in the language of those statutes and rules. The accusation or District Statement of Reduction in Force shall be verified unless made by a public officer acting in his or her official capacity or by an employee of the agency before which the proceeding is to be held. The verification may be on information and belief.

¹³ Regulation 18361.4, subd. (e).

Upon the filing of the accusation, the agency must 1) serve a copy thereof on the respondent as provided in Section 11505, subdivision (c); 2) include a post card or other form entitled Notice of Defense that, when signed by or on behalf of the respondent and returned to the agency, will acknowledge service of the accusation and constitute a notice of defense under Section 11506; 3) include (i) a statement that respondent may request a hearing by filing a notice of defense as provided in Section 11506 within 15 days after service upon the respondent of the accusation, and that failure to do so will constitute a waiver of the respondent's right to a hearing, and (ii) copies of Sections 11507.5, 11507.6, and 11507.7.¹⁴ The APA also sets forth the language required in the accompanying statement to the respondent.¹⁵

The Accusation and accompanying information may be sent to the respondent by any means selected by the agency, but no order adversely affecting the rights of the respondent may be made by the agency in any case unless the respondent has been served personally or by registered mail as set forth in the APA.¹⁶

On July 24, 2020, the Commission's Chief of Enforcement, Galena West, issued an Accusation against the Committee and Pakradouni. (Certification, Exhibit A-6.) In accordance with Section 11505, the Accusation and accompanying information, consisting of a Statement to Respondent, two copies of a Notice of Defense Form for each respondent, copies of Government Code Sections 11506, 11507.5, 11507.6, and 11507.7, were served upon the Committee and Pakradouni by personal service on July 31, 2020. (Certification, Exhibit A-7.)

Along with the Accusation, the Enforcement Division served the Committee and Pakradouni with a "Statement to Respondent," which notified them that they could request a hearing on the merits and warned that, unless a Notice of Defense was filed within 15 days of service of the Accusation, they would be deemed to have waived the right to a hearing. (Certification, Exhibit A-8.) The Committee and Pakradouni did not file a Notice of Defense within the statutory time period, which ended on August 15, 2020.

As a result, on January 4, 2021, the Enforcement Division sent a letter to the Committee and Pakradouni advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for March 18, 2021. (Certification, Exhibit A-19.)

On February 25, 2021, the Enforcement Division sent another letter to the Committee and Pakradouni advising that this matter would be submitted for a Default Decision and Order at the Commission's public meeting scheduled for March 18, 2021. (Certification, Exhibit A-20.) A copy of the Default Decision and Order, and this accompanying Exhibit 1 with attachments, was included with the letter.

¹⁴ Section 11505, subd. (a).

¹⁵ Section 11505, subd. (b).

¹⁶ Section 11505, subd. (c).

SUMMARY OF THE LAW

The Act and its regulations are amended from time to time. The violations in this case occurred between 2015 and 2019. For this reason, all legal references and discussions of law pertain to the Act's provisions as they existed at that time.

An express purpose of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring all committees to disclose all contributions received and expenditures made throughout a campaign.¹⁷ Along these lines, the Act includes a comprehensive campaign reporting system.¹⁸

In 2010, a "committee" included any person or combination of persons who received contributions totaling \$1,000 or more in a calendar year, commonly known as a "recipient committee."¹⁹ A general purpose committee is a committee which is formed or exists primarily to support or oppose more than one candidate or ballot measure.²⁰ A state general purpose committee includes a committee formed to support or oppose candidates and measures voted on in a state election or in more than one county.²¹

The Act requires a general purpose committee to file two semi-annual campaign statements each year no later than July 31 for the period ending June 30 and no later than January 31 for the period ending December 31.²² A general purpose committee that cumulatively receives contributions or makes expenditures totaling \$25,000 or more to support or oppose candidates for any elective state office or state measure is required to file campaign statements online or electronically with the SOS.²³ Once a person or entity is required to file online or electronically, the person or entity is required to file all subsequent reports online or electronically.²⁴ Persons filing online or electronically are also required to continue to file statements and reports in paper format.²⁵

Under the Act, each committee required to file a statement of organization must pay the SOS a \$50 annual fee by January 15 each year until the committee is terminated.²⁶ A committee that fails to timely pay the \$50 annual fee is subject to a penalty equal to three times the amount of the fee. The Commission is required to enforce this provision of the Act.²⁷

¹⁷ Section 81002, subd. (a).

¹⁸ Section 84200, *et seq.*

¹⁹ Section 82013, subd. (a).

²⁰ Section 82027.5, subd. (a).

²¹ Section 82027.5, subd. (b).

²² Section 84200, subd. (a).

²³ Section 84605, subd. (a)(2).

²⁴ Section 84605, subd. (d).

²⁵ Section 84605, subd. (f).

²⁶ Section 84101.5, subd. (b) and (c).

²⁷ Section 84101.5, subd. (d).

SUMMARY OF THE EVIDENCE

The Committee filed an initial statement of organization with the SOS on February 17, 2010 and indicated that it had not yet qualified as a recipient committee. (Certification, Exhibit A-9.) On October 6, 2011, the Committee filed an amended statement of organization and indicated that it had qualified as a recipient committee on November 19, 1981.²⁸ (Certification, Exhibit A-10.) Pakradouni became the treasurer in 2014, according to an amended statement of organization filed with the SOS on or around June 18, 2014. (Certification, Exhibit A-11.)

As reported on the Committee's first semi-annual campaign statement for the reporting period of January 1, 2010 through June 30, 2010, the Committee qualified as a recipient committee on or about February 17, 2010, when it received contributions totaling \$1,000 or more. (Certification, Exhibit A-12.) During the reporting period of July 1, 2010 through October 16, 2010, the Committee reported receiving \$26,850 in contributions and making \$27,100 in expenditures, including \$25,900 in expenditures supporting a candidate for an elective state office. (Certification, Exhibit A-13.) Therefore, the Committee and Pakradouni are required to file campaign statements online or electronically and in paper format.

On August 24, 2017, the Committee and Pakradouni filed a semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017 and reported an ending cash balance of \$4,162.52. (Certification, Exhibit A-14.) Since the Committee has not been terminated, the Committee and Pakradouni were required to file semi-annual campaign statements for the reporting periods of July 1, 2017 through December 31, 2017; January 1, 2018 through June 30, 2018; and July 1, 2018 through December 31, 2018.

The SOS contacted the Committee and Pakradouni at least eleven times via U.S. Mail between February 16, 2018 and August 14, 2019, regarding the delinquent campaign statements. (Certification, Exhibit A-15.) After the Committee and Pakradouni failed to file the required statements, the SOS referred these matters to the Enforcement Division in 2018 and 2019. As of February 24, 2021, the Committee and Pakradouni failed to file the semi-annual campaign statements for the reporting periods of July 1, 2017 through December 31, 2018. In addition, the Committee and Pakradouni have failed to file any campaign statements or terminate the Committee.

The Committee and Pakradouni timely paid the \$50 annual fees for 2016, 2017, and 2018. The Committee and Pakradouni were required to pay the \$50 annual fee for 2015 by January 15, 2015, and the \$50 annual for 2019 by January 15, 2019, as well as the associated \$150 penalties. The SOS sent the Committee and Pakradouni a notice regarding the required payment of the \$50 annual fee for 2015 on November 20, 2014. (Certification, Exhibit A-16.) After the Committee and Pakradouni failed to pay the 2015 annual fee, the SOS referred the matter to the Enforcement Division. The Enforcement Division identified that the Committee and Pakradouni also failed to timely pay the \$50 annual fee for 2019 and the associated \$150 penalty. The SOS sent the

²⁸ No additional information is available from the Secretary of State regarding the Committee's activity prior to the statements filed in 2010.

Committee and Pakradouni a notice regarding the required payment on December 3, 2018. (Certification, Exhibit A-16.) The Committee and Pakradouni failed to pay the \$50 annual fees for 2015 and 2019 as well as the associated \$150 penalties.

On October 24, 2018, the Enforcement Division contacted the Committee and Pakradouni via U.S. Mail regarding the required semi-annual campaign statements for the reporting periods ending on December 31, 2017, and June 30, 2018, and the \$50 annual fee for 2015. (Certification, Exhibit A-17.) Between October 24, 2018 and November 16, 2018, the Enforcement Division also contacted the Committee and Pakradouni at least three times via email. On November 2, 2018, Pakradouni asserted that he would file the delinquent campaign statements by November 15, 2018. On May 9, 2019, Pakradouni contacted the Enforcement Division via phone regarding his filing obligations. On May 9, 2019; June 18, 2019; and June 25, 2019, the Enforcement Division contacted Pakradouni via email regarding the outstanding campaign statements. On July 2, 2019, Pakradouni asserted that he would file the delinquent campaign statements on July 3, 2019.

According to a statement made by Pakradouni to Enforcement staff, Pakradouni has not had access to Committee assets since taking over as the treasurer in 2014. Any funds belonging to the Committee are presently being held by the State Controller's Office ("SCO") as Unclaimed Property. Pakradouni stated he was in the process of reclaiming the funds. As part of an investigation, the Enforcement Division subpoenaed records from SCO. According to records from SCO regarding the unclaimed property, the property was entrusted to SCO at various times in 2015. A remittance of approximately \$2,332 and a remittance of approximately \$3,042 was received by SCO on September 3, 2015. According to the supporting records provided by SCO, these funds were originally funds held in a bank account, owned by Armenian National Committee PAC. The funds were surrendered by the bank to SCO as part of a lawsuit. A remittance of \$428 was received by SCO on June 13, 2017. According to the supporting records, this property was a cashier's check from Bank of America owned by Armenian National Committee PAC (Certification, Exhibit A-18.)

The Enforcement Division reviewed all Statements of Organization on file with the Secretary of State. The Committee failed to disclose the financial institution in which the committee's funds were on deposit. As the records from SCO indicated that the Committee may have done business with Bank of America, the Enforcement Division sought records regarding any funds held with Bank of America. The Enforcement Division requested all bank records held in the name, Armenian National Committee Political Action Committee ANCPAC for the period of January 1, 2012 through December 31, 2015. In a response, the bank asserted that there were no records for the timeframe specified. (Certification, Exhibit A-18.)

Summary of Contact

Overall, the Enforcement Division contacted the Committee and Pakradouni approximately twenty-one times throughout this case, as follows:

- October 24, 2018: letter and email from the Enforcement Division

- November 2, 2018: email from the Enforcement Division
- November 16, 2018: email from the Enforcement Division
- May 9, 2019: email from the Enforcement Division
- June 18, 2019: email from the Enforcement Division
- June 25, 2019: email from the Enforcement Division
- July 29, 2019: Report in Support of Probable Cause served on the Committee and Pakradouni
- August 20, 2019: copy of Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served mailed to the Committee and Pakradouni
- November 1, 2019: email from the Enforcement Division
- December 18, 2019: email from the Enforcement Division
- January 16, 2020: voicemail message from the Enforcement Division
- January 16, 2020: telephone call between the Enforcement Division and Pakradouni
- January 16, 2020: email from the Enforcement Division
- February 3, 2020: email from the Enforcement Division
- February 4, 2020: telephone call from the Enforcement Division
- February 5, 2020: voicemail message from the Enforcement Division
- February 6, 2020: email from the Enforcement Division
- July 31, 2020: Accusation served on the Committee and Pakradouni
- January 4, 2021: letter to the Committee and Pakradouni informing them the Default Decision and Order would appear on the agenda for the February 18, 2021 Commission meeting as a notice item, and would be presented at the March 18, 2021 meeting for Commission action
- February 25, 2021: Notice of Intent to Enter Default Decision and Order to the Committee and Pakradouni informing them that the Default Decision and Order would be presented at the March 18, 2021 meeting for Commission action

VIOLATIONS

The Committee and Pakradouni committed five violations of the Act as follows:

COUNT 1

Failure to Timely File a Semi-Annual Campaign Statement by January 31, 2018

The Committee and Pakradouni had a duty to timely file a semi-annual campaign statement on paper and electronically for the reporting period of July 1, 2017 through December 31, 2017, due on January 31, 2018. By failing to file the semi-annual campaign statement on paper and electronically by January 31, 2018, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

COUNT 2

Failure to Timely File a Semi-Annual Campaign Statement by July 31, 2018

The Committee and Pakradouni had a duty to timely file a semi-annual campaign statement on paper and electronically for the reporting period of January 1, 2018 through June 30, 2018, due on July 31, 2018. By failing to file the semi-annual campaign statement on paper and electronically by July 31, 2018, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

COUNT 3

Failure to Timely File a Semi-Annual Campaign Statement by January 31, 2019

The Committee and Pakradouni had a duty to timely file a semi-annual campaign statement on paper and electronically for the reporting period of July 1, 2018 through December 31, 2018, due on January 31, 2019. By failing to file the semi-annual campaign statement on paper and electronically by January 31, 2019, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

COUNT 4

Failure to Timely Pay the 2015 Annual Fee

The Committee and Pakradouni had a duty to timely pay the 2015 annual fee to the SOS, due on January 15, 2015, and the resulting \$150 penalty. By failing to pay the 2015 annual fee by January 15, 2015, and the resulting \$150 penalty, the Committee and Pakradouni violated Government Code Section 84101.5, subdivisions (c) and (d).

COUNT 5

Failure to Timely Pay the 2019 Annual Fee

The Committee and Pakradouni had a duty to timely pay the 2019 annual fee to the SOS, due on January 15, 2019, and the resulting \$150 penalty. By failing to pay the 2019 annual fee by January 15, 2019, and the resulting \$150 penalty, the Committee and Pakradouni violated Government Code Section 84101.5, subdivisions (c) and (d).

CONCLUSION

This matter consists of five counts of violating the Act, which carry a maximum total administrative penalty of \$25,000.²⁹

²⁹ Section 83116, subd. (c).

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in the context of the following factors set forth in Regulation 18361.5 subdivision (e)(1) through (8): (1) The extent and gravity of the public harm caused by the specific violation; (2) The level of experience of the violator with the requirements of the Political Reform Act; (3) Penalties previously imposed by the Commission in comparable cases; (4) The presence or absence of any intention to conceal, deceive or mislead; (5) Whether the violation was deliberate, negligent or inadvertent; (6) Whether the violator demonstrated good faith by consulting the Commission staff or any other governmental agency in a manner not constituting complete defense under Government Code Section 83114(b); (7) Whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Political Reform Act or similar laws; and (8) Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.

In this matter, the Committee and Pakradouni failed to timely file three semi-annual campaign statements and failed to timely pay the \$50 annual fees for 2015 and 2019. The failure to comply with campaign filing obligations resulted in a lack of complete and accurate information for the public regarding the Committee's activity after June 30, 2017. However, the Enforcement Division did not find any evidence that Respondents intended to conceal, deceive, or mislead the public. The failure to file semi-annual campaign statements appears to have been negligent and part of a pattern since the Committee and Pakradouni have a history of not timely filing campaign statements. In the FPPC Case No. 17/473, the Committee and Pakradouni paid a streamline penalty for failure to timely file three semi-annual campaign statements for the reporting periods ending on June 30, 2016; December 31, 2016; and June 30, 2017. The Committee and Pakradouni paid the fine and the annual fee during the time the committee's funds were held by the SCO.

The Committee and Pakradouni are aware of their obligation to file campaign statements and pay annual fees to the SOS as they have been contacted multiple times regarding this matter, filed campaign statements and paid annual fees in the past, and paid a penalty assessed by the Commission for failure to timely file campaign statements.

Though Pakradouni sought informal advice from the Commission's education unit, he has failed to file any of the outstanding statements to report the disposition of the Committee's funds. According to Pakradouni, the Committee's funds are currently being held by the state as unclaimed property and he is working to resolve this issue.

The Enforcement Division also takes into consideration previous cases that were approved by the Commission in determining penalties. In this matter, the following cases were used as guidelines.

Counts 1-3

- *In the Matter of Santa Ana Committee for Safe Neighborhoods and Safe Access Supporting Measure BB and Opposing Measure CC, and Van Ton*, FPPC No. 15/1004. (The Commission approved a default decision on June 13, 2019.) The respondents, among other violations, failed to file eight semi-annual campaign statements and failed to disclose the disposition of the Committee’s \$4,249.25 cash balance. The Commission imposed a penalty of \$4,000 per count.

Here, the Committee and Pakradouni failed to file three semi-annual campaign statements and failed to disclose the disposition of the Committee’s \$4,162.52 cash balance. However, unlike the comparable case, the evidence shows that there was no activity as the Committee’s assets are being held by SCO. Unlike the comparable case, the Committee and Pakradouni have a prior history of failing to timely file. Therefore, a penalty of \$3,000 per count is recommended.

Counts 4-5

- *In the Matter of Committee to Elect Marina Fraser, Marina Fraser, and Jackie M. Buckley*, FPPC No. 16/140. (The Commission approved a default decision on April 20, 2017.) The respondents, among other violations, failed to timely pay the annual fees for three years to the SOS. The Commission imposed a penalty of \$200 per count.

PROPOSED PENALTY

After considering the factors of Regulation 18361.5 and the penalties imposed in prior cases, the following penalties are proposed:

Counts	Violation	Proposed Penalty per Count
1	Failure to Timely File Semi-Annual Campaign Statements	\$3,000
2	Failure to Timely File Semi-Annual Campaign Statements	\$3,000
3	Failure to Timely File Semi-Annual Campaign Statements	\$3,000
4	Failure to Timely Pay Annual Fees	\$200
5	Failure to Timely Pay Annual Fees	\$200
	Total:	\$9,400



**DECLARATION OF CUSTODIAN OF RECORDS
CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
Enforcement Division**

CERTIFICATION OF RECORDS

The undersigned declares and certifies as follows:

1. I am employed as an Associate Governmental Program Analyst by the California Fair Political Practices Commission (Commission). My business address is: California Fair Political Practices Commission, 1102 Q St, Ste 3000, Sacramento, CA 95811.
2. I am a duly authorized custodian of the records maintained by the Commission in the Enforcement Division. As such, I am authorized to certify copies of those records as being true and correct copies of the original business records which are in the custody of the Commission.
3. I have reviewed documents maintained in *FPPC Case No. 2018-01139; Armenian National Committee Political Action Committee ANCPAC and Viken K. Pakradouni*, and have caused copies to be made of documents contained therein. I certify that the copies attached hereto are true and correct copies of the documents prepared in the normal course of business and which are contained in files maintained by the Commission. The attached documents are as follows:

EXHIBIT A-1: Report in Support of a Finding of Probable Cause, dated April 19, 2019

EXHIBIT A-2: Proofs of Service for the Report in Support of a Finding of Probable Cause and applicable statutes and regulations, dated April 19, 2019, and July 24, 2019, and accompanying certified mail receipt

EXHIBIT A-3: Cover letter to the Respondents regarding the Report in Support of a Finding of Probable Cause, dated July 24, 2019, memorandum describing Probable Cause Proceedings, and applicable statutes and regulations

EXHIBIT A-4: Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated August 20, 2019

EXHIBIT A-5: Finding of Probable Cause and Order to Prepare and Serve an Accusation, dated August 21, 2019

- EXHIBIT A-6: Accusation, dated July 24, 2020
- EXHIBIT A-7: Proof of Service on July 31, 2020, for Accusation and accompanying documents from process server, dated July 31, 2020
- EXHIBIT A-8: Statement to Respondents, Notices of Defense, applicable statutes, and Proof of Service for Accusation and accompanying documents, dated July 27, 2020
- EXHIBIT A-9: Initial statement of organization, filed on February 17, 2010
- EXHIBIT A-10: Amended statement of organization, filed on October 6, 2011
- EXHIBIT A-11: Amended statement of organization, filed on June 18, 2014
- EXHIBIT A-12: Semi-annual campaign statement for the reporting period of January 1, 2010 through June 30, 2010, filed on July 19, 2010
- EXHIBIT A-13: Semi-annual campaign statement for the reporting period of July 1, 2010 through October 16, 2010, filed on October 21, 2010
- EXHIBIT A-14: Semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017, filed on August 24, 2017
- EXHIBIT A-15: Letters from the Secretary of State regarding delinquent campaign statements, dated February 16, 2018; March 2, 2018; March 21, 2018; May 10, 2018; August 15, 2018; September 19, 2018; November 1, 2018; February 12, 2019; April 19, 2019; May 29, 2019; and August 14, 2019
- EXHIBIT A-16: Letters from the Secretary of State regarding annual fees, dated November 20, 2014 and December 3, 2018
- EXHIBIT A-17: Letter from the Enforcement Division, dated October 24, 2018
- EXHIBIT A-18: Declaration of Lance Hachigian, Special Investigator, Enforcement Division, Fair Political Practices Commission, dated February 24, 2021
- EXHIBIT A-19: Notice of Default Decision and Order, dated January 4, 2021
- EXHIBIT A-20: Notice of Intent to Enter Default Decision and Order, dated February 24, 2021

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 24, 2021, at Sacramento, California.

Dominika Wojenska

Dominika Wojenska
Associate Governmental Program Analyst
Enforcement Division
Fair Political Practices Commission

Exhibit A-1

1 GALENA WEST
Chief of Enforcement
2 THERESA GILBERTSON
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 323-6421
5 Email: tgilbertson@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

8
9 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
10 **STATE OF CALIFORNIA**

11 In the Matter of) FPPC No. 2018-01139
12)
13) **REPORT IN SUPPORT OF A FINDING OF**
14) **PROBABLE CAUSE**
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

ARMENIAN NATIONAL COMMITTEE)
POLITICAL ACTION COMMITTEE)
ANCPAC and VIKEN K.)
PAKRADOUNI,)
Respondents.)
Conference Date: TBA
Conference Time: TBA
Conference Location: Commission Offices
1102 Q Street, Suite 3000
Sacramento, CA 95811

18 **INTRODUCTION**

19 Respondent Armenian National Committee Political Action Committee ANCPAC
20 (“Committee”) is a state general purpose committee. Respondent Viken K. Pakradouni (“Pakradouni”)
21 is the Committee’s treasurer.

22 The Political Reform Act (the “Act”)¹ requires a general purpose committee to file two semi-
23 annual campaign statements each year no later than July 31 for the period ending June 30 and no later
24 than January 31 for the period ending December 31. If a general purpose committee cumulatively receives

25
26 ¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014, and all statutory references
27 are to this code. The regulations of the Fair Political Practice Commission are contained in Sections 18110 through 18997 of
28 Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 contributions or makes expenditures totaling \$25,000 or more to support or oppose candidates for any
2 elective state office or state measure, the committee is required to file campaign statements online or
3 electronically and in paper format. The Act also requires recipient committees to pay to the Secretary of
4 State (“SOS”) a \$50 annual fee each year until the committee is terminated.

5 The Committee and Pakradouni violated the Act by failing to timely file three semi-annual
6 campaign statements for the reporting periods ending on December 31, 2017; June 30, 2018; and
7 December 31, 2018. The Committee and Pakradouni also violated the Act by failing to timely pay the
8 \$50 annual fee for 2015 and 2019 and the associated \$150 penalties.

10 SUMMARY OF THE LAW

11 All legal references and discussions of law pertain to the Act’s provisions as they existed at the
12 time of the violations.

13 Jurisdiction

14 The Fair Political Practices Commission (the “Commission”) has administrative jurisdiction to
15 enforce the provisions of the Act.²

16 Probable Cause Proceedings

17 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
18 the Commission or his designee (the “hearing officer”), must make a finding that there is probable cause
19 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
20 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
21 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

22
23
24
25 ² Section 83116.

³ Section 83115.5 and Regulations 18361 and 18361.4.

⁴ Section 11500, et seq.

⁵ Section 83116 and Regulation 18361.4, subd. (e).

1 Standard for Finding Probable Cause

2 To make a finding of probable cause, the hearing officer must be presented with sufficient
3 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
4 that a respondent committed or caused a violation.⁶

5 Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

6 When enacting the Political Reform Act, the people of the state of California found and declared
7 previous laws regulating political practices suffered from inadequate enforcement by state and local
8 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

9 A central purpose of the Act is to ensure voters are fully informed and improper practices are
10 inhibited by requiring committees to disclose all contributions and expenditures made throughout a
11 campaign.⁹ Another is to provide adequate enforcement mechanisms so that the Act will be “vigorously
12 enforced.”¹⁰

13 Definition of State General Purpose Committee

14 In 2010, a “committee” included any person or combination of persons who received
15 contributions totaling \$1,000 or more in a calendar year, commonly known as a “recipient committee.”¹¹
16 A general purpose committee is a committee which is formed or exists primarily to support or oppose
17 more than one candidate or ballot measure.¹² A state general purpose committee includes a committee
18 formed to support or oppose candidates and measures voted on in a state election or in more than one
19 county.¹³

20
21 //

22
23 ⁶ Section 18361.4, subd. (e).

24 ⁷ Section 81001, subd. (h).

25 ⁸ Section 81003.

26 ⁹ Section 81002, subd. (a).

27 ¹⁰ Section 81002, subd. (f).

28 ¹¹ Section 82013, subd. (a).

¹² Section 82027.5, subd. (a).

¹³ Section 82027.5, subd. (b).

1 Duty to File Semi-Annual Campaign Statements

2 A general purpose committee must file two semi-annual campaign statements each year no later
3 than July 31 for the period ending June 30 and no later than January 31 for the period ending December
4 31.¹⁴

5 Duty to File Electronically

6 A general purpose committee that cumulatively receives contributions or makes expenditures
7 totaling \$25,000 or more to support or oppose candidates for any elective state office or state measure is
8 required to file campaign statements online or electronically with the Secretary of State.¹⁵ Once a person
9 or entity is required to file online or electronically, the person or entity is required to file all subsequent
10 reports online or electronically.¹⁶ Persons filing online or electronically are also required to continue to
11 file statements and reports in paper format.¹⁷

12 Annual Fee

13 Each committee required to file a statement of organization must pay the SOS a \$50 annual fee
14 by January 15 each year until the committee is terminated.¹⁸ A committee that fails to timely pay the \$50
15 annual fee is subject to a penalty equal to three times the amount of the fee. The Commission is required
16 to enforce this provision of the Act.¹⁹

17 Treasurer Liability

18 Every committee must have a treasurer.²⁰ It is the duty of the treasurer to ensure the committee
19 complies with the requirements of the Act concerning the receipt and expenditure of funds and the
20 reporting of such funds.²¹ A committee's treasurer may be held jointly and severally liable with the
21 committee for any reporting violations.²²

22 ¹⁴ Section 84200, subd. (a).

23 ¹⁵ Section 84605, subd. (a)(2).

24 ¹⁶ Section 84605, subd. (d).

25 ¹⁷ Section 84605, subd. (f).

26 ¹⁸ Section 84101.5, subd. (b) and (c).

27 ¹⁹ Section 84101.5, subd. (d).

28 ²⁰ Section 84100.

²¹ Sections 81004, 84100, 84104, and 84213, and Regulation 18427.

²² Sections 83116.5 and 91006.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUMMARY OF THE EVIDENCE

The Committee filed an initial statement of organization with the SOS on February 17, 2010, and indicated that it had not yet qualified as a recipient committee. On October 6, 2011, the Committee filed an amended statement of organization and indicated that it had qualified as a recipient committee on November 19, 1981. According to the Committee's first semi-annual campaign statement for the reporting period of January 1, 2010 through June 30, 2010, the Committee qualified as a recipient committee on or about February 17, 2010, when it received contributions totaling \$1,000 or more.

During the reporting period of July 1, 2010 through October 16, 2010, the Committee reported receiving \$26,850 in contributions and making \$27,100 in expenditures, including \$25,900 in expenditures supporting a candidate for an elective state office. Therefore, the Committee and Pakradouni are required to file campaign statements online or electronically and in paper format.

On August 18, 2017, the Committee and Pakradouni filed a semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017, and reported an ending cash balance of \$4,162.52. Since the Committee has not been terminated, the Committee and Pakradouni are required to continue to file campaign statements on a semiannual basis. However, according to the records from the SOS, the Committee and Pakradouni have failed to file the following campaign statements: July 1, 2017 through December 31, 2017; January 1, 2018 through June 30, 2018; and July 1, 2018 through December 31, 2018.

The SOS contacted the Committee and Pakradouni at least six times via U.S. Mail between February 16, 2018 and September 19, 2018, regarding the delinquent campaign statements for the reporting periods of July 1, 2017 through December 31, 2017 and January 1, 2018 through June 30, 2018. After the Committee and Pakradouni did not file the required statements, the SOS referred the matter to the Enforcement Division.

The Committee and Pakradouni were also required to pay the \$50 annual fee for 2015 by January 15, 2015. The SOS sent the Committee and Pakradouni a notice regarding the required payment on November 20, 2014. The Committee and Pakradouni paid the 2016, 2017, and 2018 annual fee timely.

1 After the Committee and Pakradouni did not pay the 2015 annual fee, the SOS referred the matter to the
2 Enforcement Division. The Enforcement Division identified that the Committee and Pakradouni also
3 failed to timely pay the \$50 annual fee and the associated \$150 penalty for 2019. The SOS sent the
4 Committee and Pakradouni a notice regarding the required payment on December 3, 2018.

5 The Enforcement Division contacted the Committee and Pakradouni at least four times via U.S.
6 Mail and email between October 24, 2018 and November 16, 2018, regarding the required semi-annual
7 campaign statements for the reporting periods ending on December 31, 2017, and June 30, 2018, and the
8 \$50 annual fee for 2015. On November 2, 2018, Pakradouni declared he would file the delinquent
9 campaign statements by November 15, 2018. As of the date of this report, the Committee and Pakradouni
10 have failed to file three semi-annual campaign statements for the reporting periods ending on December
11 31, 2017, June 30, 2018, and December 31, 2018, and have failed to pay the \$50 annual fee for 2015 and
12 2019 as well as the associated \$150 penalties.

13 14 VIOLATIONS

15 Count 1: Failure to Timely File a Semi-Annual Campaign Statement

16 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
17 reporting period of July 1, 2017 through December 31, 2017, due January 31, 2018, in violation of
18 Government Code Sections 84200 and 84605.

19 Count 2: Failure to Timely File a Semi-Annual Campaign Statement

20 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
21 reporting period of January 1, 2018 through June 30, 2018, due July 31, 2018, in violation of Government
22 Code Sections 84200 and 84605.

23 Count 3: Failure to Timely File a Semi-Annual Campaign Statement

24 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
25 reporting period of July 1, 2018 through December 31, 2018, due January 31, 2019, in violation of
26 Government Code Sections 84200 and 84605.

1 Count 4: Failure to Timely Pay the 2015 Annual Fee

2 The Committee and Pakradouni failed to pay the 2015 annual fee by the January 15, 2015 due
3 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
4 subdivisions (c) and (d).

5 Count 5: Failure to Timely Pay the 2019 Annual Fee

6 The Committee and Pakradouni failed to pay the 2019 annual fee by the January 15, 2019 due
7 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
8 subdivisions (c) and (d).

9

10 **EXCULPATORY OR MITIGATING INFORMATION**

11 The Enforcement Division is not aware of any exculpatory or mitigating information.

12

13 **OTHER RELEVANT MATERIAL**

14 The Committee and Pakradouni have a history of not timely filing campaign statements. In the
15 FPPC Case No. 17/473, the Committee and Pakradouni paid a streamline penalty for failure to timely file
16 three semi-annual campaign statements for the reporting periods ending on June 30, 2016; December 31,
17 2016; and June 30, 2017.

18

19

20

21

22

23

24

25

26 //

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSION

Probable cause exists to believe that the Committee and Pakradouni violated the Act as described above. The Enforcement Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

Dated: 4/19/19

Respectfully Submitted,

FAIR POLITICAL PRACTICES COMMISSION
Galena West
Enforcement Chief



By: Theresa Gilbertson
Commission Counsel
Enforcement Division

Exhibit A-2

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, CA 95811.

On 4/19/19, I served the following document(s):

1. Letter dated 4/19/19, from Theresa Gilbertson;
2. FPPC No. 18/1139 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet;
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By United States Postal Service. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the addresses listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Certified Mail, Return Receipt Requested

Viken K. Pakrandouni
[REDACTED]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 4/19/19



Theresa Gilbertson

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, CA 95811.

On 7/24/19, I served the following document(s):

1. Letter dated 7/24/19, from Theresa Gilbertson;
2. FPPC No. 18/1139 Report in Support of a Finding of Probable Cause;
3. Probable Cause Fact Sheet;
4. Selected Sections of the California Government Code regarding Probable Cause Proceedings for the Fair Political Practices Commission; and
5. Selected Regulations of the Fair Political Practices Commission regarding Probable Cause Proceedings.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By United States Postal Service. I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the addresses listed below and placed the envelope or package for collection and mailing by certified mail, return receipt requested, following my company's ordinary business practices. I am readily familiar with this business' practice for collection and processing correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Certified Mail, Return Receipt Requested

Viken K. Pakradouni
[REDACTED]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 7/24/19



Theresa Gilbertson

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

VIKEN K. PAKRADOUNI



9590 9402 4215 8121 8900 87

2. Article Number (Transfer from service label)

7018 2290 0001 9166 3865

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

Karime

C. Date of Delivery

7/28/19

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Adult Signature

Adult Signature Restricted Delivery

Certified Mail®

Certified Mail Restricted Delivery

Collect on Delivery

Collect on Delivery Restricted Delivery

Priority Mail Express®

Registered Mail™

Registered Mail Restricted Delivery

Return Receipt for Merchandise

Signature Confirmation™

Signature Confirmation Restricted Delivery

Restricted Delivery

Exhibit A-3



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

July 24, 2019

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Viken K. Pakradouni



In the Matter of Armenian National Committee Political Action Committee ANCPAC and Viken K. Pakradouni, FPPC No. 18/1139

Dear Mr. Pakradouni:

The Enforcement Division of the Fair Political Practices Commission (the "Commission") is proceeding with an administrative action against you for your failure to comply with the filing and disclosure provisions of the Political Reform Act (the "Act"), as described in our previous discussions. The enclosed Report in Support of a Finding of Probable Cause (the "Report") contains a summary of the alleged violations and the relevant law and evidence.

You have the right to file a written response to the Report. That response may contain any information you think is relevant and that you wish to bring to the attention of the Hearing Officer. In your response, please indicate whether you would like the Hearing Officer to make a determination of probable cause based on the written materials alone (the Report and your response) or request a conference, during which you may orally present your case to the Hearing Officer. Probable cause conferences are held in our office, which is located at 1102 Q Street, Suite 3000, Sacramento, CA 95811. You may appear at the conference in person or by telephone and you are entitled to be represented by counsel. ***If you wish to submit a written response or request a probable cause conference, it must be filed with the Commission Assistant at the address listed above within 21 days from the date of service of this letter.*** You can reach the Commission Assistant at (916) 327-8269.

Please note that probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether there is probable cause to believe that the Act was violated. ***If you are interested in resolving this matter by means of a settlement, please contact me at (916) 323-6421 or tgilbertson@fppc.ca.gov.***

Finally, you have the right to request discovery of the evidence in possession of, and relied upon by, the Enforcement Division. ***This request must also be filed with the Commission Assistant within 21 days from the date of service of this letter.*** Should you request discovery, the Enforcement Division will provide the evidence by service of process or certified mail. From the date you are

served with the evidence, you would have an additional 21 days to file a written response to the Report, just as described above.

Should you take no action within 21 days from the date of service of this letter, your rights to respond and to request a conference are automatically waived and the Enforcement Division will independently pursue the issuance of an accusation.

For your convenience, I have enclosed a fact sheet on probable cause proceedings and copies of the most relevant statutes and regulations.

Sincerely,

Theresa Gilbertson
Commission Counsel

Enclosures

PROBABLE CAUSE FACT SHEET

INTRODUCTION

The Fair Political Practices Commission is required by law to determine whether probable cause exists to believe that the Political Reform Act (the "Act") was violated before a public administrative accusation may be issued.

The probable cause proceedings before the Fair Political Practices Commission are unique, and most respondents and their attorneys are unfamiliar with them. Therefore, we have prepared this summary to acquaint you with the process.

THE LAW

Government Code sections 83115.5 and 83116 set forth the basic requirement that a finding of probable cause be made in a "private" proceeding before a public accusation is issued and a public hearing conducted in accordance with the Administrative Procedure Act.

The Commission has promulgated regulations further defining the probable cause procedure and delegating to the General Counsel (the "Hearing Officer" for purposes of these proceedings) the authority to preside over such proceedings and decide probable cause. A copy of these statutes and regulations are attached for your convenience.

In summary, the statutes and regulations entitle you to the following:

- a) A written probable cause report containing a summary of the law alleged to have been violated, and a summary of the evidence, including any exculpatory and mitigating information and any other relevant material and arguments;
- b) The opportunity to request discovery, respond in writing, and to request a probable cause conference within 21 days of service of the probable cause report;
- c) If the Commission met to consider whether a civil lawsuit should be filed in this matter, a copy of any staff memoranda submitted to the Commission and a transcript of staff discussions with the Commission at any such meeting; and
- d) If a timely request was made, a non-public conference with the General Counsel and the Enforcement Division staff to consider whether or not probable cause exists to believe the Act was violated.

THE PROCEDURE

Probable Cause Report

Administrative enforcement proceedings are commenced with the service, by registered or certified mail or in person, of a probable cause report. The report will contain a summary of the law and the evidence, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. It is filed with the Hearing Officer.

Discovery

Within 21 calendar days following the service of the probable cause report, you may request discovery of the evidence in the possession of the Enforcement Division. This is not a right to full discovery of the Enforcement Division file, but to the evidence relied upon by the Division along with any exculpatory or mitigating evidence¹.

This request must be sent by registered or certified mail to the Commission Assistant.

Response to Probable Cause Report

Within 21 calendar days following the service of the probable cause report (or, if you timely requested discovery, within 21 calendar days from the service of the evidence) you may submit a response to the Report. By regulation, the written response may contain, "... a summary of evidence, legal arguments, and any mitigating or exculpatory information." (Cal. Code Regs., tit. 2, § 18361.4, subd. (c).)

You must file your response with the Commission Assistant and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report.

Staff Reply

Within 10 calendar days following the date the response was filed with the Commission Assistant, Commission staff may submit any evidence or argument in rebuttal. You will be served with a copy of any such reply.

Probable Cause Conference

Probable cause conferences are held at the offices of the Fair Political Practices Commission, which is located at 1102 Q Street, Suite 3000, Sacramento, CA 95811. You may appear at the conference in person or by telephone. The proceedings are not public unless all proposed respondents agree to open the conference to the public. Otherwise, the probable cause report, any written responses, and the probable cause conference itself are confidential.

Unless the probable cause conference is public, the only persons who may attend are the staff of the Commission, any proposed respondent and his or her attorney or representative, and, at the discretion of the Hearing Officer, witnesses.

The Hearing Officer may, but need not, permit testimony from witnesses. Probable cause conferences are less formal than court proceedings. The rules of evidence do not apply. The conferences will be recorded and a copy of the recording will be provided upon request.

Since it has the burden of proof, the Enforcement Division is permitted to open and close the conference presentations. The Hearing Officer may also hold the record open to receive additional evidence or arguments.

Probable cause conferences are not settlement conferences. The sole purpose of a probable cause conference is to determine whether or not there is probable cause to believe that the

¹ But see Title 2, California Code of Regulations, Section 18362, which states that the Commission provides access to complaints, responses to complaints, and investigative files and information in accordance with the requirements of the Public Records Act. (Govt. Code § 6250, et seq.)

Political Reform Act was violated. Anyone who wishes to discuss settlement with the Enforcement Division may do so before or after the probable cause conference but not during the conference.

Pursuant to Title 2, California Code of Regulations, Section 18361.4, subdivision (e), the Hearing Officer will find probable cause "if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation."

Ordinarily, probable cause determinations are made based upon the written probable cause report, any written response by the respondent, any written reply by the Enforcement Division, and the oral arguments presented at the conference. Timely written presentations are strongly recommended.

Probable Cause Order and Accusation

Once the matter is submitted to the Hearing Officer, the probable cause decision will normally be made within ten days. If the Hearing Officer finds probable cause, he will issue a Finding of Probable Cause, which will be publicly announced at the next Commission Meeting. An accusation will be issued soon after the Finding of Probable Cause is publicly announced.

Continuances

Every reasonable effort is made to accommodate the schedules of parties and counsel. However, once a date has been set it is assumed to be firm and will not be continued except upon the order of the Hearing Officer after a showing of good cause. Settlement negotiations will be considered good cause only if the Hearing Officer is presented with a fully executed settlement, or is convinced that settlement is imminent.

Settlements

Settlement discussions may take place at any time except during the probable cause conference. In order to open settlement discussions, a proposed respondent or his or her counsel or representative should present a written offer to settle stating, where appropriate, the violations to be admitted, and the monetary penalty or other remedy to be tendered.

The Enforcement Division attorney assigned to the case will negotiate any potential settlement on behalf of the Fair Political Practices Commission, and will draft the language of the settlement agreement. The Hearing Officer will not directly participate in the negotiations, but will be represented by Enforcement Division attorneys. Staff attorneys will present settlement offers to the Hearing Officer for his/her approval.

CONCLUSION

This fact sheet was intended to give you a brief summary of the probable cause process at the Fair Political Practices Commission. Such a summary cannot answer every question that might arise in such proceedings. Therefore, if you have any questions that are not addressed by this fact sheet or the copies of the law and regulations we have attached, feel free to contact the attorney whose name appears on the probable cause report.

Attachments: Relevant Sections of (1) California Government Code , and (2) Regulations of the Fair Political Practices Commission, Title 2, Division 6 of the California Code of Regulations.

CALIFORNIA GOVERNMENT CODE

Probable Cause Statutes

§ 83115.5. Probable cause; violation of title; notice of violation; summary of evidence; notice of rights; private proceedings

No finding of probable cause to believe this title has been violated shall be made by the commission unless, at least 21 days prior to the commission's consideration of the alleged violation, the person alleged to have violated this title is notified of the violation by service of process or registered mail with return receipt requested, provided with a summary of the evidence, and informed of his right to be present in person and represented by counsel at any proceeding of the commission held for the purpose of considering whether probable cause exists for believing the person violated this title. Notice to the alleged violator shall be deemed made on the date of service, the date the registered mail receipt is signed, or if the registered mail receipt is not signed, the date returned by the post office. A proceeding held for the purpose of considering probable cause shall be private unless the alleged violator files with the commission a written request that the proceeding be public.

§ 83116. Violation of title; probable cause; hearing; order

When the Commission determines there is probable cause for believing this title has been violated, it may hold a hearing to determine if a violation has occurred. Notice shall be given and the hearing conducted in accordance with the Administrative Procedure Act (Chapter 5 (commencing with Section 11500), Part 1, Division 3, Title 2, Government Code). The Commission shall have all the powers granted by that chapter. When the Commission determines on the basis of the hearing that a violation has occurred, it shall issue an order that may require the violator to do all or any of the following:

- (a) Cease and desist violation of this title.
- (b) File any reports, statements, or other documents or information required by this title.
- (c) Pay a monetary penalty of up to five thousand dollars (\$5,000) per violation to the General Fund of the state. When the Commission determines that no violation has occurred, it shall publish a declaration so stating.

**REGULATIONS OF THE FAIR POLITICAL PRACTICES COMMISSION
TITLE 2, DIVISION 6 OF THE CALIFORNIA CODE OF REGULATIONS**

Probable Cause Regulations

§ 18361 (b). Delegation by the Executive Director Pertaining to Enforcement Proceedings and Authority to Hear Probable Cause Proceedings.

Probable cause proceedings under Regulation 18361.4 shall be heard by the General Counsel or an attorney from the Legal Division. The General Counsel may delegate the authority to hear probable cause proceedings, in writing, to an administrative law judge.

§ 18361.4. Probable Cause Proceedings

(a) Probable Cause Report. If the Chief of the Enforcement Division decides to commence probable cause proceedings pursuant to Sections 83115.5 and 83116, he or she shall direct the Enforcement Division staff to prepare a written report, hereafter referred to as "the probable cause report." The probable cause report shall contain a summary of the law and evidence gathered in connection with the investigation, including any exculpatory and mitigating information of which the staff has knowledge and any other relevant material and arguments. The evidence recited in the probable cause report may include hearsay, including declarations of investigators or others relating the statements of witnesses or concerning the examination of physical evidence.

(b) No probable cause hearing will take place until at least 21 calendar days after the Enforcement Division staff provides the following, by service of process or registered or certified mail with return receipt requested, to all proposed respondents:

- (1) A copy of the probable cause report;
- (2) Notification that the proposed respondents have the right to respond in writing to the probable cause report and to request a probable cause conference at which the proposed respondent may be present in person and represented by counsel, and;
- (3) If the Commission met in executive session on this matter pursuant to Regulation 18361.2, a copy of any staff memoranda submitted to the Commission at that time along with the recording of any discussion between the Commission and the staff at the executive session as required in subdivision (b) of Regulation 18361.2.

(c) Response to Probable Cause Report.

- (1) Each proposed respondent may submit a written response to the probable cause report. The response may contain a summary of evidence, legal arguments, and any mitigating or exculpatory information. A proposed respondent who submits a response must file it with the Commission Assistant who will forward the response to the General Counsel or an attorney in the Legal Division (the "hearing officer") and provide a copy, by service of process or registered or certified mail with return receipt requested, to all other proposed respondents listed in the probable cause report not later than 21 days following service of the probable cause report.
- (2) Within 21 calendar days following the service of the probable cause report, a proposed

respondent may request discovery of evidence in the possession of the Enforcement Division. This request must be sent by registered or certified mail to the Commission Assistant. Upon receipt of the request, the Enforcement Division shall provide discovery of evidence relied upon by the Enforcement Division sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation, along with any exculpatory or mitigating evidence. This is not a right to full discovery of the Enforcement Division file. The Enforcement Division shall provide access to documents for copying by the Respondent, or upon agreement among the parties, the Enforcement Division will provide copies of the requested documents upon payment of a fee for direct costs of duplication. The Enforcement Division shall provide such evidence by service of process or registered or certified mail with return receipt requested to all respondents, with a copy to the Commission Assistant. A respondent may submit a written response to the probable cause report described in subsection (1) no later than 21 calendar days after service of discovery.

- (3) The Commission staff may submit any evidence or argument in rebuttal to the response. When the Commission staff submits evidence or argument in rebuttal to the response, it shall provide a copy, by service of process or registered or certified mail with return receipt requested, to all proposed respondents listed in the probable cause report not later than 10 calendar days following the date the response was filed with the Commission Assistant. The hearing officer may extend the time limitations in this section for good cause. At any time prior to a determination of probable cause, the hearing officer may allow additional material to be submitted as part of the initial response or rebuttal.

(d) Probable Cause Conference. Any proposed respondent may request a probable cause conference. The request shall be served upon the Commission Assistant and all other proposed respondents not later than 21 days after service of the probable cause report unless the hearing officer extends the time for good cause. The Commission Assistant shall fix a time for the probable cause conference and the hearing officer shall conduct the conference informally. The conference shall be closed to the public unless a proposed respondent requests and all other proposed respondents agree to a public conference. If the conference is not public, only members of the Commission staff, any proposed respondent and his or her legal counsel or representative shall have the right to be present and participate. The hearing officer may allow witnesses to attend and participate in part or all of the probable cause conference. In making this determination, the hearing officer shall consider the relevancy of the witness' proposed testimony, whether the witness has a substantial interest in the proceedings, and whether fairness requires that the witness be allowed to participate. Representatives of any civil or criminal prosecutor with jurisdiction may attend the conference at the discretion of the hearing officer if they agree to respect the confidential nature of the proceedings. If the conference is not open to the public and none of the parties and the presiding officer object, the conference may be conducted in whole or in part by telephone. The probable cause conference shall be recorded. The hearing officer may determine whether there is probable cause based solely on the probable cause report, any responses or rebuttals filed and any arguments presented at the probable cause conference by the interested parties. If the hearing officer requires additional information before determining whether there is probable cause, he or she may permit any party to submit additional evidence at the probable cause conference.

(e) Finding of Probable Cause. The hearing officer may find there is probable cause to believe a violation has occurred if the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a proposed respondent committed or caused a violation. A finding of probable cause by the hearing officer does not constitute a finding that a violation has actually occurred. The hearing officer shall not make a finding of probable cause if he or she is presented with clear and convincing evidence that, at a time prior to the alleged violation, the violator consulted with the staff of the Commission in good faith, disclosed truthfully all the material facts, and committed the acts complained of either in reliance on the advice of the staff or because of the staff's failure to provide advice. If the hearing officer makes a finding of probable cause, the Enforcement Division shall prepare an Accusation pursuant to Section 11503 and have it served upon the person or persons who are subjects of the probable cause finding. The hearing officer shall publicly announce the finding of probable cause. The announcement shall contain a summary of the allegations and a cautionary statement that the respondent is presumed to be innocent of any violation of the Act unless a violation is proved in a subsequent proceeding. The Chief of the Enforcement Division shall be responsible for the presentation of the case in support of the Accusation at an administrative hearing held pursuant to Section 83116.

§ 18362. Access to Enforcement Records

(a) Production of Enforcement Records. The Commission will make complaints, investigative files, and related records available to the public and members of the media in accordance with the Public Records Act (Government Code Section 6250, et seq.) Enforcement records requests should specifically identify the documents sought.

(b) Format of Enforcement Records. The Commission will make records available for inspection at its office during office hours. The Commission may provide copies of requested records either in paper or electronic format to the person that requested the records in lieu of inspecting the records at the Commission offices. Any person requesting paper copies of records must reimburse the Commission ten cents (\$0.10) per page to pay the cost of copying, or supply copying equipment and make copies in the offices of the Commission. Original records of the Commission may not be removed from the offices of the Commission.

(c) Complaint Notice Period. The Commission may not provide or make available complaints or related records until after the disclosure periods provided in Regulation 18360.

§ 18361.2. Memorandum Respecting Civil Litigation.

(a) If the Executive Director concludes civil litigation should be initiated, he or she shall submit to the Commission a written memorandum, which shall be first reviewed by the General Counsel, or an attorney from the Legal Division, summarizing the facts and the applicable law of the case and recommending the initiation of a lawsuit. The memorandum shall include all exculpatory and mitigating information known to the staff.

(b) The Commission shall review the memorandum at an executive session. The General

Counsel, or an attorney from the Legal Division, and the Commission Assistant shall be in attendance. No other member of the staff may be present unless the Commission meets with a member of the staff for that person to answer questions. The Commission may not resume its deliberations until the person is no longer present. Any communication between the Commission and the person during the executive session shall be recorded. After review of the memorandum, the Commission may direct the Executive Director to do any of the following:

- (1) Initiate civil litigation.
 - (2) Decide whether probable cause proceedings should be commenced pursuant to 2 Cal. Code of Regulations Section 18361.4.
 - (3) Return the matter to the staff for further investigation.
 - (4) Take no further action on the matter or take any other action it deems appropriate.
- (c) If the Commission decides to initiate civil litigation, the Commission may then permit other members of the staff to attend the executive session.
- (d) If the Executive Director deems it necessary, he or she may call a special meeting of the Commission to review a staff memorandum recommending the initiation of civil litigation.
- (e) It is the intent of the Commission in adopting this section to preserve for the members of the Commission the authority to decide whether alleged violations should be adjudicated in administrative hearings or in civil litigation, while at the same time avoiding the possibility that discussions with members of the staff might cause members of the Commission to prejudge a case that might be heard by the Commission under Government Code Section 83116.

Exhibit A-4

GALENA WEST
Chief of Enforcement
THERESA GILBERTSON
Commission Counsel
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street, Suite 3000
Sacramento, CA 95811
Telephone: (916) 323-6421
Email: tgilbertson@fppc.ca.gov

Attorneys for Complainant

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

In the Matter of) FPPC No. 2018-01139
)
ARMENIAN NATIONAL COMMITTEE) EX PARTE REQUEST FOR A FINDING OF
POLITICAL ACTION COMMITTEE) PROBABLE CAUSE AND AN ORDER THAT
ANCPAC and VIKEN K. PAKRADOUNI,) AN ACCUSATION BE PREPARED AND
) SERVED
)
Respondents.) Gov. Code § 83115.5
)

TO THE HEARING OFFICER OF THE FAIR POLITICAL PRACTICES COMMISSION:

Pursuant to Section 83115.5 of the Political Reform Act (the "Act")¹ and Regulation 18361.4, Respondents Viken K. Pakradouni ("Pakradouni") and Armenian National Committee Political Action Committee ANCPAC ("Committee") were served with a copy of a report in support of a finding of probable cause ("Report") in the above-entitled matter.² The Report, attached as "Exhibit A," was part of a packet of materials, including a cover letter and a memorandum describing probable cause proceedings, which was served to Pakradouni by means of certified mail, return receipt requested on July 29, 2019. A copy of the return receipt is attached as "Exhibit B."

¹ The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Gov. Code § 83115.5; Cal. Code Reg., tit. 2, § 18361.4.

1 In the cover letter, dated July 24, 2019, and the attached materials, Pakradouni and the Committee
2 were advised that they could respond in writing to the Report and orally present the case to the Hearing
3 Officer at a probable cause conference to be held in Sacramento. Pakradouni and the Committee were
4 further advised that in order to have a probable cause conference, they needed to make a written request
5 for one on or before 21 days of the date they received the Report. Additionally, Pakradouni and the
6 Committee were advised that if they did not request a probable cause conference, such a conference would
7 not be held, and probable cause would be determined based solely on the Report and any written response
8 that they submitted within 21 days of the date they were served with the Report. To date, Pakradouni and
9 the Committee have not submitted a written response or requested a probable cause conference.

10
11 WHEREFORE, based on the attached Report, the Enforcement Division requests a finding by the
12 Hearing Officer that probable cause exists to believe that the Respondents committed five violations of
13 the Act, stated as follows:

14 Count 1: Failure to Timely File a Semi-Annual Campaign Statement

15 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
16 reporting period of July 1, 2017 through December 31, 2017, due January 31, 2018, in violation of
17 Government Code Sections 84200 and 84605.

18 Count 2: Failure to Timely File a Semi-Annual Campaign Statement

19 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
20 reporting period of January 1, 2018 through June 30, 2018, due July 31, 2018, in violation of Government
21 Code Sections 84200 and 84605.

22 Count 3: Failure to Timely File a Semi-Annual Campaign Statement

23 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
24 reporting period of July 1, 2018 through December 31, 2018, due January 31, 2019, in violation of
25 Government Code Sections 84200 and 84605.

26 //

1 Count 4: Failure to Timely Pay the 2015 Annual Fee

2 The Committee and Pakradouni failed to pay the 2015 annual fee by the January 15, 2015 due
3 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
4 subdivisions (c) and (d).

5 Count 5: Failure to Timely Pay the 2019 Annual Fee

6 The Committee and Pakradouni failed to pay the 2019 annual fee by the January 15, 2019 due
7 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
8 subdivisions (c) and (d).

9 Additionally, after finding probable cause exists, the Enforcement Division requests an order by
10 the Hearing Officer that an accusation be prepared against Pakradouni and the Committee and served upon
11 them.³

12 A copy of this Request was mailed via U.S. Mail to Pakradouni and the Committee on August 20,
13 2019 at the last known address and the place of service, as follows:

14 Viken K. Pakradouni
15 

16 Dated: 8/20/19

17 Respectfully Submitted,

18
19 **FAIR POLITICAL PRACTICES COMMISSION**

20 Galena West
21 Chief of Enforcement

22 

23 By: Theresa Gilbertson
24 Commission Counsel
25 Enforcement Division

26 ³ Gov. Code § 11503.

EXHIBIT A

1 GALENA WEST
Chief of Enforcement
2 THERESA GILBERTSON
Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 323-6421
5 Email: tgilbertson@fppc.ca.gov

6 Attorneys for Complainant
Enforcement Division of the Fair Political Practices Commission
7

8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
9 **STATE OF CALIFORNIA**
10

11 In the Matter of) FPPC No. 2018-01139
)
) REPORT IN SUPPORT OF A FINDING OF
) PROBABLE CAUSE
13 ARMENIAN NATIONAL COMMITTEE)
14 POLITICAL ACTION COMMITTEE) Conference Date: TBA
14 ANCPAC and VIKEN K.) Conference Time: TBA
15 PAKRADOUNI,) Conference Location: Commission Offices
) 1102 Q Street, Suite 3000
) Sacramento, CA 95811
16 Respondents.)

17
18 **INTRODUCTION**

19 Respondent Armenian National Committee Political Action Committee ANCPAC
20 (“Committee”) is a state general purpose committee. Respondent Viken K. Pakradouni (“Pakradouni”)
21 is the Committee’s treasurer.

22 The Political Reform Act (the “Act”)¹ requires a general purpose committee to file two semi-
23 annual campaign statements each year no later than July 31 for the period ending June 30 and no later
24 than January 31 for the period ending December 31. If a general purpose committee cumulatively receives

25
26 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 Practice Commission are contained in Sections 18110 through 18997 of
27 Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 contributions or makes expenditures totaling \$25,000 or more to support or oppose candidates for any
2 elective state office or state measure, the committee is required to file campaign statements online or
3 electronically and in paper format. The Act also requires recipient committees to pay to the Secretary of
4 State (“SOS”) a \$50 annual fee each year until the committee is terminated.

5 The Committee and Pakradouni violated the Act by failing to timely file three semi-annual
6 campaign statements for the reporting periods ending on December 31, 2017; June 30, 2018; and
7 December 31, 2018. The Committee and Pakradouni also violated the Act by failing to timely pay the
8 \$50 annual fee for 2015 and 2019 and the associated \$150 penalties.

10 SUMMARY OF THE LAW

11 All legal references and discussions of law pertain to the Act’s provisions as they existed at the
12 time of the violations.

13 Jurisdiction

14 The Fair Political Practices Commission (the “Commission”) has administrative jurisdiction to
15 enforce the provisions of the Act.²

16 Probable Cause Proceedings

17 Prior to the Enforcement Division commencing an administrative action, the General Counsel of
18 the Commission or his designee (the “hearing officer”), must make a finding that there is probable cause
19 to believe the respondent has violated the Act.³ After a finding of probable cause, the Commission may
20 hold a noticed hearing in accordance with the Administrative Procedure Act⁴ to determine whether
21 violations occurred, and levy an administrative penalty of up to \$5,000 for each violation.⁵

22
23
24
25 ² Section 83116.

26 ³ Section 83115.5 and Regulations 18361 and 18361.4.

27 ⁴ Section 11500, et seq.

28 ⁵ Section 83116 and Regulation 18361.4, subd. (e).

1 Standard for Finding Probable Cause

2 To make a finding of probable cause, the hearing officer must be presented with sufficient
3 evidence to lead a person of ordinary caution and prudence to believe, or entertain a strong suspicion,
4 that a respondent committed or caused a violation.⁶

5 Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

6 When enacting the Political Reform Act, the people of the state of California found and declared
7 previous laws regulating political practices suffered from inadequate enforcement by state and local
8 authorities.⁷ To that end, the Act must be liberally construed to achieve its purposes.⁸

9 A central purpose of the Act is to ensure voters are fully informed and improper practices are
10 inhibited by requiring committees to disclose all contributions and expenditures made throughout a
11 campaign.⁹ Another is to provide adequate enforcement mechanisms so that the Act will be “vigorously
12 enforced.”¹⁰

13 Definition of State General Purpose Committee

14 In 2010, a “committee” included any person or combination of persons who received
15 contributions totaling \$1,000 or more in a calendar year, commonly known as a “recipient committee.”¹¹
16 A general purpose committee is a committee which is formed or exists primarily to support or oppose
17 more than one candidate or ballot measure.¹² A state general purpose committee includes a committee
18 formed to support or oppose candidates and measures voted on in a state election or in more than one
19 county.¹³

20
21 //

22
23 ⁶ Section 18361.4, subd. (e).

24 ⁷ Section 81001, subd. (h).

25 ⁸ Section 81003.

26 ⁹ Section 81002, subd. (a).

27 ¹⁰ Section 81002, subd. (f).

28 ¹¹ Section 82013, subd. (a).

¹² Section 82027.5, subd. (a).

¹³ Section 82027.5, subd. (b).

1 Duty to File Semi-Annual Campaign Statements

2 A general purpose committee must file two semi-annual campaign statements each year no later
3 than July 31 for the period ending June 30 and no later than January 31 for the period ending December
4 31.¹⁴

5 Duty to File Electronically

6 A general purpose committee that cumulatively receives contributions or makes expenditures
7 totaling \$25,000 or more to support or oppose candidates for any elective state office or state measure is
8 required to file campaign statements online or electronically with the Secretary of State.¹⁵ Once a person
9 or entity is required to file online or electronically, the person or entity is required to file all subsequent
10 reports online or electronically.¹⁶ Persons filing online or electronically are also required to continue to
11 file statements and reports in paper format.¹⁷

12 Annual Fee

13 Each committee required to file a statement of organization must pay the SOS a \$50 annual fee
14 by January 15 each year until the committee is terminated.¹⁸ A committee that fails to timely pay the \$50
15 annual fee is subject to a penalty equal to three times the amount of the fee. The Commission is required
16 to enforce this provision of the Act.¹⁹

17 Treasurer Liability

18 Every committee must have a treasurer.²⁰ It is the duty of the treasurer to ensure the committee
19 complies with the requirements of the Act concerning the receipt and expenditure of funds and the
20 reporting of such funds.²¹ A committee's treasurer may be held jointly and severally liable with the
21 committee for any reporting violations.²²

22 ¹⁴ Section 84200, subd. (a).

23 ¹⁵ Section 84605, subd. (a)(2).

24 ¹⁶ Section 84605, subd. (d).

25 ¹⁷ Section 84605, subd. (f).

26 ¹⁸ Section 84101.5, subd. (b) and (c).

27 ¹⁹ Section 84101.5, subd. (d).

28 ²⁰ Section 84100.

²¹ Sections 81004, 84100, 84104, and 84213, and Regulation 18427.

²² Sections 83116.5 and 91006.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUMMARY OF THE EVIDENCE

The Committee filed an initial statement of organization with the SOS on February 17, 2010, and indicated that it had not yet qualified as a recipient committee. On October 6, 2011, the Committee filed an amended statement of organization and indicated that it had qualified as a recipient committee on November 19, 1981. According to the Committee's first semi-annual campaign statement for the reporting period of January 1, 2010 through June 30, 2010, the Committee qualified as a recipient committee on or about February 17, 2010, when it received contributions totaling \$1,000 or more.

During the reporting period of July 1, 2010 through October 16, 2010, the Committee reported receiving \$26,850 in contributions and making \$27,100 in expenditures, including \$25,900 in expenditures supporting a candidate for an elective state office. Therefore, the Committee and Pakradouni are required to file campaign statements online or electronically and in paper format.

On August 18, 2017, the Committee and Pakradouni filed a semi-annual campaign statement for the reporting period of January 1, 2017 through June 30, 2017, and reported an ending cash balance of \$4,162.52. Since the Committee has not been terminated, the Committee and Pakradouni are required to continue to file campaign statements on a semiannual basis. However, according to the records from the SOS, the Committee and Pakradouni have failed to file the following campaign statements: July 1, 2017 through December 31, 2017; January 1, 2018 through June 30, 2018; and July 1, 2018 through December 31, 2018.

The SOS contacted the Committee and Pakradouni at least six times via U.S. Mail between February 16, 2018 and September 19, 2018, regarding the delinquent campaign statements for the reporting periods of July 1, 2017 through December 31, 2017 and January 1, 2018 through June 30, 2018. After the Committee and Pakradouni did not file the required statements, the SOS referred the matter to the Enforcement Division.

The Committee and Pakradouni were also required to pay the \$50 annual fee for 2015 by January 15, 2015. The SOS sent the Committee and Pakradouni a notice regarding the required payment on November 20, 2014. The Committee and Pakradouni paid the 2016, 2017, and 2018 annual fee timely.

1 After the Committee and Pakradouni did not pay the 2015 annual fee, the SOS referred the matter to the
2 Enforcement Division. The Enforcement Division identified that the Committee and Pakradouni also
3 failed to timely pay the \$50 annual fee and the associated \$150 penalty for 2019. The SOS sent the
4 Committee and Pakradouni a notice regarding the required payment on December 3, 2018.

5 The Enforcement Division contacted the Committee and Pakradouni at least four times via U.S.
6 Mail and email between October 24, 2018 and November 16, 2018, regarding the required semi-annual
7 campaign statements for the reporting periods ending on December 31, 2017, and June 30, 2018, and the
8 \$50 annual fee for 2015. On November 2, 2018, Pakradouni declared he would file the delinquent
9 campaign statements by November 15, 2018. As of the date of this report, the Committee and Pakradouni
10 have failed to file three semi-annual campaign statements for the reporting periods ending on December
11 31, 2017, June 30, 2018, and December 31, 2018, and have failed to pay the \$50 annual fee for 2015 and
12 2019 as well as the associated \$150 penalties.

13 14 VIOLATIONS

15 Count 1: Failure to Timely File a Semi-Annual Campaign Statement

16 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
17 reporting period of July 1, 2017 through December 31, 2017, due January 31, 2018, in violation of
18 Government Code Sections 84200 and 84605.

19 Count 2: Failure to Timely File a Semi-Annual Campaign Statement

20 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
21 reporting period of January 1, 2018 through June 30, 2018, due July 31, 2018, in violation of Government
22 Code Sections 84200 and 84605.

23 Count 3: Failure to Timely File a Semi-Annual Campaign Statement

24 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
25 reporting period of July 1, 2018 through December 31, 2018, due January 31, 2019, in violation of
26 Government Code Sections 84200 and 84605.

1 Count 4: Failure to Timely Pay the 2015 Annual Fee

2 The Committee and Pakradouni failed to pay the 2015 annual fee by the January 15, 2015 due
3 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
4 subdivisions (c) and (d).

5 Count 5: Failure to Timely Pay the 2019 Annual Fee

6 The Committee and Pakradouni failed to pay the 2019 annual fee by the January 15, 2019 due
7 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
8 subdivisions (c) and (d).

9
10 **EXCULPATORY OR MITIGATING INFORMATION**

11 The Enforcement Division is not aware of any exculpatory or mitigating information.

12
13 **OTHER RELEVANT MATERIAL**

14 The Committee and Pakradouni have a history of not timely filing campaign statements. In the
15 FPPC Case No. 17/473, the Committee and Pakradouni paid a streamline penalty for failure to timely file
16 three semi-annual campaign statements for the reporting periods ending on June 30, 2016; December 31,
17 2016; and June 30, 2017.

18
19
20
21
22
23
24
25
26 //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSION

Probable cause exists to believe that the Committee and Pakradouni violated the Act as described above. The Enforcement Division respectfully requests an order finding probable cause pursuant to Section 83115.5 and Regulation 18361.4.

Dated: 4/19/19

Respectfully Submitted,

FAIR POLITICAL PRACTICES COMMISSION
Galena West
Enforcement Chief



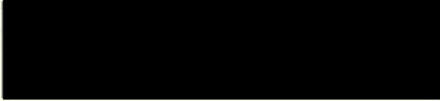
By: Theresa Gilbertson
Commission Counsel
Enforcement Division

EXHIBIT B

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
VIKEN K. PAKRADOUNI



9590 9402 4215 8121 8900 87

2. Article Number (Transfer from service label)
7018 2290 0001 9166 3865

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
  Addressee

B. Received by (Printed Name) C. Date of Delivery
Kapone 7/29/19

D. Is delivery address different from Item 1? Yes
If YES, enter delivery address below: No

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Return Receipt for Merchandise
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

Exhibit A-5

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

1	In the Matter of) FPPC No. 18/01139
2)
3)
4)
5	ARMENIAN NATIONAL COMMITTEE) FINDING OF PROBABLE CAUSE AND
6	POLITICAL ACTION COMMITTEE) ORDER TO PREPARE AND SERVE AN
7	ANCPAC and VIKEN K. PAKRADOUNI,) ACCUSATION
8	Respondent.) Gov. Code § 83115.5
9)
10)

By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served, dated July 24, 2019 the Enforcement Division submitted the above-entitled matter to the Hearing Officer for a determination of Probable Cause. As set forth in the Ex Parte Request for a Finding of Probable Cause and an Order that an Accusation Be Prepared and Served (Ex Parte Request), the Enforcement Division served a Report in Support of a Finding of Probable Cause (PC Report) on Respondents Viken K. Pakradouni (“Pakradouni”) and Armenian National Committee Political Action Committee ANCPAC (“Committee”) on July 29, 2019 by certified mail, return receipt requested. Accompanying the PC Report was a packet of materials that informed Respondents of their right to file a written response to the PC Report and to request a probable cause conference within 21 days following service of the PC Report. During the 21 days that followed service of the PC Report, Respondents did not file a response to the PC Report or request a probable cause conference. Pursuant to California Code of Regulations title 2, section 18361.4, determination of probable cause may be made solely on papers submitted when the respondent does not request a probable cause conference.¹

In making a probable cause determination, it is the duty of the Hearing Officer of the Fair Political Practices Commission to determine whether probable cause exists to believe that a respondent violated the Political Reform Act as alleged by the Enforcement Division in the PC Report served on the respondent.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

1 Probable cause to believe a violation has occurred can be found to exist when “the evidence is
2 sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that
3 the proposed respondent(s) committed or caused a violation.”²
4

5 The PC Report served on Respondents Pakradouni and the Committee, and the subsequent Ex
6 Parte Request in this matter, alleges five violations of the Political Reform Act were committed, as
7 follows:

8 Count 1: Failure to Timely File a Semi-Annual Campaign Statement

9 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
10 reporting period of July 1, 2017 through December 31, 2017, due January 31, 2018, in violation of
11 Government Code Sections 84200 and 84605.

12 Count 2: Failure to Timely File a Semi-Annual Campaign Statement

13 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
14 reporting period of January 1, 2018 through June 30, 2018, due July 31, 2018, in violation of Government
15 Code Sections 84200 and 84605.

16 Count 3: Failure to Timely File a Semi-Annual Campaign Statement

17 The Committee and Pakradouni failed to timely file the semi-annual campaign statement for the
18 reporting period of July 1, 2018 through December 31, 2018, due January 31, 2019, in violation of
19 Government Code Sections 84200 and 84605.

20 Count 4: Failure to Timely Pay the 2015 Annual Fee

21 The Committee and Pakradouni failed to pay the 2015 annual fee by the January 15, 2015 due
22 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
23 subdivisions (c) and (d).

24 Count 5: Failure to Timely Pay the 2019 Annual Fee

25 The Committee and Pakradouni failed to pay the 2019 annual fee by the January 15, 2019 due
26 date, and failed to pay the resulting \$150 penalty, in violation of Government Code Section 84101.5,
27 subdivisions (c) and (d).


28 ² Cal. Code Reg., tit. 2, § 18361.4, subd. (e).

1
2 Based on the Ex Parte Request given to me, I find that notice has been given to Pakradouni and
3 the Committee.³ I further find, based on the PC Report and the Ex Parte Request, that there is probable
4 cause to believe that the Pakradouni and the Committee violated the Political Reform Act as alleged in
5 Counts 1-5, as identified above.

6 I therefore direct that the Enforcement Division issue an accusation against the Pakradouni and the
7 Committee in accordance with this finding.

8
9 IT IS SO ORDERED.

10
11 Dated: 8-21-19


12
13 Hearing Officer
14 Fair Political Practices Commission

15
16
17
18
19
20
21
22
23
24
25
26
27
28

³ Government Code § 83115.5; Cal. Code Reg., tit. 2, §18361.4, subd. (b).

**FPPC No. 18/01139, In the matter of Armenian National Committee Political Action Committee
ANCPAC and Viken K. Pakradouni**

PROOF OF SERVICE


At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, CA 95811. On the date below, I served the following document:

FINDING OF PROBABLE CAUSE AND ORDER TO PREPARE AND SERVE AN ACCUSATION

MANNER OF SERVICE

(U.S. Mail) By causing a true copy thereof to be served on the parties in this action through the U.S. Mail and addressed as listed below. I am familiar with the procedure of the Fair Political Practices Commission for collection and processing of correspondence for mailing with the United States Postal Service, and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business.

SERVICE LIST

Viken K. Pakradouni


(By Personal Service) On Wednesday, August 21, 2019, at approximately 1:30 p.m., I personally served:

Theresa Gilbertson, Commission Counsel, at 1102 Q Street, Suite 3000, Sacramento, CA 95811.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document is executed at Sacramento, California, on August 21, 2019.



Sasha Linker

Exhibit A-6

1 GALENA WEST
Chief of Enforcement
2 THERESA GILBERTSON
Senior Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q St, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 323-6421
5 Email: tgilbertson@fppc.ca.gov

6 Attorneys for Complainant

7
8 **BEFORE THE FAIR POLITICAL PRACTICES COMMISSION**
9 **STATE OF CALIFORNIA**

10
11 In the Matter of) FPPC No. 2018-01139
12)
13 ARMENIAN NATIONAL COMMITTEE) **ACCUSATION**
POLITICAL ACTION COMMITTEE)
14 ANCPAC and VIKEN K. PAKRADOUNI,)
15) (Gov. Code §11503)
Respondents.)
16)
17)

18 Complainant, the Enforcement Division of the Fair Political Practices Commission, after a finding
19 of probable cause pursuant to Government Code Section 83115.5, alleges the following:

20 **JURISDICTION**

21 1. Complainant is the Enforcement Division of the Fair Political Practices Commission (the
22 “Commission”) and makes this Accusation in its official capacity and in the public interest.

23 2. The authority to bring this action is derived from Title 2, California Code of Regulations,
24 Sections 18361 and 18361.4, subdivision (e), and the statutory law of the State of California, specifically
25 including, but not limited to, Government Code Sections 83111, 83116, and 91000.5, which assign to the
26 Enforcement Division the duty to administer, implement, and enforce the provisions of the Political
27 Reform Act, found at Government Code Sections 81000 through 91014.

3. When enacting the Political Reform Act (the “Act”),¹ California voters specifically found and declared that previous laws regulating political practices had suffered from inadequate enforcement, and it was their purpose to ensure that the Act be vigorously enforced.²

4. To that end, Section 81003 requires that the Act be liberally construed to achieve its purposes.

5. One of the stated purposes of the Act is to ensure voters are fully informed and improper practices are inhibited by requiring all political candidates, as well as the committees that support or oppose them, to disclose all contributions and expenditures made throughout a campaign.³

RESPONDENTS

6. Respondent Armenian National Committee Political Action Committee ANCPAC (the “Committee”) is a state general purpose committee.

7. Respondent Viken K. Pakradouni (“Pakradouni”) is the Committee’s current treasurer.

APPLICABLE LAW

8. All applicable law in this Accusation is the law as it existed during the relevant time for the violations alleged.

A. Definition of State General Purpose Committee

9. In 2010, a “committee” included any person or combination of persons who received contributions totaling \$1,000 or more in a calendar year, commonly known as a “recipient committee.”⁴

10. A general purpose committee is a committee which is formed or exists primarily to support or oppose more than one candidate or ballot measure.⁵

11. A state general purpose committee includes a committee formed to support or oppose candidates and measures voted on in a state election or in more than one county.⁶

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations.

² Sections 81001, subd. (h), and 81002, subd. (f).

³ Section 81002, subd. (a).

⁴ Section 82013, subd. (a).

⁵ Section 82027.5, subd. (a).

⁶ Section 82027.5, subd. (b).

1 **B. Duty to File Semi-Annual Campaign Statements**

2 12. A general purpose committee must file two semi-annual campaign statements each year no
3 later than July 31 for the period ending June 30 and no later than January 31 for the period ending
4 December 31.⁷

5 **C. Duty to File Electronically**

6 13. In 2010, a general purpose committee that cumulatively receives contributions or makes
7 expenditures totaling \$25,000 or more to support or oppose candidates for any elective state office or state
8 measure is required to file campaign statements online or electronically with the Secretary of State (the
9 “SOS”).⁸

10 14. Once a person or entity is required to file online or electronically, the person or entity is
11 required to file all subsequent reports online or electronically.⁹

12 15. Persons filing online or electronically are also required to continue to file statements and
13 reports in paper format.¹⁰

14 **D. Duty to Pay Annual Fees**

15 16. Each committee required to file a statement of organization must pay the SOS a \$50 annual
16 fee by January 15 each year until the committee is terminated.¹¹

17 17. A committee that fails to timely pay the \$50 annual fee is subject to a penalty equal to three
18 times the amount of the fee.

19 18. The Commission is required to enforce this provision of the Act.¹²

20 **E. Factors to be Considered by the Fair Political Practices Commission**

21 19. In framing a proposed order following a finding of a violation pursuant to Section 83116,
22 the Commission and the administrative law judge shall consider all the surrounding circumstances
23 including but not limited to: (1) The seriousness of the violation; (2) The presence or absence of any
24 intention to conceal, deceive or mislead; (3) Whether the violation was deliberate, negligent or inadvertent;

25
26 ⁷ Section 84200, subd. (a).

27 ⁸ Section 84605, subd. (a)(2).

28 ⁹ Section 84605, subd. (d).

¹⁰ Section 84605, subd. (f).

¹¹ Section 84101.5, subd. (b) and (c).

¹² Section 84101.5, subd. (d).

1 (4) Whether the violator demonstrated good faith by consulting the Commission staff or any other
2 government agency in a manner not constituting a complete defense under Section 83114(b); (5) Whether
3 the violation was isolated or part of a pattern and whether the violator has a prior record of violations of
4 the Act or similar laws; and (6) Whether the violator, upon learning of a reporting violation, voluntarily
5 filed amendments to provide full disclosure.¹³

6 GENERAL FACTS

7 20. The Committee filed an initial statement of organization with the SOS on February 17,
8 2010 and indicated that it had not yet qualified as a recipient committee.

9 21. On October 6, 2011, the Committee filed an amended statement of organization and
10 indicated that it had qualified as a recipient committee on November 19, 1981.¹⁴

11 22. According to the Committee's first semi-annual campaign statement for the reporting
12 period of January 1, 2010 through June 30, 2010, the Committee qualified as a recipient committee on or
13 about February 17, 2010, when it received contributions totaling \$1,000 or more.

14 23. During the reporting period of July 1, 2010 through October 16, 2010, the Committee
15 reported receiving \$26,850 in contributions and making \$27,100 in expenditures, including \$25,900 in
16 expenditures supporting a candidate for an elective state office. Therefore, the Committee and Pakradouni
17 are required to file campaign statements online or electronically and in paper format.

18 24. Pakradouni became the treasurer in 2014, according to an amended statement of
19 organization filed with the Secretary of State on or around June 18, 2014.

20 25. On August 18, 2017, the Committee and Pakradouni filed a semi-annual campaign
21 statement for the reporting period of January 1, 2017 through June 30, 2017 and reported an ending cash
22 balance of \$4,162.52.

23 26. Since the Committee has not been terminated, the Committee and Pakradouni were
24 required to file semi-annual campaign statements for the reporting periods of July 1, 2017 through
25 December 31, 2017; January 1, 2018 through June 30, 2018; and July 1, 2018 through December 31, 2018
26 but failed to do so.

27 ¹³ Regulation 18361.5, subd. (d).

28 ¹⁴ No additional information is available from the Secretary of State regarding the Committee's activity prior to the
statements filed in 2010.

1 27. The Committee and Pakradouni timely paid the \$50 annual fee for 2016, 2017, and 2018.

2 28. The Committee and Pakradouni were required to pay the \$50 annual fee for 2015 by
3 January 15, 2015, and the \$50 annual for 2019 by January 15, 2019, as well as the associated \$150
4 penalties but failed to do so.

5 29. According to a statement made by Pakradouni to Enforcement staff, Pakradouni has not
6 had access to Committee assets since taking over as the treasurer in 2014. Any funds belonging to the
7 Committee are presently being held by the State Controller's Office ("SCO") as Unclaimed Property.
8 Pakradouni stated he was in the process of reclaiming the funds. According to records from SCO regarding
9 the unclaimed property, the property was entrusted to SCO at various times in 2015. A remittance of
10 approximately \$2,332 and a remittance of approximately \$3,042 was received by SCO on September 3,
11 2015. According to the supporting records provided by SCO, these funds were originally funds held in a
12 bank account that surrendered the funds as part of a lawsuit. A remittance of \$428 was received by SCO
13 on June 13, 2017. According to the supporting records, these funds were a cashier's check held by Bank
14 of America.

15 30. The Enforcement Division sought to obtain bank records held in the name of the
16 Committee at the financial institution that the Committee purported to have an account with on a statement
17 of organization. According to the financial institution, no such records could be located.

18 **PROCEDURAL HISTORY**

19 31. The SOS sent the Committee and Pakradouni a notice regarding the required payment of
20 the \$50 annual fee for 2015 on November 20, 2014. After the Committee and Pakradouni failed to pay the
21 2015 annual fee, the SOS referred the matter to the Enforcement Division.

22 32. The Enforcement Division identified that the Committee and Pakradouni also failed to
23 timely pay the \$50 annual fee for 2019 and the associated \$150 penalty. The SOS sent the Committee and
24 Pakradouni a notice regarding the required payment on December 3, 2018.

25 33. The SOS contacted the Committee and Pakradouni at least eleven times via U.S. Mail
26 between February 16, 2018 and August 14, 2019, regarding the delinquent campaign statements for the
27 reporting periods of July 1, 2017 through December 31, 2017; January 1, 2018 through June 30, 2018;
28

1 and July 1, 2018 through December 31, 2018. After the Committee and Pakradouni failed to file the
2 required statements, the SOS referred these matters to the Enforcement Division in 2018 and 2019.

3 34. The Enforcement Division contacted the Committee and Pakradouni at least four times via
4 U.S. Mail and email between October 24, 2018 and November 16, 2018, regarding the required semi-
5 annual campaign statements for the reporting periods ending on December 31, 2017, and June 30, 2018,
6 and the \$50 annual fee for 2015.

7 35. On November 2, 2018, Pakradouni asserted that he would file the delinquent campaign
8 statements by November 15, 2018. On May 9, 2019, Pakradouni contacted the Enforcement Division via
9 phone regarding his filing obligations.

10 36. On May 9, 2019; June 18, 2019; and June 25, 2019, the Enforcement Division contacted
11 Pakradouni via email regarding the outstanding campaign statements.

12 37. On July 2, 2019, Pakradouni asserted that he would file the delinquent campaign statements
13 on July 3, 2019.

14 38. The Enforcement Division initiated an administrative action against the Committee and
15 Pakradouni in this matter by serving them with a packet containing a cover letter, a Report in Support of
16 a Finding of Probable Cause (“PC Report”), a fact sheet regarding probable cause proceedings, selected
17 sections of the Government Code regarding probable cause proceedings for the Commission, and selected
18 regulations of the Commission regarding probable cause proceedings.

19 39. The Committee and Pakradouni were served with the PC Report on July 29, 2019. The
20 information contained in the PC Report packet advised the Committee and Pakradouni that they had 21
21 days in which to request a probable cause conference, file a written response to the PC Report, or both.
22 As of the date of this Accusation, the Committee and Pakradouni have not responded to the PC Report.

23 40. By means of an Ex Parte Request for a Finding of Probable Cause and an Order that an
24 Accusation Be Prepared and Served (“Ex Parte Request”), dated August 20, 2019, the Enforcement
25 Division submitted the matter to the Hearing Officer for a determination of probable cause.

26 41. On or about August 21, 2019, the Hearing Officer issued an order finding, based on the Ex
27 Parte Request and the PC Report, that there was probable cause to believe the Committee and Pakradouni
28

1 violated the Act and directed the Enforcement Division to issue an accusation against the Committee and
2 Pakradouni in accordance with the finding.

3 42. As of the date of this Accusation, the Committee and Pakradouni have failed to file three
4 semi-annual campaign statements for the reporting periods ending on December 31, 2017; June 30, 2018;
5 and December 31, 2018 and have failed to pay the \$50 annual fees for 2015 and 2019 as well as the
6 associated \$150 penalties. The Committee remains open and continues to have an obligation to file
7 campaign statements and to pay the annual fee.

8 **VIOLATIONS**

9 43. The Committee and Pakradouni committed five violations of the Act as follows:

10 **Count 1**

11 **Failure to Timely File a Semi-Annual Campaign Statement**

12 44. Complainant incorporates paragraphs 1 – 43 of this Accusation, as though completely set
13 forth here.

14 45. The Committee and Pakradouni had a duty to file a semi-annual campaign statement on
15 paper and electronically for the reporting period of July 1, 2017 through December 31, 2017 by the
16 deadline of January 31, 2018.

17 46. The Committee and Pakradouni failed to file a semi-annual campaign statement on paper
18 and electronically for the reporting period of July 1, 2017 through December 31, 2017 by the deadline.

19 47. By failing to file the semi-annual campaign statement on paper and electronically by
20 January 31, 2018, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

21 **Count 2**

22 **Failure to Timely File a Semi-Annual Campaign Statement**

23 48. Complainant incorporates paragraphs 1 – 47 of this Accusation, as though completely set
24 forth here.

25 49. The Committee and Pakradouni had a duty to file a semi-annual campaign statement on
26 paper and electronically for the reporting period of January 1, 2018 through June 30, 2018 by the deadline
27 of July 31, 2018.

1 50. The Committee and Pakradouni failed to file a semi-annual campaign statement on paper
2 and electronically for the reporting period of January 1, 2018 through June 30, 2018 by the deadline.

3 51. By failing to file the semi-annual campaign statement on paper and electronically by July
4 31, 2018, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

5 **Count 3**

6 **Failure to Timely File a Semi-Annual Campaign Statement**

7 52. Complainant incorporates paragraphs 1 – 51 of this Accusation, as though completely set
8 forth here.

9 53. The Committee and Pakradouni had a duty to file a semi-annual campaign statement on
10 paper and electronically for the reporting period of July 1, 2018 through December 31, 2018 by the
11 deadline of January 31, 2019.

12 54. The Committee and Pakradouni failed to file a semi-annual campaign statement on paper
13 and electronically for the reporting period of July 1, 2018 through December 31, 2018 by the deadline.

14 55. By failing to file the semi-annual campaign statement on paper and electronically by
15 January 31, 2019, the Committee and Pakradouni violated Government Code Sections 84200 and 84605.

16 **Count 4**

17 **Failure to Timely Pay the 2015 Annual Fee**

18 56. Complainant incorporates paragraphs 1 – 55 of this Accusation, as though completely set
19 forth here.

20 57. The Committee and Pakradouni had a duty to pay the 2015 annual fee to the SOS by the
21 deadline of January 15, 2015, and the resulting \$150 penalty.

22 58. The Committee and Pakradouni failed to pay the 2015 annual fee by the deadline and the
23 resulting \$150 penalty.

24 59. By failing to pay the 2015 annual fee by January 15, 2015, and the resulting \$150 penalty,
25 the Committee and Pakradouni violated Government Code Section 84101.5, subdivisions (c) and (d).

26
27

28 //

1 **Count 5**

2 **Failure to Timely Pay the 2019 Annual Fee**

3 60. Complainant incorporates paragraphs 1 – 59 of this Accusation, as though completely set
4 forth here.

5 61. The Committee and Pakradouni had a duty to pay the 2019 annual fee to the SOS by the
6 deadline of January 15, 2019, and the resulting \$150 penalty.

7 62. The Committee and Pakradouni failed to pay the 2019 annual fee by the deadline and the
8 resulting \$150 penalty.

9 63. By failing to pay the 2019 annual fee by January 15, 2019, and the resulting \$150 penalty,
10 the Committee and Pakradouni violated Government Code Section 84101.5, subdivisions (c) and (d).

11 **MITIGATING OR EXCULPATORY FACTORS**

12 64. According to Pakradouni, the Committee’s funds are currently being held by the state as
13 unclaimed property and he is working to resolve this issue.

14 **AGGRAVATING FACTORS AND OTHER RELEVANT MATERIALS**

15 65. The Committee and Pakradouni have a history of not timely filing campaign statements. In
16 the FPPC Case No. 17/473, the Committee and Pakradouni paid a streamline penalty for failure to timely
17 file three semi-annual campaign statements for the reporting periods ending on June 30, 2016; December
18 31, 2016; and June 30, 2017. The Committee and Pakradouni paid the fine and the annual fee during the
19 time the committee’s funds were held by the SCO.

20 66. Though Pakradouni sought informal advice from the Commission’s education division, he
21 has failed to file any of the outstanding statements to report the disposition of the Committee’s funds.

22 **PRAYER**

23 WHEREFORE, Complainant prays as follows:

- 24 1. That the Fair Political Practices Commission hold a hearing pursuant to Section 83116 and
25 Regulation 18361.5, and at such hearing find that the Committee and Pakradouni violated
26 the Act as alleged herein;

2. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Pakradouni to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 1**;
3. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Pakradouni to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 2**;
4. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Pakradouni to pay a monetary penalty of up to \$5,000 for the violation of the Political Reform Act alleged in **Count 3**;
5. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Pakradouni to pay a monetary penalty of up to \$200 for the violation of the Political Reform Act alleged in **Count 4**;
6. That the Fair Political Practices Commission, pursuant to Section 83116, subdivision (c), order the Committee and Pakradouni to pay a monetary penalty of up to \$200 for the violation of the Political Reform Act alleged in **Count 5**;
7. That the Fair Political Practices Commission, pursuant to Regulation 18361.5, subdivision (d), consider the following factors in framing a proposed order following a finding of a violation pursuant to Section 83116: (1) the seriousness of the violation; (2) the presence or absence of any intention to conceal, deceive or mislead; (3) whether the violation was deliberate, negligent or inadvertent; (4) whether the violator demonstrated good faith by consulting the Commission staff or any other government agency in a manner not constituting a complete defense under Section 83114, subdivision (b); (5) whether the violation was isolated or part of a pattern and whether the violator has a prior record of violations of the Act or similar laws; and (6) whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.

//

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8. That the Fair Political Practices Commission grant such other and further relief as it deems just and proper.

Dated: 24 July 2020



Galena West
Chief of Enforcement
Fair Political Practices Commission

Exhibit A-7

AFFIDAVIT OF PERSONAL SERVICE

Case: 2018-01139	Court: Fair Political Practices Commission	County: Sacramento	Job: 4734540 (Serve Viken Pakradouni)
Plaintiff / Petitioner: FAIR POLITICAL PRACTICES COMMISSION		Defendant / Respondent: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC and VIKEN K. PAKRADOUNI	
Received by: My Investigative Services, Inc.		For: California Fair Political Practices Commission	
To be served upon: Viken Pakradouni			

I, William Sera, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Viken Pakradouni, Home:



Manner of Service: Personal/Individual, on July 31, 2020, 8:35 a.m.

- Documents:
1. Statement to Respondent;
 2. FPPC Case No. 2018-01139: Accusation;
 3. Notice of Defense, FPPC Case No. 2018/00916;
 4. Selected Sections of the California Government Code, Administrative Procedure Act.

Additional Comments:

1) Unsuccessful Attempt on July 30, 2020, at 1:10 pm at Home:



We door knocked and his spouse answered and stated he is an attorney and he is at work. I asked if tonight and she stated he has a meeting. It would be better tomorrow morning at 8:00 a.m. before he leaves to work would be best. I stated to her I will be back tomorrow morning.

2) Successful Attempt on July 31, 2020, 8:35 a.m. at Home:



Age: 60; Ethnicity: Armenia; Gender: Male; Weight: 170; Height: 5'8"; Hair: Bald; Eyes: Brown;

I door knocked & a male answered and he stated his name after asked it was positively the target and it was handed/personally to him and he accepted it.

William Sera

Digitally signed by William Sera
Date: 2020.07.31 13:41:43
-07'00'

July 31, 2020

William Sera
RPS No. 2016163195
Los Angeles County

Date

My Investigative Services, Inc.
136 N. Grand Ave Suite 115
West Covina, CA 91791
(213) 342-1802

Exhibit A-8



FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3000 • Sacramento, CA 95811

STATEMENT TO RESPONDENTS

[Government Code Section 11505, subdivision (b)]

***ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
and VIKEN K. PAKRADOUNI
FPPC Case No. 2018-01139***

Enclosed is an Accusation, which was filed with the Fair Political Practices Commission (the "FPPC") and which is hereby served upon you, along with two copies of a Notice of Defense and Government Code Sections 11506 through 11508.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the FPPC within 15 days after the Accusation was served on you, the FPPC may proceed upon the Accusation without a hearing. The request for a hearing may be made by delivering or mailing the enclosed form entitled Notice of Defense, or by delivering or mailing a notice of defense as provided by Section 11506 of the Government Code to the Commission Assistant at the FPPC.

You may, but need not, be represented by counsel at any or all stages of these proceedings.

If you desire a list of the names and addresses of witnesses against you, or an opportunity to inspect and copy the items mentioned in Section 11507.6 of the Government Code that are in the possession, custody, or control of this agency, or if you wish to discuss the possibility of resolving this matter without a formal hearing, you may contact Theresa Gilbertson, Commission Counsel, at (916) 323-6421 or tgilbertson@fppc.ca.gov, Enforcement Division.

The hearing may be postponed for good cause. If you have good cause, you are obliged to notify the FPPC or, if an administrative law judge has been assigned to the hearing, the Office of Administrative Hearings, within 10 working days after you discover the good cause. Failure to give notice within 10 days will deprive you of a postponement.

After a hearing, the FPPC will consider the following factors in determining whether to assess a penalty (Title 2, California Code of Regulations, Section 18361.5, subdivision (d).):

1. The seriousness of the violation;
2. The presence or absence of any intention to conceal, deceive, or mislead;
3. Whether the violation was deliberate, negligent, or inadvertent;
4. Whether the violator demonstrated good faith by consulting Commission staff or any other government agency in a manner not constituting a complete defense under Government Code Section 83114, subdivision (b);
5. Whether the violation was isolated or part of a pattern;
6. Whether the violator has a prior record of violations of the Political Reform Act or similar laws; and
7. Whether the violator, upon learning of a reporting violation, voluntarily filed amendments to provide full disclosure.



Before the Fair Political Practices Commission

State of California

In the Matter of) NOTICE OF DEFENSE
) (Pursuant to Gov. Code § 11506)
)
ARMENIAN NATIONAL COMMITTEE) FPPC Case No. 2018/00916
POLITICAL ACTION COMMITTEE)
ANCPAC and VIKEN K. PAKRADOUNI,)
)
Respondents.)
)
)
)
)

Viken K. Pakradouni, a respondent named in the above entitled proceeding and on behalf of committee, Armenian National Committee Political Action Committee ANCPAC, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

GROUND FOR NOTICE OF DEFENSE

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
 - a) I admit the Accusation in whole.
 - b) I admit the Accusation in part as indicated below:

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: _____

Respondent

Print Name

Mailing Address

City, State, Zip



Before the Fair Political Practices Commission

State of California

In the Matter of)	NOTICE OF DEFENSE
)	(Pursuant to Gov. Code § 11506)
)	
ARMENIAN NATIONAL COMMITTEE)	FPPC Case No. 2018/00916
POLITICAL ACTION COMMITTEE)	
ANCPAC and VIKEN K. PAKRADOUNI,)	
)	
Respondents.)	
)	
)	

Viken K. Pakradouni, a respondent named in the above entitled proceeding and on behalf of committee, Armenian National Committee Political Action Committee ANCPAC, hereby acknowledges receipt of the Accusation, a copy of the Statement to Respondent, a copy of Government Code Sections 11506 through 11508, and two copies of a *NOTICE OF DEFENSE*.

Pursuant to Government Code Section 11506, subdivision (a), you may file this *NOTICE OF DEFENSE* requesting a hearing on the grounds listed below. Failure to file this *NOTICE OF DEFENSE* shall constitute a waiver of your right to a hearing. If you waive your right to a hearing, you may file a statement of mitigation by separate letter that will be considered by the Commission in assessing any penalties for the violations alleged in the Accusation.

If you wish to file a *NOTICE OF DEFENSE*, please check **all** applicable grounds for the *NOTICE OF DEFENSE*, complete the remainder of the form, and mail to the Commission within fifteen (15) days of receipt of the Accusation.

GROUND FOR NOTICE OF DEFENSE

- 1) I request a hearing;
- 2) I object to the Accusation upon the ground that it does not state acts or omissions upon which the agency may proceed;
- 3) I object to the form of the Accusation on the ground that it is so indefinite or uncertain that I cannot identify the transaction that is the subject of the Accusation or prepare my defense;
- 4) I admit the Accusation in whole or in part (check box "a" or "b");
 - a) I admit the Accusation in whole.
 - b) I admit the Accusation in part as indicated below:

- 5) I wish to present new matter by way of defense;
- 6) I object to the accusation upon the ground that, under the circumstances, compliance with the requirements of a regulation of the Fair Political Practices Commission would result in a material violation of another regulation enacted by another department affecting substantive rights.

Dated: _____

Respondent

Print Name

Mailing Address

City, State, Zip

California Government Code sections 11506 through 11508

§ 11506. Filing of notice of defense or notice of participation; Contents; Right to hearing on the merits

(a) Within 15 days after service of the accusation or District Statement of Reduction in Force the respondent may file with the agency a notice of defense, or, as applicable, notice of participation, in which the respondent may:

(1) Request a hearing.

(2) Object to the accusation or District Statement of Reduction in Force upon the ground that it does not state acts or omissions upon which the agency may proceed.

(3) Object to the form of the accusation or District Statement of Reduction in Force on the ground that it is so indefinite or uncertain that the respondent cannot identify the transaction or prepare a defense.

(4) Admit the accusation or District Statement of Reduction in Force in whole or in part.

(5) Present new matter by way of defense.

(6) Object to the accusation or District Statement of Reduction in Force upon the ground that, under the circumstances, compliance with the requirements of a regulation would result in a material violation of another regulation enacted by another department affecting substantive rights.

(b) Within the time specified the respondent may file one or more notices of defense, or, as applicable, notices of participation, upon any or all of these grounds but all of these notices shall be filed within that period unless the agency in its discretion authorizes the filing of a later notice.

(c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense or notice of participation, and the notice shall be deemed a specific denial of all parts of the accusation or District Statement of Reduction in Force not expressly admitted. Failure to file a notice of defense or notice of participation shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing. Unless objection is taken as provided in paragraph (3) of subdivision (a), all objections to the form of the accusation or District Statement of Reduction in Force shall be deemed waived.

(d) The notice of defense or notice of participation shall be in writing signed by or on behalf of the respondent and shall state the respondent's mailing address. It need not be verified or follow any particular form.

(e) As used in this section, "file," "files," "filed," or "filing" means "delivered or mailed" to the agency as provided in Section 11505.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 931 § 1; Stats 1982 ch 606 § 1; Stats 1986 ch 951 § 20; Stats 1995 ch 938 § 29 (SB 523), operative July 1, 1997; Stats 2013 ch 90 § 5 (SB 546), effective January 1, 2014.

§ 11507. Amended or supplemental accusation or District Statement of Reduction in Force; Objections

At any time before the matter is submitted for decision, the agency may file, or permit the filing of, an amended or supplemental accusation or District Statement of Reduction in Force. All parties shall be notified of the filing. If the amended or supplemental accusation or District Statement of Reduction in Force presents new charges, the agency shall afford the respondent a reasonable opportunity to prepare his or her defense to the new charges, but he or she shall not be entitled to file a further pleading unless the agency in its discretion so orders. Any new charges shall be deemed controverted, and any objections to the amended or supplemental accusation or District Statement of Reduction in Force may be made orally and shall be noted in the record.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 2013 ch 90 § 6 (SB 546), effective January 1, 2014; Stats 2014 ch 71 § 69 (SB 1304), effective January 1, 2015.

§ 11507.3. Consolidated proceedings; Separate hearings

(a) When proceedings that involve a common question of law or fact are pending, the administrative law judge on the judge's own motion or on motion of a party may order a joint hearing of any or all the matters at issue in the proceedings. The administrative law judge may order all the proceedings consolidated and may make orders concerning the procedure that may tend to avoid unnecessary costs or delay.

(b) The administrative law judge on the judge's own motion or on motion of a party, in furtherance of convenience or to avoid prejudice or when separate hearings will be conducive to expedition and economy, may order a separate hearing of any issue, including an issue raised in the notice of defense or notice of participation, or of any number of issues.

HISTORY: Added Stats 1995 ch 938 § 30 (SB 523), operative July 1, 1997. Amended Stats 2013 ch 90 § 7 (SB 546), effective January 1, 2014.

///

§ 11507.5. Exclusivity of discovery provisions

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

HISTORY: Added Stats 1968 ch 808 § 3.

§ 11507.6. Request for discovery

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

HISTORY: Added Stats 1968 ch 808 § 4. Amended Stats 1985 ch 1328 § 5; Stats 1995 ch 938 § 31 (SB 523), operative July 1, 1997.

§ 11507.7. Motion to compel discovery; Order

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of *Section 915 of the Evidence Code* and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become

effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

HISTORY: Added Stats 1968 ch 808 § 5. Amended Stats 1971 ch 1303 § 8; Stats 1980 ch 548 § 2; Stats 1995 ch 938 § 32 (SB 523), operative July 1, 1997.

§ 11508. Time and place of hearing

(a) The agency shall consult the office, and subject to the availability of its staff, shall determine the time and place of the hearing. The hearing shall be held at a hearing facility maintained by the office in Sacramento, Oakland, Los Angeles, or San Diego and shall be held at the facility that is closest to the location where the transaction occurred or the respondent resides.

(b) Notwithstanding subdivision (a), the hearing may be held at either of the following places:

(1) A place selected by the agency that is closer to the location where the transaction occurred or the respondent resides.

(2) A place within the state selected by agreement of the parties.

(c) The respondent may move for, and the administrative law judge has discretion to grant or deny, a change in the place of the hearing. A motion for a change in the place of the hearing shall be made within 10 days after service of the notice of hearing on the respondent.

Unless good cause is identified in writing by the administrative law judge, hearings shall be held in a facility maintained by the office.

HISTORY: Added Stats 1945 ch 867 § 1. Amended Stats 1963 ch 710 § 1; Stats 1967 ch 17 § 39; Stats 1987 ch 50 § 1; Stats 1995 ch 938 § 33 (SB 523), operative July 1, 1997; Stats 2005 ch 674 § 22 (SB 231), effective January 1, 2006.

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. My business address is Fair Political Practices Commission, 1102 Q Street, Suite 3000, Sacramento, California 95811.

On 7/27/2020, I served the following document(s):

1. Statement to Respondent;
2. FPPC Case No. 2018-01139: Accusation;
3. Notice of Defense (Two Copies);
4. Selected Sections of the California Government Code, Administrative Procedure Act.

By Personal Delivery. I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By personal service. At 10:55 (a.m./p.m.):

I personally delivered the document(s) listed above to the person(s) at the address(es) as shown on the service list below.

By providing the document(s) listed above with instructions for registered process server to personally deliver the envelope(s) to the person(s) at the address(es) set forth on the service list below. **The signed proof of service by the registered process server will be attached as soon as it is available.**

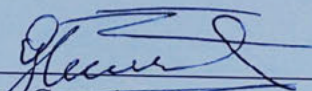
I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Sacramento County, California.

SERVICE LIST

Personal Service

Viken Pakradouni
[REDACTED]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on 7/27/2020.



Suzanna Gevorkyan

Exhibit A-9

Statement of Organization Recipient Committee

R-19
6

Type or print in ink

1324670

STATEMENT OF ORGANIZATION

CALIFORNIA FORM 410

Statement Type

Initial
Not yet qualified or

Amendment
List I.D. number:

Termination - See Part 5
List I.D. number:

_____/_____/_____
Date qualified as committee

_____/_____/_____
Date qualified as committee
(If applicable)

_____/_____/_____
Date of Termination

Date Stamp
RECEIVED AND FILED
in the office of the Secretary of State
of the State of California
FEB 17 2010
DEBRA BOWEN
Secretary of State

For Official Use Only

R/H

1. Committee Information

NAME OF COMMITTEE

Armenian National Committee Political Action Committee, "ANCPAC"

STREET ADDRESS (NO PO. BOX)

1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	818-260-0669

MAILING ADDRESS (IF DIFFERENT)

OPTIONAL: FAX / E-MAIL ADDRESS

877-260-0657

COUNTY OF DOMICILE	COUNTY WHERE COMMITTEE IS ACTIVE IF DIFFERENT THAN COUNTY OF DOMICILE
Los Angeles	

Attach additional information on appropriately labeled continuation sheets.

2. Treasurer and Other Principal Officers

NAME OF TREASURER

Kinde Durkee

STREET ADDRESS

1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	818-260-0669

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE

NAME AND POSITION OF OTHER PRINCIPAL OFFICER(S), IF APPLICABLE

Armen Martin

MAILING ADDRESS

104 N. Belmont Avenue, Suite 208

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Glendale	CA	91206	213-891-5038

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 2-16-10
DATE

By Kinde Durkee
SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

**Statement of Organization
Recipient Committee**

STATEMENT OF ORGANIZATION

**CALIFORNIA
FORM 410**

INSTRUCTIONS ON REVERSE

Page 3

COMMITTEE NAME

Armenian National Committee Political Action Committee, "ANCPAC"

I.D. NUMBER

4. Type of Committee (Continued)

General Purpose Committee

Not formed to support or oppose specific candidates or measures in a single election. Check only one box:

CITY Committee COUNTY Committee STATE Committee

PROVIDE BRIEF DESCRIPTION OF ACTIVITY

To support and/or oppose candidates and/or ballot measures.

Sponsored Committee

List additional sponsors on an attachment.

NAME OF SPONSOR

INDUSTRY GROUP OR AFFILIATION OF SPONSOR

STREET ADDRESS

NO. AND STREET

CITY

STATE

ZIP CODE

Small Contributor Committee

____/____/____
Date qualified

Check box and provide the date this committee qualified as a small contributor committee. If the committee qualified as a small contributor committee on January 1, 2001, enter 1/1/01.

5. Termination Requirements By signing the verification, the treasurer, assistant treasurer and/or candidate, officeholder, or proponent certify that all of the following conditions have been met:

- This committee has ceased to receive contributions and make expenditures;
 - This committee does not anticipate receiving contributions or making expenditures in the future;
 - This committee has eliminated or has no intention or ability to discharge all debts, loans received, and other obligations;
 - This committee has no surplus funds; and
 - This committee has filed all campaign statements required by the Political Reform Act disclosing all reportable transactions.
- There are restrictions on the disposition of surplus campaign funds held by elected officers who are leaving office and by defeated candidates. Refer to Government Code Section 89519.

Exhibit A-10

**Statement of Organization
Recipient Committee**

R
G19

Type or print in Ink.

1324670

STATEMENT OF ORGANIZATION

RECEIVED AND FILED
in the office of the Secretary
of the State of California

OCT 06 2011

DEBRA BOWEN
Secretary of State

Page 1 of 3

CALIFORNIA FORM **410**

RE

Statement Type

Initial
 Not yet qualified or

Amendment

List I.D. number:
1324670
11/19/1981

Termination - See Part 5

List I.D. number:

Date qualified as committee

Date qualified as committee
(if applicable)

Date of Termination

1. Committee Information

NAME OF COMMITTEE

ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE 'ANCPAC'

STREET ADDRESS (NO P.O. BOX)

120 N. Sunset Canyon Dr

CITY

BURBANK

STATE ZIP CODE

CA 91501

AREA CODE / PHONE

(818) 846-0024

MAILING ADDRESS (IF DIFFERENT)

OPTIONAL: FAX / E-MAIL ADDRESS

(818) 846-1012 / pamcorradi@att.net

COUNTY OF DOMICILE

Los Angeles

COUNTY WHERE COMMITTEE IS ACTIVE IF DIFFERENT
THAN COUNTY OF DOMICILE

Attach additional information on appropriately labeled continuation sheets.

2. Treasurer and Other Principal Officers

NAME OF TREASURER

Pamela Corradi

STREET ADDRESS

120 N. Sunset Canyon Dr.

CITY

Burbank

STATE ZIP CODE

CA 91501

AREA CODE / PHONE

(818) 846-0024

NAME OF ASSISTANT TREASURER, IF ANY

Mary Khayat

STREET ADDRESS

120 N SUNSET CANYON DR

CITY

BURBANK

STATE ZIP CODE

CA 91501

AREA CODE / PHONE

(818) 846-0024

NAME AND POSITION OF OTHER PRINCIPAL OFFICER(S), IF APPLICABLE

MAILING ADDRESS

CITY

STATE ZIP CODE

AREA CODE / PHONE

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/4/2011
DATE

By *Pamela Corradi*
SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

**Statement of Organization
Recipient Committee**

STATEMENT OF ORGANIZATION

**CALIFORNIA
FORM 410**

INSTRUCTIONS ON REVERSE

Page 3

COMMITTEE NAME

Armenian National Committee Political Action Committee, "ANCPAC"

I.D. NUMBER

4. Type of Committee (Continued)

General Purpose Committee

Not formed to support or oppose specific candidates or measures in a single election. Check only one box:

CITY Committee COUNTY Committee STATE Committee

PROVIDE BRIEF DESCRIPTION OF ACTIVITY

To support and/or oppose candidates and/or ballot measures.

Sponsored Committee

List additional sponsors on an attachment.

NAME OF SPONSOR

INDUSTRY GROUP OR AFFILIATION OF SPONSOR

STREET ADDRESS

NO. AND STREET

CITY

STATE

ZIP CODE

Small Contributor Committee

____/____/____
Date qualified

Check box and provide the date this committee qualified as a small contributor committee. If the committee qualified as a small contributor committee on January 1, 2001, enter 1/1/01.

5. Termination Requirements By signing the verification, the treasurer, assistant treasurer and/or candidate, officeholder, or proponent certify that all of the following conditions have been met:

- This committee has ceased to receive contributions and make expenditures;
 - This committee does not anticipate receiving contributions or making expenditures in the future;
 - This committee has eliminated or has no intention or ability to discharge all debts, loans received, and other obligations;
 - This committee has no surplus funds; and
 - This committee has filed all campaign statements required by the Political Reform Act disclosing all reportable transactions.
- There are restrictions on the disposition of surplus campaign funds held by elected officers who are leaving office and by defeated candidates. Refer to Government Code Section 89519.

Exhibit A-11

Statement of Organization Recipient Committee

R19
G

Type or print in ink

1324670

STATEMENT OF ORGANIZATION

Statement Type

Initial
Not yet qualified or

Date qualified as committee

Amendment

List I.D. number:
1324670

Date qualified as committee
(If applicable)

Termination - See Part 5

List I.D. number:

Date of Termination

RECEIVED AND FILED
in the office of the Secretary of State
of the State of California

JUN 18 2014

CALIFORNIA FORM 410

For Official Use Only
TR
E

1. Committee Information

NAME OF COMMITTEE

Armenian National Committee Political Action Committee ANCPAC

STREET ADDRESS (NO P.O. BOX)

108 North Brand Blvd., Suite 202

CITY STATE ZIP CODE AREA CODE/PHONE
Glendale CA 91203 (562) 833-5906

MAILING ADDRESS (IF DIFFERENT)

OPTIONAL: FAX / E-MAIL ADDRESS

vpakradouni@earthlink.net

COUNTY OF DOMICILE COUNTY WHERE COMMITTEE IS ACTIVE IF DIFFERENT THAN COUNTY OF DOMICILE
Los Angeles

Attach additional information on appropriately labeled continuation sheets.

2. Treasurer and Other Principal Officers

NAME OF TREASURER

Viken K. Pakradouni

STREET ADDRESS

108 North Brand, Suite 202

CITY STATE ZIP CODE AREA CODE/PHONE
Glendale CA 91203 (562) 833-5906

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

NAME AND POSITION OF OTHER PRINCIPAL OFFICER(S), IF APPLICABLE

MAILING ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 13, 2014
DATE

Executed on _____
DATE

Executed on _____
DATE

Executed on _____
DATE

By Viken Pakradouni
SIGNATURE OF TREASURER OR ASSISTANT TREASURER

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

Statement of Organization Recipient Committee

STATEMENT OF ORGANIZATION

**CALIFORNIA
FORM 410**

INSTRUCTIONS ON REVERSE

Page 2

COMMITTEE NAME

I.D. NUMBER

4. Type of Committee Complete the applicable sections.

Controlled Committee

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "non-partisan."
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROPONENT	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	PARTY
			<input type="checkbox"/> Non-Partisan
			<input type="checkbox"/> Non-Partisan

- List the financial institution where the campaign bank account is located (controlled "candidate election" committees only)

NAME OF FINANCIAL INSTITUTION	AREA CODE/PHONE	BANK ACCOUNT NUMBER	
ADDRESS	CITY	STATE	ZIP CODE

Primarily Formed Committee Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER)	CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION (INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)	CHECK ONE	
		SUPPORT	OPPOSE

Statement of Organization
Recipient Committee

STATEMENT OF ORGANIZATION

CALIFORNIA FORM 410

INSTRUCTIONS ON REVERSE

Page 3

COMMITTEE NAME

I.D. NUMBER

4. Type of Committee (Continued)

General Purpose Committee

Not formed to support or oppose specific candidates or measures in a single election. Check only one box:

CITY Committee COUNTY Committee STATE Committee

PROVIDE BRIEF DESCRIPTION OF ACTIVITY

Support candidates and measures of interest to the American Armenian community in California.

Sponsored Committee

List additional sponsors on an attachment.

NAME OF SPONSOR

INDUSTRY GROUP OR AFFILIATION OF SPONSOR

STREET ADDRESS

NO. AND STREET

CITY

STATE

ZIP CODE

Small Contributor Committee

____/____/____
Date qualified

Check box and provide the date this committee qualified as a small contributor committee. If the committee qualified as a small contributor committee on January 1, 2001, enter 1/1/01.

5. Termination Requirements By signing the verification, the treasurer, assistant treasurer and/or candidate, officeholder, or proponent certify that all of the following conditions have been met:

- This committee has ceased to receive contributions and make expenditures;
 - This committee does not anticipate receiving contributions or making expenditures in the future;
 - This committee has eliminated or has no intention or ability to discharge all debts, loans received, and other obligations;
 - This committee has no surplus funds; and
 - This committee has filed all campaign statements required by the Political Reform Act disclosing all reportable transactions.
- There are restrictions on the disposition of surplus campaign funds held by elected officers who are leaving office and by defeated candidates. Refer to Government Code Section 89519.

Exhibit A-12

Recipient Committee Campaign Statement

(Government Code Sections 84200-84216.5)

Type or print in ink.

Date Stamp

Page 1 of 13

For Official Use Only

Statement covers period
from 01/01/2010
through 06/30/2010

Date of election if applicable:
(Month, Day, Year)

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1,2,3, and 4.

- | | |
|--|---|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee
<input type="radio"/> State Candidate Election Committee
<input type="radio"/> Recall
(Also Complete Part 5.) | <input type="checkbox"/> Ballot Measure Committee
<input type="radio"/> Primary Formed
<input type="radio"/> Controlled
<input type="radio"/> Sponsored
(Also Complete Part 6.) |
| <input checked="" type="checkbox"/> General Purpose Committee
<input type="radio"/> Sponsored
<input type="radio"/> Small Contributor Committee
<input type="radio"/> Political Party/Central Committee | <input type="checkbox"/> Primary Formed Candidate/
Officeholder Committee
(Also Complete Part 7.) |

2. Type of Statement:

- | | |
|---|--|
| <input type="checkbox"/> Pre-election Statement | <input type="checkbox"/> Quarterly Statement |
| <input checked="" type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement | <input type="checkbox"/> Supplemental Preelection
Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER
1324670

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Armenian National Committee - St.

STREET ADDRESS (NO P.O. BOX)
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	(818) 260-0669

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	

OPTIONAL: FAX/E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER
Kinde Durkee

MAILING ADDRESS
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	(818) 260-0669

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX/E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 07/08/2010 By Kinde Durkee
DATE SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT OR RESPONSIBLE OFFICER OF SPONSOR

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

**Recipient Committee
Campaign Statement
Cover Page – Part 2**

Type or print in ink.

COVER PAGE - PART 2

**CALIFORNIA
FORM 460**

Page 2 of 13

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Held:

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or to make expenditures on behalf of your candidacy.

COMMITTEE NAME I.D.NUMBER

NAME OF TREASURER CONTROLLED COMMITTEE?
 YES NO

COMMITTEE ADDRESS STREET ADDRESS (NO P.O.BOX)
CITY STATE ZIP CODE AREA CODE/PHONE

COMMITTEE NAME I.D.NUMBER

NAME OF TREASURER CONTROLLED COMMITTEE?
 YES NO

COMMITTEE ADDRESS STREET ADDRESS (NO P.O.BOX)
CITY STATE ZIP CODE AREA CODE/PHONE

6. Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD DISTRICT NO. IF ANY

7. Primarily Formed Committee

List names of officeholder(s) or candidate(s) for which this committee is primarily formed.

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period		CALIFORNIA FORM 460
from	01/01/2010	
through	06/30/2010	Page 3 of 13
		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Armenian National Committee - St.

Contributions Received

		Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions	Schedule A, Line 3	\$2,000.00	\$2,000.00
2. Loans Received	Schedule B, Line 7	\$0.00	\$0.00
3. SUBTOTAL CASH CONTRIBUTIONS	Add Lines 1 + 2	\$2,000.00	\$2,000.00
4. Nonmonetary Contributions	Schedule C, Line 3	\$0.00	\$0.00
5. TOTAL CONTRIBUTIONS RECEIVED	Add Lines 3 + 4	\$2,000.00	\$2,000.00

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

	1/1 through 6/30	7/1 to Date
20. Contribution Received	\$0.00	\$0.00
21. Expenditures Made	\$0.00	\$0.00

Expenditures Made

		Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made	Schedule E, Line 4	\$930.48	\$930.48
7. Loans Made	Schedule H, Line 7	\$0.00	\$0.00
8. SUBTOTAL CASH PAYMENTS	Add Lines 6 + 7	\$930.48	\$930.48
9. Accrued Expenses (Unpaid Bills)	Schedule F, Line 3	\$0.00	\$0.00
10. Nonmonetary Adjustment	Schedule C, Line 3	\$0.00	\$0.00
11. TOTAL EXPENDITURES MADE	Add Lines 8 + 9 + 10	\$930.48	\$930.48

Expenditure Limit Summary for State Candidates

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Current Cash Statement

12. Beginning Cash Balance	Previous Summary Page, Line 16	\$0.00
13. Cash Receipts	Column A, Line 3 above	\$2,000.00
14. Miscellaneous Increases to Cash	Schedule I, Line 4	\$0.00
15. Cash Payments	Column A, Line 8 above	\$930.48
16. ENDING CASH BALANCE	Add Lines 12 + 13 + 14, then subtract Line 15	\$1,069.52
If this is a termination statement, Line 16 must be zero.		

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

17. LOAN GUARANTEES RECEIVED.....	Schedule B, Part 2	\$0.00
-----------------------------------	--------------------	--------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents	See instructions on reverse	\$0.00
19. Outstanding Debts	Add Line 2 + Line 9 in Column B above	\$0.00

*Since January 1, 2001. Amounts in this section may be different from amounts reported in Column B.

Schedule A Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period		CALIFORNIA FORM 460
from	01/01/2010	
through	06/30/2010	Page 4 of 13
NAME OF FILER Armenian National Committee - St.		I.D. Number 1324670

SEE INSTRUCTIONS ON REVERSE

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
2/17/2010	Arch Properties LLC 350 N Glenoaks Bl #302 Burbank, CA 91502	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$500.00	\$500.00	
2/17/2010	G&S Transit Management Inc 7955 San Fernando Rd Sun Valley, CA 91352	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$500.00	\$500.00	
6/16/2010	GMZ Pharmacy Corp DBA Remedy Pharmacy 459 W Broadway Glendale, CA 91204	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$250.00	\$500.00	
6/16/2010	GMZ Pharmacy Corp DBA Remedy Pharmacy 459 W Broadway Glendale, CA 91204	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$250.00	\$500.00	
2/17/2010	Industrial Motor Power Corporation 928 N San Fernando Blvd, Ste J Burbank, CA 91503	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$500.00	\$500.00	

SUBTOTAL \$2,000.00

Schedule A Summary

1. Amount received this period - contributions of \$100 or more. (Include all Schedule A subtotals.)	\$2,000.00
2. Amount received this period - unitemized contributions of less than \$100	\$0.00
3. Total monetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.)	TOTAL \$2,000.00

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

FPPC Form 460 (JUNE/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

Schedule B - Part 1 Loans Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period
from 01/01/2010
through 06/30/2010

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

I.D. NUMBER
1324670

FULL NAME, STREET ADDRESS AND ZIP CODE OF LENDER (IF COMMITTEE, ALSO ENTER I D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT RECEIVED THIS PERIOD	(c) AMOUNT PAID OR FORGIVEN THIS PERIOD*	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST PAID THIS PERIOD	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE CONTRIBUTIONS TO DATE
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	

SUBTOTALS

Schedule B Summary

(Enter (e) on
Schedule E, Line 3)

1. Loans received this period. _____
(Total Column (b) plus unitemized loans less than \$100.)

2. Loans paid or forgiven this period _____
(Total Column (c) plus loans under \$100 paid or forgiven.)
(Include loans paid by a third party that are also itemized on Schedule A.)

3. Net change this period. (Subtract Line 2 from Line 1.) _____ **Net** _____
Enter the net here and on the Summary Page, Column A, Line 2. (may be a negative number)

* Amounts forgiven or paid by another party also must be reported on Schedule A.

** If required.

*Contributor Codes
IND-Individual COM-Recipient Committee (other than PTY or SCC) OTH-Other PTY-Political Party SCC-Small Contributor Committee

**Schedule B - Part 2
Loan Guarantors**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>01/01/2010</u> through <u>06/30/2010</u>	CALIFORNIA FORM 460
	Page <u>6</u> of <u>13</u>
	I.D. Number 1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

FULL NAME, STREET ADDRESS AND ZIP CODE OF GUARANTOR (IF COMMITTEE, ALSO ENTER I D. NUMBER)	CONTRIBUTOR CODE	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	LOAN	AMOUNT GUARANTEED THIS PERIOD	CUMULATIVE TO DATE	BALANCE OUTSTANDING TO DATE
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	

SUBTOTAL

Enter on
Summary Page,
Line 17 only.

Schedule C Nonmonetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

Statement covers period from <u>01/01/2010</u> through <u>06/30/2010</u>	CALIFORNIA FORM 460
	Page <u>7</u> of <u>13</u>
I.D. Number 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL

Schedule C Summary

- Amount received this period - nonmonetary contributions of \$100 or more.
(Include all Schedule C subtotals.)..... _____
- Amount received this period - unitemized nonmonetary contributions of less than \$100 _____
- Total nonmonetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.) **TOTAL** _____

*Contributor Codes
 IND - Individual
 COM- Recipient Committee
 (other than PTY or SCC)
 OTH - Other
 PTY - Political Party
 SCC - Small Contributor Committee

**Schedule D
Summary of Expenditures
Supporting/Opposing Other
Candidates, Measures and Committees**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE D

Statement covers period
from 01/01/2010
through 06/30/2010

**CALIFORNIA
FORM 460**

Page 8 of 13

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

I.D. NUMBER
1324670

DATE	NAME OF CANDIDATE, OFFICE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE	TYPE OF PAYMENT	DESCRIPTION (IF REQUIRED)	AMOUNT THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN.1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose	<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				

SUBTOTAL

Schedule D Summary

1. Contributions and independent expenditures made this period of \$100 or more. (Include all Schedule D subtotals.) _____
2. Unitemized contributions and independent expenditures made this period of under \$100 _____
3. Total contributions and independent expenditures made this period. (Add Lines 1 and 2. Do not enter on the Summary Page.) **TOTAL** _____

Schedule E Payments Made

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		CALIFORNIA FORM 460
from	01/01/2010	
through	06/30/2010	Page 9 of 13
NAME OF FILER Armenian National Committee - St.		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Durkee & Associates 1212 S. Victory Blvd. Burbank, CA 91502	PRO		\$519.03
Armenian National Committee PAC 1212 S Victory Bl Burbank, CA 91502	TSF		\$411.45

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$930.48

Schedule E Summary

- | | |
|--|-----------------------|
| 1. Payments made this period of \$100 or more. (Include all Schedule E subtotals.) | \$930.48 |
| 2. Unitemized payments made this period of under \$100. | \$0.00 |
| 3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) | \$0.00 |
| 4. Total payments made this period. (Add lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) | TOTAL \$930.48 |

Schedule F Accrued Expenses (Unpaid Bills)

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		CALIFORNIA FORM 460
from	01/01/2010	
through	06/30/2010	Page 10 of 13
NAME OF FILER Armenian National Committee - St.		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

NAME AND ADDRESS OF CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR DESCRIPTION OF PAYMENT	(a) OUTSTANDING BALANCE BEGINNING OF THIS PERIOD	(b) AMOUNT INCURRED THIS PERIOD	(c) AMOUNT PAID THIS PERIOD (ALSO REPORT ON E)	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTALS

Schedule F Summary

- Total accrued expenses incurred this period. (Include all Schedule F, Column (b) subtotals for accrued expenses of \$100 or more, plus total unitemized accrued expenses under \$100.)..... **INCURRED TOTALS** _____
- Total accrued expenses paid this period. (Include all Schedule F, Column (c) subtotals for payments on accrued expenses of \$100 or more, plus total unitemized payments on accrued expenses under \$100.)..... **PAID TOTALS** _____
- Net change this period. (**Subtract** Line 2 from Line 1. Enter the difference here and on the Summary Page, Column A, Line 9.)..... **NET** _____
May be a negative number.

Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)

Type or print in ink.
 Amounts may be rounded to whole dollars.

Statement covers period
 from 01/01/2010
 through 06/30/2010

CALIFORNIA FORM 460
 Page 11 of 13

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
 Armenian National Committee - St.

I.D. NUMBER
 1324670

NAME OF AGENT OR INDEPENDENT CONTRACTOR

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

NAME AND ADDRESS OF PAYEE OR CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID

Attach additional information on appropriately labeled continuation sheets.

TOTAL*

* Do not transfer to any other schedule or to the Summary Page. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule E.

Schedule H – Loans Made to Others*

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>01/01/2010</u> through <u>06/30/2010</u>	CALIFORNIA FORM 460
	Page <u>12</u> of 13
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

FULL NAME, STREET ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT LOANED THIS PERIOD	(c) REPAYMENT OR FORGIVENESS THIS PERIOD*	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST RECEIVED	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE LOANS TO DATE
				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
		SUBTOTALS						

*Loans that are contributions to another candidate or committee must also be summarized on Schedule D. Loans forgiven must also be reported on Schedule E.

(Enter (e) on
Schedule I, Line 3)

Schedule H Summary

- Loans made this period
(Total Column (b) plus unitemized loans less than \$100.)
- Payments received on loans
(Total Column (c) plus unitemized payments less than \$100.)
- Net change this period. (Subtract Line 2 from Line 1.) **NET**
(Enter the net here and on the Summary Page, Column A, Line 7.)

** If Required

(May be a negative number)

**Schedule I
Miscellaneous Increases to Cash**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE I

Statement covers period
from 01/01/2010
through 06/30/2010

CALIFORNIA FORM 460
Page 13 of 13
I.D. NUMBER
1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

DATE RECEIVED	FULL NAME AND ADDRESS OF SOURCE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	DESCRIPTION OF RECEIPT	AMOUNT OF INCREASE TO CASH

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$0.00

Schedule I Summary

1. Increases to cash of \$100 or more this period.....	\$0.00
2. Unitemized increases to cash under \$100 this period.....	\$0.00
3. Total of all interest received this period on loans made to others. (Schedule H, Column (e).).....	\$0.00
4. Total miscellaneous increases to cash this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Line 14.).....	TOTAL \$0.00

Exhibit A-13

Recipient Committee Campaign Statement

(Government Code Sections 84200-84216.5)

Type or print in ink.

Date Stamp

Page 1 of 17

For Official Use Only

Statement covers period from <u>07/01/2010</u> through <u>10/16/2010</u>	Date of election if applicable: (Month, Day, Year) _____
---	---

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1,2,3, and 4.

- | | |
|---|--|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee | <input type="checkbox"/> Ballot Measure Committee |
| <input type="radio"/> State Candidate Election Committee | <input type="radio"/> Primary Formed |
| <input type="radio"/> Recall | <input type="radio"/> Controlled |
| (Also Complete Part 5.) | <input type="radio"/> Sponsored |
| <input checked="" type="checkbox"/> General Purpose Committee | (Also Complete Part 6.) |
| <input type="radio"/> Sponsored | <input type="checkbox"/> Primary Formed Candidate/
Officeholder Committee |
| <input type="radio"/> Small Contributor Committee | (Also Complete Part 7.) |
| <input type="radio"/> Political Party/Central Committee | |

2. Type of Statement:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Pre-election Statement | <input type="checkbox"/> Quarterly Statement |
| <input type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement | <input type="checkbox"/> Supplemental Preelection
Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER
1324670

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
Armenian National Committee - St.

STREET ADDRESS (NO P.O. BOX)
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	(818) 260-0669

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	

OPTIONAL: FAX/E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER
Kinde Durkee

MAILING ADDRESS
1212 S. Victory Blvd.

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Burbank	CA	91502	(818) 260-0669

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX/E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/19/2010 By Kinde Durkee
DATE SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT OR RESPONSIBLE OFFICER OF SPONSOR

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

Executed on _____ By _____
DATE SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

**Recipient Committee
Campaign Statement
Cover Page – Part 2**

Type or print in ink.

COVER PAGE - PART 2

**CALIFORNIA
FORM 460**

Page 2 of 17

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Held:

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or to make expenditures on behalf of your candidacy.

COMMITTEE NAME I.D. NUMBER

NAME OF TREASURER CONTROLLED COMMITTEE?
 YES NO

COMMITTEE ADDRESS STREET ADDRESS (NO P.O.BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

COMMITTEE NAME I.D. NUMBER

NAME OF TREASURER CONTROLLED COMMITTEE?
 YES NO

COMMITTEE ADDRESS STREET ADDRESS (NO P.O.BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

6. Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER	JURISDICTION	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD DISTRICT NO. IF ANY

7. Primarily Formed Committee List names of officeholder(s) or candidate(s) for which this committee is primarily formed.

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT
		<input type="checkbox"/> OPPOSE

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period	CALIFORNIA FORM 460
from <u>07/01/2010</u>	
through <u>10/16/2010</u>	Page <u>3</u> of <u>17</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Armenian National Committee - St.

Contributions Received

		Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions	Schedule A, Line 3	\$26,850.00	\$28,850.00
2. Loans Received	Schedule B, Line 7	\$0.00	\$0.00
3. SUBTOTAL CASH CONTRIBUTIONS	Add Lines 1 + 2	\$26,850.00	\$28,850.00
4. Nonmonetary Contributions	Schedule C, Line 3	\$0.00	\$0.00
5. TOTAL CONTRIBUTIONS RECEIVED	Add Lines 3 + 4	\$26,850.00	\$28,850.00

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

	1/1 through 6/30	7/1 to Date
20. Contribution Received	\$0.00	\$0.00
21. Expenditures Made	\$0.00	\$0.00

Expenditures Made

		Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made	Schedule E, Line 4	\$27,100.00	\$28,030.48
7. Loans Made	Schedule H, Line 7	\$0.00	\$0.00
8. SUBTOTAL CASH PAYMENTS	Add Lines 6 + 7	\$27,100.00	\$28,030.48
9. Accrued Expenses (Unpaid Bills)	Schedule F, Line 3	\$0.00	\$0.00
10. Nonmonetary Adjustment	Schedule C, Line 3	\$0.00	\$0.00
11. TOTAL EXPENDITURES MADE	Add Lines 8 + 9 + 10	\$27,100.00	\$28,030.48

Expenditure Limit Summary for State Candidates

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)	Total to Date
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Current Cash Statement

12. Beginning Cash Balance	Previous Summary Page, Line 16	\$1,069.52
13. Cash Receipts	Column A, Line 3 above	\$26,850.00
14. Miscellaneous Increases to Cash	Schedule I, Line 4	\$0.00
15. Cash Payments	Column A, Line 8 above	\$27,100.00
16. ENDING CASH BALANCE	Add Lines 12 + 13 + 14, then subtract Line 15	\$819.52
If this is a termination statement, Line 16 must be zero.		

To calculate Column B, add amounts in Column A to the corresponding amounts from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

17. LOAN GUARANTEES RECEIVED.....	Schedule B, Part 2	\$0.00
-----------------------------------	--------------------	--------

Cash Equivalents and Outstanding Debts

18. Cash Equivalents	See instructions on reverse	\$0.00
19. Outstanding Debts	Add Line 2 + Line 9 in Column B above	\$0.00

*Since January 1, 2001. Amounts in this section may be different from amounts reported in Column B.

Schedule A Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 4 of 17
NAME OF FILER		I.D. Number
Armenian National Committee - St.		1324670

SEE INSTRUCTIONS ON REVERSE

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
10/6/2010	ADHC Management LLC 721 S Glendale Av #5 Glendale, CA 91205	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$2,000.00	\$2,000.00	
9/30/2010	Ohanes Dimejian 1445 Sierra Madre Villa Av Pasadena, CA 91107	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Century 21 Golden Realty Real Estate Broker	\$100.00	\$100.00	
10/14/2010	Five Star Quality Healthcare Inc 541 W Colorado St #322 Glendale, CA 91204	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$5,000.00	\$5,000.00	
10/14/2010	Mardi Gaboudian 23070 Bryce St Woodland Hills, CA 91364	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Boudian Construction Contractor	\$1,000.00	\$1,000.00	
10/14/2010	Ginger Investors LLC 5609 Yolanda Ave Tarzana, CA 91357	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$5,000.00	\$5,000.00	

SUBTOTAL

Schedule A Summary

1. Amount received this period - contributions of \$100 or more. (Include all Schedule A subtotals.)	\$26,800.00
2. Amount received this period - unitemized contributions of less than \$100	\$50.00
3. Total monetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.)	TOTAL \$26,850.00

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

FPPC Form 460 (JUNE/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

Schedule A (Continuation Sheet) Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page <u>5</u> of <u>17</u>
NAME OF FILER		I.D. Number
Armenian National Committee - St.		1324670

SEE INSTRUCTIONS ON REVERSE

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
8/12/2010	Michael Hatzbanian 1827 Oakwood Av Glendale, CA 91208	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A Retired	\$150.00	\$150.00	
8/12/2010	Khatcher Hawatian 10024 Covert Av Tujunga, CA 91042	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Logic Mate Computer Consultant	\$200.00	\$200.00	
10/6/2010	Hichoice Health Care Corporation 1745 Victory Bl Montrose, CA 91021	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$1,800.00	\$1,800.00	
10/14/2010	Avedik Izmirlian 2169 Haven St Glendale, CA 91208	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Digifab Systems Inc President	\$4,000.00	\$4,000.00	
9/17/2010	Johnnies Paint & Body Shop 2245 E Foothill Bl Pasadena, CA 91107	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$250.00	\$250.00	

SUBTOTAL

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

Schedule A (Continuation Sheet) Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 6 of 17
NAME OF FILER		I.D. Number
Armenian National Committee - St.		1324670

SEE INSTRUCTIONS ON REVERSE

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
8/12/2010	Mayk Kalachian 3734 La Crescenta Av Glendale, CA 91208	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A Homemaker	\$100.00	\$100.00	
8/12/2010	Seroj Khachikian 5217 Cheryl Av Glendale, CA 91214	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A Retired	\$150.00	\$150.00	
10/6/2010	Kym Enterprises LLC 721 S Glendale Av Glendale, CA 91204	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$1,500.00	\$6,500.00	
10/14/2010	Kym Enterprises LLC 721 S Glendale Av Glendale, CA 91204	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$5,000.00	\$6,500.00	
8/12/2010	Hrayr Sabounjian 2763 Stevens St La Crescenta, CA 91214	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	LBI Manager	\$100.00	\$100.00	

SUBTOTAL

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

Schedule A (Continuation Sheet) Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 7 of 17
NAME OF FILER		I.D. Number
Armenian National Committee - St.		1324670

SEE INSTRUCTIONS ON REVERSE

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
8/12/2010	Svenska Auto Service 3346 Foothill Bl Glendale, CA 91214	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$200.00	\$200.00	
8/12/2010	Sarkis Tchakian 3110 Montrose Av #3 La Crescenta, CA 91214	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A Retired	\$150.00	\$150.00	
8/12/2010	Ara Yahinian 1634 Glenwood Rd Glendale, CA 91201-1839	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	N/A Retired	\$100.00	\$100.00	
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				

SUBTOTAL \$26,800.00

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

Schedule B - Part 1 Loans Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period
from 07/01/2010
through 10/16/2010

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

I.D. NUMBER
1324670

FULL NAME, STREET ADDRESS AND ZIP CODE OF LENDER (IF COMMITTEE, ALSO ENTER I D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT RECEIVED THIS PERIOD	(c) AMOUNT PAID OR FORGIVEN THIS PERIOD*	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST PAID THIS PERIOD	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE CONTRIBUTIONS TO DATE
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN	 DATE DUE	 RATE %	 DATE INCURRED	 CALENDAR YEAR PER ELECTION**
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN	 DATE DUE	 RATE %	 DATE INCURRED	 CALENDAR YEAR PER ELECTION**
<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN	 DATE DUE	 RATE %	 DATE INCURRED	 CALENDAR YEAR PER ELECTION**

SUBTOTALS

Schedule B Summary

(Enter (e) on
Schedule E, Line 3)

1. Loans received this period. _____
(Total Column (b) plus unitemized loans less than \$100.)

2. Loans paid or forgiven this period _____
(Total Column (c) plus loans under \$100 paid or forgiven.)
(Include loans paid by a third party that are also itemized on Schedule A.)

3. Net change this period. (Subtract Line 2 from Line 1.) _____ **Net** _____
Enter the net here and on the Summary Page, Column A, Line 2. (may be a negative number)

* Amounts forgiven or paid by another party also must be reported on Schedule A.

** If required.

*Contributor Codes
IND-Individual COM-Recipient Committee (other than PTY or SCC) OTH-Other PTY-Political Party SCC-Small Contributor Committee

Schedule B - Part 2
Loan Guarantors

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>07/01/2010</u> through <u>10/16/2010</u>	CALIFORNIA FORM 460
	Page <u>9</u> of <u>17</u>
	I.D. Number 1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

FULL NAME, STREET ADDRESS AND ZIP CODE OF GUARANTOR (IF COMMITTEE, ALSO ENTER I D. NUMBER)	CONTRIBUTOR CODE	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	LOAN	AMOUNT GUARANTEED THIS PERIOD	CUMULATIVE TO DATE	BALANCE OUTSTANDING TO DATE
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	
	<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		LENDER _____ DATE _____		CALENDAR YEAR _____ PER ELECTION (IF REQUIRED) _____	

SUBTOTAL

Enter on
Summary Page,
Line 17 only.

Schedule C Nonmonetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

Statement covers period from <u>07/01/2010</u> through <u>10/16/2010</u>	CALIFORNIA FORM 460
	Page <u>10</u> of <u>17</u>
I.D. Number 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL

Schedule C Summary

- Amount received this period - nonmonetary contributions of \$100 or more.
(Include all Schedule C subtotals.)..... _____
- Amount received this period - unitemized nonmonetary contributions of less than \$100 _____
- Total nonmonetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.) **TOTAL** _____

*Contributor Codes
 IND - Individual
 COM- Recipient Committee
 (other than PTY or SCC)
 OTH - Other
 PTY - Political Party
 SCC - Small Contributor Committee

**Schedule D
Summary of Expenditures
Supporting/Opposing Other
Candidates, Measures and Committees**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 11 of 17
		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

DATE	NAME OF CANDIDATE, OFFICE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE	TYPE OF PAYMENT	DESCRIPTION (IF REQUIRED)	AMOUNT THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN.1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
10/6/2010	Jerry Brown Governor District n/a Jurisdiction: Statewide	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$5,000.00	\$25,900.00	2010G: \$25,900.00
	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose					
10/15/2010	Jerry Brown Governor District n/a Jurisdiction: Statewide	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$20,900.00	\$25,900.00	2010G: \$25,900.00
	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose					
		<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					

SUBTOTAL \$25,900.00

Schedule D Summary

- Contributions and independent expenditures made this period of \$100 or more. (Include all Schedule D subtotals.) \$25,900.00
- Unitemized contributions and independent expenditures made this period of under \$100 \$0.00
- Total contributions and independent expenditures made this period. (Add Lines 1 and 2. Do not enter on the Summary Page.) **TOTAL** \$25,900.00

**Schedule E
Payments Made**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 12 of 17
NAME OF FILER Armenian National Committee - St.		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
AABC-Channel 284 1110 Sonora Av #207 Glendale, CA 91201	TEL		\$1,200.00
Brown For Governor 2010 2633 Telegraph Av #406 Oakland, CA 94612	CTB		\$5,000.00
Committee ID: 1321867 Brown For Governor 2010 2633 Telegraph Av #406 Oakland, CA 94612	CTB		\$20,900.00
Committee ID: 1321867			

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$27,100.00

Schedule E Summary

1. Payments made this period of \$100 or more. (Include all Schedule E subtotals.)	\$27,100.00
2. Unitemized payments made this period of under \$100.	\$0.00
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).)	\$0.00
4. Total payments made this period. (Add lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.)	TOTAL \$27,100.00

Schedule F Accrued Expenses (Unpaid Bills)

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period		CALIFORNIA FORM 460
from	07/01/2010	
through	10/16/2010	Page 13 of 17
NAME OF FILER Armenian National Committee - St.		I.D. NUMBER 1324670

SEE INSTRUCTIONS ON REVERSE

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

NAME AND ADDRESS OF CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR DESCRIPTION OF PAYMENT	(a) OUTSTANDING BALANCE BEGINNING OF THIS PERIOD	(b) AMOUNT INCURRED THIS PERIOD	(c) AMOUNT PAID THIS PERIOD (ALSO REPORT ON E)	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTALS

Schedule F Summary

- Total accrued expenses incurred this period. (Include all Schedule F, Column (b) subtotals for accrued expenses of \$100 or more, plus total unitemized accrued expenses under \$100.)..... **INCURRED TOTALS** _____
- Total accrued expenses paid this period. (Include all Schedule F, Column (c) subtotals for payments on accrued expenses of \$100 or more, plus total unitemized payments on accrued expenses under \$100.)..... **PAID TOTALS** _____
- Net change this period. (**Subtract** Line 2 from Line 1. Enter the difference here and on the Summary Page, Column A, Line 9.)..... **NET** _____
May be a negative number.

**Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)**

Type or print in ink.
Amounts may be rounded to whole dollars.

Statement covers period
from 07/01/2010
through 10/16/2010

CALIFORNIA FORM 460
Page 14 of 17

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

I.D. NUMBER
1324670

NAME OF AGENT OR INDEPENDENT CONTRACTOR

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| CMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MTG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, email) |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

NAME AND ADDRESS OF PAYEE OR CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID

Attach additional information on appropriately labeled continuation sheets.

TOTAL*

* Do not transfer to any other schedule or to the Summary Page. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule E.

**Schedule H –
Loans Made to Others***

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>07/01/2010</u> through <u>10/16/2010</u>	CALIFORNIA FORM 460
	Page <u>15</u> of <u>17</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

FULL NAME, STREET ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT LOANED THIS PERIOD	(c) REPAYMENT OR FORGIVENESS THIS PERIOD*	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST RECEIVED	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE LOANS TO DATE
				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
				<input type="checkbox"/> PAID <input type="checkbox"/> FORGIVEN		_____% RATE		CALENDAR YEAR PER ELECTION**
					DATE DUE		DATE INCURRED	
		SUBTOTALS						

*Loans that are contributions to another candidate or committee must also be summarized on Schedule D. Loans forgiven must also be reported on Schedule E.

(Enter (e) on
Schedule I, Line 3)

Schedule H Summary

- Loans made this period
(Total Column (b) plus unitemized loans less than \$100.)
- Payments received on loans
(Total Column (c) plus unitemized payments less than \$100.)
- Net change this period. (Subtract Line 2 from Line 1.) **NET**
(Enter the net here and on the Summary Page, Column A, Line 7.)

**** If Required**

(May be a negative number)

**Schedule I
Miscellaneous Increases to Cash**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE I

Statement covers period
from 07/01/2010
through 10/16/2010

CALIFORNIA FORM 460
Page 16 of 17
I.D. NUMBER
1324670

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Armenian National Committee - St.

DATE RECEIVED	FULL NAME AND ADDRESS OF SOURCE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	DESCRIPTION OF RECEIPT	AMOUNT OF INCREASE TO CASH

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$0.00

Schedule I Summary

- 1. Increases to cash of \$100 or more this period..... \$0.00
- 2. Unitemized increases to cash under \$100 this period..... \$0.00
- 3. Total of all interest received this period on loans made to others. (Schedule H, Column (e).)..... \$0.00
- 4. Total miscellaneous increases to cash this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Line 14.)..... **TOTAL** \$0.00

Supplemental Pre-election Campaign Statement

(Government Code Section 84202.5)

Type or print in ink.

SUPPLEMENTAL PRE-ELECTION

Date Stamp

CALIFORNIA FORM 495

For Official Use Only

Check one of the following boxes to indicate which form is attached to this Form 495:

- Form 450, Recipient Committee Campaign Statement - Short Form
- Form 460, Recipient Committee Campaign Statement - Long Form

Amendment (Explain Below)

1. Committee Information

I.D. NUMBER
1324670

COMMITTEE NAME

Armenian National Committee - St.

STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX/E-MAIL ADDRESS

Treasurer(s)

NAME OF TREASURER

STREET ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

NAME OF ASSISTANT TREASURER, IF ANY

STREET ADDRESS

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL: FAX/E-MAIL ADDRESS

2. Contributions Made

DATE OF ELECTION: (MONTH, DAY, YEAR)

11/02/2010

JURISDICTION OF THE ELECTION

State of California

\$ 25,900.00 has been contributed in connection with this election during the period beginning six months prior to the election and ending 17 days before the election

3. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____
DATE

By _____
SIGNATURE OF TREASURER OR ASSISTANT TREASURER

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT OR RESPONSIBLE OFFICER OF SPONSOR

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

Executed on _____
DATE

By _____
SIGNATURE OF CONTROLLING OFFICEHOLDER, CANDIDATE, STATE MEASURE PROPONENT

Exhibit A-14

Recipient Committee Campaign Statement Cover Page

(Government Code Sections 84200-84216.5)

Type or print in ink.

COPY

COVER PAGE

Date Stamp
RECEIVED AND FILED
 in the office of the Secretary of State
 of the State of California

CALIFORNIA
2001/02
FORM 460

Page 1 of 11

For Official Use Only

Statement covers period
 from 1/1/2017
 through 6/30/2017

Date of election if applicable:
 (Month, Day, Year)

AUG 24 2017

SEE INSTRUCTIONS ON REVERSE

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- | | |
|--|--|
| <input type="checkbox"/> Officeholder, Candidate Controlled Committee
<input type="radio"/> State Candidate Election Committee
<input type="radio"/> Recall
<i>(Also Complete Part 5)</i> | <input type="checkbox"/> Primarily Formed Ballot Measure Committee
<input type="radio"/> Controlled
<input type="radio"/> Sponsored
<i>(Also Complete Part 6)</i> |
| <input checked="" type="checkbox"/> General Purpose Committee
<input type="radio"/> Sponsored
<input type="radio"/> Small Contributor Committee
<input type="radio"/> Political Party/Central Committee | <input type="checkbox"/> Primarily Formed Candidate/Officeholder Committee
<i>(Also Complete Part 7)</i> |

2. Type of Statement:

- | | |
|---|---|
| <input type="checkbox"/> Preelection Statement | <input type="checkbox"/> Quarterly Statement |
| <input checked="" type="checkbox"/> Semi-annual Statement | <input type="checkbox"/> Special Odd-Year Report |
| <input type="checkbox"/> Termination Statement
<i>(Also file a Form 410 Termination)</i> | <input type="checkbox"/> Supplemental Preelection Statement - Attach Form 495 |
| <input type="checkbox"/> Amendment (Explain below) | |

3. Committee Information

I.D. NUMBER
 1324670

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)
 ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

STREET ADDRESS (NO P.O. BOX)
 108 N. BRAND BLVD. STE. 202

CITY GLENDALE	STATE CA	ZIP CODE 91203	AREA CODE/PHONE (562) 833-5906
------------------	-------------	-------------------	-----------------------------------

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS
 vpakradouni@earthlink.net

Treasurer(s)

NAME OF TREASURER
 Viken Pakradouni

MAILING ADDRESS
 108 North Brand
 Suite 202

CITY Glendale	STATE CA	ZIP CODE 91203	AREA CODE/PHONE (562) 833-5906
------------------	-------------	-------------------	-----------------------------------

NAME OF ASSISTANT TREASURER, IF ANY

MAILING ADDRESS

CITY	STATE	ZIP CODE	AREA CODE/PHONE
------	-------	----------	-----------------

OPTIONAL: FAX / E-MAIL ADDRESS
 Treasurer: vpakradouni@earthlink.net

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/18/2017 _____
 Date

Executed on _____
 Date

Executed on _____
 Date

Executed on _____
 Date

By Viken Pakradouni _____
 Signature of Treasurer or Assistant Treasurer

By _____
 Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

By _____
 Signature of Controlling Officeholder, Candidate, State Measure Proponent

By _____
 Signature of Controlling Officeholder, Candidate, State Measure Proponent

Recipient Committee Campaign Statement Cover Page - Part 2

Type or print in ink.

COVER PAGE - PART 2

**CALIFORNIA
FORM 460**

Page 2 of 11

5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)

RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET) CITY STATE ZIP

Related Committees Not Included in this Statement: *List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.*

COMMITTEE NAME	I.D. NUMBER
----------------	-------------

NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
-------------------	---

COMMITTEE ADDRESS STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

COMMITTEE NAME	I.D. NUMBER
----------------	-------------

NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO
-------------------	---

COMMITTEE ADDRESS STREET ADDRESS (NO P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE

BALLOT NO. OR LETTER

JURISDICTION

SUPPORT
 OPPOSE

Identify the controlling officeholder, candidate, or state measure proponent, if any.

NAME OF OFFICEHOLDER, CANDIDATE, OR PROPONENT

OFFICE SOUGHT OR HELD

DISTRICT NO. IF ANY

7. Primarily Formed Candidate/Officeholder Committee

List names of

officeholder(s) or candidate(s) for which this committee is primarily formed.

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD

SUPPORT
 OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD

SUPPORT
 OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD

SUPPORT
 OPPOSE

NAME OF OFFICEHOLDER OR CANDIDATE

OFFICE SOUGHT OR HELD

SUPPORT
 OPPOSE

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Type or print in ink.
Amounts may be rounded
to whole dollars.

SUMMARY PAGE

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>3</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

Contributions Received	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
1. Monetary Contributions <i>Schedule A, Line 3</i>	\$50.00	\$50.00
2. Loans Received <i>Schedule B, Line 3</i>	\$0.00	\$0.00
3. SUBTOTAL CASH CONTRIBUTIONS <i>Add Lines 1 + 2</i>	\$50.00	\$50.00
4. Nonmonetary Contributions <i>Schedule C, Line 3</i>	\$0.00	\$0.00
5. TOTAL CONTRIBUTIONS RECEIVED <i>Add Lines 3 + 4</i>	\$50.00	\$50.00

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections	1/1 through 6/30	7/1 to Date
20. Contributions Received	_____	_____
21. Expenditures Made	_____	_____

Expenditures Made	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)	Column B CALENDAR YEAR TOTAL TO DATE
6. Payments Made <i>Schedule E, Line 4</i>	\$50.00	\$50.00
7. Loans Made <i>Schedule H, Line 3</i>	\$0.00	\$0.00
8. SUBTOTAL CASH PAYMENTS <i>Add Lines 6 + 7</i>	\$50.00	\$50.00
9. Accrued Expenses (Unpaid Bills) <i>Schedule F, Line 3</i>	\$0.00	\$0.00
10. Nonmonetary Adjustment <i>Schedule C, Line 3</i>	\$0.00	\$0.00
11. TOTAL EXPENDITURES MADE <i>Add Lines 8 + 9 + 10</i>	\$50.00	\$50.00

Expenditure Limit Summary for State Candidates	Date of Election (mm/dd/yy)	Total to Date
22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)	_____	_____

Current Cash Statement	Column A TOTAL THIS PERIOD (FROM ATTACHED SCHEDULES)
12. Beginning Cash Balance <i>Previous Summary Page, Line 16</i>	\$4,162.52
13. Cash Receipts <i>Column A, Line 3 above</i>	\$50.00
14. Miscellaneous Increases to Cash <i>Schedule I, Line 4</i>	\$0.00
15. Cash Payments <i>Column A, Line 8 above</i>	\$50.00
16. ENDING CASH BALANCE <i>Add Lines 12 + 13 + 14, then subtract Line 15</i>	\$4,162.52

To calculate Column B, add amounts in Column A to the corresponding amount from Column B of your last report. Some amounts in Column A may be negative figures that should be subtracted from previous period amounts. If this is the first report being filed for this calendar year, only carry over the amounts from Lines 2, 7, and 9 (if any).

Amounts in this section may be different from amounts reported in Column B.

17. LOAN GUARANTEES RECEIVED <i>Schedule B, Part 2</i>	\$0.00
Cash Equivalents and Outstanding Debts	
18. Cash Equivalents <i>See instructions on reverse</i>	\$0.00
19. Outstanding Debts <i>Add Line 2 + Line 9 in Column B above</i>	\$0.00

Schedule A Monetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE A

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>4</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
SUBTOTAL \$						

Schedule A Summary

1. Amount received this period - itemized monetary contributions. (Include all Schedule A subtotals.)	\$0.00
2. Amount received this period - unitemized monetary contributions of less than \$100	\$50.00
3. Total monetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.)	TOTAL \$50.00

*Contributor Codes
 IND - Individual
 COM - Recipient Committee
 (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

Schedule B - Part 1 Loans Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>5</u> of <u>11</u>

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

I.D. NUMBER
1324670

FULL NAME, STREET ADDRESS AND ZIP CODE OF LENDER (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT RECEIVED THIS PERIOD	(c) AMOUNT PAID OR FORGIVEN THIS PERIOD*	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST PAID THIS PERIOD	(f) ORIGINAL AMOUNT OF LOAN	(g) CUMULATIVE CONTRIBUTIONS TO DATE
Kym Enterprises LLC 721 S Glendale Avenue Glendale, CA 91205				<input type="checkbox"/> PAID \$0.00	\$2,000.00	0 %	\$2,000.00	CALENDAR YEAR \$0.00
<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		\$2,000.00	\$0.00	<input type="checkbox"/> FORGIVEN \$0.00	11/1/2020	RATE \$0.00	11/1/2010	PER ELECTION**
				<input type="checkbox"/> PAID	DATE DUE	%	DATE INCURRED	CALENDAR YEAR
				<input type="checkbox"/> FORGIVEN		RATE		PER ELECTION**
					DATE DUE		DATE INCURRED	CALENDAR YEAR
				<input type="checkbox"/> PAID		%		PER ELECTION**
				<input type="checkbox"/> FORGIVEN		RATE		CALENDAR YEAR
					DATE DUE		DATE INCURRED	PER ELECTION**
					DATE DUE		DATE INCURRED	CALENDAR YEAR
								PER ELECTION**
SUBTOTAL \$								

(Enter (e) on
Schedule E, Line 3)

Schedule B Summary

- Loans received this period \$0.00
(Total Column (b) plus unitemized loans of less than \$100.)
- Loans paid or forgiven this period \$0.00
(Total Column (c) plus loans under \$100 paid or forgiven.)
(Include loans paid by a third party that are also itemized on Schedule A.)
- Net change this period. (Subtract Line 2 from Line 1.) NET \$0.00
Enter the net here and on the Summary Page, Column A, Line 2. (May be a negative number)

***Contributor Codes**
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

*Amounts forgiven or paid by another party also must be reported on Schedule A.

** If required.

Schedule C Nonmonetary Contributions Received

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>6</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE*	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$

Schedule C Summary

1. Amount received this period - itemized nonmonetary contributions. (Include all Schedule C subtotals.)	\$0.00
2. Amount received this period - unitemized nonmonetary contributions of less than \$100	\$0.00
3. Total nonmonetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.)	TOTAL \$0.00

*Contributor Codes

IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

**Schedule D
Summary of Expenditures
Supporting/Opposing Other
Candidates, Measures and Committees**

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>7</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

DATE	NAME OF CANDIDATE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE	TYPE OF PAYMENT	DESCRIPTION (IF REQUIRED)	AMOUNT THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
		<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					
		<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					
		<input type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure				
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					
SUBTOTAL \$						

Schedule D Summary

1. Itemized contributions and independent expenditures made this period. (Include all Schedule D subtotals.)	\$0.00
2. Unitemized contributions and independent expenditures made this period of under \$100	\$0.00
3. Total contributions and independent expenditures made this period. (Add Lines 1 and 2. Do not enter on the Summary Page.)	\$0.00

Schedule E Payments Made

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE E

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>8</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
IND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$

Schedule E Summary

1. Itemized payment made this period. (Include all Schedule E subtotals.)	\$0.00
2. Unitemized payments made this period of under \$100	\$50.00
3. Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).)	\$0.00
4. Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.)	\$50.00

Schedule F Accrued Expenses (Unpaid Bills)

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>9</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

CMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
IND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR DESCRIPTION OF PAYMENT	(a) OUTSTANDING BALANCE BEGINNING OF THIS PERIOD	(b) AMOUNT INCURRED THIS PERIOD	(c) AMOUNT PAID THIS PERIOD (ALSO REPORT ON E)	(d) OUTSTANDING BALANCE AT CLOSING OF THIS PERIOD
SUBTOTAL \$			\$	\$	\$

* Payments that are contributions or independent expenditures must also be summarized on Schedule D, summarized on Schedule D.

Schedule F Summary

- Total accrued expenses incurred this period. (Include all Schedule F, Column (b) subtotals for accrued expenses of \$100 or more, plus total unitemized accrued expenses under \$100.).....**INCURRED TOTALS** \$ 0.00
- Total accrued expenses paid this period. (Include all Schedule F, Column (c) subtotals for payments on accrued expenses of \$100 or more, plus total unitemized payments on accrued expenses under \$100.).....**PAID TOTALS** \$ 0.00
- Net change this period. (Subtract Line 2 from Line 1. Enter the difference here and on the Summary Page, Column A, Line 9.).....**NET** \$ 0.00
(May be a negative number)

**Schedule H
Loans Made to Others***

Type or print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period from <u>1/1/2017</u> through <u>6/30/2017</u>	CALIFORNIA FORM 460
	Page <u>10</u> of <u>11</u>
I.D. NUMBER 1324670	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC

FULL NAME, STREET ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	(a) OUTSTANDING BALANCE BEGINNING THIS PERIOD	(b) AMOUNT LOANED THIS PERIOD	(c) REPAYMENT OR FORGIVENESS THIS PERIOD*		(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD	(e) INTEREST RECEIVED RATE %	(f) ORIGINAL AMOUNT OF LOAN DATE INCURRED	(g) CUMULATIVE LOANS TO DATE CALENDAR YEAR PER ELECTION**
				<input type="checkbox"/> PAID	<input type="checkbox"/> FORGIVEN				
				<input type="checkbox"/> PAID					
				<input type="checkbox"/> FORGIVEN					
						DATE DUE		DATE INCURRED	
				<input type="checkbox"/> PAID					
				<input type="checkbox"/> FORGIVEN					
						DATE DUE		DATE INCURRED	
*Loans that are contributions to another candidate or committee must also be summarized on Schedule D. Loans forgiven must also be reported on Schedule E.			SUBTOTAL	\$	\$	\$	\$		

(Enter (e) on
Schedule I, Line 3)

Schedule H Summary

- Loans made this period \$0.00
(Total Column (b) plus unitemized loans of less than \$100.)
- Payments received on loans \$0.00
(Total Column (c) plus unitemized payments of less than \$100.)
- Net change this period. (Subtract Line 2 from Line 1.) NET \$0.00
Enter the net here and on the Summary Page, Column A, Line 7. (May be a negative number)

** If required.

Exhibit A-15



February 16, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670



Dear Filer:

Based on our records you did not file the campaign statement specified below. Please submit the required filing within 30 days of the date of this notice. This entity is active and is required to file regardless of the level of activity.

All state committees, including electronic filers, must file paper reports with the Secretary of State's office. An electronic filer is a committee that has received contributions or made expenditures cumulatively totaling \$25,000 or more. For additional information regarding electronic filing, use the following link:

<http://www.sos.ca.gov/campaign-lobbying/electronic-filing-information/>

In addition to other penalties established by the Political Reform Act, a recipient committee is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov.

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

ELECTRONIC FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670
Statement Required: Form 460 - **ELECTRONIC**
Period Covered: July 01, 2017 through December 31, 2017
Date Due: January 31, 2018



ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA
POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel 916.653.6224 | Fax 916.653.5045 | www.sos.ca.gov

March 02, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE PAC ID# 1324670



Dear Filer:

Based on our records you did not file the campaign statement specified below. Please submit the required filing within 30 days of the date of this notice. This entity is active and is required to file regardless of the level of activity.

All state committees, including electronic filers, must file paper reports with the Secretary of State's office. An electronic filer is a committee that has received contributions or made expenditures cumulatively totaling \$25,000 or more. For additional information regarding electronic filing, use the following link:

<http://www.sos.ca.gov/campaign-lobbying/electronic-filing-information/>

In addition to other penalties established by the Political Reform Act, a recipient committee is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov.

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

PAPER FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE PAC ID# 1324670
Statement Required: Form 460 - **PAPER**
Period Covered: July 01, 2017 through December 31, 2017
Date Due: January 31, 2018



March 21, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

ELECTRONIC FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670
Statement Required: Form 460 - **ELECTRONIC**
Period Covered: July 01, 2017 through December 31, 2017
Date Due: January 31, 2018
Date of First Written Notice: February 16, 2018



May 10, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

PAPER FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE PAC ANCPAC ID# 1324670
Statement Required: Form 460 - **PAPER**
Period Covered: July 01, 2017 through December 31, 2017
Date Due: January 31, 2018
Date of First Written Notice: March 02, 2018



ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA
POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel 916.653.6224 | Fax 916.653.5045 | www.sos.ca.gov

August 15, 2018

VIKEN K. PAKRADOUNI

ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

Based on our records you did not file the campaign statement specified below. Please submit the required filing within 30 days of the date of this notice. This entity is active and is required to file regardless of the level of activity.

All state committees, including electronic filers, must file paper reports with the Secretary of State's office. An electronic filer is a committee that has received contributions or made expenditures cumulatively totaling \$25,000 or more. For additional information regarding electronic filing, use the following link:

<http://www.sos.ca.gov/campaign-lobbying/electronic-filing-information/>

In addition to other penalties established by the Political Reform Act, a recipient committee is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov.

Sincerely,

David Walker, Compliance Analyst
Political Reform Division

FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **ELECTRONIC**

Period Covered: January 01, 2018 through June 30, 2018

Date Due: Julv 31. 2018



September 19, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

ELECTRONIC FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **ELECTRONIC**

Period Covered: January 01, 2018 through June 30, 2018

Date Due: July 31, 2018

Date of First Written Notice: August 15, 2018



ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA
POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel 916.653.6224 | Fax 916.653.5045 | www.sos.ca.gov

November 01, 2018

VIKEN K. PAKRADOUNI

ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

PAPER FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **PAPER**

Period Covered: January 01, 2018 through June 30, 2018

Date Due: July 31, 2018

Date of First Written Notice: September 17, 2018



February 12, 2019

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

Based on our records you did not file the campaign statement specified below. Please submit the required filing within 30 days of the date of this notice. This entity is active and is required to file regardless of the level of activity.

All state committees, including electronic filers, must file paper reports with the Secretary of State's office. An electronic filer is a committee that has received contributions or made expenditures cumulatively totaling \$25,000 or more. For additional information regarding electronic filing, use the following link:

<http://www.sos.ca.gov/campaign-lobbying/electronic-filing-information/>

In addition to other penalties established by the Political Reform Act, a recipient committee is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov.

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

ELECTRONIC FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **ELECTRONIC**

Period Covered: July 01, 2018 through December 31, 2018

Date Due: January 31, 2019



April 19, 2019

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

Based on our records you did not file the campaign statement specified below. Please submit the required filing within 30 days of the date of this notice. This entity is active and is required to file regardless of the level of activity.

All state committees, including electronic filers, must file paper reports with the Secretary of State's office. An electronic filer is a committee that has received contributions or made expenditures cumulatively totaling \$25,000 or more. For additional information regarding electronic filing, use the following link:

<http://www.sos.ca.gov/campaign-lobbying/electronic-filing-information/>

In addition to other penalties established by the Political Reform Act, a recipient committee is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov.

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

PAPER FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **PAPER**

Period Covered: July 01, 2018 through December 31, 2018

Date Due: January 31, 2019



May 29, 2019

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

ELECTRONIC FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **ELECTRONIC**

Period Covered: July 01, 2018 through December 31, 2018

Date Due: January 31, 2019

Date of First Written Notice: February 12, 2019



ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA
POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel 916.653.6224 | Fax 916.653.5045 | www.sos.ca.gov

August 14, 2019

VIKEN K. PAKRADOUNI

ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC ID# 1324670



Dear Filer:

A review of our files fails to reflect a response to our earlier notice to you of an apparent duty to file your form specified below as required by the Political Reform Act.

In addition to other penalties established by the Political Reform Act, a filer is liable in the amount of \$10 for each day a required report is late. This fine will continue to accrue until your report is filed.

The Secretary of State may reduce or waive payment of the liability in certain limited cases. Pursuant to Government Code Section 91013, **the liability cannot be waived if the statement is not filed within 10 days of this notice.** Please refer to the acceptable good cause reasons and documentation requirements on the reverse side of this letter. If you believe the reason for filing your report late conforms to the good cause standards, you may mail or hand deliver Form PRD-1 Request for Waiver of Liability when you submit the statement detailed below.

IF NO RESPONSE IS RECEIVED WITHIN 10 DAYS OF THE DATE OF THIS LETTER, THE MATTER WILL BE REFERRED TO THE ENFORCEMENT DIVISION OF THE FAIR POLITICAL PRACTICES COMMISSION.

If you have any questions, please send an email to: NonFilerDesk@sos.ca.gov

Sincerely,

Gwinith Clara, Compliance Analyst
Political Reform Division

PAPER FILING REQUIREMENT

Name of Filer: ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC
ID# 1324670

Statement Required: Form 460 - **PAPER**

Period Covered: July 01, 2018 through December 31, 2018

Date Due: January 31, 2019

Date of First Written Notice: April 19, 2019

Exhibit A-16



DEBRA BOWEN | SECRETARY OF STATE
STATE OF CALIFORNIA | POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel (916) 653-6224 | Fax (916) 653-5045 | www.sos.ca.gov

November 20, 2014

VIKEN K. PAKRADOUNI, TREASURER
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC, ID#1324670



Dear Committee Treasurer:

Government Code section 84101.5 imposes an annual fee on all active (not terminated) state and local campaign committees. **The annual fee of \$50 is due and payable on January 15, 2015 for the above referenced committee if the committee will continue to exist in 2015, regardless of the level of activity.**

If the fee is due and not paid by the January 15, 2015 deadline, the law imposes an additional \$150 penalty, which will require the committee pay a total of \$200 (the \$50 annual fee plus the \$150 penalty).

If the committee will cease activity by no later than December 31, 2014, no fee for 2015 will be due. However a terminating Statement of Organization (Form 410) will need to be **filed with the Secretary of State's Office** at the address shown below by January 31, 2015, allowing it to be submitted with your year-end committee campaign statement.

An online fillable Form 410 can be accessed at the Secretary of State's webpage at www.sos.ca.gov/prd/campaign-info/forms-instructions/compend-camp-forms.htm. (Please note the rules for terminating a committee found in the FPPC manuals available online at <http://www.fppc.ca.gov/index.php?id=633>. See the appropriate chapter for your committee type, in most cases titled "After the Election.")

Your committee will **not** receive any further notice or invoice in advance of the January 15, 2015, annual fee payment deadline.

Please remit your annual fee payment (\$50) to:

Secretary of State
Political Reform Division
1500 11th Street – Room 495
Sacramento, CA 95814

Make your check payable to the Secretary of State and please write your committee ID number on the lower left portion of the check to ensure the payment is posted to your account.

If you have any questions about this notice, please contact Nancy Landers at the Secretary of State's office at (916) 653-6038.

Sincerely,

CHRIS REYNOLDS, Chief
Political Reform Division



ALEX PADILLA | SECRETARY OF STATE | STATE OF CALIFORNIA
POLITICAL REFORM

1500 11th Street, Room 495 | Sacramento, CA 95814 | Tel 916.653.6224 | Fax 916.653.5045 | www.sos.ca.gov

December 3, 2018

VIKEN K. PAKRADOUNI
ARMENIAN NATIONAL COMMITTEE POLITICAL ACTION COMMITTEE ANCPAC #1324670



Dear Committee Treasurer:

Government Code section 84101.5 imposes an annual fee on all active (not terminated) state and local campaign committees. **The annual fee of \$50 is due and payable on January 15, 2019 for the above referenced committee if the committee will continue to exist in 2019 regardless of the level of activity.**

If the fee is due and not paid by the January 15, 2019 deadline, the law imposes an additional \$150 penalty, which will require the committee pay a total of \$200 (the \$50 annual fee plus the \$150 penalty).

If the committee will cease activity by no later than December 31, 2018, no fee for 2019 will be due. However a terminating Statement of Organization (Form 410) will need to be **filed with the Secretary of State's Office by January 31, 2019**. An online fillable Form 410 can be accessed at the Secretary of State's webpage at <http://www.sos.ca.gov/campaign-lobbying/campaign-disclosure-and-requirements/campaign-forms-and-instructions/>. The rules can be found at the FPPC website, <http://www.fppc.ca.gov/learn/campaign-rules.html>.

Your committee will **not** receive any further notice or invoice in advance of the January 15, 2019, annual fee payment deadline.

If you have any questions about this notice, please email: annualfee@sos.ca.gov.

Sincerely,

Julie Waddell
Chief, Political Reform Division

Please detach and enclose with your payment

Committee ID #1324670

Amount Enclosed _____

Please remit your annual fee payment (\$50),
along with any forms to:

Secretary of State
Political Reform Division
1500 11th Street – Room 495
Sacramento, CA 95814

Make your check payable to the **Secretary of State** and please write your **committee ID number** on the lower left portion of the check to ensure the payment is posted to your account.

Exhibit A-17



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

October 24, 2018

Viken Pakradouni
o/b/o Armenian National Committee Political Action Committee

[REDACTED]

Also sent via email at: [REDACTED]

RE: Failure to File Campaign Statements: FPPC No. 2018-01139; Armenian National Committee Political Action Committee (ID#1324670)

Dear Mr. Pakradouni:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ The Enforcement Division has received a referral from the Secretary of State's Office regarding your committee's failure to file the following campaign statements and failure to pay the 2015 \$50 annual fee:

Statement/Report Type	Reporting Period	Filing Deadline
Semi-annual (Form 460)	7/1/2017 – 12/31/2017	1/31/2018
Semi-annual (Form 460)	1/1/2018 – 6/30/2018	7/31/2018

Failing to timely file a campaign statement is a violation of the Act. As the treasurer of this committee, you are liable for the committee's filing violation. The Enforcement Division has commenced an enforcement action against you, and can obtain an order that you pay a monetary penalty to the State of California of up to \$5,000 per violation.²

You must first **file any past-due campaign statements** with the County of Los Angeles **within 30 days** of the date of this letter. Once filed, the Enforcement Division staff will contact you after the statements are filed with a proposed settlement of this matter. Please note that if your committee is active in supporting candidates or ballot measures on the November 6, 2018 General Election ballot, you may incur additional filing obligations.

By not responding you could incur a fine of up to \$5,000 per violation. These fines can be pursued against you personally even if you choose not to respond or update your filings.

For more information on your campaign forms, visit our website at www.fppc.ca.gov. If you have any questions regarding this letter or your filing obligations, please contact me at (916) 322-8190 or chackert@fppc.ca.gov.

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014.

² Section 83116.

Sincerely,

CHackert

Chloe Hackert
Political Reform Consultant
Enforcement Division

/ch

Exhibit A-18

1 ANGELA BRERETON
Chief of Enforcement
2 THERESA GILBERTSON
Senior Commission Counsel
3 **FAIR POLITICAL PRACTICES COMMISSION**
1102 Q Street, Suite 3000
4 Sacramento, CA 95811
Telephone: (916) 323-6421
5 Email: tgilbertson@fppc.ca.gov

6 Attorneys for Complainant

7
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

9
10 STATE OF CALIFORNIA

11 In the Matter of

) FPPC No.: 2018-01139

12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

ARMENIAN NATIONAL COMMITTEE
POLITICAL ACTION COMMITTEE
ANCPAC and VIKEN K. PAKRADOUNI,

) DECLARATION OF LANCE
HACHIGIAN

) (Gov. Code §§ 11506 and 11520)

Respondents.

I, Lance Hachigian, declare as follows:

1. I am a Special Investigator employed by the Fair Political Practices Commission of the State of California.
2. As part of an investigation into potential unreported campaign activity by the Armenian National Committee Political Action Committee ANCPAC (“Committee”) and Viken K. Pakradouni (“Pakradouni”), I reviewed filed campaign statements, statements of organization, and caused the issuance of subpoenas.
3. According to Pakradouni and confirmed by an online search of the California State Controller’s Office (SCO) Unclaimed Property Search, the Committee had assets held by SCO.
4. On March 20, 2020, in response to a subpoena, I received records from the California State Controller’s Office (SCO). The records are summarized below:

- 1 a. Records supporting a \$2,332.56 condemnation award, received by SCO on September 3,
2 2015 from the Superior Court of CA, County of LA.
3 b. Records supporting a \$3,042.36 condemnation award, received by SCO on September 3,
4 2015 from the Superior Court of CA, County of LA.
5 c. Records supporting a \$428.00 cashier's check, received by SCO on June 13, 2017 from
6 Bank of America – CA.

7 5. I reviewed all Statements of Organization on file with the Secretary of State. The Committee
8 failed to disclose the financial institution in which the committee's funds were on deposit. As the
9 records from SCO indicated that the Committee may have done business with Bank of America,
10 I caused a subpoena to be issued to confirm if additional funds were held at Bank of America.

11 6. On April 2, 2020, Bank of America was served with a subpoena issued by the Fair Political
12 Practices Commission. The subpoena requested bank records held in the name, Armenian
13 National Committee Political Action Committee ANCPAC, for the period of January 1, 2012
14 through December 31, 2015. In a response dated March 6, 2020, Bank of America stated that the
15 Bank was unable to locate any records requested for the timeframe specified.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct.

18
19 Dated: 2/24/2021

Lance Hachigian

Lance Hachigian, Special Investigator
Fair Political Practices Commission

Exhibit A-19



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

January 4, 2021

Viken K. Pakradouni
Armenian National Committee Political Action Committee ANCPAC

NOTICE OF DEFAULT DECISION AND ORDER

Re: FPPC No. 2018-01139, In the Matter of Armenian National Committee Political Action Committee ANCPAC and Viken K. Pakradouni

Dear Mr. Pakradouni:

On July 31, 2020, you were personally served with an accusation in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default will appear on the published agenda for the Commission’s public meeting on February 18, 2021. This agenda will be public, and you could be contacted by the media with questions. The Commission will be asked to adopt the default at the subsequent public meeting on March 18, 2021 and impose an administrative penalty of \$9,400 against you.

Following the issuance of the default, the Commission will obtain a judgment in superior court for the amount owed and then take action to collect the judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

You may still resolve this matter informally by way of a stipulated settlement if an agreement can be reached prior to this matter appearing for consideration by the Commission. Please contact me at (916) 323-6421 or tgilbertson@fppc.ca.gov if you wish to enter into a settlement to resolve this matter in its entirety.

Sincerely,

Theresa Gilbertson
Senior Commission Counsel
Enforcement Division

¹ Government Code section 11505.

Exhibit A-20



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

February 24, 2021

Viken K. Pakradouni
Armenian National Committee Political Action Committee ANCPAC



NOTICE OF INTENT TO ENTER DEFAULT DECISION AND ORDER

Re: FPPC No. 2018-01139, In the Matter of Armenian National Committee Political Action Committee ANCPAC and Viken K. Pakradouni

Dear Mr. Pakradouni:

On July 31, 2020, you were personally served with an accusation in the above referenced matter. Pursuant to the Administrative Procedure Act, you were required to file a notice of defense within 15 days after service of the accusation to request an administrative hearing. You did not file a notice of defense. **As a result, you have waived your right to an administrative hearing.**¹

The Fair Political Practices Commission (the “Commission”) will proceed with a default, decision and order (“default”) against you. The initial notice of this default appeared on the published agenda for the Commission’s public meeting on February 18, 2021. The Commission will be asked to adopt the default at its public meeting scheduled for March 18, 2021 and impose an administrative penalty of \$9,400 against you. A copy of the default, decision, and order and accompanying exhibits the Commission will consider at its meeting on March 18, 2021 is enclosed with this letter.

You may, but you are not required to, provide a response brief, along with any supporting materials, no later than five calendar days before the Commission hearing at which the default is scheduled to be heard. Your response brief must be served on the Commission Assistant, at the above address.

Following the issuance of the default order and imposition of the administrative penalty, we will commence legal proceedings to collect this fine, which may include converting the Commission’s order to a court judgment. Please be advised that administrative penalties for violations of the Political Reform Act cannot be discharged in bankruptcy proceedings.

¹ Government Code section 11505.

This letter is your last opportunity to resolve this matter informally by way of a stipulated settlement, before the default proceedings are commenced. If we do not reach a resolution, the enclosed documents will be placed on the Commission's agenda for the March 18, 2021 meeting. Please contact me at (916) 323-6421 or tgilbertson@fppc.ca.gov if you wish to enter into a negotiated settlement.

Sincerely,



Theresa Gilbertson
Senior Commission Counsel
Enforcement Division

Enclosures