



**FAIR POLITICAL PRACTICES COMMISSION**

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

August 3, 2015

Keith Richter  
[REDACTED]  
[REDACTED]

**Re: Closure Letter**  
**FPPC No. 14/877: Keith Richter** ✓

Dear Mr. Richter:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").<sup>1</sup> As you are aware, the Enforcement Division opened an investigation against you concerning the conflicts of interests and economic disclosure provisions of the Act. Specifically, the Enforcement Division investigated allegations that you were a member of an advisory board for Emergency Services Consulting International (ESCI), and as chief of the Orange County Fire Authority (OCFA), you violated the conflict of interest prohibitions by making, participating in making and/or attempting to influence governmental decisions involving the Standard of Cover Study ESCI conducted for OCFA. Additionally, the Enforcement Division investigated allegations that you failed to disclose your business position on the advisory board of ESCI in your applicable statements of economic interests (SEIs). Lastly, the Enforcement Division investigated allegations that you failed to disclose gifts from ESCI in your applicable SEIs, some of which may have been over the applicable gift limits.

After a full investigation, the Enforcement Division has found insufficient evidence to establish that you violated the Act in this regard. The evidence obtained showed that you did not serve on any ESCI board. Additionally, the evidence showed that you did not make, participate in making and/or attempt to influence governmental decisions involving the Standard of Cover Study ESCI conducted for OCFA. Lastly, no evidence supported the allegations that you accepted any gifts or compensation from ESCI that would lead to a potential conflict of interests.

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<sup>1</sup> 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.

Additionally, the evidence showed that you timely filed your SEIs, and you did not receive any gifts or compensation from ESCI or hold a business position with ESCI during the applicable time period. Thus, you did not have any disclosure obligations concerning ESCI.

Based upon the evidence obtained, we have closed our investigation against you in this matter. If you have any questions regarding this matter, please feel free to contact me at [REDACTED]

Sincerely,

[REDACTED]

Angela J. Brereton  
Senior Commission Counsel  
Enforcement Division