



FAIR POLITICAL PRACTICES COMMISSION

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

(916) 322-5660 • Fax (916) 322-0886

December 8, 2009

✓ Keren Brooks, Chief Research Analyst
CoBro Consulting

REDACTED

**Re: In the Matter of Darlene Cole, Keren Brooks, and Urban Pelicon
FPPC No. 06/594**

Dear Ms. Brooks:

The Fair Political Practices Commission (the "Commission") enforces the provisions of the Political Reform Act (the "Act")¹ found in California Government Code Section 81000 and following. On June 23, 2006, the Commission received a complaint alleging violations of the conflicts of interest provisions of the Act regarding your employment by the Grossmont-Cuyamaca Community College District (the District) as a Research Analyst in the District's Office of Institutional Research and Planning, and your consulting company, CoBro Consulting, LLC.

Based on our review and investigation, we determined that you were not a public official under the Act. As such, there is no basis for a conflict of interest violation under Section 87100. Therefore, our file in this matter has been closed.

If you have any questions regarding this matter, please feel free to contact me at 916-322-5660.

Sincerely,

REDACTED

Angela J. Brereton
Senior Commission Counsel
Enforcement Division

¹The Political Reform 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 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.