FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

September 30, 2010

Mr. William J. Keene
o/b/o Sonoma County Agricultural Preservation and Open Space District

REDACTED

Advisory Letter Re: FPPC No. 10/815, William J. Keene / Sonoma County Agricultural Preservation and Open Space District

Dear Mr. Keene:

As you may know, the Enforcement Division of the Fair Political Practices Commission (the "FPPC") has received a complaint against you. The complaint alleged that, as the responsible filer for the Sonoma County Agricultural Preservation and Open Space District, you may have failed to comply with your required reporting obligations. Specifically, the California Secretary of State indicated that you failed to file required reports for the following time periods: October 1, 2008 through December 31, 2008; January 1, 2009 through March 31, 2009; and April 1, 2009 through June 30, 2009.

The FPPC enforces the provisions of the Political Reform Act (the "Act"),[1] found in Government Code section 81000, et seq. Section 86115 of the Act provides that lobbyist employers must file periodic reports. Section 82039.5 of the Act defines a lobbyist employer as an entity that either "[e]mploys one or more lobbyists for economic consideration, other than reimbursement for reasonable travel expenses, for the purpose of influencing legislative or administrative action" or "[c]ontracts for the services of a lobbying firm for economic consideration, other than reimbursement for reasonable travel expense, for the purpose of influencing legislative or administrative action." Section 86117(a) provides that these reports "shall be filed during the month following each calendar quarter."

---

[1] The 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 18109 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.

After investigation, we have determined that there is insufficient evidence to find your organization violated the Act. Specifically, during the time periods in question your organization was filing in conjunction with the County of Sonoma. For this reason the FPPC is closing its case with this advisory letter.

Your cooperation in ensuring that the requirements of the Act are consistently satisfied is greatly appreciated. If you have any questions regarding this matter, please contact Jennifer Reimer at 916-322-8222.

Sincerely,

REDACTED

Gary S. Winuk, Chief
Enforcement Division

cc: Gloria Gilmore
Political Reform Division
California Secretary of State

GSW/jr