



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

August 9, 2022

Mr. Dennis Keller
[REDACTED]

**Re: No Action Closure Letter
FPPC Case No. 2018-00378; Dennis Keller**

Dear Mr. Keller:

The Enforcement Division of the Fair Political Practices Commission (FPPC) enforces the provisions of the Political Reform Act.¹ This case arises from a filing officer referral with respect to a 2017 annual statement of economic interests (Form 700) that you filed for your position as a consulting engineer for the Atwell Island Water District. On your filing, you reported receipt of a gift from Eric Shannon Farming, valued at \$4,000, with a description of “Fishing.” The purpose of our investigation was to determine whether this was an over-the-limit gift.

Our investigation found that the gift was for a fishing trip in eastern Montana, including transportation via air/ground, room, and board. You timely reported receipt of the gift on your Form 700, but you mistakenly over-reported the fair market value. The actual value of the gift was approximately \$1,920, and when you learned this, you paid the donor of the gift back for the full amount. Our investigation was unable to obtain sufficient evidence to determine whether any exceptions to the gift rules applied here. Additionally, you received the gift on or about July 4, 2017, and we are closing this matter without further action because the statute of limitations has expired.

For future reference, current information about gift limits may be found on our website here: <https://www.fppc.ca.gov/learn/public-officials-and-employees-rules-/gifts-and-honoraria.html>.

Thank you for your attention to this matter. Please do not hesitate to call if you have any questions.

Very truly yours,

Neal P. Bucknell

Neal P. Bucknell
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¹ The Political Reform Act—sometimes simply referred to as the Act—is contained in Government Code sections 81000 through 91014. All statutory references are to this code.