



August 28, 2024

Eric Casher
o/b/o Keith Curry
Via email: eric@redwoodpubliclaw.com

Warning Letter re: FPPC No. 2024-00762, Keith Curry

Dear Eric Casher,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ As you are aware, the Enforcement Division received a referral from the County of Los Angeles alleging that your client, Keith Curry, violated the Act’s gift limit provisions.

The Enforcement Division has completed its review of the facts in this case. Specifically, we found that on Schedule D of your client’s 2022 Annual SEI, they disclosed gifts totaling in excess of the annual gift limit from a single source imposed by Section 89503 of the Act.

The Act prohibits certain public officials from accepting gifts valued at more than the calendar year gift limit from a single source.² The term “gift” is defined as “any payment that confers a personal benefit on the recipient, to the extent that consideration of equal or greater value is not received.”³ As the President/CEO of the Compton Community College District, your client is prohibited from accepting a gift(s) from any single source in any calendar year with a total value of more than the gift limit. The gift limit for calendar year 2022 was \$520.⁴ According to Schedule D of the 2022 Annual SEI, your client received gifts totaling \$760 from the City of Pasadena.

Your client violated the Act by receiving gifts exceeding the applicable limit from a single source for the calendar year of 2022. However, your client reimbursed the City of Pasadena for the amount over the gift limit, an amendment was filed to the 2022 Annual SEI to disclose that the gift was paid down, and your client has no Enforcement history. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26, 2023, which requires the Enforcement Division to take all appropriate actions within their

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 Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 89503.

³ Section 82028(a).

⁴ Regulation 18940.2.

discretion to decrease the Division's annual carryover caseload, the Enforcement Division is closing this case with this warning letter.⁵ Discretion was used based on mitigating or aggravating circumstances and the totality of the circumstances.⁶ This resolution may not be used as a comparable case for other enforcement matters.⁷

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

If you have any questions regarding this letter, please contact Tara Stock at 279-237-5958 or tstock@fppc.ca.gov.

Sincerely,

James M. Lindsay

James M. Lindsay, Chief
Enforcement Division

JML:ts

<https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁶ Regulations 18360.1 and 18360.3.

⁷ See Regulation 18361.5, subd. (e)(3).