



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

May 11, 2022

Nicholas Sanders
o/b/o Century West Partners
Via email: nsanders@campaignlawyers.com

Re: No Action Closure Letter
FPPC Case No. 2018-00012; Century West Partners

Dear Mr. Sanders:

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act¹ (the “Act”). As you are aware, the Enforcement Division received a sworn complaint alleging that your client, Century West Partners, failed to file as a major donor in connection with a contribution made in the amount of \$25,000 in 2014.

As a result of the \$25,000 contribution your client, Century West Partners, made to a general purpose recipient committee, *Responsible Leadership for a Better Community*, on October 17, 2014, they qualified as a major donor committee. Under the Act, an individual or entity that makes contributions totaling \$10,000 or more in a calendar year qualifies as a major donor committee and incurs filing obligations.² If the \$10,000 threshold is met in the first six months of the calendar year, a major donor committee must file Form 461 covering the period of January 1 through June 30 by July 31 of that calendar year. If the \$10,000 threshold is met in the last six months of the calendar year, a major donor committee must file Form 461 covering the period of January 1 through December 31 by January 31 of the following calendar year.³ Depending on when the contributions are made and which candidates and/or committees the contributions are made to, a major donor committee may also be required to file 24-Hour Contribution Reports if it makes a contribution(s) totaling \$1,000 or more to a candidate or committee.⁴

Despite attempts made by the Enforcement Division to obtain compliance, it does not appear that Century West Partners has filed a Form 461 to disclose the contribution made to *Responsible Leadership for a Better Community*. However, the Act’s statute of limitations to pursue administrative prosecution is five years.⁵ The allegation regarding the failure to file Form 461 is outside of the Act’s statute of limitations. Therefore, the Enforcement Division is closing this matter without further action.

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 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 82013(c).

³ Section 84200(b).

⁴ Sections 82036 and 84203.

⁵ Section 91000.5.

If you have any questions, please contact Tara Stock at 916-322-8241 or tstock@fppc.ca.gov.

Sincerely,

Angela J. Brereton

Angela J. Brereton, Chief
Enforcement Division

AJB:ts

cc: Mary Marlow, sworn complainant