



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

August 9, 2022

Colliers International
101 Second Street, 11th Floor
San Francisco, CA 94105

Advisory Letter: re: FPPC Case No. 2022-00582; Colliers International

Dear Colliers International,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to a Commission-initiated investigation which found that Colliers International failed to file a major donor campaign statement (Form 461) for the reporting period of July 1, 2016 through December 31, 2016 despite qualifying as a major donor committee during that period.

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 must file a Form 461 covering the period of January 1 through June 30 by July 31 of the calendar year. If the threshold is met in the latter six months of the calendar year, a major donor must file a Form 461 covering the period January 1 through December 31 by January 31 of the following calendar year.³

The Enforcement Division found that on September 30, 2016, Colliers International contributed \$20,000 to the committee San Franciscans Against Wasteful Spending. We found that Colliers International failed to file a corresponding Form 461 by the January 31, 2017 deadline to disclose this contribution. However, the Act’s statute of limitations to pursue administrative prosecution is five years⁴. And since this violation is outside of that timeframe the Enforcement Division has decided to close this case with this advisory letter.

Should you choose to make contributions in the future, the FPPC publishes forms and manuals to facilitate compliance with the provisions of the Act. These manuals include filing schedules that show when campaign statements are due. If Colliers International needs forms or a manual, or guidance regarding its obligations, please call the Commission’s Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

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

⁴ Section 91000.5

Please feel free to contact Ginny Brown at gbrown@fppc.ca.gov or 916-322-8064 with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton

Angela Brereton, Chief
Enforcement Division

AJB/gab