



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

February 26, 2024

Gary Winuk
Kaufman Legal Group
o/b/o Alison Collins
Email: gwinuk@kaufmanlegalgroup.com

Warning Letter: FPPC No. 2021-00993; Alison Collins

Dear Gary Winuk,

The Enforcement Division of the Fair Political Practices Commission (“FPPC”) enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to an anonymous complaint. The Enforcement Division found that as a result of Alison Collins’ position as Board Member of the San Francisco Unified School District, the Act required your client to periodically file a Statement of Economic Interests (“SEI”) and that they failed to timely file their 2021 Annual and Leaving Office SEIs. Additionally, your client failed to disclose certain reportable interests on their 2021 Annual and Leaving Office SEIs.

Section 87300 of the Act requires every state and local agency to develop a Conflict of Interest Code. This Code requires individual who participate in making decisions which may foreseeably have a material financial effect on any financial interest belonging to that person to disclose all reportable interests on SEIs.² Individuals required to file SEIs must file within 30 days of assuming office, annually thereafter at the time specified by the Code, and within 30 days of leaving office.³

Under Section 87206 of the Act, you are required to report your investment interests on your SEI. This disclosure also requires a statement of the nature of the investment and a statement of the fair market value of the investment.

Your client violated the Act by failing to timely file their 2021 Annual and Leaving Office SEIs by the specified deadlines. Your client also violated the Act by failing to disclose their spousal interest in F4 Transbay Partners LLC (through Urban Pacific Development LLC), partial owner of Parcel F (located at 542-550 Howard Street) on their 2021 Annual and Leaving Office SEIs. However, your client is no longer in the position, they have paid a fine in connection to the late filing of both SEIs with the San Francisco Ethic Commission and certain related economic interests were disclosed on their SEIs. Based on the foregoing, and in accordance with the Enforcement Division Policy Directives formally adopted by the Commission on January 26,

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 87302, subd. (b).

³ *Ibid.*

2023, which requires the Enforcement Division to take all appropriate action within their discretion to decrease the Division's annual carryover caseload, the Enforcement Division is closing this case with this warning letter.⁴ Discretion was used based upon mitigating or aggravating circumstances and the totality of the circumstances.⁵ This resolution may not be used as a comparable case for other enforcement matters.⁶

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.

Any future non-filings may result in monetary penalties and this warning letter may be considered in any future enforcement actions.

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 your client with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If your client wishes to avail themselves of these proceedings by requesting that their 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 Chance Felkins at 279-237-3766 or cfelkins@fppc.ca.gov.

Sincerely,

Michael Chance Felkins

Michael Chance Felkins, Commission Counsel
Enforcement Division

⁴ <https://www.fppc.ca.gov/content/dam/fppc/NS/Documents/AgendaDocuments/General%20Items/2023/january/15.0-Enforcement-directives.pdf>

⁵ Regulation 18360.1 and 18360.3.

⁶ See Regulation 18361.5, subdivision (e)(3).