



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

October 15, 2024

Campaign to Elect Dwight Cline, Plumas County Sheriff 2022

Dwight Cline

Jolene Cline

Via email: [dwight@cline4sheriff.com](mailto:dwight@cline4sheriff.com)

**Warning Letter Re: FPPC No. 2022-00497; Campaign to Elect Dwight Cline, Plumas County Sheriff 2022, Dwight Cline, Jolene Cline**

Dear Committee, Dwight Cline and Joline Cline:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).<sup>1</sup> As you are aware, the Enforcement Division received an AdWatch submission regarding your failure to include the proper advertisement disclosures in a mailer. The Enforcement Division has completed its investigation and found you also failed to timely file certain campaign statements and reports and failed to accurately report contributions on campaign statements.

The Act requires committees to file semi-annual campaign statements each year no later than July 31 for the period ending June 30 and January 31 for the period ending December 31.<sup>2</sup> Preelection campaign statements shall be filed no later than 40 days before the election for the period ending 45 days before the election and for the period ending 17 days before the election.<sup>3</sup>

A late contribution includes a loan, that totals in the aggregate \$1,000 or more and is made to or received by a candidate or controlled committee during the 90-day period preceding the date of the election.<sup>4</sup> Each candidate or committee that makes or receives a late contribution, shall report the late contribution to each office with which the candidate or committee is required to file its next campaign statement.<sup>5</sup> A late contribution shall be reported within 24 hours of the time it is made or received.<sup>6</sup>

The Act also requires each campaign statement contain, among other things, the total amount of contributions received during the period covered by the campaign statement from anyone who has given a cumulative amount of \$100 or more.<sup>7</sup> If the cumulative amount of

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<sup>1</sup> 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.

<sup>2</sup> Section 84200.

<sup>3</sup> Sections 84200.5 and 84200.8.

<sup>4</sup> Section 82036.

<sup>5</sup> Section 84203, subd. (a).

<sup>6</sup> Section 84203, subd. (b).

<sup>7</sup> Section 84211, subd. (c).

contributions from a person is \$100 or more, the persons full name, street address, occupation, name of that persons employer, and the date received for each contribution is also required.<sup>8</sup>

Further, any advertisement paid for by a committee shall include the words “Paid for by” followed by the committee’s name.<sup>9</sup> A candidate or candidate controlled committee shall not send a mass mailing unless the name, street address, and city of the candidate or committee are shown on the outside of each piece of mail and on at least one of the inserts included within each piece of mail in no less than 6-point type that is in a color or print that contrasts with the background so as to be easily legible.<sup>10</sup>

You violated the Act by failing to timely file a preelection and semi-annual campaign statement for the periods ending May 21, 2022 and June 30, 2022, and by failing to file 24-hour Contribution Reports (Form 497s) for contributions the candidate made to the Committee over \$1,000 during the 90-day period preceding the election, which began March 9, 2022. You also violated the Act by failing to report cumulative totals, occupation, and employer information for contributions from the candidate. These contributions were reported on Schedule I – Miscellaneous Increases to Cash, instead of Schedule A – Monetary Contributions Received, or Schedule B – Loans Received. Miscellaneous increases to cash are for example, interest received from a bank account, refunds received from vendors, and proceeds from the sale of campaign property or auction items. Since the information was reported on Schedule I, the cumulative totals and employer information etc. were not reported. Regarding the mass mailing, you failed to include the Committee’s full address on each envelope and failed to include disclosures on the letter inside.

Despite the violations, the Enforcement Division has decided that further enforcement action is not warranted. While the letters sent by the Committee did not contain disclosure, the envelope they came in stated, “Paid for by the Campaign to Elect Dwight Cline...” The late contributions that were misreported as miscellaneous increases to cash nevertheless were reported on campaign statements filed prior to the election. Additionally, the Committee was almost entirely funded by Dwight Cline, you have a low level of experience with the Act and no prior Enforcement history, Dwight Cline was an unsuccessful candidate, and the Committee has since terminated.

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

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<sup>8</sup> Section 84211, subd. (f).

<sup>9</sup> Section 84502, subd. (a)(2).

<sup>10</sup> Section 84305, subd. (a)(1).

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.

Please feel free to contact me at 916-322-5771 or [abreron@fppc.ca.gov](mailto:abreron@fppc.ca.gov) with any questions you may have regarding this letter.

Sincerely,

*Angela J. Brereton*

Angela J. Brereton  
Assistant Chief  
Enforcement Division

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