



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

June 6, 2025

Matthew Wakefield, individually and on behalf of Citizens to Keep Crescent City Safe and Strong Yes on Measure S

Via email: [REDACTED]

Warning Letter Re: FPPC No. 2020-01078; Citizens to Keep Crescent City Safe and Strong Yes on Measure S and Matthew Wakefield

Dear Matthew Wakefield:

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 sworn complaint alleging Citizens to Keep Crescent City Safe and Strong Yes on Measure S (ID# 1431971) (the “Committee”) sent mass mailers at public expense. However, this allegation has been disproven. The Enforcement Division has completed its investigation and review of the facts in this case. Specifically, we found that the Committee initially failed to timely amend its statement of organization, misreported \$15,000 as a single contribution from the Crescent City Fire & Rescue Firefighters Association, and failed to timely file campaign statements and reports.

Under the Act, a “primarily formed committee” includes a recipient committee which is formed primarily to support a single measure.² Within 30 days of the designation of the measure on the ballot, any committee which is primarily formed to support the measure must include its support of the specific ballot measure in its name.³ If there is a change in any of the information contained in a statement of organization, an amendment shall be filed within 10 days to reflect the change, including to disclose the committee’s date of qualification and changes to the committee’s name.⁴

Additionally, primarily formed committees must file two pre-election campaign statements no later than 40 days before the election for the period ending 45 days before the election, and no later than 12 days before the election for the period ending 17 days before the

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.

² Section 82047.5, subd. (b).

³ Section 84107.

⁴ Section 84103, subd. (a).

election.⁵ Any contribution of \$1,000 or more made to or received by a primarily formed committee during the 90 days before the election at which the measure is to be voted on qualifies as a “late contribution” and must be reported within 24 hours of the time it is received.⁶

The Committee violated the Act by failing to initially identify as a primarily formed committee and by failing to update its name to include “Yes on Measure S” within 30 days of the measure’s designation. Additionally, the Committee violated the Act by: failing to properly disclose contributions received from Crescent City Fire & Rescue Firefighters Association; failing to timely file a pre-election campaign statement for the reporting period of July 1, 2020 to September 19, 2020, by the September 24, 2020 due date; and failing to timely file 24-hour contribution reports for seven late contributions received totaling \$14,000, by the applicable due dates. However, the Enforcement Division has decided to close this case with this warning letter because the violations resulted in minimal public harm. The Committee filed amendments to its Form 410 and filed pre-election campaign statement and 24-hour contribution reports prior receiving contact from the Enforcement Division and prior to the relevant election, the Committee has since terminated, and you have no prior experience with the Act or history of violating the Act.

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 Regulations 18360.1 and 18360.2 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 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 10 days from the date of this letter.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission’s Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov. Please feel free to contact me at JRinehart@fppc.ca.gov or (279) 237-5910 with any questions you may have regarding this letter.

⁵ Sections 84200.5 and 84200.8.

⁶ Sections 82036 and 84203, subd. (a)-(b).

Sincerely,

Jenna Rinehart

Jenna C. Rinehart,
Senior Commission Counsel
Enforcement Division

cc: Linda Sutter l_sutter@yahoo.com