

**From:** [CampaignGuidance](#)  
**To:** [Alma Castillo](#); [CampaignGuidance](#)  
**Cc:** [Taber, Toni](#)  
**Subject:** RE: FW: Donating to City campaigns  
**Date:** Tuesday, February 13, 2024 1:11:05 PM

---

Good afternoon,

If the donation is comprised of city campaign funds then that donation would be considered a transfer of funds if donated to any other person's city campaign fund or any other candidates noncity campaign fund. The prohibitions in SJMC 12.06.410 prohibit a "donation" of this kind from being made.

Please let me know if you have any additional questions.

Office of the City Attorney, Campaign Guidance  
City of San José  
200 East Santa Clara Street, 16th Floor Tower  
San Jose, CA 95113  
Office No: (408) 535-1900  
Fax No: (408) 998-3131  
[SJElections@sanjoseca.gov](mailto:SJElections@sanjoseca.gov)  
<http://www.sanjoseca.gov/index.aspx?NID=4796>

---

**From:** Alma Castillo <[REDACTED]>  
**Sent:** Wednesday, February 7, 2024 3:04 PM  
**To:** CampaignGuidance <[SJElections@sanjoseca.gov](mailto:SJElections@sanjoseca.gov)>  
**Cc:** Taber, Toni <[toni.taber@sanjoseca.gov](mailto:toni.taber@sanjoseca.gov)>  
**Subject:** Re: FW: Donating to City campaigns

[External Email]

Good afternoon,

Thank you for the below response. I just need some clarification for my client.

Does donating from a city candidate campaign committee to another city candidate campaign committee fall under the SJ Muni Code 12.06.410? There was a question if a donation is considered a transfer of funds.

Thank you for your time.

- Alma Castillo

Sent from my mobile device.

On Wed, Feb 7, 2024 at 1:23 PM Taber, Toni <[toni.taber@sanjoseca.gov](mailto:toni.taber@sanjoseca.gov)> wrote:

---

**From:** CampaignGuidance <[SJElections@sanjoseca.gov](mailto:SJElections@sanjoseca.gov)>

**Sent:** Tuesday, February 6, 2024 11:33 AM

**To:** Taber, Toni <[toni.taber@sanjoseca.gov](mailto:toni.taber@sanjoseca.gov)>; [REDACTED]

**Subject:** RE: Donating to City campaigns

Good morning,

The previous guidance regarding the prohibition on the transfer of city campaign funds to any other person's city campaign fund is still in place and codified as San Jose Municipal Code Section 12.06.410 (A.).

Please let me know if you have any additional questions.

Office of the City Attorney, Campaign Guidance  
City of San José

[200 East Santa Clara Street, 16th Floor](#) Tower

San Jose, CA 95113

Office No: (408) 535-1900

Fax No: (408) 998-3131

[SJElections@sanjoseca.gov](mailto:SJElections@sanjoseca.gov)

<http://www.sanjoseca.gov/index.aspx?NID=4796>

---

**From:** Taber, Toni <[toni.taber@sanjoseca.gov](mailto:toni.taber@sanjoseca.gov)>

**Sent:** Monday, February 5, 2024 9:11 AM

**To:** CampaignGuidance <[SJElections@sanjoseca.gov](mailto:SJElections@sanjoseca.gov)>

**Subject:** FW: Donating to City campaigns

Please respond to Alma. Thank you,

Toni

---

**From:** Alma Castillo <[REDACTED]>  
**Sent:** Monday, February 5, 2024 8:27 AM  
**To:** Taber, Toni <[toni.taber@sanjoseca.gov](mailto:toni.taber@sanjoseca.gov)>  
**Subject:** Donating to City campaigns

[External Email]

Hi Toni,

Just a quick question. Are city candidate campaign committees allowed to contribute to other city candidate campaign committees?

I remember from years ago I was alerted that this was not allowed based on the Muni code 12.06.410 regarding prohibition on transfer of funds.

I want to confirm this is still the case.

Thank you for the assistance.

- Alma Castillo

Sent from my mobile device.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.