

From: [CampaignGuidance](#)
To: [Alex Shoor](#); [Elections](#)
Cc: [R. Elysa Gurman](#); [Rodriguez, Joy](#); [Taber, Toni](#); [CampaignGuidance](#)
Subject: RE: Post Election Information for Candidates
Date: Thursday, June 6, 2024 9:58:04 AM

Good afternoon, Mr. Shoor:

I apologize as it appears previous guidance on this question was not forwarded back to your email account.

Donations made to a bona fide charitable, educational, civic, religious, or similar tax-exempt, nonprofit organization is a permissible use of campaign funds so long as the donation is reasonably related to a political, legislative, or governmental purpose and does not personally benefit the candidate, committee treasurer, or any individual with authority to approve the expenditure of campaign funds, or any such person's immediate family member. These donations can be made prior to and after the "surplus fund" designation kicks in.

However, donations to "individuals" that worked on a campaign are not part of this nonprofit donation carve out.

The expenditure of campaign funds which do not confer a substantial personal benefit on the candidate, must be reasonably related to a political, legislative, or governmental purpose. A committee may pay for professional services reasonably required by the committee to assist it in the performance of its administrative functions as those are deemed to be directly related to a political, legislative, or governmental purpose. This includes the professional services of committee members, excluding the candidate, treasurer or other person that has authority to approve expenditures, with a very limited exception.

Additionally, unless directly related to a political, legislative, or governmental purpose, personal gifts may not be paid for with campaign funds.

Once remaining funds are deemed to be "surplus funds" the permitted use of those funds is further restricted and may only be used in accordance with Section 12.06.720 of the SJMC.

Please let me know if you have any additional questions.

Matthew Tolnay
Deputy City Attorney
City of San José | City Attorney's Office
200 E. Santa Clara Street | San José, CA 95113
p: 408.535.1912 | f: 408.998.3131
matthew.tolnay@sanjoseca.gov

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Thank you for your cooperation.

From: Alex Shoor <[REDACTED]>
Sent: Tuesday, May 28, 2024 4:57 PM
To: Elections <elections@sanjoseca.gov>
Cc: R. Elysa Gurman <[REDACTED]>; Rodriguez, Joy <Joy.Rodriguez@sanjoseca.gov>;
Taber, Toni <toni.taber@sanjoseca.gov>; CampaignGuidance <SJElections@sanjoseca.gov>
Subject: Re: Post Election Information for Candidates

[External Email]

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City — following up on this.

- Alex

Sent from a smartphone. Please forgive any typos and my brevity.

On May 2, 2024, at 7:47 PM, Alex Shoor <[REDACTED]> wrote:

These wouldn't be prohibited transfers. I'm not running in November.

The donations would be to individuals who worked on my campaign and the following 501c3 orgs (one exception which is a 501c8):

Destination: Home
Valley Verde
True Fellowship Lodge #52 of the California Odd Fellows
PACT
Silicon Valley African American Cultural Center
Sharks Foundation
Earthquakes Foundation
Billy DeFrank LGBTQ Center
Bill Wilson Center
Guadalupe River Park Conservancy
Planned Parenthood Mar Monte
YWCA
SVCN
Our City Forest

On Tue, Apr 30, 2024 at 11:56 AM Elections <elections@sanjoseca.gov> wrote:

Hi Alex,

Per the City Attorney's Office:

<image001.png>

Please let us know so the CAO's election team can advise further.

Thanks so much,

Mitsy Ikegami

City of San José | Office of the City Clerk

200 East Santa Clara Street – 14th Floor | San José, CA 95113

[For a quick survey click here](#)

From: Alex Shoor [REDACTED]

Sent: Monday, April 29, 2024 10:16 AM

To: Taber, Toni <toni.taber@sanjoseca.gov>; R. Elysa Gurman

<[REDACTED]>

Cc: Ikegami, Mitsy <Mitsy.Ikegami@sanjoseca.gov>; Rodriguez, Joy

<Joy.Rodriguez@sanjoseca.gov>

Subject: Re: Post Election Information for Candidates

[External Email]

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Toni — Checking back in with y'all.

- Alex

Alex Shoor
[REDACTED]

On Apr 15, 2024, at 3:13 PM, Alex Shoor [REDACTED]
wrote:

Ok, thanks for the update. Lemme know. I'm in a holding pattern until then.

On Wed, Apr 10, 2024 at 1:00 PM Taber, Toni <toni.taber@sanjoseca.gov> wrote:

I just reached out to the attorney's office for a follow up. I sent it to them on 4/2.

From: Alex Shoor <[REDACTED]>
Sent: Wednesday, April 10, 2024 11:39 AM
To: Taber, Toni <toni.taber@sanjoseca.gov>
Cc: Ikegami, Mitsy <Mitsy.Ikegami@sanjoseca.gov>; Rodriguez, Joy <Joy.Rodriguez@sanjoseca.gov>
Subject: Re: Post Election Information for Candidates

[External Email]

Toni,

I understand my Campaign Manager Elysa Gurman had asked the Clerk's Office a question about distributing funds before June. Could we follow up on that?

Thanks much,
Alex

Alex Shoor
[REDACTED]

On Mar 20, 2024, at 2:32 PM, Taber, Toni <toni.taber@sanjoseca.gov> wrote:

Please see the attached information for the Post Election requirements for Candidates.

Thank you,

Toni J. Taber, CMC
City Clerk
City of San José
200 E Santa Clara Street
San José, CA 95113
408-535-1260

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Alex Shoor

[REDACTED]

[LinkedIn Profile](#)

cell: [REDACTED]

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Alex Shoor

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