



October 23, 2023

Burt Field  
Stand Up For Santa Clara  
su4santaclara@gmail.com  
contact@standupforsantaclara.com

**Subject: Inquiry Regarding Requirements for Compliance by Stand Up For Santa Clara with the City of Santa Clara's Dark Money Ordinance, Santa Clara City Code Chapter 2.130 Article X**

Dear Mr. Field:

I write to you in my official capacity as the City Clerk of Santa Clara who is responsible for administering the City's Dark Money ordinance, SCCC Section 2.130.320 et. seq. On September 11, 2023 the City received a written complaint alleging certain violations by Stand Up For Santa Clara regarding its failure to comply with the Dark Money ordinance. For your reference I am including a copy of the complaint filed with the City regarding your organization's activity.

By way of background, as you may know, the City of Santa Clara has implemented the Dark Money Ordinance to require disclosure requirements for campaign contributions by certain organizations to provide greater transparency to the voters in the City of Santa Clara. Under City Code Section 2.130.340 (Mandatory Disclosure, under Article X. Dark Money):

All contributions of One Hundred Dollars (\$100) or more to any organization, including but not limited to Multipurpose Organizations as such organizations are defined in Government Code Section 84222, that makes expenditures that affect or are intended to affect a local Santa Clara election to City office or for or against a local Santa Clara ballot measure shall be reported in the same manner as campaign contributions are required to be reported under section 2.130.280 of this Chapter. (Ord. 1979 § 1, 5-15-18).

Violations of this ordinance may be subject to enforcement as provided in Chapter 2.130 Article VI.

A link to the Dark Money code sections can be obtained at the following link:

<https://www.codepublishing.com/CA/SantaClara/#!/SantaClara02/SantaClara02130.html#2.130.320>

You may find more information regarding the Dark Money ordinance at the City website [www.santaclaraca.gov](http://www.santaclaraca.gov) under the City Clerk's webpage here: <https://www.santaclaraca.gov/our-city/departments-a-f/city-clerk-s-office/campaign-disclosure-forms-and-filings> . The Santa Clara Campaign Disclosure form can also be found online or sent by the City Clerk's Office upon request.

After some preliminary research, I have determined that neither you, nor any other representative associated with Stand Up For Santa Clara, has filed any Santa Clara Campaign Disclosure forms on behalf of Stand Up For Santa Clara.

After reviewing the Complaint and the Dark Ordinance materials I have referred to you, if you believe that the City's Dark Money Ordinance **does not apply** to Stand Up For Santa Clara or its activities, please notify me in writing by Wednesday, **November 1, 2023**. Please include an explanation of why you



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believe the ordinance does not apply. If you believe that the Dark Money Ordinance **does apply**, to Stand Up For Santa Clara, please also notify me in writing of this by **November 1, 2023**. Please include a date by which you believe any required disclosures will be provided. Such date should be no later than **November 15, 2023**.

If you have any questions regarding this letter or the terms of the ordinance itself, please contact me at [hhaggag@santaclaraca.gov](mailto:hhaggag@santaclaraca.gov).

Thank you in advance for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Hosam Haggag".

Hosam Haggag  
City Clerk

cc: Glen Googins, City Attorney