

# Complaint Type

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## Electronic Complaint System

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**Complaint:** If you suspect someone has violated the Political Reform Act, file a complaint with the FPPC's Enforcement Division using the Electronic Complaint System. To file, provide the requested information on the complaint below, attach all documents you have containing evidence of the violations using the document uploader, and click submit. You will receive an email confirming receipt of your complaint if you provide a return email address. If you file a sworn complaint, you will receive notifications regarding your complaint.

**Referral:** Filing officers can submit referrals to the Enforcement Division using the Electronic Complaint System. To refer a matter for prosecution by the Enforcement Division, provide the information requested below, attach the respondent's most recent statement or report and a copy of your conflict of interest code (if applicable), and click submit. You will receive an email confirming receipt of the referral and notification when the FPPC takes action on the referral.

**If you have questions or problems submitting your complaint or referral, please email [complaint@fppc.ca.gov](mailto:complaint@fppc.ca.gov) and we will assist you.**

## Complaint Type

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Complaint Type: Non-Sworn  
Complaint

You will not receive any notifications regarding your complaint, but may be contacted for more information. Your complaint is a public document.

# Complaint Details

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## Your Contact Information

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First Name: [REDACTED]

Last Name: [REDACTED]

Email: [REDACTED]

Phone Number: [REDACTED]

Please note that non-sworn complaints do not receive notice of the resolution of the complaint. In check the status of your complaint, you will need to email [complaint@fppc.ca.gov](mailto:complaint@fppc.ca.gov).

## Respondent Information

Position/Office Held (if applicable)	Jurisdiction	First Name	Last Name	Address	City	State	Zip Code	Email
		Noelle	Moseley					
		Genevieve	Jurvetson					
		Steve	Jurvetson					
		Brook	Byers					
		Shawn	Byers					
		Carla	Crane					
		Rick	Caruso					
		David	Crane					
		Michael	Moritz					
Mayor	San Jose	Matt	Mahan	312 Clay St	Oakland	CA	94607	<a href="mailto:filings@seowenscompany.com">filings@seowenscompany.com</a>

Committee or Organization Name	Committee ID	Address	City	State	Zip Code	Email
Mahan for Governor 2026	1486858	312 Clay Street	Oakland	CA	94607	<a href="mailto:filings@seowenscompany.com">filings@seowenscompany.com</a>
Deliver for California Mahan for Governor 2026	1488176	2350 Kerner Blvd 250	San Rafael	CA	94904	<a href="mailto:form410@nmgovlaw.com">form410@nmgovlaw.com</a>
California Back to Basic supporting Matt Mahan for Governor 2026	1487425	2350 Kerner Blvd 250	San Rafael	CA	94901	<a href="mailto:form410@nmgovlaw.com">form410@nmgovlaw.com</a>
Govern for California Network Committee	1383984	2350 Kerner Blvd 250	San Rafael	CA	94901	<a href="mailto:form410@nmgovlaw.com">form410@nmgovlaw.com</a>

Entity Name	Entity ID	Address	City	State	Zip Code	Email	Phone Nur
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## Violation Information

Violation Type	Violation Code Section	Violation Comments
		<p>Violation: Candidate Campaign Coordination with IE Committee</p> <p>Matt Mahan, Rick Caruso, Michael Moritz, David Crane and others are knowingly and will the Political Reform Act by intentionally coordinating both fundraising and campaign strat between Matt Mahan for Governor 2026 (“Mahan Campaign”), CA Back to Basics Suppo Mahan for Governor 2026 (“CA Back to Basics”) and Deliver for California Matt Mahan fo 2026 (“Deliver for CA”). State law clearly states that an expenditure is “made at the behe: candidate...under the control or at the direction of, in cooperation, consultation, coordinat with, at the request or suggestion of, or with the express, prior consent of the candidate.. §18225.7(b).”</p> <p>Mahan, himself, along with his campaign consultant, TKO, met with both Caruso and Moi campaign messaging and strategy. Caruso has publicly confirmed his participation with tl committee and Moritz is actively participating in the IE committee’s fundraising efforts.</p> <p>In addition to Mahan personally meeting with Caruso and Moritz, some major donors, inc Genevieve Jurvetson are participating in both campaign and IE meetings while other maj David and Carla Crane and Shawn and Brook Byers, are attempting to present an appea separation with David Crane and Brook Byers participating on IE meetings and their spot Crane and Shawn Byers participating on campaign calls.</p>
Contribution Limits Violation	Contribution Limits – Person	

Violation Type	Violation Code Section	Violation Comments
	(85301)	<p>Violation: Exceeding the Contribution Limit</p> <p>As previously stated, Mahan and the Mahan Campaign are blatantly coordinating with CA Back to Basics and Deliver for California fundraising and campaign strategies.</p> <p>As a result of Mahan’s brazen communications with Caruso, Moritz and others spearhead to Basics and Deliver for California, the expenditures made by the independent expenditure committees are not and never were independent. Therefore, the expenditures reported by the independent expenditure committees are contributions to the Mahan Campaign – well in excess of the contribution limit. To date, the independent expenditure committees have reported over 5 million in expenditures to support Mahan. In addition to money already spent, CA Back to Basics has a 35 million dollar media campaign amounting to a total of over 40 million dollars in contributions to the Mahan Campaign.</p>
Campaign Statements Not Filed	Failure to File Late Contribution Reports - 24 hour reports (84203)	<p>Violation: Failure to Disclose Contributions Received – Late Contribution Reports</p> <p>CA Back to Basics has concocted a deceptive fundraising scheme to thwart transparency by not disclosing contributions from special interest groups and individuals supporting Mahan while coordinating the Mahan Campaign. The PRA requires committees to disclose receipt of earmarked contributions when the contribution is received from the intermediary (Cal. Gov’t. Code §85704(e)(1)). In addition, Moseley a donor connected with the Mahan Campaign is actively soliciting contributions through an “escrow” account.</p> <p>CA Back to Basics is intentionally holding contributions in escrow with the Governor for Campaign Network Committee avoiding disclosure of contributions received until the Governor for Campaign Network Committee, whose principal officer is David Crane, forwards the contributions.</p> <p>Donors who have made earmarked contributions to CA Back to Basics through Governor for Campaign Network Committee are required to file late contribution reports when the contribution is received. If only one donor has disclosed an intermediary contribution to CA Back to Basics.</p> <p>By exploiting this loophole within the PRA, CA Back to Basics is intentionally avoiding public disclosure of contributions received while having the luxury of knowing how much funding they have received. These actions are contrary to the Act’s purpose of transparency and fostering public trust.</p>
Advertisement Disclaimers effective 2018	Top Contributor Disclosure (84503)	<p>Violation: Advertisement Disclosures/Top Contributors</p> <p>In addition to avoiding public disclosure, voters are misled with incorrect campaign advertisement. State law, committees are required to disclose the names of persons who have made the cumulative contributions over \$50,000 (Cal. Gov’t. Code §84501.). Again, by exploiting a loophole, CA Back to Basics are not disclosing its true top contributors while contributions intended for disclosure are held in “escrow”.</p>

**ATTN - THE FPPC WILL NOT ACCEPT COMPLAINTS REGARDING THE FOLLOWING VIOLATIONS:**

- Brown Act
- False or Misleading Campaign Materials
- Election Fraud
- Federal Campaigns
- Local Ordinance/Local Contribution Limits
- Vandalism to Campaign Signs
- Not Living in the Jurisdiction

*These alleged violations are not enforced by the FPPC. Please contact your local jurisdiction (i.e. your city attorney, county attorney, or District Attorney).*

**Witnesses**

First Name	Last Name	Street Address (including number)	City	State	Zip Code	Phone	Email	Information this Witness Provide

## Upload

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### Files

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Document Name	Update Date/Time
Complaint Supporting Documents.pdf	4/16/2026 8:09 AM

Please click the **upload document** button after selecting your additional files.

## Submit

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### Submit

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