

CAMPAIGN OPERATIONS

PART 1: FUNDRAISING



March 19, 2014
1:15 p.m. – 2:45 p.m.

Objectives – Part 1

- ▣ Review Contribution Basics
- ▣ Evaluate Methods for Curing Excessive Contributions
- ▣ Discuss Contributions with Tricky Reporting
- ▣ Identify Ways the Candidate May Support the Campaign

CAMPAIGN CONTRIBUTION BASICS

Contribution Basics

Per Election Limits:

\$2,600 (indexed for inflation)

- Individuals/Persons
- Non-multicandidate committees (“non-qualified”)

\$5,000 (not indexed)

- Multicandidate committees (“qualified”)

\$2,000 (not indexed)

- Campaign committee to campaign committee

I. Per Election Basis

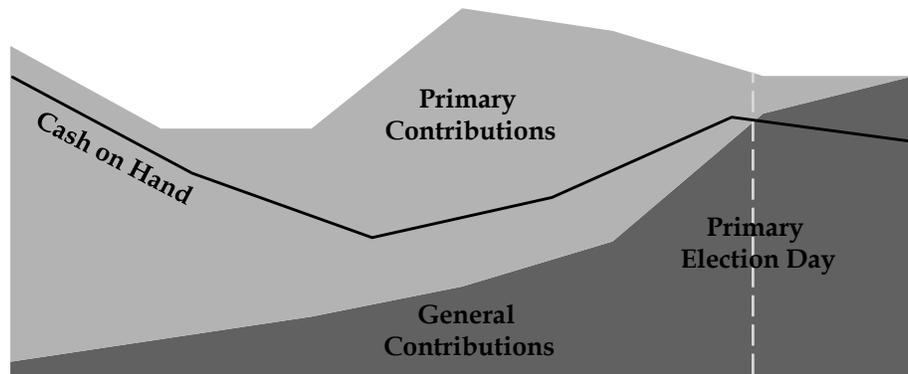
A. Subject to Limit (*Guide*, p. 17)

1. Limits are per election, per candidate.
 - a) **\$2,600/election** (indexed for inflation) from individuals, persons, non-multicandidate committees.
 - b) **\$5,000/election** (not indexed) from multicandidate committees.
 - c) **\$2,000/election** (not indexed) from one federal candidate’s authorized committee to another federal candidate’s authorized committee.
2. The value of an in-kind contribution (usual and normal charge) counts against same contribution limit as gifts of money.

Contribution Basics

Accounting Method:

- ▣ During primary, cash on hand must be \geq total general election contributions received



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2013-14 Election Cycle

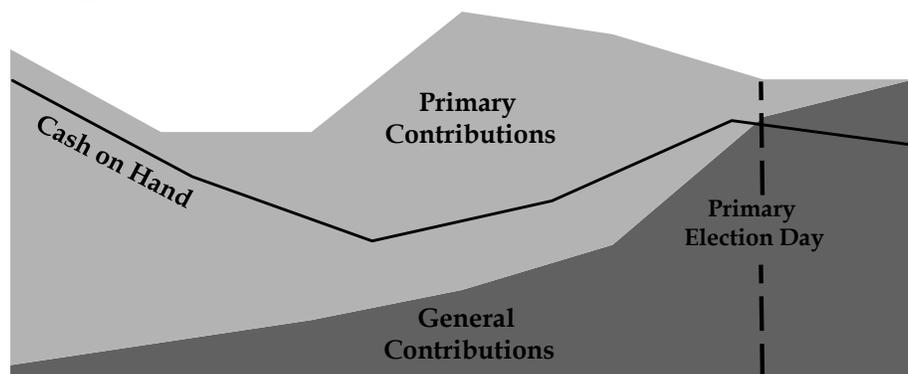
Campaign Operations Part 1

- B. Accounting Method** (*Guide*, p. 74)
1. Campaign must adopt an accounting system to distinguish between contributions made for the primary and those for the general election.
 2. During the primary, the campaign's cash on hand must at least equal the amount of general election contributions received. 11 CFR 102.9(e)(2).

Contribution Basics

Accounting Method:

- ▣ If candidate loses primary, campaign must refund general election contributions w/in 60 days



Information Division
2013-14 Election Cycle

Campaign Operations Part 1

- C. **Candidates Who Lose in the Primary** (*Guide*, pp. 20-21)
1. Entitled to limit only if candidate seeks office in that election.
 2. Candidate who accepts contributions for general election before primary is held and loses the primary must refund, redesignate or reattribute general election contributions within 60 days of the primary or public withdrawal from the primary race. 11 CFR 110.1(b)(3) and (5).
 3. Similar application for convention, runoff, etc.

Contribution Basics

Debt Retirement Contributions

- ▣ Debt is assigned to an election
- ▣ Debt retirement contributions acceptable if:
 - Campaign has “net debts” for an election
 - Contribution designated for that election AND
 - Does not exceed per election limit

- D. **Contributions to Retire Debts** (*Guide*, pp. 27-28)
1. **Debt Retirement Contributions**
 - a) If a committee has net debts outstanding after an election is over, it may accept contributions after the election to retire debts provided that the:
 - (1) Contribution is **designated** for that election;
 - (2) Contribution does **not exceed contributor’s limit for the designated election**; and
 - (3) Campaign has **net debts outstanding** on the day it receives the contribution. 11 CFR 110.1(b)(3)(i) and (iii).
 - b) For example, campaigns retiring debt for 2012 general can accept up to \$2,500 from an individual, not the current \$2,600 limit.

Net Debts Outstanding



$$\begin{array}{r} \text{Receipts} \\ - \text{Disbursements} \\ \hline \text{Cash on Hand} \\ \\ \text{Debts} \\ - \text{Cash on Hand} \\ \hline \text{Net Debts} \\ \text{Outstanding} \end{array}$$

 Information Division
2013-14 Election Cycle Campaign Operations Part 1

2. Calculating net debts outstanding

- a) A campaign's net debts outstanding consist of unpaid debts incurred with respect to a particular election, minus cash on hand.
- b) First calculated as of the day of election.
- c) Figure is continually recalculated as additional funds are received for, or spent on, the election for which debt remains.

II. Soliciting and Receiving Contributions

Soliciting Campaign Funds



Vote Kramer

for U.S. Congress

**Primary Election Day is
June 24**

Paid for by the Committee to Elect Cosmo Kramer

Information Division
2013-14 Election Cycle

Campaign Operations Part 1

Soliciting Campaign Funds



Dear Mr. Justin Pitt,
Please contribute.

Note that federal law requires us to ask for name, address, occupation and employer for any contributor who gives more than \$200 in the election cycle.

Best,
Cosmo Kramer

Paid for by the Committee to Elect Cosmo Kramer

- ✓ Best Efforts
- ✓ Fundraising Notice

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2013-14 Election Cycle

Campaign Operations Part 1

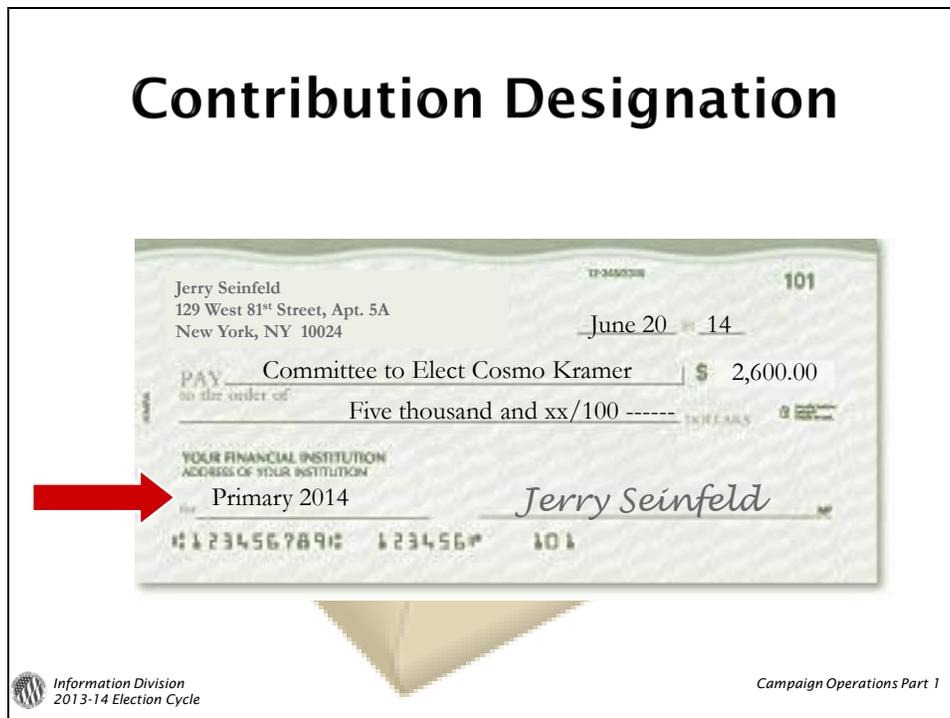
A. Solicitations and Fundraising Notices (*Guide*, pp. 63-67)

1. Authorization Notice

- a) When the campaign solicits contributions through public communications, or on a campaign website, it must include a clear and conspicuous notice on the solicitation stating that it was paid for by the campaign.
- b) *“Paid for by the Cosmo Kramer for Congress Committee”*

2. Best Efforts

- a) When making solicitations, campaigns and their treasurers must make “best efforts” to obtain, maintain and the report name, address, occupation and employer for each contributor who gives more than \$200 in an election cycle.
- b) Initial solicitation must specifically request that information and inform contributors that the campaign is required by law to use its best effort to collect and report it.
- c) If a contributor does not provide sufficient reporting information, the campaign must make one follow up within 30 days of receipt.

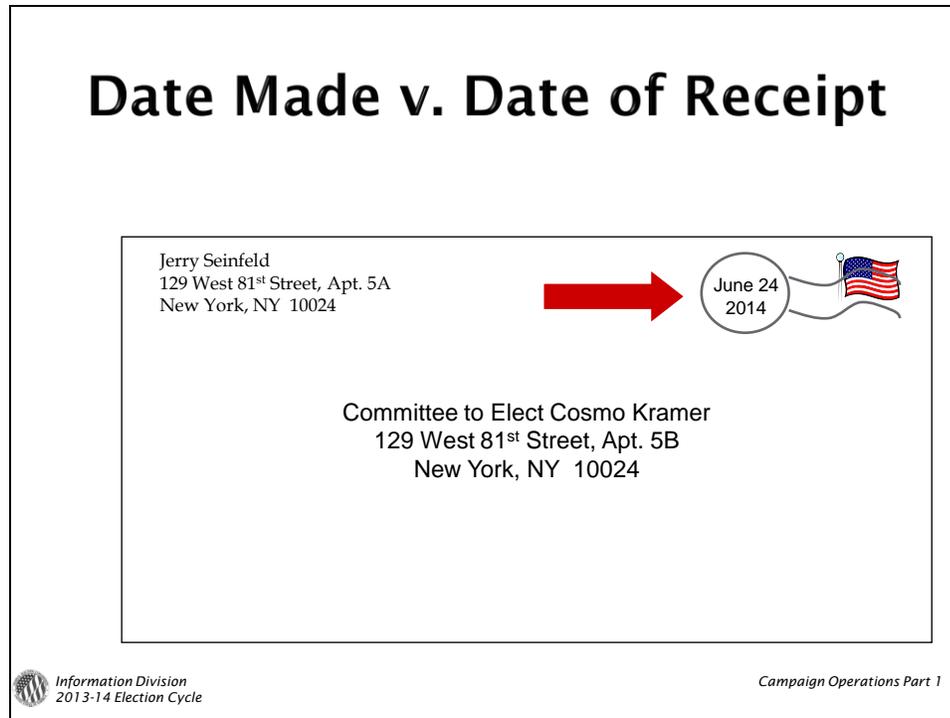


B. How Contributions Work

1. Designated and Undesignated Contributions

- a) **Designated contributions** count against the donor’s contribution limits for the election that is named. Donors may designate contributions by indicating in writing on the check or in a signed statement accompanying the contribution.

- b) **Undesignated contributions** count against the donor’s contribution for the candidate’s next scheduled election, based upon “date made.” (see below)



2. Date Made v. Date of Receipt

a) Date Made

- (1) The date the contribution is made determines which election limit it counts against. Undesignated contributions made on or before the date of the election count against the donor’s limit for that election, even if the date of receipt is after the election day.
- (2) The date the contribution is made is the date the contributor relinquishes control over it.
 - (a) **Hand delivery:** date the contribution is delivered by the contributor to the campaign.
 - (b) **Mail:** date of the postmark. If campaign wishes to rely on the postmark as evidence of date made, it must retain the envelope or a copy of it.
 - (c) **In-kind:** date the goods or services are provided by the contributor.
 - (d) **Internet:** date the contributor electronically confirms making the transaction.

b) Date of Receipt

(1) The date the campaign (or person acting on the campaign's behalf) actually receives the contribution. This is the date used for reporting purposes.

(2) **Special situations:**

(a) **Credit card:** date of receipt is the date on which the committee receives the contributor's signed authorization to charge the contribution. Treasurer should retain a copy of authorization form for committee's records.

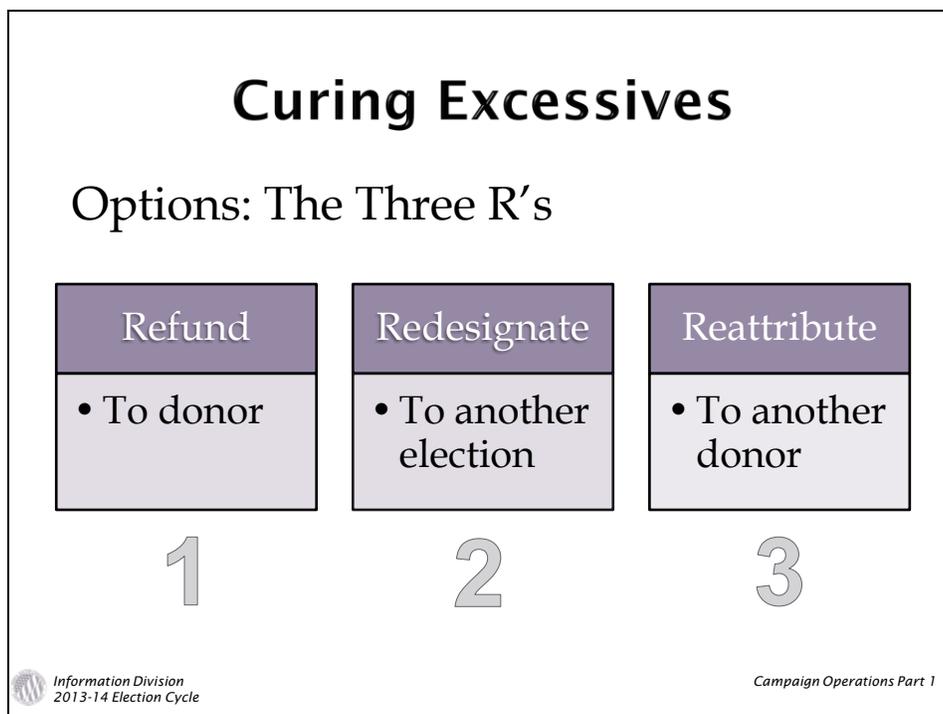
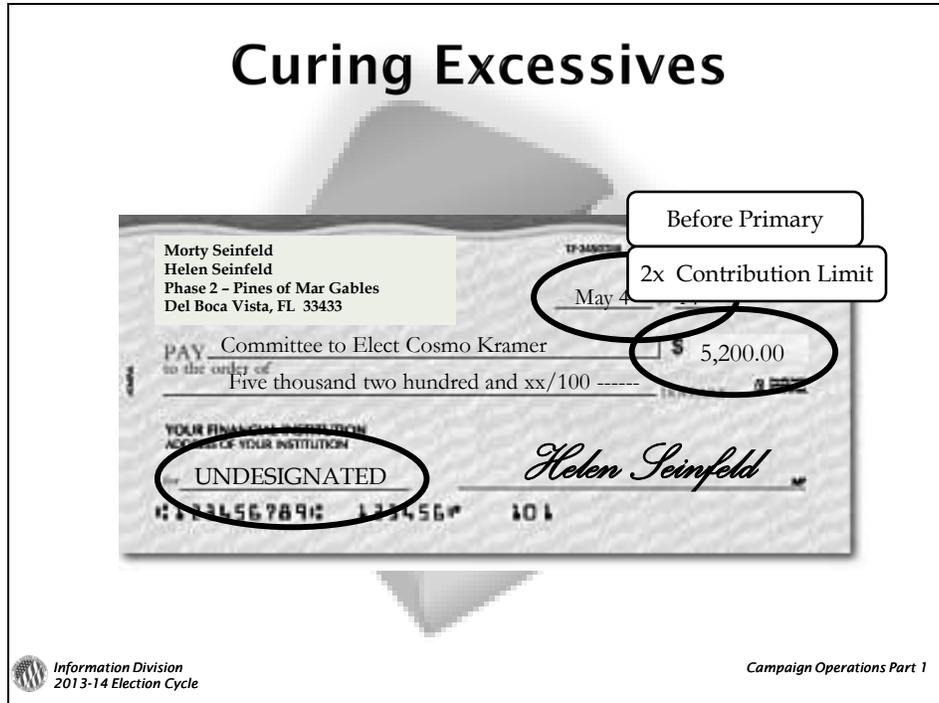
(b) **In-kind:** date the goods/services are provided to the committee, even if the contributor pays the bill for goods/services after they are provided to the campaign.

c) Date of Deposit

All contributions must be deposited within 10 days of receipt; this date is **not** used for reporting or contribution limit purposes.

CURING EXCESSIVE CONTRIBUTIONS

I. Methods for Curing Excessive Contributions



A. Refund

Presumptive Redesignation



Helen Seinfeld

1. Designate \$2,600 to Primary
2. Redesignate \$2,600 to General
3. Notify Helen, offering option of refund

* Ensure that donor does not exceed contribution limit

- B. Redesignate – (11 CFR 110.1(b)(5)(ii)(B)(1)-(4)); (*Guide*, pp. 24-27)**
- 1. Presumptive Redesignation**

If individual or non-multicandidate committee makes an excessive primary contribution, campaign may presumptively redesignate excessive portion to general election if contribution:

 - a) Is made before candidate's primary election;
 - b) Is not designated in writing for a particular election;
 - c) Would be excessive if treated as a primary election contribution; and
 - d) As redesignated, does not cause the contributor to exceed any other contribution limit.
 - 2. Backward-looking provision:** An undesignated contribution made after primary, but before general, may be applied to primary debt if campaign's net debts are greater than the amount redesignated.
 - 3. Notification Requirement**

Committee must notify contributor of redesignation by paper mail, e-mail, fax or other written method within 60 days of treasurer's receipt of contribution; must notify contributor of right to receive refund instead.
 - 4. Electronic Contributor Redesignations**

The Commission has recently acknowledged that, in certain circumstances, an online process can provide a sufficient level of assurance as to the contributor's identity and intent such that it satisfies the written signature requirements. See Interpretive Rule Regarding Electronic Contributor Redesignations, 76 FR 16233 (March 23, 2011). Available on FEC website at:
http://www.fec.gov/law/cfr/ej_compilation/2011/notice_2011-02.pdf

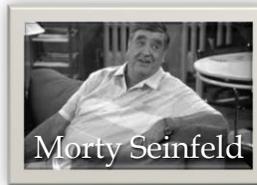


- C. **Reattribute** – (11 CFR 110.1(k)(3)(ii)(B)(1)); (*Guide*, p. 25)
1. **Attribution of Contributions by Contributors**
 - a) Individual contributions attributed to person(s) who sign check.
 - b) Joint account – both must sign check or accompanying statement.

Presumptive Reattribution



1. Attribute \$2,600 to Helen
2. Reattribute excessive \$2,600 to Morty



3. Notify both; offering option of a refund

* Ensure that neither donor exceeds contribution limit



Information Division
2013-14 Election Cycle

Campaign Operations Part 1

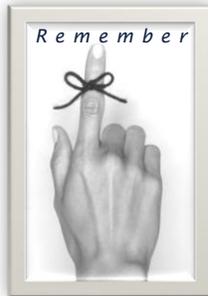
2. Presumptive Reattribution

If individual contribution exceeds limit and is made on joint account, but has only one signature:

- a) Attribute permissible amount to the signer; and
 - b) Presumptively reattribute excessive amount to other account holder, without obtaining his/her signature.
3. Reattribution may not cause contributors to exceed any contribution limits.
 4. Committee must notify contributor of reattribution by paper mail, e-mail, fax or other written method within 60 days of treasurer's receipt of contribution; must notify contributor of right to receive refund instead.

Avoid Excessives

- ▣ Encourage donors to designate contributions
- ▣ Obtain signatures for joint contributions
- ▣ Presumptive redesignation **NOT** available for multicandidate committee contributions



- ▣ Designation required if:
 - Contributing to a future election (i.e., not next election)
 - Contributing to retire debt from a past election

 Information Division
2013-14 Election Cycle

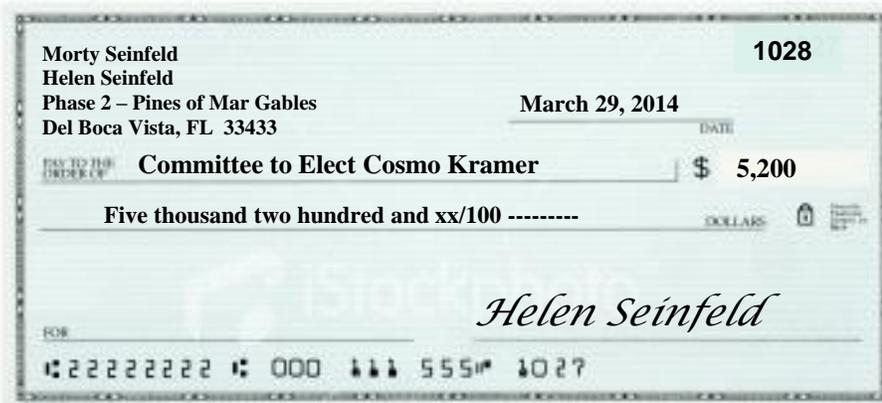
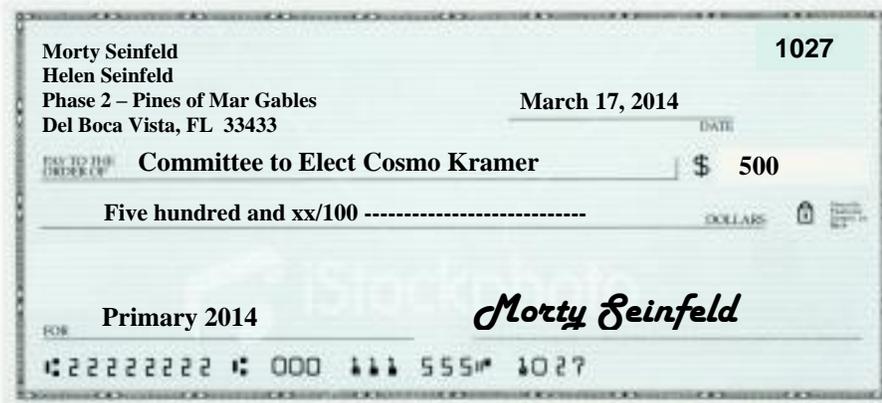
Campaign Operations Part 1

D. Avoiding Excessive Contributions

1. **Campaigns** – Ask contributors to designate contributions for a particular election.
2. **Designate** all contributions your committee makes to federal candidates.
3. **Ask joint contributors** to make sure both sign check or accompanying statement.
4. **Presumptive redesignation NOT available for excessive multicandidate committee contributions** (only individuals and non-multicandidate committees). Redesignation would need to be done the “old” way:
 - a) Campaign asks contributor to provide a written, signed statement redesignating contribution for another election. The request must also state that the contributor may instead receive a refund of the excessive amount.
 - b) Contribution is properly redesignated if, within 60 days of receipt, the campaign receives a written, signed statement redesignating the excessive portion to another election.
 - c) If the signed authorization is not received within 60 days, the campaign must refund the excessive portion.
5. **Designation of Campaign Contributions by Contributor**
 - a) If contributor intends contribution to count toward a future election, beyond the upcoming election.
 - b) If contributor wants contribution to retire candidate’s debt of a past election. Note: This is permissible only if:
 - (1) Candidate has net debt outstanding from that election; and
 - (2) Contribution, when aggregated with previous contributions to same candidate for same election, does not exceed limit.

SCENARIO #1: *Redesignation/Reattribution of Excessive Contributions*
(Guide, pp. 92-94)

Congressman Cosmo Kramer is running for re-election in 2014. While visiting his son in New York City, Morty Seinfeld attended the Congressman's St. Patrick's Day fundraiser at Monk's Café. At the event, he made a \$500 contribution, designated for the primary (see check below). When Morty returned home to Florida, he talked to his wife, Helen, about doing more to get their friend Kramer re-elected to Congress. In response, she mailed the campaign a check for \$5,200 (see check below), which the campaign received on April 3, 2014.



1. How should the committee disclose the \$500 contribution from Morty Seinfeld?
2. Can we accept Helen's contribution check as written? If not, what must the campaign do to remedy the situation?
3. How should the committee disclose the transaction(s) that remedy the excessive contribution?
4. Key issues:

SCENARIO #1 – ANSWERS:

Reporting Receipts

How to Itemize Receipts

Always Itemize:

- ✓ Contributions from party committees and organizations
- ✓ Contributions from other political committees
- ✓ Transfers
- ✓ Loans

Itemize all other receipts when:

- ✓ Aggregate > \$200 from one source in an election cycle

Receipt transactions should include the following itemization information for contribution source:

- Name and mailing address;
- Occupation and employer (individuals only);
- FEC ID number (political committees only);
- Election to which contribution/loan was designated;
- Date of receipt;
- Amount of receipt; and
- Aggregate election-cycle-to-date total for all receipts from same source.

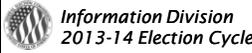
1. **How should the committee disclose the \$500 contribution from Morty Seinfeld?**
 Contributions from individuals are reported on Schedule A for Line 11(a)(i).

Part 1 of 2: Report Receipt from Individual (April Q)

Form 3: Schedule A, Line 11(a)(i)

Redesignation & Reattribution

SCHEDULE A (FEC Form 3)	Use separate schedule(s) for each category of the Detailed Summary Page	LINE NUMBER: (check only one) <input checked="" type="checkbox"/> 1a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 11d <input type="checkbox"/> 12 <input type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14	PAGE
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (In Full) <div style="border: 1px solid black; padding: 5px; text-align: center; font-weight: bold; font-size: 1.1em;"> Committee to Elect Cosmo Kramer </div>			
Full Name (Last, First, Middle Initial) A. Morty Seinfeld		Date of Receipt M M / D D / Y Y Y Y <div style="border: 1px solid black; padding: 2px; display: inline-block;">03</div> / <div style="border: 1px solid black; padding: 2px; display: inline-block;">17</div> / <div style="border: 1px solid black; padding: 2px; display: inline-block;">2014</div>	
Mailing Address Phase 2 – Pines of Mar Gables			
City Del Boca Vista State FL Zip Code 33433			
FEC ID number of contributing federal political committee. <div style="border: 1px solid black; padding: 2px; display: inline-block;">C</div>		Amount of Each Receipt this Period <div style="border: 1px solid black; padding: 2px; display: inline-block; font-weight: bold; font-size: 1.1em;">500.00</div>	
Name of Employer Self		Occupation Retired	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date <div style="border: 1px solid black; padding: 2px; display: inline-block; font-weight: bold; font-size: 1.1em;">500.00</div>	


Campaign Operations Part 1

2. **Can we accept Helen’s contribution check as written? If not, what must the campaign do to remedy the situation?**

No. Potentially, these could be joint contributions. However, since only Helen signed the \$5,200 check, Helen has made an excessive contribution for the primary. To remedy this, the campaign can reattribute and/or redesignate the excessive portion of her contribution.

3. **How should the committee disclose the transaction(s) that remedy the excessive contribution?**

Reattribution:

Since Helen’s contribution is drawn on a joint account, the campaign has the option of reattributing the excessive portion to the joint account holder, Morty Seinfeld. The campaign may presumptively reattribute the excessive portion (\$2,600) to Morty for the primary election as long as it would not cause him to exceed his limits.

Report receipt: show reporting on Schedule A for Line 11(a)(i). Two separate entries:
 a. Show check as written: \$5,200 contribution from Helen Seinfeld for primary; and
 b. Subtract excessive amount of contribution: -\$2,600 removed from Helen Seinfeld’s primary contribution.

For both entries, include cross-reference notations: “retribution and redesignation below.”

In our scenario, Morty Seinfeld made a \$500 contribution before the above check was written, so that attributing the full \$2,600 to him for the primary would cause him to exceed his limit for that election by \$500. Therefore, only \$2,100 may be reattributed to Morty.

Report reattribution: show reporting on Schedule A for Line 11(a)(i). Show full \$5,200 as primary contribution from Helen Seinfeld. Change attribution of excessive portion to Morty Seinfeld as MEMO entry and include notation in Amount of Each Receipt this Period box indicating, “retribution.”

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

FOR LINE NUMBER: (check only one)
 11a 11b 11c 11d
 12 13a 13b 14

NAME OF COMMITTEE (In Full)
Committee to Elect Cosmo Kramer

A. Helen Seinfeld
 Mailing Address: Phase 2 – Pines of Mar Gables, Del Boca Vista, FL 33433
 Date of Receipt: 04 / 03 / 2014
 Amount of Each Receipt this Period: 5,200.00
 Receipt For: Primary General
 See reattribution and redesignation below

B. Helen Seinfeld
 Mailing Address: Phase 2 – Pines of Mar Gables, Del Boca Vista, FL 33433
 Date of Receipt: 04 / 03 / 2014
 Amount of Each Receipt this Period: -2,600.00
 Receipt For: Primary General
 MEMO Reattribution and Redesignation below

Morty Seinfeld
 Mailing Address: Phase 2 – Pines of Mar Gables, Del Boca Vista, FL 33433
 Date of Receipt: 04 / 03 / 2014
 Amount of Each Receipt this Period: 2,100.00
 Receipt For: Primary General
 MEMO Reattribution

Information Division
 2013-14 Election Cycle

Campaign Operations Part 1

With the remaining \$500, the campaign can presumptively redesignate the excessive \$500 to the general election as a remedy.

Redesignation:

Campaign committees may also remedy an excessive contribution by applying the excessive portion to a future election. The campaign may presumptively redesignate the excessive portion to the general election as long as the contribution:

- Is made before the candidate’s primary election;
- Is not designated;
- Would be excessive if treated as a primary election contribution; and
- As redesignated, does not cause the donor to exceed any other limits.

Helen Seinfeld has not yet made any general election contributions; therefore, the campaign may presumptively redesignate either the full \$2,600 excessive portion of primary contribution to the general, or the \$500 that remains after the reattribution to Morty. To maximize the availability of funds for the primary, the campaign chooses the latter.

Report redesignation: show reporting on Schedule A for Line 11(a)(i) as a \$500 contribution from Helen Seinfeld. Change designation to general as a MEMO entry and include notation in Amount of Each Receipt this Period box indicating, “redesignation.”

Redesignation & Reattribution

See reattribution and redesignation below

MEMO
Redesignation

MEMO
Reattribution

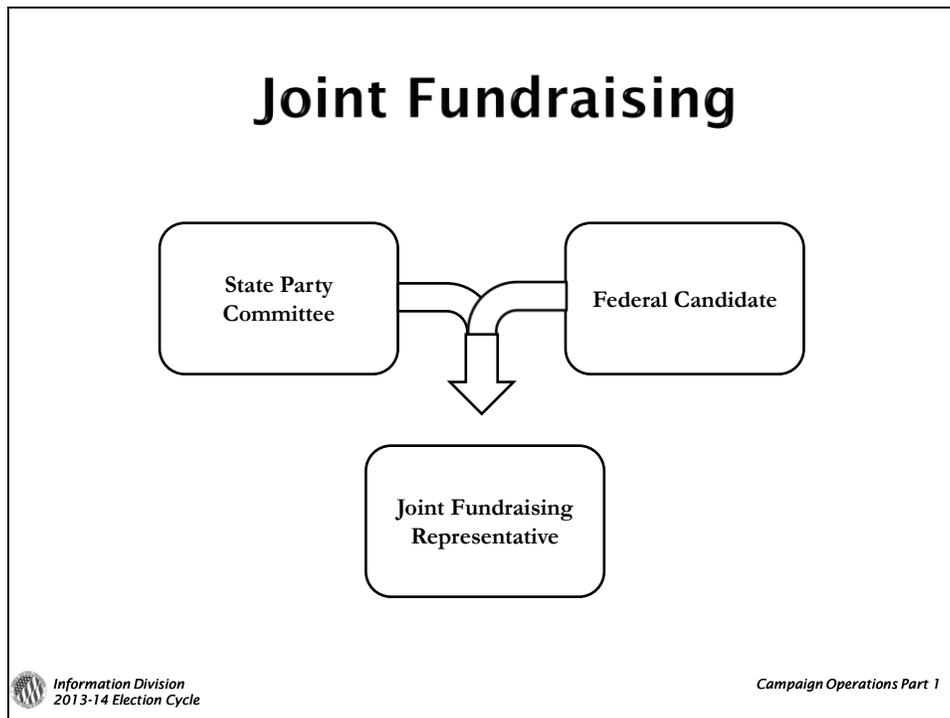
Campaign Operations Part 1

Part 2 of 2:
 Report
 Reattribution &
 Redesignation
 (July Q Report)
 Form 3:
 Schedule A,
 Line 11(a)(i)

4. Key issues:

- A presumptive reattribution is allowed even if only one signature is on the check. Ensure that the reattribution won't cause donors to exceed any limits (i.e., per election limits, biennial limit).
- A presumptive redesignation for the primary to the general election is allowed if the contribution is not designated for a particular election. For example, if Helen had written "primary" on the memo line of her check, a presumptive redesignation would not be allowed. The redesignation would need to be done the "old" way – with written authorization from contributor within 60 days of receipt BEFORE the redesignation could occur.
- Remember written notification to contributor(s) must be done within 60 days of receipt for presumptive reattributions and redesignations. The notification must also offer the contributor the option to receive a refund instead.

CONTRIBUTIONS WITH TRICKY REPORTING



Joint Fundraising

Procedures:

- ▣ Establish Joint Fundraising Representative (JFR)
 - Participants designate JFR as an authorized committee on Form 1
 - Collects/deposits joint fundraising contributions in separate account
 - Pays expenses and transfers proceeds to participants
- ▣ Create Written Agreement
 - Outlines formula for allocating proceeds and expenses

I. **Joint Fundraising** – (11 CFR 102.17); (*Guide*, pp. 131-138)

Election-related fundraising conducted by a campaign committee and one or more other political committees or unregistered organizations.

A. **Joint Fundraising Representative**

1. All participants must either create a new committee (recommended) or select one of the participating federal political committees to act as joint fundraising representative (JFR).
2. New committee established as JFR must register with the FEC and must include the name of each participating federal candidate in the new committee's name.
3. Participants amend FEC Form 1 to designate JFR as an authorized committee.
4. Responsible for collecting and depositing joint contributions, paying expenses and allocating net proceeds to all participants.
5. Must keep records and report overall joint fundraising activity.

B. **Screening Contributions**

1. JFR and participants must screen contributions to make sure they are neither prohibited nor in excess of contribution limits.
2. Maximum limit = total amount he/she may contribute to all participants, without exceeding any limits.

C. **Joint Fundraising Agreement**

Participants agree to formula to allocate proceeds and expenses and sign a written agreement.

SCENARIO #2: *Joint Fundraising Transfers (Guide, pp. 136-138)*
48-Hour Notices (Guide, pp. 81, 83)

Representative Cosmo Kramer and Senator Frank Costanza decide to hold an event on June 14, 2014 in Candidate Kramer’s district as a final push for their primary campaigns. They plan to divide the expenses and proceeds equally and have designated the “Kramer/Costanza Victory Fund” as their joint fundraising representative.

At the event, Kramer/Costanza Victory Fund collects a total of \$5,200. The only contributions came from Matt Wilhelm and David Puddy. Each made a \$2,600 contribution at the event. Since the proceeds were split evenly (50%) between Representative Kramer and Senator Costanza, Mr. Wilhelm and Mr. Puddy each made a \$1,300 contribution to Representative Kramer and a \$1,300 contribution to Senator Costanza.

Kramer/Costanza Victory Fund incurred \$1,000 in expenses to put on the June 14th event. As a result, the Kramer for Congress Committee received a check from the Kramer/Costanza Victory Fund on June 21, 2014, in the amount of \$2,100, comprising the committee’s 50% allocation of net proceeds.



- 1. How should Kramer for Congress disclose the transfer in from Kramer/Costanza Victory Fund?**
- 2. Do the contributions received at the joint fundraising event trigger a 48-hour notice?**
- 3. Is any additional disclosure necessary?**
- 4. Key issues:**

SCENARIO #2 – ANSWERS:

1. How should Kramer for Congress disclose the transfer in from Kramer/Costanza Victory Fund?

The funds are coming from Kramer/Costanza Victory Fund, which has been authorized to raise money for the candidate. Therefore, the receipt is treated as a transfer of funds from an authorized committee – not as contributions from individuals. The campaign committee should itemize its net proceeds (the campaign’s share of the gross contributions, minus its share of expenses) as a receipt from Kramer/Costanza Victory Fund.

2. Do the contributions received at the joint fundraising event trigger a 48-hour notice?

Yes. Principal campaign committees must file special notices regarding contributions of \$1,000 or more received less than 20 days but more than 48 hours before 12:01am of the day of any election in which the candidate is running (whether or not the candidate has opposition in the election). The expedited disclosure requirements apply to all types of contributions received, including contributions collected through a joint fundraising effort.

48-Hour Notices

- ▣ Any contribution of \$1,000 or more received < 20 days up to 48-hours before an election
- ▣ FEC Form 6
- ▣ Applies to all types of contributions including:
 - Contributions from individuals, entities and committees
 - Contributions from the candidate
 - Loans from the candidate and other non-bank sources
 - Endorsements or guarantees of loans from banks
 - Joint fundraising and earmarked contributions (based upon amount from original contributor)

Campaign committees may file their 48-Hour Notices using FEC Form 6. The notices must reach the FEC (House & President) or Secretary of the Senate (Senate) within 48-hours of the committee’s receipt of the contribution(s). Committees filing electronically **must** file their 48-Hour Notices electronically. Committees filing paper forms may fax the notice to the appropriate office: House & President (202) 219-0174; Senate (202) 224-1851.

Alternatively, a paper-filing House or Presidential committee may file online using the FEC's website at <https://webforms.nictusa.com/form6>.

Note that a last-minute contribution must also be itemized on the Committee's next scheduled report.

48-Hour Notices

State	Decision Date	Close of Polls	Polling Location	Filing Deadline	48-Hour Notice (T-1) (Candidate only)
Alabama (2012/10/07)	09/13/12	09/10/12	09/07/12	09/10/12	09/05/12 - 09/10/12
Florida	04/24/12	04/24/12	04/23/12	04/23/12	04/20/12 - 04/23/12
Alaska (2012/10/07)	09/28/12	09/18/12	09/13/12	09/16/12	09/09/12 - 09/20/12

www.fec.gov/info/charts_primary_dates_2014.shtml

Information Division
2013-14 Election Cycle

Campaign Operations Part 1

In our scenario, the 48-Hour Notice period in connection with the June 24th primary runs from June 5 through June 21 – therefore, the June 14th receipts trigger the 48-Hour Notice requirements.

Note for Joint Fundraising: the date of receipt is the date the JFR receives the contribution. However, the principal campaign committee, not the JFR, is responsible for filing the 48-Hour notice.

Report last minute receipts: show reporting of 48-Hour Notice on Form 6.

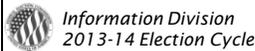
See Reporting Example on Next Page

Part 1 of 2: Report Receipts on 48-Hour Notice FEC Form 6

Joint
 Fundraising

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED			
<small>(See Reverse Side for Instructions)</small>			
<small>To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.</small>			
1. NAME OF COMMITTEE IN FULL Committee to Elect Cosmo Kramer		4. FEC IDENTIFICATION NUMBER C00320000	
ADDRESS (number and street) 129 West 81st Street Apt. 5B		Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.	
CITY, STATE, and ZIP CODE New York, NY 10024			
2. NAME OF CANDIDATE Cosmo Kramer	3. OFFICE SOUGHT (State and District) NY / 08		
A. Full Name, Mailing Address and ZIP Code Matt Wilhelm 340 Amsterdam Avenue New York, NY 10024		Name of Employer New York Mets	Date (month, day, year) 6/14/14
		Occupation Head Scout	Amount \$1,300.00
B. Full Name, Mailing Address and ZIP Code David Puddy 375 West End Avenue New York, NY 10024		Name of Employer West End Auto Body	Date (month, day, year) 6/14/14
		Occupation Mechanic	Amount \$1,300.00
SIGNATURE (optional) <i>Mr. Newman</i>		DATE 6/16/14	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100

FE1AN063.PDF



FEC FORM 6
 (Revised 1/2001)

Campaign Operations Part 1

3. Is any additional disclosure necessary?

Yes. The committee must list the individual contributions contained in the transfer-in from the JFR that meet the itemization threshold using MEMO entries on Schedule A. The MEMO entries should be linked to the transfer (for electronic filers) or appear directly underneath the main transfer entry. This will make it clear which individual contributions made up each transfer in cases where the committee reports multiple JFR transfers. (If unable to link or list individual contributions underneath the main transfer entry, specify the JFR transfer date next to each individual contribution as MEMO text).

Report receipt of transfer from Joint Fundraising Representative (JFR): show reporting on Schedule A for Line 12. The Date of Receipt is the date the campaign receives the net proceeds from the JFR.

Report individual contributors: show reporting on Schedule A for Line 12 using MEMO entries. The Date of Receipt is the date the JFR received the contribution from the individual; the Amount of Each Receipt this Period is the campaign's full share of contribution (before expenses); also include the notation in the Receipt This Period box indicating, "Kramer/Costanza Victory Fund – Joint Fundraiser."

See Reporting Example on Next Page

Part 2 of 2: Report Receipts on July Quarterly Report

Joint Fundraising

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS		FOR LINE NUMBER: (check only one)		PAGE OF	
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
		<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	<input type="checkbox"/> 15
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer					
Full Name (Last, First, Middle Initial) A. Kramer/Costanza Victory Fund		Date of Receipt 06 / 21 / 2014		Amount of Each Receipt this Period 2,100.00	
Mailing Address 48 West 77th Street		City, State, Zip Code New York NY 10024		Name of Employer Joint Fundraising Committee	
FEC ID number of contributing federal political committee C 00558741		Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General		Election Cycle-to-Date 2,100.00	
Full Name (Last, First, Middle Initial) B. Matt Wilhelm					
Mailing Address 340 Amsterdam Avenue		Date of Receipt 06 / 14 / 2014		Amount of Each Receipt this Period 1,300.00	
City, State, Zip Code New York NY 10024		Name of Employer New York Mets		MEMO Kramer/Costanza Victory Fund - Joint Fundraiser	
FEC ID number of contributing federal political committee C		Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General		Election Cycle-to-Date 1,300.00	
Full Name (Last, First, Middle Initial) C. David Puddy					
Mailing Address 375 West End Avenue		Date of Receipt 06 / 14 / 2014		Amount of Each Receipt this Period 1,300.00	
City, State, Zip Code New York NY 10024		Name of Employer West End Auto Body		MEMO Kramer/Costanza Victory Fund - Joint Fundraiser	
FEC ID number of contributing federal political committee C		Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General		Election Cycle-to-Date 1,300.00	

Form 3: Schedule A, Line 12

- Report transfer received from JFR
- Memo entries for individual donors

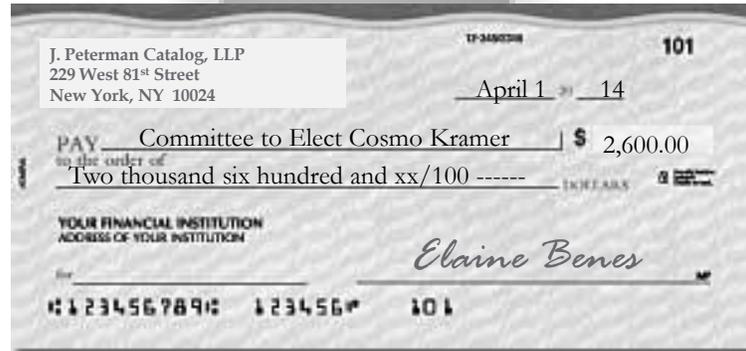
Campaign Operations Part 1

4. Key issues:

Joint Fundraising

- The date of receipt may be different for the JFR and the contributors.
- Report the transaction using Line 12 (Transfers from Other Authorized Committee), not Line 11(a)(i).
- Use MEMO entries to break out contributor itemization.
 - Report gross amount of contribution(s) and include a notation referring back to JFR.
 - Itemize contributions from the original donors making up its share of the gross receipts as MEMO entries on Schedule A (only contributions aggregating over \$200 for the election cycle for the contributor require itemization).
 - Please note that in most cases, the net amount of the transfer in to a participating campaign committee will be less than the sum of the MEMO entries supporting the transfer.
- The JFR pays expenses out of the total funds raised, and then gives participating committees their allocated share of the leftover money.
- Remember, when designating a separate JFR, participating campaign(s) must amend their FEC Forms 1 & 2 to add the JFR as an authorized committee.

Contribution from Partnerships/LLCs



Information Division
2013-14 Election Cycle

Campaign Operations Part 1

Contribution from Partnerships/LLCs

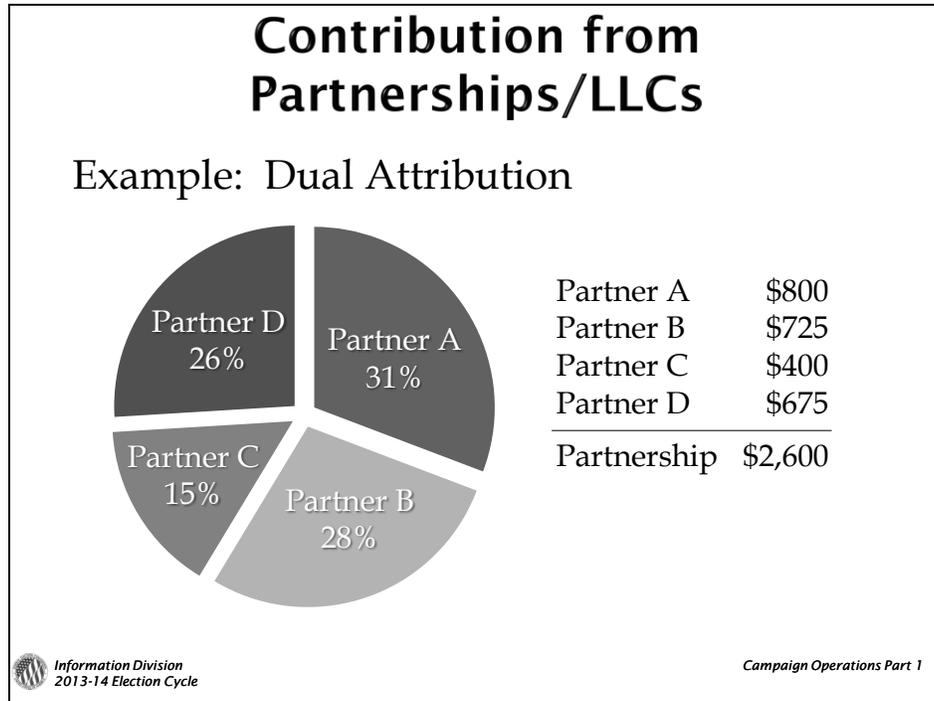
- ▣ Partnerships/Non-corporate LLCs may contribute \leq \$2,600 per election
- ▣ Dual Attribution
 - Counts as contribution from partnership and from non-corporate members
 - Allocation based on ownership stake or other agreement among partners

Information Division
2013-14 Election Cycle

Campaign Operations Part 1

II. Partnership and Limited Liability Company (LLC) Contributions – (11 CFR 110.1(e) and (g)); (*Guide*, pp.127-129)

- A. **Limit: \$2,600/election** (indexed for inflation).



B. Dually Attributed

1. Contributions are attributed both to the partnership (or LLC) and also to individual partners based on their share of the profits/losses.
2. Partnerships and LLCs must provide campaign with written statement indicating attribution to partners.
3. Cannot attribute to any corporate partners.

C. Types of LLCs

1. **LLC Treated as Partnership** - treated as partnership for tax purposes, partnership rules above apply.
2. **LLC Treated as Corporation** - If treated as corporation for tax purposes, corporate prohibition on contributions applies.

Form 3: Schedule A, Line 11(a)(i)

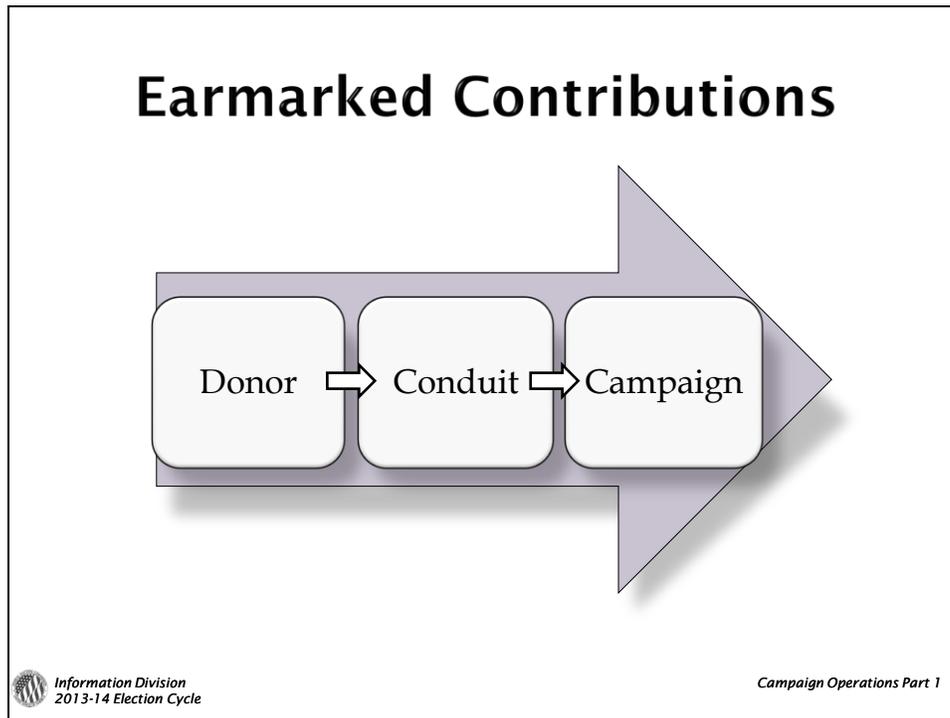
Partnership

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS		FEC LINE NUMBER: PAGE OF	
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 11a	11b 11c 11d 11e 11f 11g 11h 11i 11j 11k 11l 11m 11n 11o 11p 11q 11r 11s 11t 11u 11v 11w 11x 11y 11z
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (in Full) Committee to Elect Cosmo Kramer			
Full Name (Last, First, Middle Initial) J. Peterman Catalog, LLP		Date of Receipt 04 01 2014	
Mailing Address 229 West 81st Street		Amount of Each Receipt This Period 2,600.00	
City, State, Zip Code New York NY 10024		See partnership attribution below	
FEC ID number of contributing federal political committee C		Name of Employer J. Peterman Catalog	
Name of Employer J. Peterman Catalog		Occupation Owner/Founder	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 2,600.00	
Full Name (Last, First, Middle Initial) John Peterman		Date of Receipt 04 01 2014	
Mailing Address 229 West 81st Street		Amount of Each Receipt This Period 1,300.00	
City, State, Zip Code New York NY 10024		MEMO Partnership Attribution	
FEC ID number of contributing federal political committee C		Name of Employer J. Peterman Catalog	
Name of Employer J. Peterman Catalog		Occupation Senior Editor	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 1,300.00	
Full Name (Last, First, Middle Initial) Elaine Benes		Date of Receipt 04 01 2014	
Mailing Address 229 West 81st Street		Amount of Each Receipt This Period 1,300.00	
City, State, Zip Code New York NY 10024		MEMO Partnership Attribution	
FEC ID number of contributing federal political committee C		Name of Employer J. Peterman Catalog	
Name of Employer J. Peterman Catalog		Occupation Senior Editor	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 1,300.00	

- Report total from partnership
- Use memo entries for individual partners

- D. Reporting Partnership Contributions**
1. Itemized on Schedule A for Line 11(a)(i).
 2. The campaign reports the contribution from entity (partnership/LLC) and includes notation in the Receipt this Period box indicating, “See partnership attribution below.”
 3. Use MEMO entries to indicate attribution to partners/members that aggregate over \$200 for the election cycle. Do NOT add them again to the totals.

III. Earmarked Contributions – (11 CFR 110.6); (*Guide*, pp. 123-126)



- A. Definition:** A contribution to a candidate which the contributor directs (either orally or in writing) through an intermediary or conduit.

The text box is titled "Earmarked Contributions" in a large, bold, black font at the top center. Below the title, the text reads: "Conduit: anyone who receives and forwards an earmarked contribution to a candidate". Underneath this, it says "Except . . .". Below that is a bulleted list of four items: "Employees/full time volunteers of campaign", "Authorized fundraisers", "Affiliated committees of the campaign", and "Commercial fundraising firms". In the bottom left corner of the text box, there is a small circular logo with the text "Information Division 2013-14 Election Cycle". In the bottom right corner, it says "Campaign Operations Part 1".

B. Conduit/Intermediary

1. Anyone who receives and forwards an earmarked contribution to a candidate. This includes individuals, political committees, unregistered committees and partnerships.
2. Persons not considered conduits include:
 - a) Corporations, unions and other prohibited sources;
 - b) Employees or full time volunteers working for campaign committee;
 - c) Individuals expressly authorized to raise money on behalf of the candidate;
 - d) Committees affiliated with campaign committee; and
 - e) Commercial fundraising firms retained by campaign committee.

C. Effect on Contribution Limits

1. An earmarked contribution counts against the contributor's limit for the recipient candidate.
2. Conduit limit is affected when the conduit exercises direction or control over the contributor's choice of recipient candidate.

Earmarked Contributions

Procedures:

- ▣ Contribution must be:
 - Forwarded to campaign within 10 days of conduit's receipt
- ▣ Conduit must:
 - Provide campaign with contributor information for FEC report

D. Transmittal to Campaign

1. The conduit must forward an earmarked contribution to the recipient campaign committee within 10 days of receiving the contribution.
2. Campaign should receive transmittal report from conduit containing the contributor information needed to disclose on FEC report.

SCENARIO #3

Earmarked Contributions (Guide, pp. 125-126)
48-Hour Notices (Guide, pp. 81, 83)

As the June 24, 2014, primary election day approaches, Candidate Kramer makes a number of solicitation calls to his loyal contributors. In response to his call, David Puddy and his friend, Tim Whatley (who lives around the corner at 715 West 79th Street, New York, NY 10024), invite a group of friends over to David's apartment on June 21st to celebrate the first day of summer and drum up support for Kramer's re-election campaign while watching the Mets v. Cardinals game at David's Manhattan apartment.

During the 7th Inning Stretch, David begins a discussion about Candidate Kramer and in response a number of guests break out their checkbooks to make contributions. Since no campaign representatives were at the event, one of the attendees, Art Vandelay, decides to collect the checks and forward them to the campaign. Most of the checks were for \$50, except for one from Mickey Abbott who wrote a check for \$250. In order to get the money to the campaign before the election, Art takes a walk to the Kramer Campaign Office and hand-delivers the envelope of checks to Treasurer Newman on June 23, 2014.

1. Does the campaign disclose the receipt of an earmarked contribution as a contribution from the conduit or as a contribution from the individual? Or both?

2. Do any of these receipts trigger last-minute disclosure (48-Hour Notices)?

3. How does the campaign disclose the receipt of earmarked contributions?

4. Key issues:

SCENARIO #3 – ANSWERS:

1. Does the committee disclose the receipt of an earmarked contribution as a contribution from the conduit, a contribution from the individual donors or both?
Only as a contribution from the individual(s). In this scenario, Art Vandelay is acting as a conduit. Since the decision to make the contribution to the candidate was independently made by the individual contributors, not under the direction or control of Mr. Vandelay, it is treated as a contribution only from the individual(s), not affecting the conduit's limits.

2. Do any of these receipts trigger last-minute disclosure (48-Hour Notices)?
No. As a reminder, in our scenario, the 48-Hour Notice Period in connection with Candidate Kramer's primary runs from June 5 through June 21, 2014. While the earmarked contributions were received within the 48-Hour Notice period and the total amount of contributions earmarked through Art Vandelay is in excess of \$1,000, a 48-Hour Notice is only triggered when **any single contribution of \$1,000 or more** is received within the 48-Hour Notice Period. Therefore, these contributions **do not** trigger the 48-Hour Notice requirements. These contributions will simply be disclosed on the next regularly-scheduled report (the July Quarterly Report).

3. How does the committee disclose the receipt of earmarked contributions?

- **Report itemized contribution from individual(s)** on Schedule A for Line 11(a)(i). The Date of Receipt is the date the conduit received the money from the contributors, in this case the date of the event. The itemization should also include a notation in the Receipt This Period box indicating, "Earmarked through Art Vandelay." All of the smaller contributions of \$50 do not require itemization, but the value should be included in the total amount of unitemized contributions reported on Line 11(a)(ii).
- **Report the receipt from conduit** on Schedule A for Line 11(a)(i) as a MEMO entry. The Date of Receipt is the date the campaign received the funds from the conduit; itemization should also include a notation in the Receipt This Period box indicating "Total earmarked through conduit."

See Reporting Example on Next Page

Form 3: Schedule A, Line 11(a)(i)

Earmarked Contribution

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS		FOR LINE NUMBER: PAGE OF	
Use separate schedule(s) for each category of the Detailed Summary Page		11a 11b 11c 11d 12 13a 13b 14 15	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer			
Full Name (Last, First, Middle Initial) A. Mickey Abbott Mailing Address 460 Columbus Avenue City New York State NY Zip Code 10024 FEC ID number of contributing federal political committee. C		Date of Receipt 06 / 21 / 2014 Amount of Each Receipt this Period 250.00 Earmarked through Art Vandelay	
Name of Employer Kramerica Industries Occupation Executive Assistant Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 250.00 MEMO Total earmarked through conduit: limit not affected	
Full Name (Last, First, Middle Initial) B. Art Vandelay Mailing Address 460 West End Avenue, Suite 2500 City New York State NY Zip Code 10024 FEC ID number of contributing federal political committee. C		Date of Receipt 06 / 23 / 2014 Amount of Each Receipt this Period 1,800.00	
Name of Employer Vandelay Industries Occupation Importer/Exporter Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Election Cycle-to-Date 1,800.00	

Both entries relate to a single receipt

4. Key issues:

- The date of receipt may be different for the conduit and the contributor(s).
- Use MEMO entry if the amount of earmarked contributions passed on by the conduit exceeds \$200 over the election cycle.
- The conduit's contribution limit is affected if the conduit exercises direction or control over the choice of candidate. Please note that if the conduit's limit is affected, the conduit must tell the campaign.
- **48-Hour Notices**
 - A state-by-state chart of 48-Hour Notice periods for 2014 primary elections can be found on the FEC website at www.fec.gov/info/charts_primary_dates_2014.shtml.
 - Must be filed within 48-hours of receipt.
For earmarked contribution, date of receipt = date campaign receives contribution from conduit.
 - Where and How to File:
 - **House Committees file with the FEC.** Electronic filers file electronically; Paper filers, file via fax or online using the FEC website.
 - **Senate Committees – file with the Secretary of the Senate.** File via mail or fax.

Lobbyist Bundling

- Bundled or Earmarked?
 - Intermediary of a bundled contribution must be a Lobbyist / Registrant / PAC
 - Two Types of Bundled Contributions
 - Forwarded by Lobbyist
 - Received by campaign, Lobbyist given credit for raising \$\$
- Additional Disclosure on Form 3L
Required if Lobbyist forwards, or is credited with raising > \$17,300 during a covered period
- Form 3 and 3L Filed Simultaneously
When reviewing receipts at end of period, also examine bundling activity to determine if additional disclosure is necessary

IV. Disclosure of Contributions Bundled by Lobbyists/Registrants and Lobbyist/Registrant PACs – (11 CFR 104.22); (*Guide*, pp. 156-157)

A. Basic Rule

Generally, to be a *bundled contribution*, the intermediary between the contributor and recipient campaign committee must be a *lobbyist, registrant or lobbyist registrant PAC*.

1. Determining Whether a Person is Known to be a Lobbyist/Registrant or Lobbyist/Registrant PAC

a) **Lobbyist/Registrant.** At the time the contribution is forwarded or received determine if the person is:

- (1) Listed as current registrant under section 4(a) of the Lobbying Disclosure Act of 1995 (the LDA); or
- (2) An individual listed on a current registration filed under Section 4(b)(6) or current report filed under Section 5(b)(2)(C) of the LDA.

b) **Lobbyist/Registrant PAC.** At the time the contribution is forwarded or received determine if the committee is:

- (1) Identified as a lobbyist/registrant PAC on its FEC Form 1 (Statement of Organization); or
- (2) Listed as a political committee established or controlled by a lobbyist or registrant on a report filed under Sec. 203(a) of HLOGA, amending the LDA.

- c) **Consult the websites maintained by:**
 - (1) Clerk of the House: <http://clerk.house.gov>
 - (2) Secretary of the Senate:
http://www.senate.gov/pagelayout/legislative/g_three_sections_with_teasers/lobbyingdisc.htm
 - (3) FEC: <http://www.fec.gov>
- d) **Proof of Calculated Search**

Computer printout or screen capture showing absence of person's name on the Senate, House or FEC websites may be used to demonstrate reporting committee's efforts to determine if person in question is a lobbyist/registrant or lobbyist/registrant PAC.
See 11 CFR 104.22(b)(2)(ii)

B. "Bundled" Contributions

1. Forwarded Contribution

Contribution (monetary or in-kind) delivered or transmitted by physical or electronic means to campaign committee by lobbyist/registrant or lobbyist/registrant PAC or by any person the reporting committee knows to be acting on behalf of a lobbyist/registrant or lobbyist/registrant PAC.

2. Received and Credited Contribution

Contribution (monetary or in-kind) received by campaign committee from contributor and credited by campaign to a lobbyist/registrant or lobbyist/registrant PAC through records, designations, or other means of recognizing that money has been raised by the lobbyist/registrant or lobbyist/registrant PAC.

a) Track or Give Credit for Contributions: Records

Written evidence (i.e., computer files, databases) that the campaign attributes contributions received by campaign as raised by a lobbyist/registrant/PAC.

b) Track or Give Credit for Contributions: Designations or Other Means of Recognizing.

Benefits given by the campaign to persons for raising a certain amount of contributions including, but not limited to:

- (1) **Titles** assigned by the campaign;
- (2) **Tracking identifiers** assigned by the campaign for the purpose of maintaining information about the amount of contributions the person raises;
- (3) **Access** (includes offers or attendance) to campaign events or activities; and
- (4) **Mementos** given by the campaign (e.g. photos with the candidate or autographed copies of books authored by candidate).

3. What is NOT a "Bundled" Contribution?

Personal funds contributions from lobbyists/registrants or spouses of individual lobbyists/registrants; and contributions made by lobbyist/registrant PAC from its own PAC funds.

C. Disclosure of Lobbyist Bundling Activity (*Guide*, p. 157)

1. 2014 Disclosure Threshold = \$17,300

Campaign committees that receive two or more bundled contributions from a lobbyist/registrant or lobbyist/registrant PAC aggregating in excess of \$17,300 during a specific *covered period* are required to disclose activity on FEC Form 3L.

2. Bundled Contributions Disclosed on Form 3L *Guide*, pp. 157-160)

Form 3L is filed on the same quarterly schedule, simultaneously with Form 3. Additional semi-annual covered period disclosure for report due in July (July Quarterly or pre-election report, if applicable) and January (Year-End Report).

3. FEC Form 3L

Campaigns must also file a semi-annual report for any semi-annual period for which they filed a quarterly report.

a) Example. A campaign that filed an April Quarterly 3L Report but did not trigger the 3L filing requirement during the July Quarterly period would not be responsible for filing a July Quarterly 3L Report, but would be responsible for filing a Mid-Year Semi-Annual 3L Report to reflect its bundled contributions during the January 1 through June 30 covered period.

b) Form 3L and Instructions:

<http://www.fec.gov/pdf/forms/fecfrm3l.pdf> and

<http://www.fec.gov/pdf/forms/fecfrm3l.pdf>

D. Has My Campaign Triggered Disclosure of Bundled Contributions?

To determine whether your campaign triggers disclosure under these rules, ask the following three questions:

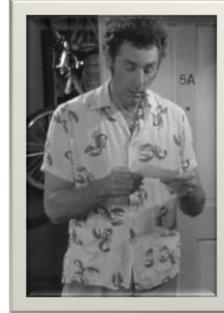
1. Does the campaign receive forwarded contributions or give credit to fundraisers for contributions they raise?
2. If so, are contributions forwarded by, or does campaign give credit to, persons that qualify as lobbyists/registrants or lobbyist/registrant PACs?
3. If so, does the amount forwarded by, or credited to, a lobbyist/registrant or lobbyist/registrant PAC exceed \$17,300 during the covered period?

If the answer to all three questions is yes, then the campaign committee must file a Form 3L.

SUPPORT FROM THE CANDIDATE

Candidate Support

- ▣ Unlimited Personal Funds
- ▣ ½ Jointly Held Assets
- ▣ Contributions vs. Loans
 - Both unlimited from personal funds
 - Loans can be repaid, contributions cannot



I. Personal Funds (*Guide*, pp. 15, 29-30)

A. Unlimited

Candidate may spend unlimited personal funds on his/her campaign.

B. Personal Funds Defined

Assets that the candidate had legal right of access to, or control over, or equitable interest in, prior to candidacy, including:

1. Salary.
2. Other earned income. See AO 2006-13.
3. Dividends from stock.
4. Sale of stock or investments.
5. Income from trusts established before candidacy.
6. Bequests to candidate (even after candidacy).
7. Winnings from lotteries or games of chance.
8. Gifts of cash or other assets, but **only if** customarily received prior to candidacy.

C. Application to Spouse (*Guide*, pp. 14-15, 17)

1. **Limit: \$2,600/election** (indexed) – same as other individuals.
2. Candidate may use a portion of assets (normally 50%) jointly owned with his or her spouse, without contribution from spouse resulting.

II. Loans from the Candidate (*Guide*, pp. 14-15, 30, 36, 91-92, 105-106)

A. Loan = Contribution

Considered a contribution; as such, has no limit. However, amount disclosed as loan can be repaid, contributions cannot. See AO 2008-09.

B. Source of Loan Funds

1. Candidate's own personal funds.
2. Candidate uses funds obtained through a personal loan from a lending institution, funds derived from an advance on their brokerage account, credit card or other line of credit.

Candidate Support

Repayment of Candidate Loans

- ☐ Using contributions made *before* election
 - May repay entire amount
- ☐ Using contributions made *after* election
 - May repay no more than \$250,000
 - Amount in excess of \$250,000 = contribution

C. Repayment of Personal Loans from Candidate (*Guide*, pp. 30, 51)

1. For personal loans from the candidate (including advances or candidate-endorsed bank loans) to his or her authorized committee that aggregate more than \$250,000, the following rules apply:
 - a) Campaign committee may use contributions to repay the candidate for the entire amount of the loan or loans only if those contributions were made on or before the day of the election; and
 - b) Committee may use contributions to repay the candidate only up to \$250,000 from contributions made after the date of the election.

- c) If committee uses the amount of cash-on-hand as of the date of the election to repay the candidate for loans in excess of \$250,000, then it must:
 - (1) Do so within 20 days of the election; and
 - (2) Treat the portion of candidate loans that exceed \$250,000, minus the amount of cash-on-hand as of the day after the election as a contribution by the candidate.
2. See AOs 2008-22 and 2008-09 (still in effect even though Millionaires' Amendment is not).

Candidate Support

Transfers

- ⊘ Nonfederal Campaign to PCC - PROHIBITED
- ✓ From Prior Fed. Campaign in Different Cycle
 - Unlimited
 - No aggregation of contributor limits

III. Transfers from Candidate's Other Campaigns for Different Offices (*Guide*, pp. 59-61)

- A. **From Candidate's State or Local Campaign** (11 CFR 110.3(d))
Prohibited.
- B. **From Candidate's Prior Federal Campaign in Different Cycle** (11 CFR 110.3(c)(4))
Unlimited, without aggregation of contributor limits. See AOs 1996-52 and 1980-30.

Candidate Support

Transfers

- ✓ From Candidate's Campaign for Different Office
 - In the Same/Overlapping Election Cycle
 - Set up separate committee
 - No transfers while actively seeking more than one office
 - Aggregation of contributor limits
 - In Different Cycles
 - Unlimited
 - No aggregation

- C. From Candidate's Federal Campaign for Different Office in Same or Overlapping Cycle – (11 CFR 110.3(c)(5))**
1. Prohibited while actively seeking more than one office.
 2. When no longer actively seeking two offices, permitted, but contributor limits are aggregated.
 3. See AOs 1984-38, 1982-01 and 1978-19.
- D. Separate Accounts and Organizations Required.**
Required for each campaign for different office.

SCENARIO #4: *Candidate Loans* (Guide, pp. 91-92, 103-107)
 48-Hour Notices (Guide, pp. 81, 83)

On June 13, 2014, Candidate Cosmo Kramer generously dips into his “rainy-day” savings account and contributes \$10,000 to his campaign committee to give his primary re-election campaign a last push before the primary. He indicates, however, that once money from other contributors comes in, he wishes to be paid back in full, no matter how long it may take, and will not charge the committee any interest.

Successful in the primary, however, concerned about the lack of money coming into the campaign for the general, on October 1, 2014, Candidate Kramer decides to loan the campaign an additional \$50,000 – this time the funds were derived from a loan he took out from Chemical Bank. The bank charges the candidate 12.5% interest on the loan. However, the candidate decides not to charge as much interest to the committee and loans the money to the campaign at an interest rate of 9.5%.

After visiting their son, George who is friends with Congressman Kramer, Frank and Estelle Costanza stop by and contribute \$2,600 each towards Candidate Kramer’s primary. With a new confidence in their fundraising plan in the coming months, the campaign repays Candidate Kramer \$4,000 of his loan on October 10, 2014. (Note: payment consists of \$3,650 principal payment and \$350 interest payment).

- 1. Should the committee disclose the personal funds loan? If so, how should the committee disclose it? Does the personal funds loan trigger a 48-Hour Notice?**

- 2. Are the reporting requirements any different for Candidate Kramer’s \$50,000 loan to the committee funded from a loan he took out from a lending institution?**

- 3. How is the committee’s loan repayment to the candidate disclosed?**

- 4. Key issues:**

SCENARIO #4 – ANSWERS:

1. Should the committee disclose the personal funds loan? If so, how should the committee disclose it? Does the personal funds loan trigger a 48-hour notice?

Yes. The term “loan” is contained in the definition of contribution, and as such, the personal funds loan from Candidate Kramer should be disclosed as both a contribution on Schedule A and as a loan on Schedule C.

Since the loan was giving to the campaign in close proximity to the candidate’s primary election, it must be determined whether or not the receipt triggers expedited disclosure with a 48-Hour Notice. The expedited disclosure requirement applies to all types of contributions received, including loans from the candidate, loans received (other than bank loans) and endorsements of bank loans.

In our scenario, Candidate Kramer is participating in the New York Primary being held on June 24, 2014, and the applicable 48-Hour Notice period runs from June 5 through June 21, 2014. Therefore the \$10,000 personal funds bank loan received on June 13th triggers the 48-Hour Notice requirements and must be reported to the FEC by June 15, 2014.

Report last minute receipt: show reporting of 48-Hour Notice on Form 6.

Part 1 of 2: Report Receipt on 48-Hour Notice FEC Form 6

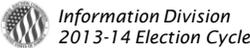
Candidate
Loan

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED
(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL Committee to Elect Cosmo Kramer		Includes Loans				
ADDRESS (number and street) 129 West 81st Street Apt. 5B						
CITY, STATE, and ZIP CODE New York, NY 10024						
2. NAME OF CANDIDATE Cosmo Kramer	3. OFFICE SOUGHT (State and District) NY / 08	4. FEC IDENTIFICATION NUMBER C00320000				
<small>Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.</small>						
A. Full Name, Mailing Address and ZIP Code Cosmo Kramer 129 West 81st Street New York, NY 10024	Name of Employer Kramerica Industries <small>Occupation</small> Founder	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Date (month, day, year)</th> <th style="width: 50%;">Amount</th> </tr> <tr> <td style="text-align: center;">6/13/14</td> <td style="text-align: center;">\$10,000.00</td> </tr> </table>	Date (month, day, year)	Amount	6/13/14	\$10,000.00
Date (month, day, year)	Amount					
6/13/14	\$10,000.00					
SIGNATURE (optional) <i>Mr. Newman</i>		DATE 6/14/14				
		For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100				
		FEC FORM 6 (Revised 1/2001)				

FE1AN063.PDF



Campaign Operations Part 1

As a last-minute contribution, the personal funds loan must also be itemized on the Committee’s next scheduled report (July Quarterly Report).

- **Report the loan as a contribution** on Schedule A for Line 13(a). The Date of Receipt is the date the money is received by the campaign committee; itemization should include notation in Receipt This Period box indicating “personal funds.”

Part 2 of 2: Report Receipt on July Quarterly Report (Contribution)

Form 3: Schedule A, Line 13(a)

Candidate Loan

SCHEDULE A (FEC Form 3)	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE OF (check only one)												
ITEMIZED RECEIPTS		<table style="margin: auto; border: none;"> <tr> <td style="border: 1px solid black; padding: 2px;">11a</td> <td style="border: 1px solid black; padding: 2px;">11b</td> <td style="border: 1px solid black; padding: 2px;">11c</td> <td style="border: 1px solid black; padding: 2px;">11d</td> </tr> <tr> <td style="border: 1px solid black; padding: 2px;">12</td> <td style="border: 1px solid black; padding: 2px; text-align: center;"><input checked="" type="checkbox"/></td> <td style="border: 1px solid black; padding: 2px;">13a</td> <td style="border: 1px solid black; padding: 2px;">13b</td> </tr> <tr> <td style="border: 1px solid black; padding: 2px;"></td> <td style="border: 1px solid black; padding: 2px;"></td> <td style="border: 1px solid black; padding: 2px;">14</td> <td style="border: 1px solid black; padding: 2px;">15</td> </tr> </table>	11a	11b	11c	11d	12	<input checked="" type="checkbox"/>	13a	13b			14	15
11a	11b	11c	11d											
12	<input checked="" type="checkbox"/>	13a	13b											
		14	15											

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Committee to Elect Cosmo Kramer

<p><small>Full Name (Last, First, Middle Initial)</small> A. Cosmo Kramer</p> <p><small>Mailing Address</small> 129 West 81st Street Apt. 5B</p> <p><small>City</small> New York <small>State</small> NY <small>Zip Code</small> 10024</p> <p><small>FEC ID number of contributing federal political committee.</small> C</p> <p><small>Name of Employer</small> Kramerica Industries <small>Occupation</small> Founder</p> <p><small>Receipt For:</small> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p><small>Date of Receipt</small> 06 / 13 / 2014</p> <p><small>Amount of Each Receipt this Period</small> 10,000.00</p> <p style="background-color: #e0e0e0; padding: 5px; text-align: center; font-weight: bold;">personal funds</p>
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Election Cycle-to-Date
10,000.00

Campaign Operations Part 1

- **Report terms of the loan** on Schedule C for Line 13(a). The Loan Source is the candidate. Itemization should also include notation indicating “personal funds.” Note that the committee will continuously report the loan on Schedule C until loan is fully repaid.

See Reporting Example on Next Page

Part 2 of 2: Report Receipt on
 July Quarterly Report
 (Loan)

Form 3: Schedule C, Line 13(a)

Candidate
 Loan

SCHEDULE C (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF
LOANS			FOR LINE NUMBER: (check only one) <input checked="" type="checkbox"/> 13a <input type="checkbox"/> 13b
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer			
LOAN SOURCE Full Name (Last, First, Middle Initial) Cosmo Kramer - personal funds		Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
Mailing Address 129 West 81st Street Apt. 5B			
City New York		State NY	ZIP Code 10024
Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period	
10,000.00	0.00	10,000.00	
TERMS			
Date Incurred	Date Due	Interest Rate	Secured:
06 / 13 / 2014	None	None	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
List All Endorsers or Guarantors (if any) to Loan Source			
1. Full Name (Last, First, Middle Initial)		Name of Employer	
Mailing Address		Occupation	
City State ZIP Code		Amount Guaranteed Outstanding	

2. Are the reporting requirements any different for Candidate Kramer’s \$50,000 loan to the committee funded from a loan he took out from a lending institution?

Yes. In addition to the disclosures on Schedules A & C (as noted above), the campaign committee must also submit Schedule C-1 to disclose the loan agreement between the lending institution and the candidate. Schedule C-1 also includes description/value of collateral used (if any), and requires the signature of an approving official from the bank.

See Reporting Example on Next Page

Part 1 of 2: Report Receipt on Year-End Report (Contribution)

Form 3: Schedule A, Line 13(a)

Bank Loan

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) <input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 11d <input type="checkbox"/> 12 <input checked="" type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14 <input type="checkbox"/> 15
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer		
Full Name (Last, First, Middle Initial) A. Cosmo Kramer Mailing Address 129 West 81st Street Apt. 5B City New York State NY Zip Code 10024		Date of Receipt M / D / Y 10 / 01 / 2014
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50,000.00
Name of Employer Kramerica Industries Occupation Founder		Loan from Bank
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Election Cycle-to-Date 60,000.00		

Information Division
 2013-14 Election Cycle Campaign Operations Part 1

Part 1 of 2: Report Receipt on Year-End Report (Loan)

Form 3: Schedule C, Line 13(a)

Bank Loan

SCHEDULE C (FEC Form 3) LOANS	Use separate schedule(s) for each category of the Detailed Summary Page
FOR LINE NUMBER: (check only one) <input type="checkbox"/> 13a <input checked="" type="checkbox"/> 13b	
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer	
LOAN SOURCE Full Name (Last, First, Middle Initial) Cosmo Kramer (Loan from Bank)	
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
Mailing Address 129 West 81st Street Apt. 5B City New York State NY Zip Code 10024	
Original Amount of Loan	Cumulative Payment To Date
50,000.00	0.00
Balance Outstanding at Close of This Period	
50,000.00	
TERMS	
Date Incurred	Date Due
10 / 01 / 2014	01 / 31 / 2016
Interest Rate	Secured:
9.5 % (apr)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Information Division
 2013-14 Election Cycle Campaign Operations Part 1

Note that terms disclosed on Schedules C and C-1 may differ.

- (1) Candidate may use different terms than the bank (including no repayment conditions).
- (2) Lending institution must have terms offered in the normal course of business.

Part 1 of 2: Loan Agreement on Year-End Report

Bank Loan

SCHEDULE C-1 (FEC Form 3)
LOANS AND LINES OF CREDIT FROM LENDING INSTITUTIONS

Federal Election Commission, Washington, D.C. 20463

Supplementary for information found on Page _____ of Schedule C

NAME OF COMMITTEE (in Full) Committee to Elect Cosmo Kramer		FEC IDENTIFICATION NUMBER C 00320000
LENDING INSTITUTION (LENDER) Full Name Chemical Bank	Amount of Loan 50,000.00	Interest Rate (APR) 12.5 %
Mailing Address 120 West 81st Street	Date Incurred or Established 10 / 01 / 2014	Date Due 01 / 31 / 2016
City New York	State, Zip Code NY 10024	

A. Has loan been restructured? No Yes If yes, date originally incurred _____

B. If line of credit, Total Outstanding Balance: _____

C. Are other parties secondarily liable for the debt incurred?
 No Yes (Endorsers and guarantors must be reported on Schedule C.)

D. Are any of the following pledged as collateral for the loan: real estate, personal property, goods, negotiable instruments, certificates of deposit, chattel papers, stocks, accounts receivable, cash on deposit, or other similar traditional collateral?
 No Yes If yes, specify: **Real estate** What is the value of this collateral?
250,000.00

Does the lender have a perfected security interest in it? No Yes

E. Are any future contributions or future receipts of interest income, pledged as collateral for the loan? No Yes If yes, specify: _____ What is the estimated value?
0.00

A depository account must be established pursuant to 11 CFR 100.82(e)(2) and 100.142(e)(2).
 Date account established: _____ Location of account: _____
 Address: _____
 City, State, Zip: _____

F. If neither of the types of collateral described above was pledged for this loan, or if the amount pledged does not equal or exceed the loan amount, state the basis upon which this loan was made and the basis on which it assures repayment.

Form 3:
Schedule C-1

Loan Agreement:
outlines loan
terms between
the Bank &
Candidate



Information Division
2013-14 Election Cycle

Campaign Operations Part 1

3. How is the committee's loan repayment to the candidate disclosed?

If payment is applied to the principal AND interest balances, the committee may use one check, but must break out each part and disclose them separately. Payment towards the principal balance is shown as a loan repayment, and payments toward interest are reported as operating expenditures. Note that principal repayments must also be continuously reported on Schedule C for each reporting period.

- **Report principal payment** on Schedule B for Line 19(a); itemization should include notation in Purpose of Disbursement box indicating, “candidate loan repayment – personal funds.”
- **Report interest payment** on Schedule B for Line 17; itemization should include a notation in Purpose of Disbursement box indicating, “interest payment on candidate loan.”

See Reporting Example on Next Page

Part 2 of 2: Report Payment on
 Year-End Report (Loan)
 Form 3: Schedule C, Line 13(a)

Bank Loan

SCHEDULE C (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF
LOANS		FOR LINE NUMBER: (check only one)	<input checked="" type="checkbox"/> 13a <input type="checkbox"/> 13b
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer			
LOAN SOURCE Full Name (Last, First, Middle Initial) Cosmo Kramer (Loan from Bank)		Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
Mailing Address 129 West 81st Street Apt. 5B			
City New York State NY ZIP Code 10024			
Original Amount of Loan 50,000.00	Cumulative Payment To Date 3,650.00	Balance Outstanding at Close of This Period 46,350.00	
TERMS			
Date Incurred MM / DD / YYYY 10 / 01 / 2014	Date Due MM / DD / YYYY 01 / 31 / 2016	Interest Rate 9.5 % (apr)	Secured: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
List All Endorsers or Guarantors (if any) to Loan Source			
1. Full Name (Last, First, Middle Initial)		Name of Employer	
Mailing Address		Occupation	
City State ZIP Code		Amount Guaranteed Outstanding	

Part 2 of 2: Report Payment on Year-End
 Report (Disbursement)

Principal – Form3: Schedule B, Line 19(a)

Bank Loan

SCHEDULE B (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
ITEMIZED DISBURSEMENTS			<input type="checkbox"/> 17 <input type="checkbox"/> 18 <input checked="" type="checkbox"/> 19a <input type="checkbox"/> 19b <input type="checkbox"/> 20a <input type="checkbox"/> 20b <input type="checkbox"/> 20c <input type="checkbox"/> 21	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer				
Full Name (Last, First, Middle Initial) A. Cosmo Kramer		Date of Disbursement 10 / 10 / 2014		
Mailing Address 129 West 81st Street Apt. 5B		Amount of Each Disbursement This Period 3,650.00		
City New York State NY Zip Code 10024				
Purpose of Disbursement Loan Payment - Candidate Loan from Bank				
Candidate Name Cosmo Kramer		Category/Type		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State NY	District 8			

Interest - Form 3: Schedule B, Line 17

SCHEDULE B (FEC Form 3)		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
ITEMIZED DISBURSEMENTS			<input checked="" type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19a <input type="checkbox"/> 19b <input type="checkbox"/> 20a <input type="checkbox"/> 20b <input type="checkbox"/> 20c <input type="checkbox"/> 21	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) Committee to Elect Cosmo Kramer				
Full Name (Last, First, Middle Initial) A. Cosmo Kramer		Date of Disbursement 10 / 10 / 2014		
Mailing Address 129 West 81st Street Apt. 5B		Amount of Each Disbursement This Period 350.00		
City New York State NY Zip Code 10024				
Purpose of Disbursement Interest Payment on Bank Loan				
Candidate Name Cosmo Kramer		Category/Type		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State NY	District 8			

4. Key issues:

Candidate Loans

- If the candidate wishes to be paid back, be sure to report the receipt as a loan on the *first report* disclosing the receipt.
- **Tips for a Personal Funds Loan**
 - Use both Schedules A for Line 13(a) and Schedule C for Line 13(a).
 - Don't forget loan terms. Terms of a loan from the candidate's personal funds (no lending institution involved) may be more flexible. If there is no interest or due date, don't leave boxes blank, enter "none" or "n/a."
 - Include notations on both Schedules A & C indicating "personal funds."
 - When the candidate forgives a loan, the committee should file a letter signed by the candidate stating that the loan is forgiven – for both paper and electronic filers.
- **Tips for a Candidate Loan from Lending Institution**
 - When the candidate obtains a loan from the bank and then loans those funds to the campaign, report using Schedule A for Line 13(a), Schedule C for Line 13(a), and Schedule C-1.
 - Don't forget to include loan terms. Often terms on C-1 and C will differ. The candidate is able to use different terms than the bank (including no repayment conditions). The bank must have terms offered in the normal course of business.
 - Remember to include notations – i.e., "home equity line of credit."
 - Candidate may charge the campaign an interest rate on a loan derived from a bank that is different from what the bank charges the candidate.
 - When disclosing repayment on this type of loan, principal campaign committee (PCC) may issue repayment to candidate or to the bank. Reflect payment on Schedules B and C. On Schedule B, break out payments towards principal and interest separately – disclosed on different line numbers: Line 19(a) for principal payments and Line 17 for interest payments.
 - Loans made by a lending institution directly to the committee should be reported on Schedules A and C for Line 13(b) and Schedule C-1. Repayments on these loans should be reported on Schedule B for Line 19(b) for principal payments and Schedule B for Line 17 for interest payments, as well as reflected on Schedule C.

48-Hour Notices

- Campaign committees must file special notices regarding contributions of \$1,000 or more received less than 20 days but more than 48 hours before 12:01am of the day of any election in which the candidate is running (whether or not the candidate has opposition).
- The expedited disclosure requirements apply to all types of contributions received, including loans from the candidate and other non-bank sources. Does not apply to bank loans.
- A state-by-state chart of 48-Hour Notice periods for 2014 primary elections can be found on the FEC website at www.fec.gov/info/charts_primary_dates_2014.shtml.
- Where and How to File:
 - **House Committees:** file with the FEC. Electronic filers must file electronically; paper filers may file via fax or online using the FEC website.
 - **Senate Committees:** file with the Secretary of the Senate. File via mail or fax.

Workshop Evaluation

Help Us Help You!

Please complete an evaluation
of this workshop