



REPORTING BASICS

I. Filing Schedule and Report Deadlines

Reporting Basics

House and Senate campaigns file on FEC Form 3; Presidential campaigns file on FEC Form 3P

Reports due quarterly*

All campaign committees file with the FEC

▶ Over \$50,000 required to file electronically



^{*} Presidential campaigns that raise/spend >\$100k file monthly in election year.

A. Filing frequency

- 1. House/Senate campaign committees

 Quarterly filing is mandatory for authorized campaign committees
 in all calendar years.
- 2. Presidential campaign committees
 In the election year, Presidential campaign committees that raise/spend more than \$100,000 must file monthly; other presidential committees may file monthly or quarterly.

2025 Filing Schedule

Report Type	Coverage and Due Dates	
April Quarterly	Covers 1/1 - 3/31/25; Due 4/15/25	
July Quarterly	Covers 4/1 - 6/30/25; Due 7/15/25	
October Quarterly	Covers 7/1 - 9/30/25; Due 10/15/25	
Year-End	Covers 10/1 - 12/31/25; Due 1/31/26	

Reporting dates always up-to-date on: www.fec.gov/help-candidates-and-committees/dates-and-deadlines/

B. October Quarterly Report covering period

• 7/1/25 – 9/30/25; Due 10/15/25

Looking Ahead...

2026 Filing Schedule

Report Type	Coverage and Due Dates		
April Quarterly	Covers 1/1 - 3/31/26; Due 4/15/26		
Pre-Primary and Pre-Runoff reports - see next slide			
July Quarterly	Covers 4/1 - 6/30/26; Due 7/15/26		
October Quarterly	Covers 7/1 - 9/30/26; Due 10/15/26		
Pre-General (12G)	Due 12 days before election 12G covers 10/1 - 10/14/26; Due 10/22/26		
Post-General (30G)	Due 30 days after election 30G covers 10/15 - 11/23/26; Due 12/3/26		
Year-End	Covers 11/24 - 12/31/26; Due 1/31/27		
Year-End (candidate not in General)	Covers 10/1 - 12/31/26; Due 1/31/27		

Pre-Election Reporting

Pre-Election Reports

- Due 12 days before candidate's election includes primary, general and/or runoff (if applicable)
- Covers period from close of books on last report through 20 days before the election

48-Hour Notices

- Reports of "last minute" contributions and/or loans of \$1,000 or more received < 20 days but > 48 hours before election
- Due within 48 hours of receipt of \$

2. Pre-election reports in election year (2026)

- a) File Pre-Primary (or Pre-Convention/Runoff if applicable) Report, due 12 days before election.
- b) If participating in general election, file Pre-General Report, due 12 days before general.

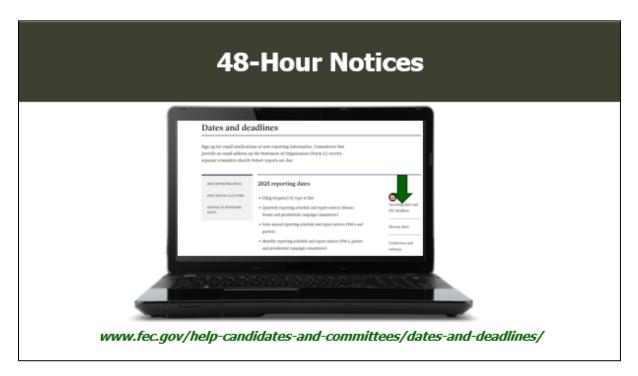
3. File Post-General Report, due 30 days after general

4. 48-Hour Notices

- a) Principal campaign committees must file for 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 (even if candidate is unopposed in the election).
- b) The expedited disclosure requirements apply to all types of contributions received individuals, party committees, political committees, joint fundraising and earmarked contributions, personal funds from the candidate, in-kind gifts or advances of goods or services, loans from the candidate or other non-bank sources, and guarantees or endorsements of bank loans to the candidate or committee.
- c) The notices must reach the FEC 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 FEC; campaigns may also file online using the FEC website.

 Note: Last-minute contribution must also be itemized on the committee's next scheduled report.

More: <u>www.fec.gov/help-candidates-and-committees/filing-reports/48-hour-notices/</u>



Filing on Time

No Extensions

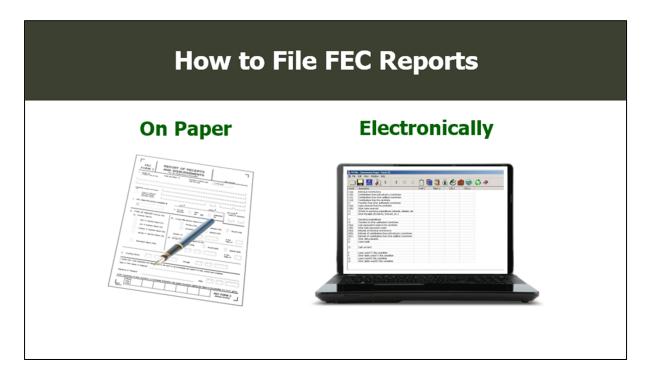
- Filing dates not extended for weekends or holidays
- Must be received on business day preceding filing date

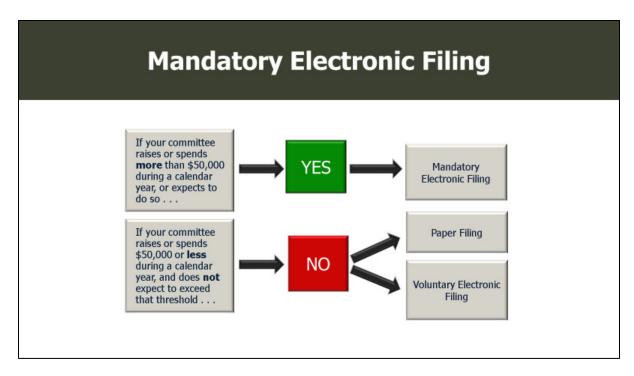
Registered/Certified vs. Overnight Mail

- If using USPS registered/certified mail, keep receipt
- Overnight mail means next-day express or priority mail with delivery confirmation or overnight service with online tracking system.
 Same terms as registered/certified. Keep receipt/tracking number

D. Filing on time

- 1. Paper filers other reporting considerations
 - a) Statute prohibits extensions (applicable to paper and electronic filers).
 - b) Weekends and holidays
 Filing dates not extended for weekends or holidays. Must be
 filed on or before business day preceding filing date.
 - c) Registered/certified vs. first class mail
 - (1) If filing using USPS registered/certified mail, report is considered filed on the date of the U.S. postmark; keep your receipt in the event of a delivery failure.
 - (2) Reports filed via priority or overnight mail with a delivery confirmation or an online tracking system will be considered timely filed if the report is postmarked on or before the mailing deadline.
 - (3) If using first class mail or hand delivery, report is considered timely filed when it is received by the Commission; risk of timely delivery is on the filer.
- 2. Electronic filers filed when received/validated by Commission
 Electronic reports considered "filed" when it is received and validation
 by the Commission's computer system on or before 11:59 p.m.
 (Eastern Time) on the filing date.





E. Electronic vs. paper filing

1. Who must e-file?

All campaign committees that raise or spend more than \$50,000 in a calendar year, or that have reason to expect to do so.

2. Who is exempt from mandatory e-filing?
Campaign committees that do not meet the \$50,000 threshold above.

F. Electronic filing

1. Passwords required

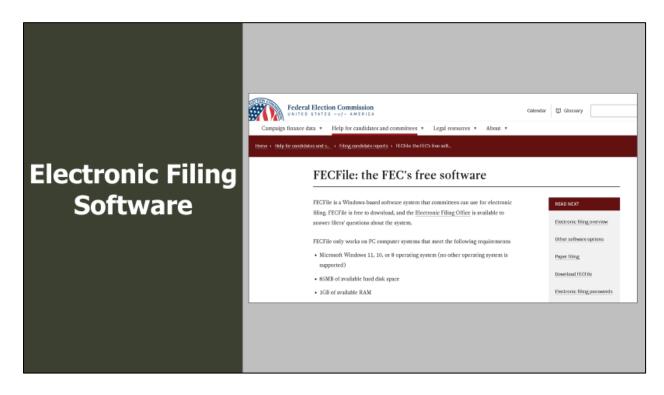
You cannot file without one.

2. How do you get a password?

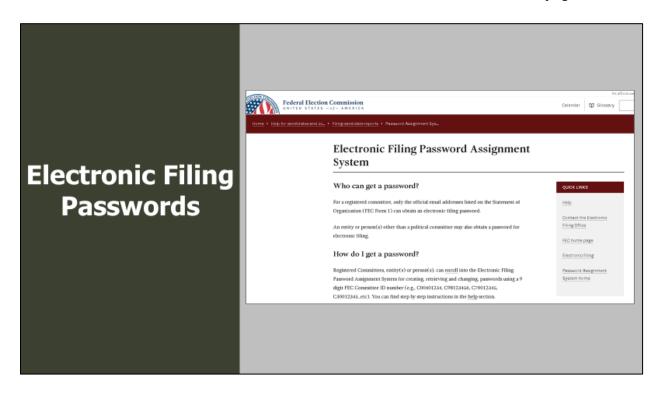
- a) Most committees may obtain or change their password online at webforms.fec.gov/psa/newrequest.htm
- b) Existing committees that have not previously used the online system should contact the Electronic Filing Office for assistance at 202-694-1307.

3. How long does it take?

- a) Passwords can now be obtained in just a few minutes online.
- b) We recommend you request your password as early in the process as possible in case any issues arise.



www.fec.gov/help-candidates-and-committees/filing-reports/electronic-filing/



webforms.fec.gov/psa/index.htm

II. Using Best Efforts/Timely Filing

Best Efforts to File on Time

Committee prevented from filing report on time by reasonably unforeseen circumstances beyond its control

Filed the report no later than 24 hours after end of those circumstances

A. Best efforts defense

Not the same as "best efforts" for obtaining contributor information

- 1. Reports required on time No extensions.
- 2. If report not filed on time

Committees may use "best efforts" defense if committee took normal precautions and trained staff, but failure to report was due to <u>circumstances beyond committee's control</u> and the late report was filed within 24 hours after those circumstances ended (pursuant to April 2007 revisions to AFP regulations). 11 CFR 111.35(b)(3)

Committee may use best efforts defense if late filing is due to:

- Severe weather or other disasterrelated event
- FEC computer/software failure that tech support cannot resolve
- Widespread disruption of internet transmissions

Best Efforts to File on Time

3. When can best efforts defense be used

a) Committee may use best efforts defense if failure to report is due to "reasonably unforeseen circumstances beyond the committee's control," such as the failure of Commission computers or software, despite receiving Commission technical assistance; widespread disruption of information transmissions over the internet; or severe weather or other disaster-related event. 11 CFR 111.35(c).

Committee prevented from filing report on time by other factors, including:

- Illness, inexperience or unavailability of treasurer or committee staff
- Committee computer, software or ISP failures
- Delays caused by committee vendors/contractors
- Failure to use filing software properly

Not Considered Best Efforts

- b) Committee may <u>not</u> use best efforts defense if failure to report is due to unavailability; inexperience or negligence of staff, counsel or organization; failure of committee's computer system; delays caused by vendors; failure to understand or know the law; or failure to use filing software properly. *See* 11 CFR 111.35(d).
- 4. For more information, review:

<u>www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-7.pdf</u> (rules) and

<u>www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-13.pdf</u> (policy statement) and the May and July 2007 *Record* issues.

Best Practices: Filing

- Ensure your staff and vendors understand filing rules and deadlines
- ✓ Update software regularly
- ✓ Have a current email address on FEC Form 1 to receive courtesy email reminders
- √ Filers can add two email addresses



B. Best practices for filing reports

- 1. Ensure your staff and vendors understand filing rules and deadlines.
- 2. E-filers: update your software regularly.
- 3. Have a current email address on the Statement of Organization (FEC Form 1) to electronically receive Requests for Additional Information (RFAIs) and courtesy reminders about reports due. Up to two email addresses can be provided on a FEC Form 1 for receiving FEC communications.
- 4. Notify the Commission of address, email and treasurer changes by filing an amended FEC Form 1.
- 5. Provide timely and adequate responses to RFAIs.

REPORTS ANALYSIS DIVISION (RAD) REVIEW PROCESS AND REQUESTS FOR ADDITIONAL INFORMATION (RFAIs)

I. RAD Review of Reports & RFAIs

Review and Referral Policy

30 categories of review:

- Mathematical discrepancies
- Failure to provide supporting schedules
- Failure to properly itemize contributions from individuals
- Prohibited excessive and impermissible contributions
- Improper itemization of disbursements

A. RAD review and referral policy

Policy is reassessed every election cycle and revisions/changes made based on input from RAD and other offices, such as the Office of General Counsel (OGC) and Commissioners. A redacted version of the RAD review and referral policy can be found on the FEC website.

B. Categories of review

- 1. Internal policy contains categories of review the Analyst checks.
- 2. Policy has established thresholds for making determinations on whether to send a RFAI.
- 3. Thresholds are confidential.

RFAI Thresholds

Thresholds are confidential; Policy is approved by Commission



Review and Referral Policy

<u>www.fec.gov/resources/cms-content/documents/Final-Redacted-2023-2024-RAD-Review-Referral-Procedures.pdf</u>

Review of Reports



Thresholds applied on per report basis

- If a reporting issue appears on multiple reports, committee may receive multiple RFAIs on same issue
- Analyst does not consider previous responses to RFAIs, except:
 - Best efforts procedures; and
 - Foreign address safe harbor guidelines

It's possible to see an issue questioned on one report, but not on another

- C. Review is conducted, and thresholds are applied, on a <u>per report basis</u>, meaning the thresholds are applied to each report reviewed.
 - 1. This means a committee may receive a RFAI identifying the same issue already addressed in response to a RFAI referencing a different report.
 - 2. Exceptions include outlining best efforts procedures which would apply to the two-year cycle, and responses relating to foreign address inquiries that indicate safe harbor guidelines are followed for <u>all</u> contributions apply for the two-year election cycle.
 - 3. There may be several issues that are aggregated together to meet a single threshold, so it's possible to see an issue questioned on one report that isn't included in an RFAI on for another report.

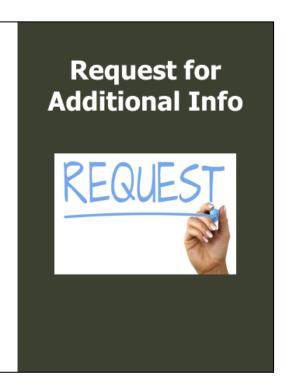
If internal thresholds are met:

 Analyst sends RFAI with response due date in upper right corner

No extensions

Responses assessed by analysts and team leaders

Analysts do not reply to committee responses



D. Request for Additional Information (RFAI)

1. If internal thresholds are met, an RFAI is sent with a "Response Due Date" in the upper right hand corner of the letter, extensions are not granted. The committee Analyst's name and contact telephone number are also provided in the letter.

Tip: You can find out who your Analyst is by visiting: www.fec.gov/help-candidates-and-committees/question-rad/



RAD emails RFAIs to email address(es) on Statement of Organization (FEC Form 1)

List <u>up to two</u> email addresses on FEC Form 1

Ensure current contact information appears on FEC Form 1

- 2. Committees should ensure that they have provided the most current mailing address, email address and phone numbers on their Statement of Organization (FEC Form 1). Often RFAIs are returned by the Post Office due to an incorrect mailing address.
- 3. RAD sends RFAIs via email to the committee's official email address, as disclosed on the FEC Form 1. Up to two email addresses can be provided (both will be used for emailing RFAIs). Committees will have the option to continue to receive RFAIs on paper through the mail.





Responding to RFAIs

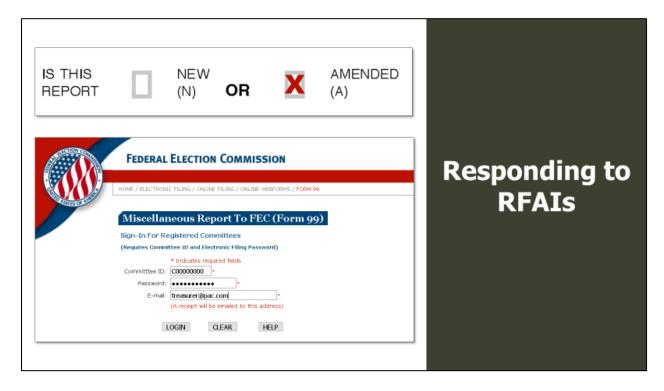
Analysts do not make legal conclusions

Analysts cannot categorize your activity

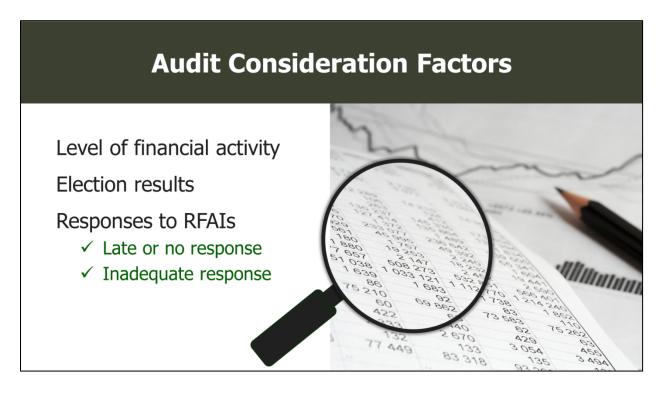
In some cases, RAD consults OGC before sending an RFAI and when assessing a committee's response

4. Responses are assessed by the Analysts and in some cases, team leaders

- a) Analysts do not reply to responses.
- b) Contact is not made with committees in every case when a response is not sufficient. Further explanation below.
- c) Committees are encouraged to contact their assigned Analyst prior to responding if unsure about how to respond or after a response is filed to ensure an adequate response is received.
- d) Keep in mind that Analysts can't make legal conclusions or give guidance on a legal conclusion being made by a committee. In addition, they cannot determine what category your activity falls under (i.e., independent expenditures or coordinated party expenditures).
- e) In some cases, RAD consults with OGC before sending a RFAI and when making a response assessment.



- 5. Must amend report when changing information that affects entries on a report
 - This would include additions, changes or deletions.
- 6. Miscellaneous text submission (Form 99)
 Used for narrative responses that do not affect actual entries within a report. (For example, when outlining procedures for "best efforts" in obtaining contributor information.)



E. Referrals to the Audit Division

- 1. Factors for making referrals to the Audit Division
 - a) Level of financial activity
 - b) Election results
 - c) Responses to RFAIs:
 - Late or no response
 - Inadequate response
- 2. The number of amendments filed is not a factor
- **3. The number of RFAIs is not a factor** if responded to adequately and on time.

OGC & ADRO Referrals



Policy includes referral thresholds

RAD calls committee before referring matter to explain RFAI and request response

Committee's adequate and timely response may prevent referral

F. Referrals to OGC and Alternative Dispute Resolution Office (ADRO)

- 1. Internal policy includes thresholds for determining whether a matter should be referred to OGC or ADRO.
- 2. Committee will receive a phone call from RAD prior to a referral to ADRO or OGC to explain RFAI and request a response.
- 3. An adequate response is required by the timeframe given to prevent the matter from being referred.

Action initiated by:

- FEC Audit and review
- Sworn and notarized complaint
- Referral from another office

Agency actions:

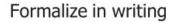
- Administrative Fines
- Alternative Dispute Resolution
- Matters Under Review (MURs)

Enforcement

Internal Controls

A process designed to ensure:

- Effective and efficient operations
- Reliable financial reporting
- Compliance with laws and regulations
- Protection of the organization's assets



Educate committee staff

Verify that professional compliance firms use internal controls and best practices



Most banks offer fraud prevention services

Check and ACH debit Positive Pay

 Verify that checks and ACH debits presented to the bank are authorized committee expenses

<u>Contact your bank</u> for more information on Positive Pay programs

 Some banks may charge a fee for these services, but others offer them for free



G. Fraud controls

- 1. Most banks offer services to prevent check and ACH fraud.
- 2. Fraud prevention programs (often referred to as Positive Pay systems) allow your bank to work more closely with your committee to verify that:
 - a) The checks presented to the bank for payment on your account are authorized; and
 - b) The ACH debits made against your committee's account are approved committee expenses.
- 3. Some banks may charge a fee for these services, but others offer them for free. Contact your financial institution for more information.

More: Internal controls resources - <u>www.fec.gov/help-candidates-and-committees/keeping-records/misappropriated-funds/</u>

FEC REPORTING FORMS, SCHEDULES & REPORTING FINANCIAL ACTIVITY

I. Candidate and Committee Registration

Candidate Registration Process					
FEC FORM 2 STATEMENT OF CANDIDACY 1. (a) Name of Candidate (in full) (b) Address (inumber and street)	FEC FORM 1	STATEMENT OF ORGANIZATION	Office Use Gray		
(c) City, State, and ZP Code 4. Party Attitution 5. Othor S DESIGNAT	NAME OF COMMITTEE (in full)	(Check if name Example: If typing, type over the lines.	12PE4M5		
7. I hereby designate the following named politics WOTE: This designation should be filed with the (a) Name of Committee (in Aut) (a)	ADDRESS (number and sheet) (Check if address is changed)	CITYA	SWIE ZP CODE		
(b) Address (number and street) [c] City, State, and ZiP Code	COMMITTEE'S E-MAIL ADDRI	ESS Optional Second E-Mail Address			
DESIGNAT 8. I hereby authorize the following named commit candidaty. NOTE: This designation should be filed with the	COMMITTEE'S WEB PAGE AD (Check if address is changed)	DDRESS (UFL)			

A. Candidate registration (11 CFR 101.1)

- 1. Individual files the Statement of Candidacy (FEC Form 2) within 15 days of triggering candidacy (i.e., raise/spend over \$5,000).
- 2. Incumbent seeking re-election amends existing FEC Form 2 each election cycle.



B. Committee registration (11 CFR 102.1(c) and 102.2)

Principal Campaign Committees file Statement of Organization (FEC Form 1) within 10 days of designation by candidate on Statement of Candidacy (FEC Form 2).

1. Requirements

Committees that file electronically must include their email address. Others are encouraged to do so.

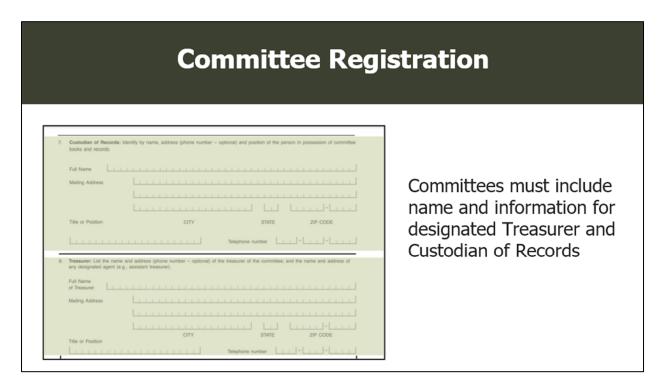
2. Amendments

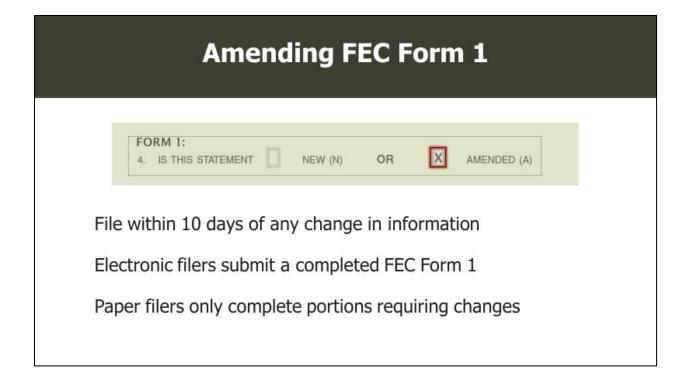
Amend FEC Form 1 (and other filings) when necessary within 10 days of change.

3. Access to FEC Form 1

- a) Forms may be downloaded and printed from the FEC website: www.fec.gov/help-candidates-and-committees/forms/
- b) Link to FEC Form 1 webform: webforms.fec.gov/webforms/form1/index.htm





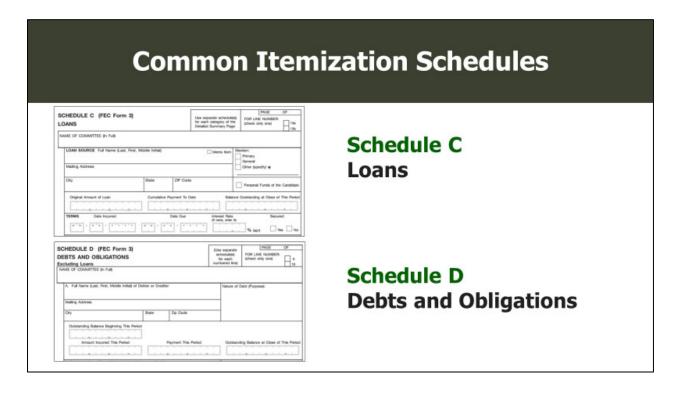


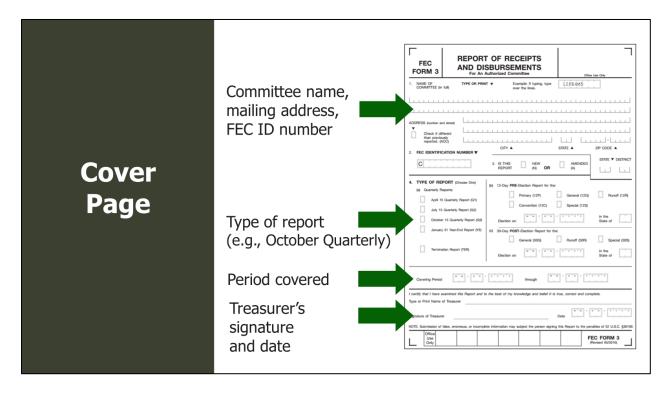
II. Campaign Finance Disclosure on Report of Receipts and Disbursements (FEC Form 3)

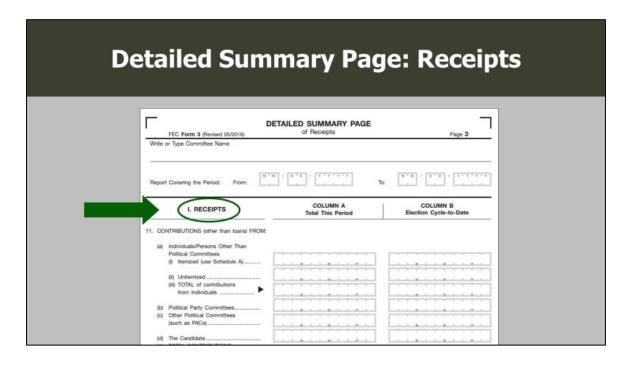
FEC Form 3

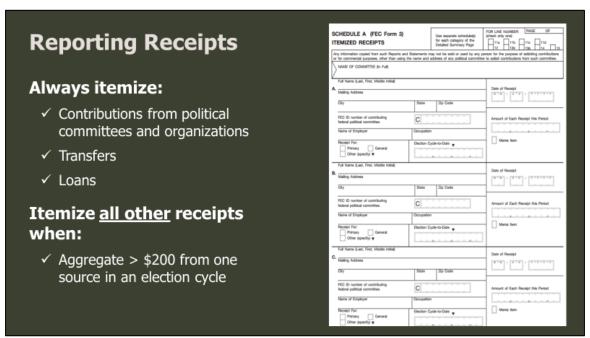
Used by House and Senate Filers

- Cover Page: Shows report type/coverage dates
- Summary Page: Overview of receipts and disbursements
- <u>Detailed Summary Page</u>: Overview of receipts and disbursements by category
- Schedules: Show detailed info by line number









A. Report receipts on the appropriate line number

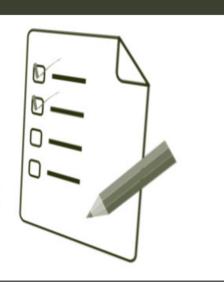
- 1. Itemize regardless of amount:
 - a) Contributions from political committees Line 11b or 11c
 - b) Transfers from affiliated authorized committees Line 12
 - c) Loans received Line 13a or 13b

2. Threshold for other categories

Itemize all other receipts once they exceed \$200 when aggregated with other receipts from that same source during the election cycle.

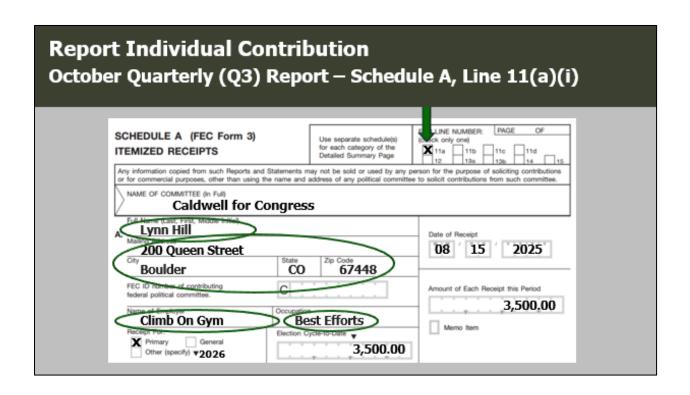
Making Best Efforts

- Request contributor info when soliciting contribution
- ✓ If info missing, make follow-up request within 30 days
- Amend report to disclose missing information once received



3. Best efforts (11 CFR 104.7)

Required to make "best efforts" to obtain, maintain and report required information.



Making Best Efforts (Follow-Up)



Thank you for your generous contribution to Caldwell for Congress. With help from supporters like you, we're certain to win in November!

Thank you for your generous contribution to Caldwell for Congress. With help from supporters like you, we're certain to win in November!

Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in an election cycle.

a) To show "best efforts," committee must:

- (1) Request information in solicitation, along with applicable disclaimer informing contributors that information is required under federal law; and
- (2) Make follow-up request within 30 days of receipt of contributions lacking required information, keep written documentation of follow-up request (with no additional solicitation made).
- **Amend reports** to disclose information received but not previously disclosed (or include information in memo reports on the next report filed).

How to Amend FEC Form 3

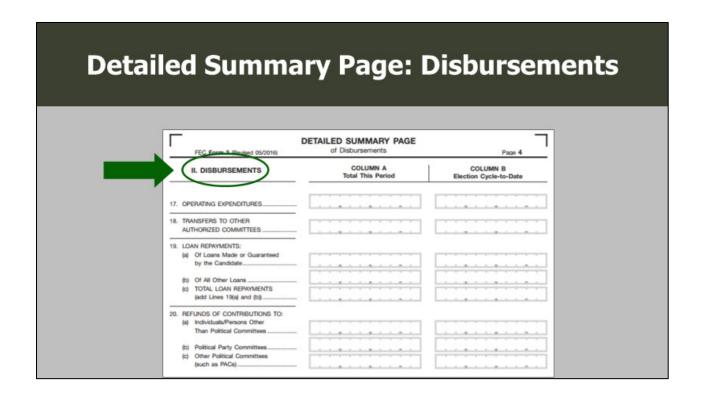
Amendments:

- Earlier report contained erroneous information
- Missing required information for a particular transaction in time to include it in the appropriate report
- E-filers submit a complete FEC Form 3
- Paper filers only complete portions requiring changes

c) Amending FEC Form 3

- (1) File an amendment when:
 - Campaign discovers that an earlier report contained erroneous information.
 - Committee does not obtain all the required information concerning a particular transaction in time to include it in the appropriate report.
- (2) Amended disclosure for receipt of best efforts information:
 - If committee receives contributor information after the contribution has been reported, it should either file an amendment to the report originally disclosing the contribution or file an amended Schedule A (check "Memo Item" box) listing all the contributions for which additional information was received with its next regularly scheduled report.

Amended Disclosure of Individual Contribution Year-End (YE) Report — Schedule A, Line 11(a)(i)					
SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page FOR LINE NUMBER: PAGE OF (check only one) 11a 11b 11c 11d 11d 11d 12 13b 14 15				
	Date of Receipt 08 15 2025				



Reporting Disbursements Always itemize: - Transfers to affiliated committees - Loans made and repaid - Contributions to other candidates - Refunds of contributions to political committees - Refunds of contributions to political committees - Refunds of contributions to political committees - Aggregate > \$200 to same payee in an election cycle

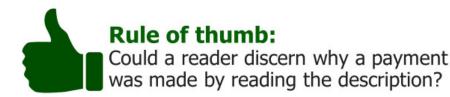
B. Report disbursements on the appropriate line number

- 1. Itemize regardless of amount:
 - a) Transfers to affiliated authorized committees Line 18
 - b) Loan repayments Line 19
 - c) Refunds of contributions to political committees Line 20
 - d) Contributions made to other federal candidates/other political committees Line 21

2. Threshold for other disbursement categories

Itemize all other disbursements once they exceed \$200 when aggregated with other disbursements to the same payee during the election cycle.

Purpose of Disbursement



Non-exhaustive list available online:

www.fec.gov/help-candidates-and-committees/purposesdisbursement/

www.fec.gov/help-candidates-and-committees/purposes-disbursement/

Entry must be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment ABC Group ABC Group Office Sought: Disbursement Pois Disbursement Princy Office Sought: Disbursement Princy Disbursement P

3. Purpose of disbursement

a) FEC regulations require that the "purpose of disbursement" entry for each disbursement be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment. 11 CFR 104.3(b)(3) and (4).

- b) Policy statement includes non-exhaustive lists of acceptable and unacceptable "purpose of disbursement" descriptions intended to provide additional guidance to the regulated community and to foster consistency among filers.
- c) As a general guideline, the statement suggests that filers consider whether a person unaffiliated with the campaign/committee could discern why a payment was made by reading the description they have provided.
- d) List is updated periodically and available online: <u>www.fec.gov/help-</u> candidates-and-committees/purposes-disbursement/

4. Disbursements requiring additional itemization

Certain disbursements require supporting information that can be reported as a memo entry. The supporting memo entry must include the original vendor, date, amount, address, and purpose.

- a) Staff reimbursements
- b) In-kind contributions from the candidate
- c) Credit card payments



Poll Question

Which of these purposes of disbursemen	t entries do you think w	vould be adequate?
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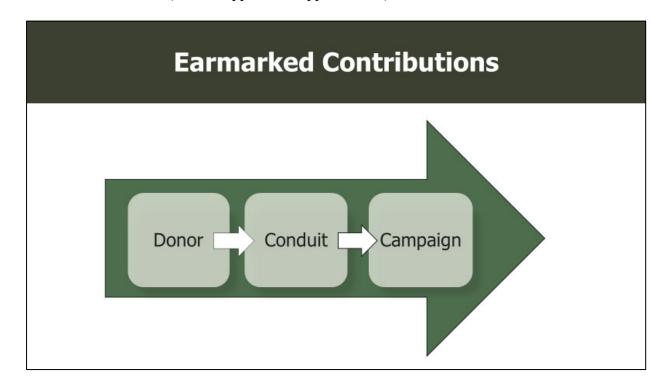
- ☐ A: Consulting
- ☐ B: Campaign Materials
- ☐ C: Technology
- ☐ D: Printed Door Hangers

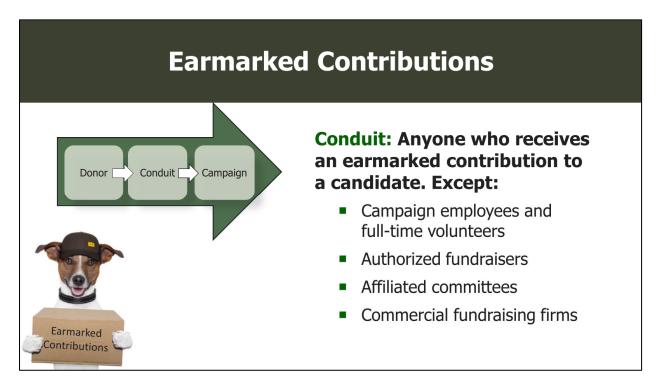
Poll Answer

Which	of	these purposes of disbursement entries do you think would be adequate?
	A:	Consulting
	B:	Campaign Materials
	C:	Technology
	D:	Printed Door Hangers

EXAMINE REPORTING SCENARIOS

SCENARIO #1 Earmarked Contributions (<u>11 CFR 110.6</u>); (*Guide*, Appendix A, pp. 143-146)





Earmarked contributions

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

Conduit/intermediary

Anyone who receives and forwards an earmarked contribution to a candidate. This includes individuals, political committees, unregistered committees and partnerships.

Persons NOT considered conduits include:

- Corporations, unions and other prohibited sources;
- Employees or full time volunteers working for campaign;
- Individuals expressly authorized to raise money on behalf of candidate;
- Committees affiliated with campaign committee; and
- Commercial fundraising firms retained by campaign.

Earmarked Contributions

Procedures for conduits to follow

Contribution must be:

→ Forwarded to campaign within 10 days of conduit's receipt



Conduit must:

Provide campaign with contributor information for FEC reports

Effect on contribution limits

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

Transmittal to campaign

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

Reporting Earmarked Contributions Received

- → Disclose the contributions with a notation "earmarked through [conduit's name]" and the date of receipt by the conduit
- → Use a memo entry to disclose the conduit including the date of receipt by the committee and total amount received by the conduit
- → Indicate the conduit's contribution limit not affected if it did not exercise direction or control over the contributions





On September 10, 2025, the Pyrite for Congress campaign receives a check from Bark Action PAC (Bark PAC) comprising individual contributions earmarked through the PAC. The letter accompanying the check notes that on September 8, 2025, Bark PAC collected a total of \$5,000 in contributions from a total of 44 individuals. In the letter, the PAC provides contributor information and contribution amounts. Almost all the contributions are for \$100, but Amber Grufferson and Jade Jack Russell each contributed \$300.Bark PAC deducts transaction fees before forwarding the net amount of \$4,780 to the Pyrite for Congress campaign.



Poll Question

- 1. For this receipt, what should the committee disclose on its report?
 - ☐ A: Contributions forwarded by the conduit
 - ☐ B: Memo entry with conduit information including amount forwarded
 - ☐ C: Both

Poll Answer

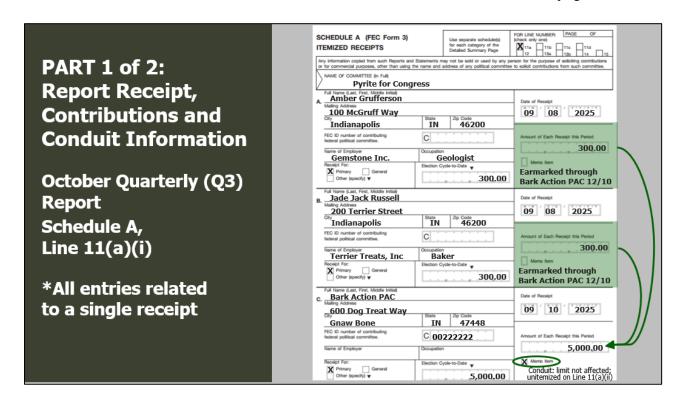
	C:	Both
	B:	Memo entry with conduit information including amount forwarded
	A:	Contributions forwarded by the conduit

1. For this receipt what should the committee disclose on its report?

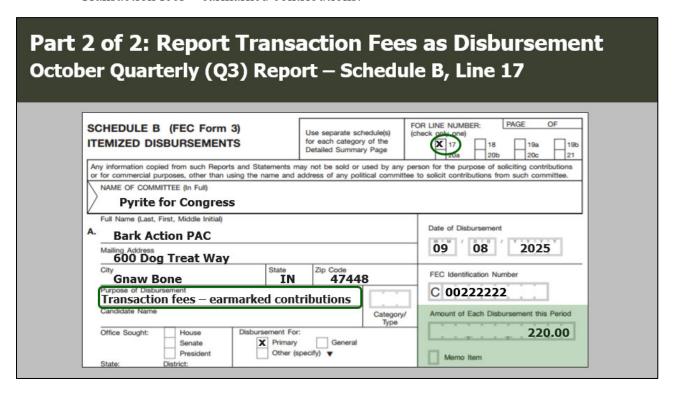
The earmarked contributions collected in this scenario count as contributions from the individuals, since the decision to make the contribution to the candidate was independently made by the individual contributors, not under the PAC's direction or control in its report, the campaign discloses information about the conduit, and includes memo entries to itemize those contributions aggregating more than \$200 per election cycle. The campaign also notes that the PAC's limit was not affected.

- 2. How does the committee disclose the receipt of earmarked contributions? When disclosing earmarked contributions, the committee reports both any itemized contributions from individual(s) and the receipt from the conduit.
 - Report itemized contributions from individual(s) on Schedule A for Line 11(a)(i). The Date of Receipt for these entries is the date the conduit received the money from the contributors. The itemization should also include a notation in the Receipt This Period box indicating, "Earmarked through Bark PAC." Note that each of the \$100 contributions 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 (check "Memo Item" box). 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 "Conduit: limit not affected; unitemized on Line 11(a)(ii)"

Reporting example continues on next page



• Report the Conduit PAC transaction fees as a disbursement on Schedule B for Line 17. The Date of Disbursement is the date the conduit received and processed the contributions. Include a brief but complete Purpose of Disbursement noting "Transaction fees – earmarked contributions."

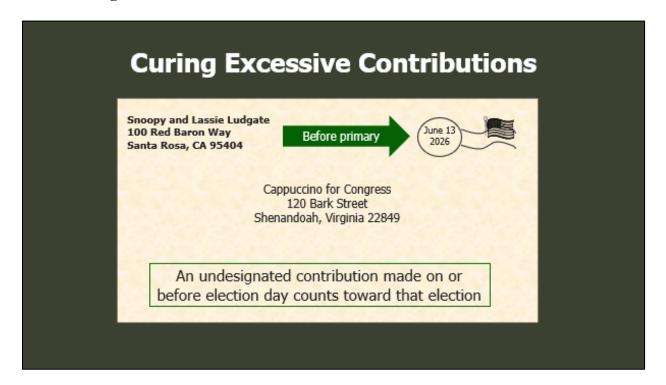


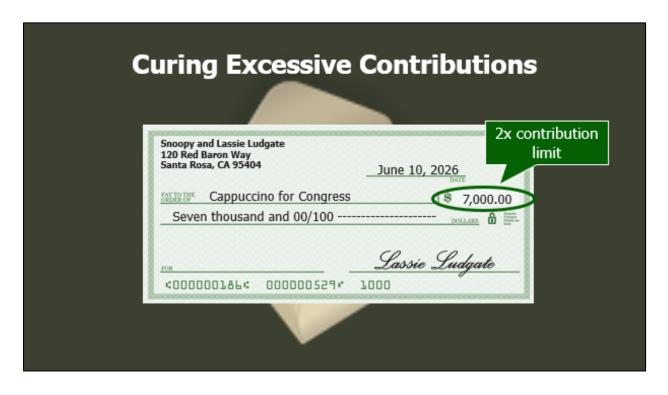
Key issues:

- The date of receipt may be different for the conduit and the contributor(s).
- Use MEMO entry (check the "Memo Item" box) for conduit if the amount of earmarked contributions passed on by the conduit exceeds \$200 in 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.
- If earmarked contributions are received by the conduit during one reporting period, but the conduit transmits the contributions to the campaign during the next reporting period, call the Reports Analysis Division (800-424-9530, option 5) for reporting guidance.

SCENARIO #2: Itemizing Receipts (*Guide*, pp. 99-101)
Curing Excessive Contributions (*Guide*, pp. 26-29; 103-104)

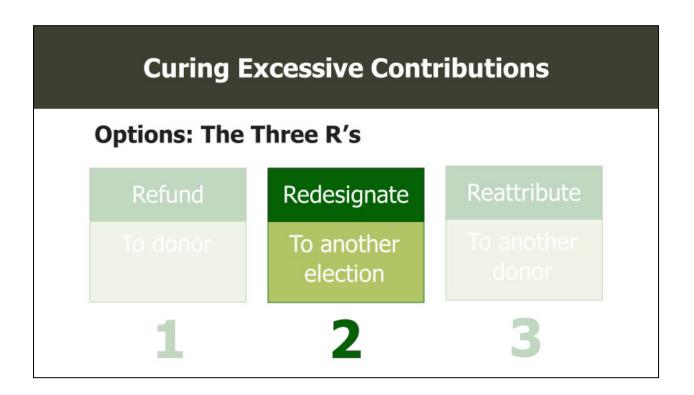
I. Curing Excessive Contributions





Curing Excessive Contributions Options: The Three R's Refund To donor Redesignate To another election To another donor To another 3

A. Refund



B. Redesignate -(11 CFR 110.1(b)(5)(ii)(B)(1)-(4)); (Guide, pp. 26-27)

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, email, 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 available on FEC website: www.fec.gov/resources/cms-

content/documents/fedreg notice 2011-02 EO13892.pdf

Curing Excessive Contributions		
Options: The	ns: The Three R's	
Refund	Redesignate	Reattribute
To donor	To another election	To another donor
1	2	3



- C. Reattribute (11 CFR 110.1(k)(3)(ii)(B)(1)); (Guide, pp. 27-28)
 - 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 \$3,500 to Lassie
- Reattribute the excessive \$3,500 to Snoopy
- Notify both, offering option of refund

* Ensure that donor does not exceed contribution limit

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, email, fax or other written method within 60 days of treasurer's receipt of contribution; must notify contributor of right to receive refund instead.

II. Avoiding Excessive Contributions

Avoid Excessive Contributions

Encourage donors to designate contributions

Obtain signatures for joint contributions

Designation required if:

- Contributing to a **future election** (i.e., not next election)
- Contributing to retire debt from a past election



- **A.** Campaigns Ask contributors to designate contributions for a particular election.
- **B.** Ask joint contributors to both sign check or accompanying statement.

C. Designation of campaign contributions required

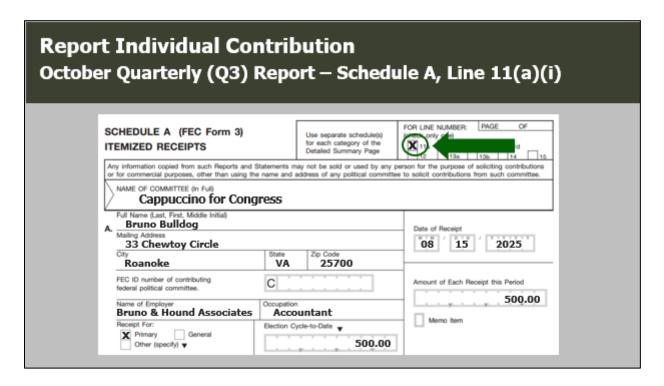
- 1. Contributor intends for contribution to count toward a future election, beyond the upcoming election.
- 2. Contributor wants contribution to retire candidate's debt for a past election. **Note:** This is permissible only if:
 - Candidate has net debt outstanding from that election; and
 - Contribution, when aggregated with previous contributions to same candidate for same election, does not exceed limit.

- D. Presumptive redesignation NOT available for excessive multicandidate committee contributions (only individuals and non-multicandidate committees).
 - 1. Campaign makes request that contributor provide a written, signed statement redesignating contribution for another election. Request must also state that the contributor may instead receive a refund of the excessive amount.
 - 2. Contribution is properly redesignated if, within 60 days of receipt, the campaign receives a written, signed statement redesignating the excessive portion to another election.
 - 3. If the signed authorization is not received within 60 days, the campaign must refund the excessive portion.

SCENARIO #2A: Reporting Individual Contribution



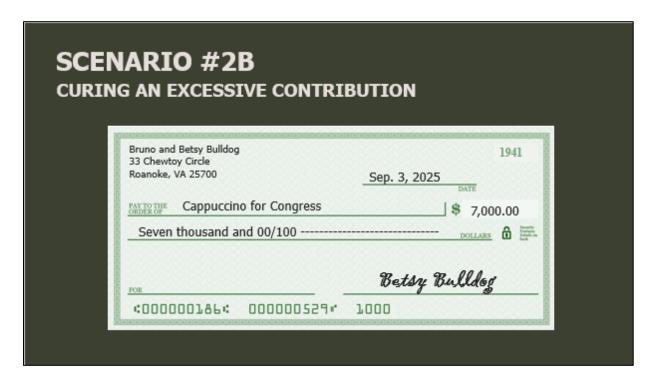
Bruno Bulldog attends a fundraiser for Cappuccino for Congress at Blue Ridge Regional Dog Park and makes a \$500 contribution designated for the 2026 primary.



SCENARIO #2B: Reattribution of Excessive Contributions



Bruno Bulldog talks to his partner, Betsy, about doing more to help support their friend Cappuccino's race for Congress. Betsy mails the campaign a check for \$7,000. The check is undesignated, signed only by Betsy, and the campaign receives the check on September 3, 2025.



1. Can Betsy's contribution check be accepted as written? If not, what must be done to remedy the situation?

No. Potentially, these could be joint contributions. However, since only Betsy signed the \$7,000 check, she has made an excessive contribution for the primary election. To remedy this, the campaign can reattribute the excessive portion of her contribution.

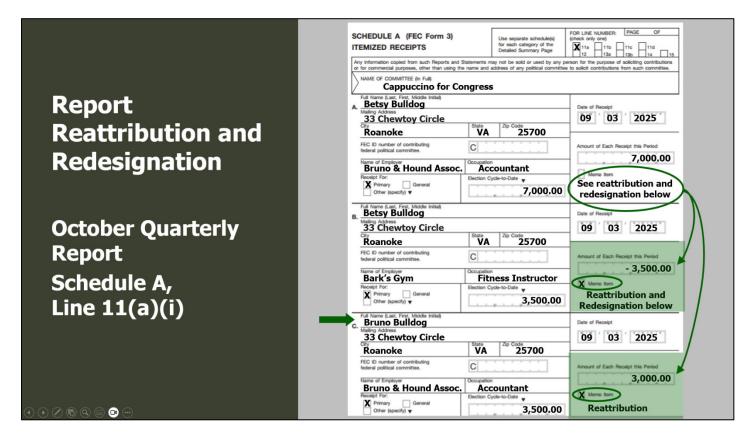
2. How should the transaction that remedies the excessive contribution be disclosed? Since Betsy's contribution is drawn on a joint account, the campaign has the option of reattributing the excessive portion to the joint account holder, Bruno. The campaign may presumptively reattribute the excessive portion (\$3,500) to Bruno for the general 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:

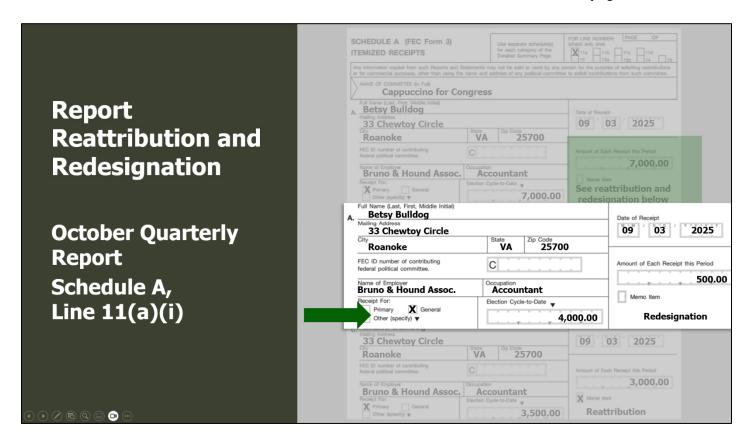
- a. Show check as written: \$7,000 contribution from Betsy Bulldog for the primary; and
- b. Subtract excessive amount of contribution: -\$3,500 removed from Betsy's primary election contribution; and
- c. Reattribute a portion of the excessive amount, \$3,000 to Bruno as primary election contribution; and
- d. Redesignate the remainder of the excessive amount, \$500 to Betsy as a general election contribution.

For all entries, include cross-reference notations: "reattribution" and "reattribution below."

Report reattribution: Show reporting on Schedule A for Line 11(a)(i). Show full \$7,000 as primary election contribution from Betsy Bulldog. Change attribution of part excessive portion to Bruno to \$3,000 as MEMO entry (check "Memo Item" box) and include notation in Amount of Each Receipt this Period box indicating, "reattribution."



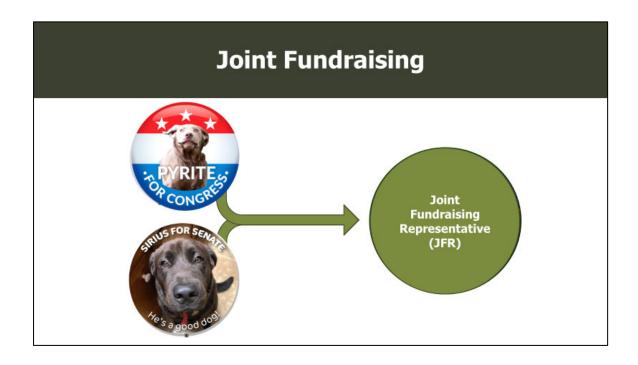
Report redesignation: Change attribution of part excessive portion to Betsy to \$500 as MEMO entry (check "Memo Item" box) and include notation in Amount of Each Receipt this Period box indicating, "redesignation"



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 the per election limits.
- Notification to contributor(s) must be done within 60 days of receipt for presumptive reattributions and must also offer contributor(s) the option to receive a refund instead.

SCENARIO #3: Joint Fundraising (*Guide*, Appendix C, pp. 151-159)



Joint Fundraising Representatives & Solicitations

Joint Fundraising Representatives (JFR)

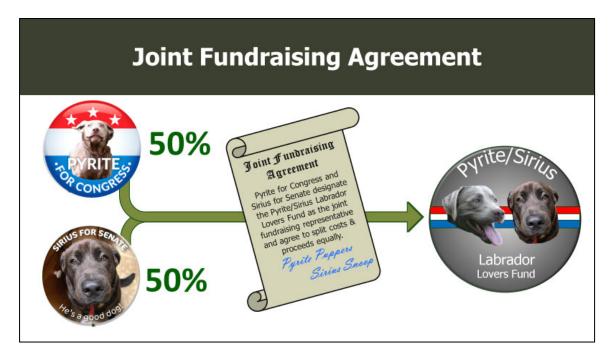
- Participants must designate JFR as authorized committee on FEC Form 1
- JFR collects and deposits joint fundraising contributions
- JFR pays expenses and transfers net proceeds to participants



Joint fundraising representative (JFR)

- 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).
- 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.

- Participants amend FEC Form 1 and FEC Form 2 to designate JFR as an authorized committee.
- Responsible for collecting and depositing joint contributions, paying expenses and allocating net proceeds to all participants.
- Must keep records and report overall joint fundraising activity.



Joint fundraising agreement:

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

Joint Fundraising Solicitations

Joint fundraising solicitations must include specific information:



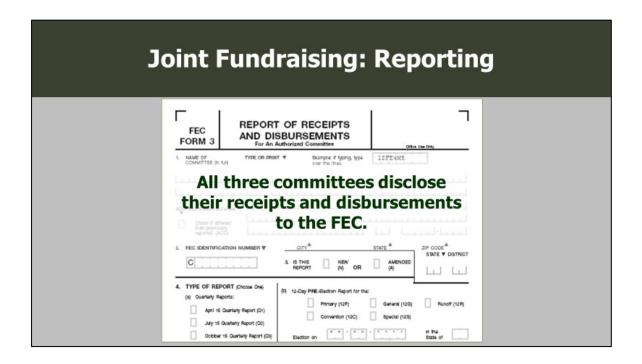
Pyrite/Sirius Labrador Lovers Fund (LLF) is a joint fundraising committee for Pyrite for Congress and Sirius for Senate. Contributions to the LLF will be split 50/50 between the two campaigns, but contributors may specify a different allocation. The allocation formula may change if any contribution would cause a contributor to exceed the limit to one of the campaigns.

Joint fundraising solicitations must state

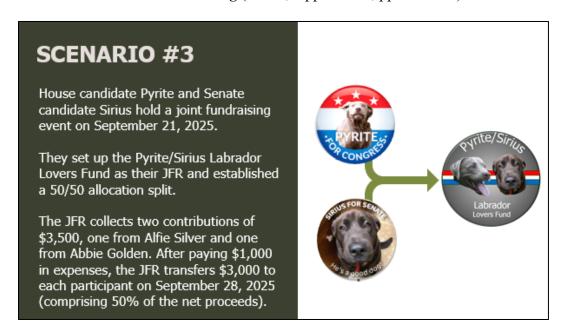
- Names of all participants (regardless of whether they are registered political committees)
- Allocation formula
- Allowance for alternate designation by contributors
- Excessive contributions may change allocation formula 11 CFR 102.17(c)(2)(i)

Solicitations and screening contributions

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



SCENARIO #4: Joint Fundraising (*Guide*, Appendix C, pp. 151-159)



House Candidate Pyrite and Senate Candidate Sirius decide to team up for a joint fundraising event on September 21, 2025. They plan to divide the expenses and proceeds equally and designate the "Pyrite/Sirius Labrador Lovers Fund" as their joint fundraising representative (JFR). They agree to divide up the expenses and proceeds 50/50.

At the event, the JFR collects a total of \$7,000. The only contributions came from Alfie Silver and Abbie Golden for \$3,500 each. Since the proceeds are split evenly (50%) between each candidate, Alfie and Abbie each made a \$1,750 contribution to Pyrite for Congress and a \$1,750 contribution to Sirius for Senate.

The Pyrite/Sirius Labrador Lovers Fund incurs \$1,000 in expenses to put on the September 21 event. Pyrite for Congress receives a check from the JFR on September 28, 2025, in the amount of \$3,000, comprising the committee's 50% share of the net proceeds.



Poll Question

How should the Pyrite for Congress committee disclose the check from the Joint Fundraising Representative (JFR)?

- ☐ A: As a contribution from an individual Line 11a(i)
- ☐ B: As a contribution from a political committee Line 11(c)
- ☐ C: As a transfer from an authorized committee Line 12
- ☐ D: No reporting is necessary

Poll Answer

How should the Pyrite for Congress committee disclose the check from the Joint Fundraising Representative (JFR)?

- ☐ A: As a contribution from an individual Line 11a(i)
- ☐ B: As a contribution from a political committee Line 11(c)
- ☑ C: As a transfer from an authorized committee Line 12
- ☐ D: No reporting is necessary

The funds are coming from the Pyrite/Sirius Labrador Lovers Fund (LLF), the joint fundraising representative (JFR) authorized to raise money for the candidate. Therefore, the receipt is reported as a transfer of funds from an authorized committee. 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 the LLF.

1. 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 as MEMO entries (check "Memo Item" box) for the 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 name and transfer date next to each individual contribution as MEMO text).

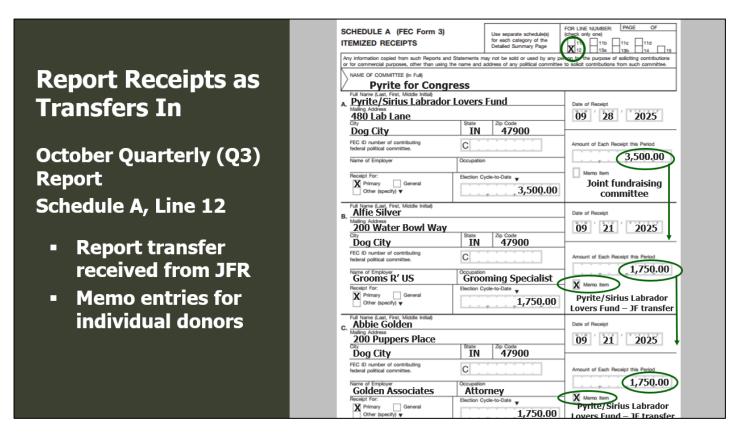


Calculating net proceeds:



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 (check "Memo Item" box). 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, "Pyrite/Sirius Labrador Lovers Fund – Joint Fundraiser."



Key issues on joint fundraising:

- The date of receipt may be different for the JFR and the contributors.
- Report transaction on Line 12 (Transfers from Other Authorized Committee), not 11(a)(i).
- Use MEMO entries (check "Memo Item" box) 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 Item" 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 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.
- **48-Hour Notices:** If applicable, 48-Hour Notices must be filed within 48-hours of receipt. For a joint fundraiser, the date of receipt = date JFR receives the contribution.

SCENARIO #4: Candidate Loans (Guide, pp. 101-102); 48-Hour Notices (Guide, pp. 81, 83)



Candidate Loans and 48-Hour Notices

SCENARIO #4A

On June 4, 2026, Candidate Cappuccino loans her campaign \$10,000 from her personal funds.

She wishes to be paid back in full, no matter how long it may take, and will not charge the committee any interest.

SCENARIO #5A: Candidate Loans - Personal Funds Loan & 48-Hour Notices

On June 4, 2026, Candidate Cappuccino Hound dips into her savings account and gives \$10,000 to her campaign committee as a last push before the primary election. She tells the Campaign Committee's Treasurer, Mocha Brewer, that the funds are to be considered a loan. As more money from other contributors comes in, she wishes to be paid back – no matter how long it may take. Cappuccino will not charge the committee any interest.



Does Cappuccino's personal funds loan to her campaign trigger a 48-Hour Notice?

☐ A: Yes

□ B: No

Poll Answer

Does Cappuccino's personal funds loan to her campaign trigger a 48-Hour Notice?

☑ A: Yes □ B: No

48-Hour Not	tices
Disclose any contribution ≥ \$1,000 received <20 days up to 48 hours	48-HOUR NOTICE OF CONTRIBUTIONS/LOAMS RECEIVED THE SET OF THE SET
before an election using FEC Form 6 Reporting requirements apply to	
contributions from all sources	
	100 2006 Supple Supple

48-Hour Notices

- Applies to all kinds of contributions (individual, political committees, personal funds from the candidate, loans from the candidate, endorsements or guarantees of loans from banks, joint fundraising and earmarked contributions).
- Principal campaign committees must file special notices for 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 (even if candidate is unopposed in the election).
- The expedited disclosure requirements apply to all types of contributions received, including contributions collected through a joint fundraising effort.
- The notices must reach the FEC 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.
- Last-minute contribution must also be itemized on committee's next scheduled report.
- Where and how to file 48-Hour Notices
 - o File with the FEC
 - Electronic filer: file electronically.
 - Paper filer: file via fax or online using the FEC website.
 - o Campaign committees file their 48-Hour Notices using **FEC Form 6:**
 - FECFile or other commercial filing software
 - Online webform: webforms.fec.gov/onlinefiling/form6/login.htm
 - Paper form: www.fec.gov/resources/cms-content/documents/fecfrm6.pdf

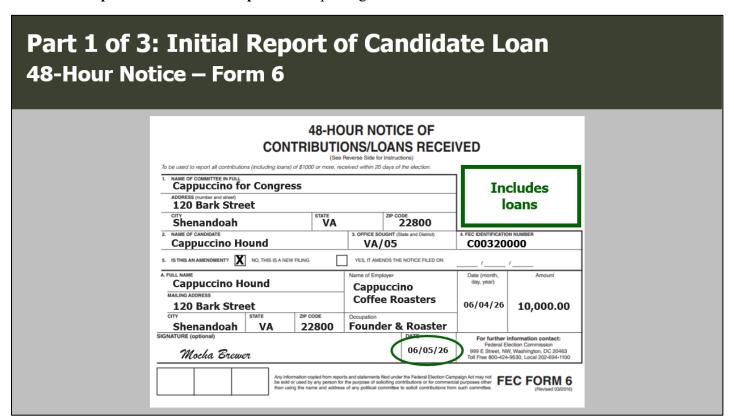
1. Should the committee disclose the personal funds loan? If so, how should the committee disclose it? Does the personal funds loan trigger a 48-Hour Notice?

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

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

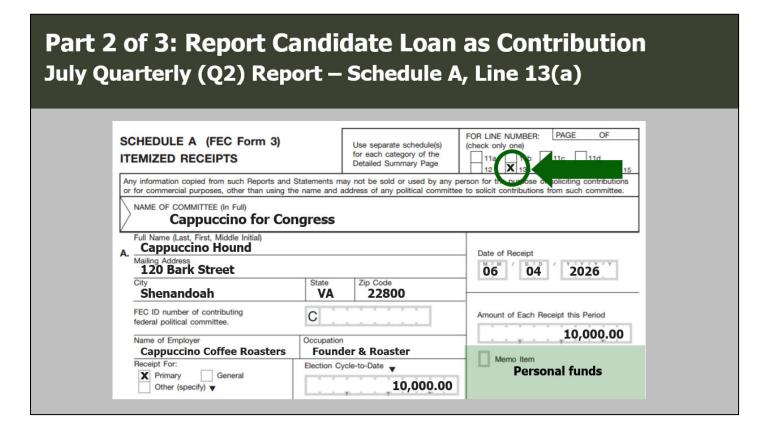
Cappuccino Hound is participating in the primary election on June 16, 2026. The applicable 48-Hour Notice period runs from May 28 through June 13. Therefore, the \$10,000 personal funds loan received on June 4 falls inside this period and triggers the 48-Hour Notice requirements. The contribution must be reported to the FEC by June 16, 2026.

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



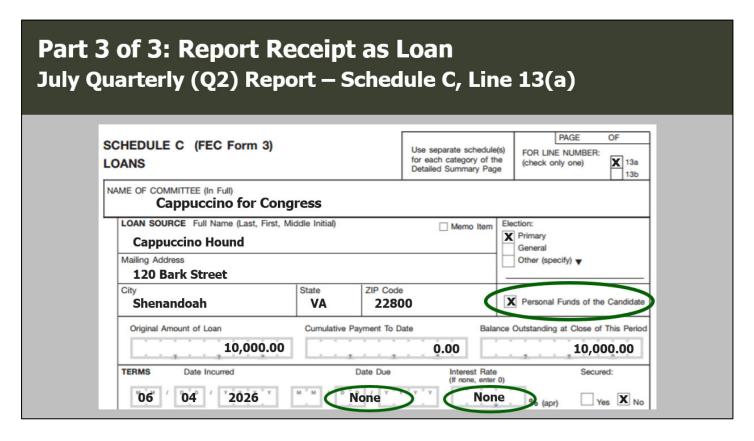
As a last-minute contribution, the personal funds loan must also be itemized on the campaign committee's next scheduled report.

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."



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.





After the campaign, Treasurer Mocha Brewer is working to close out the books on the 2026 election.

The only outstanding debt is the \$2,000 balance left on Cappuccino's personal funds loan. The candidate decides to forgive the loan balance and convert it to a contribution.





Candidate Loan Forgiveness

SCENARIO #5B: Candidate Loans - Forgiveness of Candidate's Personal Funds Loan (Guide, pp. 140-142)

After a successful election campaign, Treasurer Mocha Brewer is working to close out the books on the 2026 election. After the general election bills have been paid, the one outstanding committee debt is a \$2,000 balance on Cappuccino's personal funds loan. Mocha meets with Cappuccino to talk about the money her committee still owes her. Wanting to take a break from fundraising until the next year, Cappuccino decides simply to forgive the loan balance and convert it to a contribution.

1. How should the committee show the forgiveness of a loan by the candidate? A candidate may forgive all or a portion of a loan he/she made to the campaign. The forgiven balance becomes a contribution from the candidate.

Candidate Loan Forgiveness

- ⇒ Written, signed letter from candidate
- Schedules B and C do not show payments
- ⇒ Ensure loan ending balance is correct



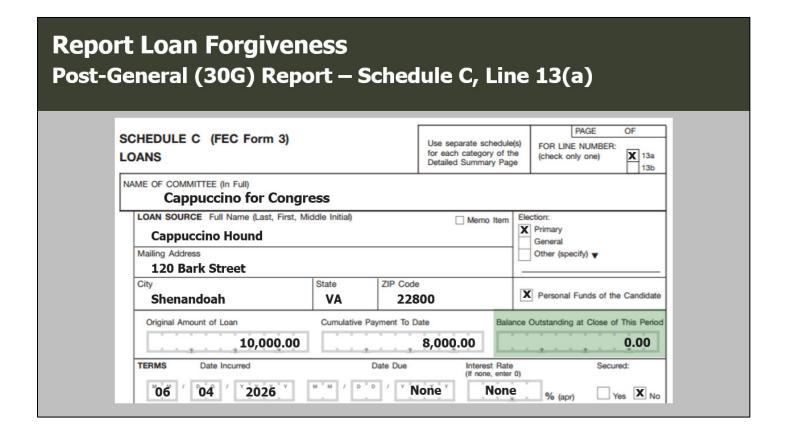
November 21, 2026 To: Treasurer Mocha Brewer I hereby forgive the \$2,000 outstanding balance of my personal funds loan to my campaign committee. Sincerely, Cappuccino Hound

The candidate must write a letter, preferably on campaign letterhead, addressed to the FEC stating that he/she forgives the loan. The candidate's original signature must be on this letter.

Note that **this requirement applies to paper and electronic filers alike**. Memo text at the end of an electronically filed report stating that the candidate forgave the loan will not be accepted in lieu of the letter.

Report candidate forgiveness of the loan: Show reporting on Schedule C for Line 13(a). The "Balance Outstanding at Close of This Period" should be \$0.

NOTE: Do not include the forgiven loan balance in the "Cumulative Payment To Date," total since the money was not actually repaid.



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).
 - Onn'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."
 - o Include notations on both Schedules A & C indicating "personal funds."
 - When the candidate forgives a loan, the committee should file <u>a letter</u> signed by the candidate stating that the loan is forgiven for both paper and electronic filers.

• Tips for a candidate loan from lending institution

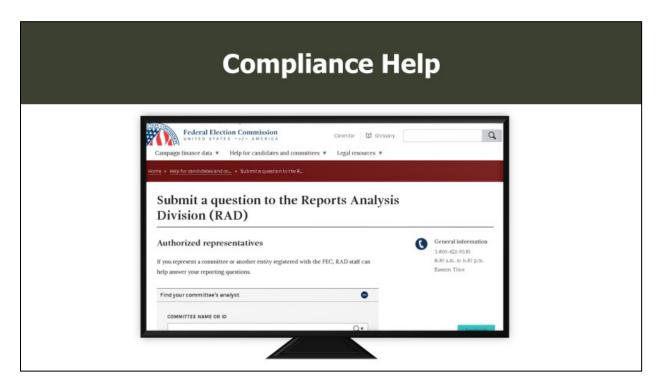
- When the candidate obtains a loan from the bank and then loans those funds to the campaign, report using Schedule A for Line 13(a), Schedule C for Line 13(a), and Schedule C-1.
- On't forget to include loan terms. Often terms on C-1 and C will differ. The candidate is able to use different terms than the bank (including no repayment conditions). The bank must have terms offered in the normal course of business.
- o Remember to include notations i.e., "home equity line of credit."
- o 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.
- o 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. A separate copy of the Schedule C-1 that contains the original signature from the lending institution and a copy of the loan agreement must be submitted to the FEC, even for electronic filers.

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 candidate has opposition).
- 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
- Campaign committees file 48-Hour Notices with the FEC. Electronic filers must file electronically; paper filers may file via fax or online using the FEC website.

FEC Form 6

- o FECFile or other commercial filing software
- Online webform: webforms.fec.gov/onlinefiling/form6/login.htm
- o Paper form: www.fec.gov/resources/cms-content/documents/fecfrm6.pdf



www.fec.gov/help-candidates-and-committees/question-rad/

More Reporting Help

Guides for campaigns and committees www.fec.gov/help-candidates-and-committees/guides/

FECTube YouTube channel (including "Help with FECFile") www.youtube.com/user/FECTube

Extended phone coverage

Call your analyst! 800-424-9530, press 5

<u>www.fec.gov/help-candidates-and-committees/guides/www.youtube.com/user/FECTube</u>



Evaluation link: https://fec.ethn.io/161112

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