



FECConnect
LIVE

Party Committee Operations, Part 1



March 4 1:00 p.m. – 2:30 p.m.

Objectives



Discuss fundraising and sources of support



Review restrictions on nonfederal fundraising by candidates/officeholders



Identify ways party can support its candidates

PART A: FUNDRAISING

I. Organize Accounts

Bank Account Basics

Committees must have at least one checking account at a federally-insured institution

Committees may invest funds, but all receipts and disbursements must pass through checking account

- A. Establishing a federal account (11 CFR [103.2](#) and [103.3](#))** (*Guide*, pp. 4-5)
1. Party committee must establish one or more federal accounts and designate a campaign depository at a federally insured institution.
 2. Committee may invest the funds, but all federal receipts and disbursements must be made through the checking account.

Federal Accounts ONLY:

National party committees are prohibited from raising or spending nonfederal funds



National Party Committees

B. National party committees ([11 CFR 300.10](#))

National party committees, their agents, or any entity established, financed, maintained or controlled by a national party committee are prohibited from raising, spending, soliciting, receiving or directing funds that are not subject to the limitations, prohibitions and reporting requirements of the Federal Election Campaign Act (i.e., “soft money”).

Additional National Party Accounts

Presidential nominating conventions



Construction, purchase, operation & renovation of party headquarters



Election recounts, contests and other legal proceedings



C. Accounts for national party committees – (*Consolidated and Further Continuing Appropriations Act, 2015 (H.R. 83)*)

1. “Convention account”

- a) Separate, segregated account used to defray expenses with respect to a presidential nominating convention.
- b) **Not** available to the national party’s senate and congressional campaign committees.

2. “Headquarters account”

- a) Separate, segregated account used to defray expenses with respect to the “construction, purchase, renovation, operation and furnishing of one or more headquarters buildings of the party.
- b) Available to **all** national party committees.

3. “Recount account”

- a) Separate, segregated account used to defray expenses with respect to the “preparation for and the conduct of election recounts and contests and other legal proceedings.”
- b) Available to **all** national party committees.

Contribution Limits



For 2025-26 Elections	Candidate Committee per election	PAC (SSF and Nonconnected) per year	State, District & Local Party Committee per year	National Party Committee per year	Additional National Party Committee Accounts per year
Individual	\$3,500	\$5,000	\$10,000 (combined)	\$44,300 x 3 =	\$132,900
Candidate Committee	\$2,000	\$5,000	Unlimited Transfers	Unlimited Transfers	
PAC: Multicandidate	\$5,000	\$5,000	\$5,000 (combined)	\$15,000 x 3 =	\$45,000
PAC: Nonmulticandidate	\$3,500	\$5,000	\$10,000 (combined)	\$44,300 x 3 =	\$132,900
National Party Committee	\$5,000	\$5,000	Unlimited Transfers	Unlimited Transfers	
State, District & Local Party Committee	\$5,000 (combined)	\$5,000 (combined)	Unlimited Transfers	Unlimited Transfers	

State/Local Party Accounts

State and local parties may have three different types of bank accounts:

1. Federal



2. Nonfederal



3. Levin



D. Three types of accounts for state/local party committees – (11 CFR [102.5\(a\)](#) and [300.30](#)); (*Guide*, pp. 4-5)

1. Federal account – required for federal activity

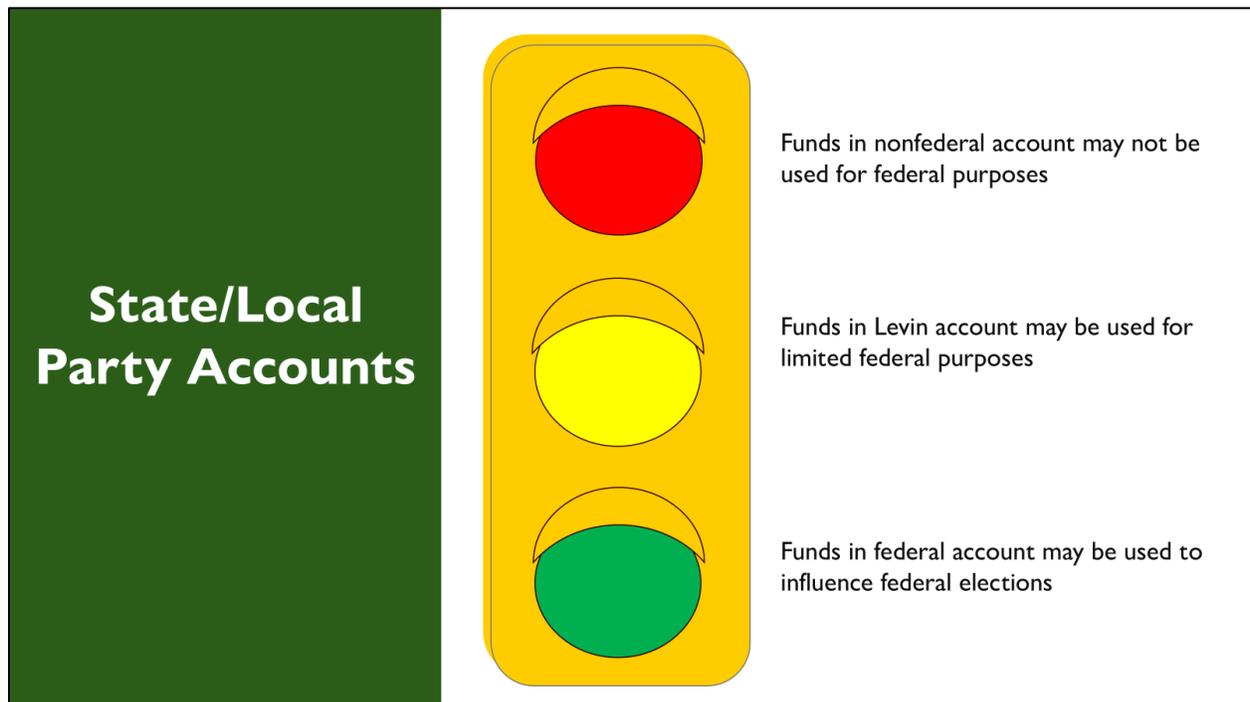
Federal funds comply with the limitations, prohibitions and reporting requirements of the Federal Election Campaign Act (the Act).

2. Nonfederal account – optional under federal law

Nonfederal funds are governed by state law. Not reportable to the FEC.

3. Levin account – optional under federal law

- a) Levin funds comply with some of the limits and prohibitions of the Act and are also governed by state law.
- b) Used to pay a portion of certain Federal Election Activity (FEA). (FEA discussed in detail in *Party Operations, Part 2.*)
- c) Note: Levin Funds may also be deposited into nonfederal account.



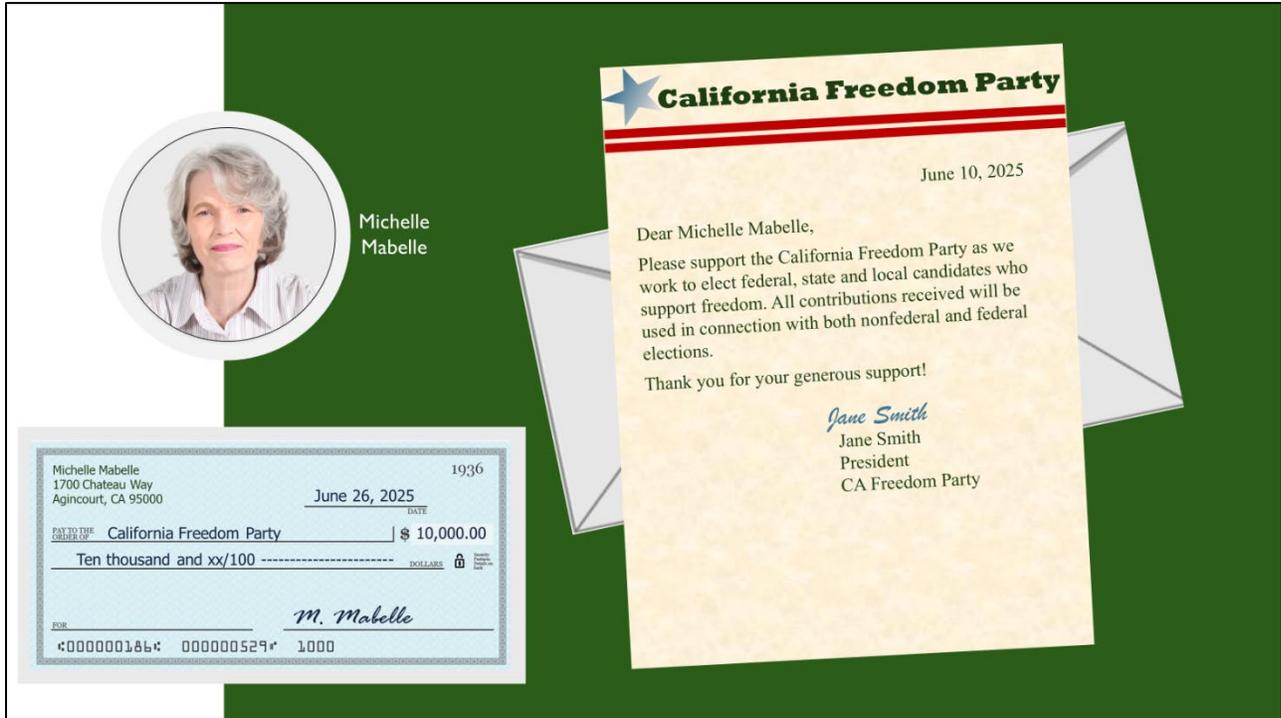
Must meet one of these conditions:

1. Designated by contributor for federal account
2. Solicited for federal account
3. Contributors informed that contribution is subject to federal limits and prohibitions

**Federal Account
Deposits**



- E. Deposits into the federal account** – (11 CFR [102.5\(a\)](#) and [300.30\(b\)\(3\)](#)); (*Guide*, p. 5)
- 1. Solicitation notice**
All funds deposited into the party’s federal account must meet one of the following conditions:
 - a) Designated or solicited for the federal account**
Funds must be designated by the contributor or expressly solicited for use in connection with federal elections; or
 - b) Contributors informed**
Contributors must be informed that contribution is subject to federal limits and prohibitions, e.g., in the initial solicitation.



Reporting Scenario #1

On June 10, the California Freedom Party sends out a solicitation for contributions. The solicitation states that the funds received will be used in connection with both nonfederal and federal elections. The committee receives a check from Michelle Mabelle in the amount of \$10,000 on June 26.

- 1. May the committee deposit the check in the federal account?**
- 2. How should the committee report the receipt of the check?**
- 3. When examining the check from Ms. Mabelle, what “red flags” should the committee consider when deciding if the check is permissible?**

Reporting Scenario #1 Answers:

1. May the committee deposit the check in the federal account?

Answer: Yes, because the solicitation stated that the funds would be used in connection with federal elections. Alternatively, the solicitation could have stated that the contributions are subject to the limits and prohibitions of the Act. Either would satisfy [11 CFR 102.5\(a\)\(2\)](#).

2. How should the committee report the receipt of the check?

Answer: The contribution is more than \$200 so it should be itemized on Schedule A for Line 11(a)(i).

Reporting Federal Receipts

**July Monthly (M7) Report:
FEC Form 3X, Schedule A, Line 11(a)**

SCHEDULE A (FEC Form 3X)		FOR LINE NUMBER: (check only one)	
ITEMIZED RECEIPTS		PAGE OF	
<small>Use separate schedule(s) for each category of the Detailed Summary Page</small>		<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 12
		<input type="checkbox"/> 11b	<input type="checkbox"/> 13
		<input type="checkbox"/> 11c	<input type="checkbox"/> 14
		<input type="checkbox"/> 15	<input type="checkbox"/> 16
		<input type="checkbox"/> 17	<input type="checkbox"/> 17

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) California Freedom Party Committee	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Mabelle, Michelle	
Mailing Address 1700 Chateau Way	
City Agincourt	State Zip Code CA 95000
FEC ID number of contributing federal political committee. C	Date of Receipt 06 / 26 / 2025
Name of Employer (for Individual) Beatle, Inc.	Occupation (for Individual) Chief Counsel
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Amount of Each Receipt this Period 10,000.00 <input type="checkbox"/> Memo Item
Aggregate Year-to-Date ▼ 10,000.00	

3. When examining the check from Ms. Mabelle, what “red flags” should the committee consider when deciding if the check is permissible?

Answer: Is the check a personal check? Is the check drawn on the account of a corporation or LLP? Is the address on the check a foreign address?



Poll Question #1

The California Freedom Party receives an additional \$50,000 from Michelle Mabelle for its “convention account.” May the party accept the contribution?

- A: Yes, state party committees can accept convention account contributions.
- B: No, state parties do not have additional federal accounts; only national parties do.

Poll Question #1 Answer

The California Freedom Party receives an additional \$50,000 from Michelle Mabelle for its “convention account.” May the party accept the contribution?

- A: Yes, state party committees can accept convention account contributions.
- B: No, state parties do not have additional federal accounts; only national parties do.

II. Contribution Exemption: Volunteer Services (*Guide*, pp. 27-28)

<h3>Volunteer Activity</h3>	<p>Volunteer services Unlimited, uncompensated personal services</p> <p>Personal property Individuals use of personal property (e.g., home, computer)</p> <p>Home event \$2,000/year per individual living in the home</p> <p>Unreimbursed travel Individual payment for own travel (on behalf of the party) up to \$2,000 per year</p>
	

- A. **Services of individual volunteer**
No limit on services provided without compensation by any individual.
[11 CFR 100.74.](#)
- B. **Use of real or personal property** (e.g., home or personal computer)
 - 1. **Unlimited when used for volunteer services** ([11 CFR 100.75](#))
 - 2. **Use of home or community room for event**
 - a) Individual may spend up to \$2,000/year for food, beverage and invitations in connection with event held at above locations.
[11 CFR 100.77.](#)

- b) Community room must be used on a regular basis by community for non-commercial purposes and must be available regardless of political affiliation.
- c) Nominal fee paid for use of community room is not a contribution.

C. Unreimbursed travel

Individual may spend up to \$2,000/year for his/her own unreimbursed travel on behalf of the party. [11 CFR 100.79](#).

III. Contribution Exemption: Food/Beverage Vendor Discounts (*Guide*, p. 28)

Vendor (even if incorporated) may sell food and beverages to the party at discount

Cumulative amount of discount limited to \$2,000 per year

Party must pay at least the vendor's cost




A. How exemption works

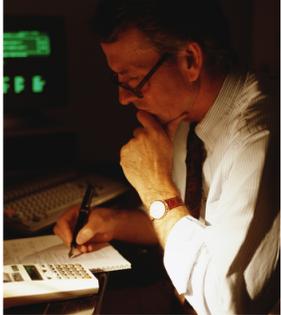
Food and beverage vendors may sell food or beverages at a discount, provided that:

1. Charge must at least equal actual cost to vendor.
2. Discount may not exceed \$2,000/year. [11 CFR 100.78](#) and [114.1\(a\)\(2\)\(v\)](#).

B. Vendor may be incorporated

IV. Contribution Exemption: Free Legal and Accounting Services (*Guide*, p. 27)

Legal and Accounting Services



Entity may provide free legal & accounting services to the party as long as:

- Services do not directly further election of candidate
- Entity paying is regular employer
- Employer does not hire additional employees to perform the service
- Party reports the name of provider, date of service and value

A. **Provided by employers**

An employer (e.g., law or accounting firm) may provide unlimited legal and accounting services as long as certain conditions are met.

B. **Conditions for exemption**

1. Services may not directly further election of specific federal candidate.
2. Entity paying for services must be regular employer of individual performing the service.
3. Employer may not hire additional employees to free regular employees to perform the service.

C. **Reporting**

Party must report name of provider, date of service and value. Report the value of services received by using a memo entry on Schedule A of Form 3X. 11 CFR [100.85](#), [104.3\(h\)](#) and [114.1\(a\)\(2\)\(vi\)](#).



Poll Question #2

A California Freedom Party volunteer spends \$4,000 on food, beverages and invitations for a party fundraising event at her home. She spends an additional \$1,000 for valet parking services. How should the party treat the volunteer's expenditures?

- A: Report all \$5,000 as an in-kind contribution.
- B: \$3,000 is reported as an in-kind contribution; \$2,000 falls under the volunteer exemption for food, beverages and invitations.
- C: None of the \$5,000 is reported.

Poll Question #2 Answer

A California Freedom Party volunteer spends \$4,000 on food, beverages and invitations for a party fundraising event at her home. She spends an additional \$1,000 for valet parking services. How should the party treat the volunteer's expenditures?

- A: Report all \$5,000 as an in-kind contribution.
- B: \$3,000 is reported as an in-kind contribution; \$2,000 falls under the volunteer exemption for food, beverages and invitations. (Valet services do not fall under this exemption.)
- C: None of the \$5,000 is reported.

V. Participation by Federal Candidates and Officeholders at Nonfederal Fundraising Events ([11 CFR 300.60 – 300.65](#))

Fundraising by Candidates or Officeholders

Prohibited Activity

Generally, federal candidates and officeholders cannot solicit, receive, direct, transfer, spend or disburse funds outside of federal limits or from prohibited sources in connection with elections

- A. **Fundraising restrictions** (*Guide*, pp. 22-23)
 - 1. **In connection with federal elections**
The persons described below may not solicit, receive, direct, transfer, spend or disburse funds in connection with federal elections unless the amounts consist of federal funds that are subject to the limitations, prohibitions, and reporting requirements of the Act. [11 CFR 300.61](#).

2. In connection with nonfederal elections

In addition, the persons described below may solicit, receive, direct, transfer spend or disburse funds in connection with any nonfederal election, only in amounts and from sources that are consistent with state law, and that do not exceed the Act's contribution limits or come from prohibited sources under the Act. [11 CFR 300.62](#).

B. Application

The fundraising restrictions apply to the following:

- 1. Federal candidates;**
- 2. Federal officeholders;**
- 3. Agents acting on behalf of federal candidates or officeholders** (See [AO 2003-10](#)); and
- 4. Entities directly or indirectly established, financed, maintained or controlled by, or acting on behalf of, one or more federal candidates or officeholders** (e.g., a Leadership PAC).
See [AO 2003-12](#) and [11 CFR 300.60](#).

Fundraising by Candidates or Officeholders



Candidate/Officeholder may:

- Attend, speak or be a featured guest at event where nonfederal or Levin funds are raised
- Solicit funds at event only if solicitation is limited to federal funds
 - ▶ Written notice OR oral statement
 - ▶ Must be clear and conspicuous

C. Attendance at nonfederal fundraising event ([11 CFR 300.64\(b\)](#))

A federal candidate or officeholder may:

1. Attend, speak at, or be a featured guest at a nonfederal fundraising event.

2. Solicit funds at a nonfederal fundraising event, provided that the solicitation is limited to funds that comply with the amount limitations and source prohibitions of the Act and that are consistent with state law.
 - a) A federal candidate or officeholder may limit the solicitation by displaying a clear and conspicuous written notice, or making a clear and conspicuous oral statement, that the solicitation is not for Levin funds (when applicable), does not seek funds in excess of \$ [federally permissible amount], and does not seek funds from corporations, labor organizations, national banks, federal government contractors, or foreign nationals.
 - b) Note: a written notice or oral statement is not clear and conspicuous if it is difficult to read or hear or if its placement is easily overlooked.

Party MAY use candidate/officeholder name/likeness in publicity that:

- Does not contain a solicitation
- Solicits only federal funds
- Solicits nonfederal or Levin funds, IF . . .
 - ▶ Candidate/officeholder identified in manner not specifically related to fundraising (e.g., honored guest) AND
 - ▶ Publicity includes disclaimer that solicitation is not being made by the candidate/officeholder

**Fundraising by
Candidates or
Officeholders**



- D. Publicity for nonfederal fundraising events ([11 CFR 300.64\(c\)](#))**
(Publicity for a nonfederal fundraising event includes, but is not limited to, advertisements, announcements, or pre-event invitation materials, regardless of format or medium of communication.)
- 1. Publicity that does not contain a solicitation**
A federal candidate or officeholder or an agent of either may approve, authorize, agree to, or consent to the use of his or her name or likeness in publicity for a nonfederal fundraising event that does not contain a solicitation.

2. Publicity containing solicitation limited to federal funds

A federal candidate or officeholder or an agent of either may approve, authorize, agree to, or consent to the use of his or her name or likeness in publicity for a nonfederal fundraising event that solicits only funds that comply with the amount limitations and source prohibitions of the Act.

Even if communication includes a disclaimer

- MAY NOT use candidate/officeholder name or likeness in publicity that solicits nonfederal funds if he/she:
 - ▶ Serves in position specifically related to fundraising;
 - ▶ Is extending an invitation to the event; OR
 - ▶ Signs the communication

**Fundraising by
Candidates or
Officeholders**



3. Publicity containing solicitation of nonfederal funds

A federal candidate or officeholder or an agent of either may approve, authorize, agree to, or consent to the use of his or her name or likeness in publicity for a nonfederal fundraising event that contains a solicitation of funds outside the amount limitations and source prohibitions of the Act or Levin funds **ONLY** if:

- a) The federal candidate or officeholder is identified as a featured guest, honored guest, special guest, featured speaker, or honored speaker, or in any other manner not specifically related to fundraising; **AND**
- b) The publicity includes a clear and conspicuous disclaimer that the solicitation is not being made by the federal candidate or officeholder. [11 CFR 300.64\(c\)\(3\)\(i\)\(B\)](#).

Fundraiser Publicity

Candidate/officeholder **MAY NOT** disseminate publicity for nonfederal fundraiser that includes solicitation of nonfederal/Levin funds by someone other than the candidate/officeholder.

E. Disclaimers on publicity

1. Clear and conspicuous

a) On written publicity

The clear and conspicuous disclaimer required by [11 CFR 300.64\(c\)\(3\)\(i\)\(B\)](#) must meet the existing requirements in [11 CFR 110.11\(c\)\(2\)](#) (i.e., contained in a box set apart from the rest of the communication) if the publicity is written. **Disclaimer requirements discussed in the Basics for Beginners workshop.**

b) On non-written publicity

Where publicity is disseminated by non-written means, the clear and conspicuous disclaimer is required only if the publicity is recorded or follows any form of written script.

c) Examples

Examples of clear and conspicuous disclaimers include, but are not limited to:

- “[Name of federal candidate/officeholder] is appearing at this event only as a featured speaker. [federal candidate/officeholder] is not asking for funds or donations;” or
- “All funds solicited in connection with this event are by [name of nonfederal candidate or entity], and not by [federal candidate/officeholder].”

- d) **Use of fundraising titles/candidate signature**
A federal candidate or officeholder or an agent of either may not approve, authorize, agree to, or consent to the use of his or her name or likeness in publicity for a nonfederal fundraising event that contains a solicitation of funds outside the amount limitations and source prohibitions of the Act or of Levin funds if:
- (1) The federal candidate or officeholder is identified as serving in a position specifically related to fundraising, such as honorary chairperson or member of a host committee, or is identified in the publicity as extending an invitation to the event, even if the communication contains a written disclaimer as described in paragraph (c)(3)(i)(B) of this section; OR
 - (2) The federal candidate or officeholder signs the communication, even if the communication contains written disclaimer as described in paragraph (c)(3)(i)(B) of this section.
- e) **Dissemination by federal candidate or agents**
A federal candidate, officeholder, or an agent of either, may not disseminate publicity for a nonfederal fundraising event that contains a solicitation of funds outside the amount limitations and source prohibitions of the Act or Levin funds by someone other than the federal candidate or officeholder.

Examples of Permissible Solicitations:

Example: Permissible

Note: Federal candidates & officeholders may be identified in any role or manner on publicity that does not contain a solicitation

No solicitation

The California Freedom Party (nonfederal account) cordially invites you to an event with

HONORARY CHAIR
U.S. REPRESENTATIVE
DESMOND JONES

Friday, June 7th, 7 P.M.
Breakers Hotel
1234 Bay City Avenue

Paid for by the California Freedom Party and not authorized by any candidate or candidate's committee. www.CAfreedomparty.com

Because this example does not contain a solicitation, no additional disclaimer is required other than any existing applicable federal disclaimer.
(This example does not address any other applicable requirement under State law.)

Example: Permissible

Federal officeholder must be identified in a non-fundraising role because this contains a solicitation outside the federal amount limitations.

Contains a solicitation outside the federal amount limits and source prohibitions

The California Freedom Party (nonfederal account) cordially invites you to a fundraiser with

HONORED SPEAKER
REPRESENTATIVE DESMOND
JONES

Friday, June 7th, 7 P.M.
Breakers Hotel
1234 Bay City Avenue

Please RSVP with your \$25,000 contribution to (123) 456-7890.
Make checks payable to the California Freedom Party.

All solicitations of funds in connection with this event are by the California Freedom Party and not by Representative Jones. Paid for by the California Freedom Party and not authorized by any candidate or candidate's committee. www.CAfreedomparty.com

Includes a solicitation outside the federal limits and prohibitions, so it needs a clear & conspicuous disclaimer that the solicitation is not being made by the federal officeholder.
The solicitation disclaimer may be placed in the same box as any other applicable federal disclaimer. Though not included in this example, any disclaimer required under state law, should be placed outside of the federal box.

Example of an Impermissible Solicitation:

Example: Impermissible

Contains a solicitation outside the federal amount limits and source prohibitions

Federal officeholder impermissibly extends invitation on publicity containing a solicitation for funds outside the federal limits and prohibitions.

This problem cannot be "cured" by including a disclaimer that the impermissible solicitation is not being made by the federal officeholder.

Congressman Desmond Jones cordially invites you to a fundraising event for the California Freedom Party (nonfederal account)

Friday, June 7th, 7:00 PM
Speakers Hall
1234 Main Street, Sacramento, CA 95811

Please RSVP with your \$25 contribution to (123) 456-7890. Make checks payable to the California Freedom Party (nonfederal account).

All solicitations of funds in connection with this event are for the California Freedom Party and not by Representative Jones. This is not an authorized campaign for the California Freedom Party and not authorized by the candidate or candidate's committee. www.CAfreedomparty.com



Poll Question #3

The California Freedom Party would like to send invitations to a fundraiser with U.S. Representative Desmond Jones listed as the honorary chair. Is this permissible?

- A: Yes, but only if the representative solicits funds within the federal limits and prohibitions.
- B: Yes, they are always allowed to serve as a chair of a fundraising drive for a state party.
- C: No, officeholders and candidates may never raise money for any political party.

Poll Question #3 Answer

The California Freedom Party would like to send invitations to a fundraiser with U.S. Representative Desmond Jones listed as the honorary chair. Is this permissible?

- A: Yes, but only if the representative solicits funds within the federal limits and prohibitions.**
- B: Yes, they are always allowed to serve as a chair of a fundraising drive for a state party.
- C: No, officeholders and candidates may never raise money for any political party.

PART B: SPENDING PARTY FUNDS

Supporting Federal Candidates

- ▶ Contributions
- ▶ Exempt Activities
- ▶ Coordinated Party Expenditures
- ▶ Independent Expenditures
- ▶ Federal Election Activities (FEA)



I. Contribution Limitations From Party Committees (11 CFR [110.1](#) and [110.2](#))
(*Guide* pp. 35-40)

2025-26 Election Cycle	House Candidate	Senate Candidate
National Party May Give:	\$5,000/election	\$5,000/election (plus \$62,000 from Nat'l & SCC/campaign)
State & Registered Local Party May Give:	\$5,000/election (combined limit)	\$5,000/election (combined limit)
Unregistered Local Party May Give:	\$3,500/election; will trigger registration	\$3,500/election; will trigger registration

- A. By national party committees**
1. **To congressional candidates** – \$5,000 per candidate, per election. [11 CFR 110.2\(b\)](#).
 2. **To senatorial candidates**
 - a) \$5,000 per candidate, per election. [11 CFR 110.2\(b\)](#).
 - b) National Committee plus Senatorial Campaign Committee together may contribute an additional \$62,000 per campaign. (Note: indexed for inflation.) [11 CFR 110.2\(e\)](#).
- B. By state, district and local party committees**
1. **To congressional and senatorial candidates**
 - a) \$5,000 per candidate, per election (combined), if multicandidate. [11 CFR 110.2\(b\)](#).
 - b) \$3,500 per candidate, per election, if not multicandidate committee. [11 CFR 110.1\(b\)](#).
 2. **Made by unregistered local party organizations**
May contribute \$3,500 per candidate, per election (indexed for inflation), BUT
 - a) Permissible funds must be used.
 - b) Counts towards \$1,000/calendar year registration threshold. [11 CFR 100.5\(c\)](#) and [110.1\(b\)](#). See also [AO 1999-04](#).



Reporting Scenario #2 - Reporting Contributions to Federal Candidates

Congressman Desmond Jones was unsuccessful in his 2026 re-election campaign and lost in the March 5 primary to newcomer, Penny Lane. Congressman Jones's campaign has a significant amount of primary election debt and the California Freedom Party would like to help the campaign pay it down.

- 1. Under what circumstances may the Freedom Party make a contribution to retire Congressman Jones's primary election debt? Are there any special reporting rules?**

Scenario #2 Answer:

Debt Retirement Contribution

**April Monthly (M4) Report:
Schedule B, Line 23**

SCHEDULE B (FEC Form 3X)		FOR LINE NUMBER: (check only one)		PAGE OF		
ITEMIZED DISBURSEMENTS		<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
		<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)	
California Freedom Party	
Full Name (Last, First, Middle Initial)	
A. Desmond Jones 2026	
Mailing Address	
1000 Santa Monica Street	
City	State Zip Code
Studio City	CA 94000
Purpose of Disbursement	
2026 Primary Debt Retirement	
Candidate Name	Category/Type
Desmond Jones	011
Office Sought:	Disbursement For:
<input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2026 Primary Debt Retirement
State: CA	District: 25
Date of Disbursement	
03 / 30 / 2026	
FEC Identification Number	
C	
Amount of Each Disbursement this Period	
2,000.00	
<input type="checkbox"/> Memo Item	

- Under what circumstances may the Freedom Party make a contribution to retire Congressman Jones’s general election debt? Are there any special reporting rules?

Answer: The party may make the contribution if the committee had not already maxed out on its contribution limit to this candidate for the 2026 primary election. For contributions made to retire debt, be sure to designate the contribution(s) specifically for debt retirement for that particular election. Contributions to candidates are reported on Line 23 of FEC Form 3X.

II. Exempt Party Activities (*Guide*, pp. 49-50)

Key Facts:

- State/local party committees only
- Exempt activities are neither “contributions” nor “expenditures”
- Must use federally permissible funds
- Count toward the \$5,000 exempt activity registration threshold

Exempt Activities

For 2025-26 Elections	Candidate Committee per election	PAC (SSF and Non-SSF) per year	State, District & Local Party Committee per year	National Party Committee per year	Additional National Party Committee Accounts
Individual	\$3,500	\$5,000	\$50,000 (combined)	Unlimited Transfers	\$12,900
Candidate Committee	\$2,000	\$5,000	\$50,000 (combined)	Unlimited Transfers	\$12,900
PAC, State, District, Local Party Committee, etc.	\$5,000	\$5,000	\$50,000 (combined)	\$44,300	\$12,900
National Party Committee	\$5,000	\$5,000	Unlimited Transfers	Unlimited Transfers	Unlimited Transfers
State, District, Local Party Committee	\$5,000 (combined)	\$5,000 (combined)	Unlimited Transfers	Unlimited Transfers	Unlimited Transfers

- A. Special features of party exempt activities**
1. Exemptions available to state/local party committees only
 2. Unlimited and exempt from definition of contribution / expenditure
 3. Use federal funds for portions allocable to federal candidates
 4. Subject to \$5,000 registration threshold ([11 CFR 100.5\(c\)](#))
 5. Disclaimer required ([11 CFR 110.11\(e\)](#))
 - a) Must state that party paid for communication.
 - b) Disclaimer does not need to state whether the communication is authorized by a candidate or any authorized committee.

Slate Cards & Sample Ballots



To be Exempt:

- Must name \geq 3 candidates
- No general public political advertising (except direct mail)
- Content limited
 - ▶ Name of candidate
 - ▶ Office held/sought
 - ▶ Party affiliation

B. Three types of “exempt party activities:”

1. Slate card/sample ballot/palm card (11 CFR [100.80](#) and [100.140](#))

- a) Must name 3 or more candidates for any public office;
- b) No general public political advertising, except direct mail (defined as commercial vendor or commercial lists); and
- c) Content restricted to identification of candidates, office currently held, office sought and party affiliation.
 - (1) Photographs and computer graphics may be used. See [AO 2008-06](#) for more information.
 - (2) “The slate card exemption is not intended as a device for party committees to circumvent the reporting provisions and the limitations on contributions and expenditures by undertaking extensive campaigning on behalf of the candidates. Rather, the purpose of this exemption is to allow state and local parties ‘to educate the general public as to the identity of the candidates of the party.’ Pictorial identification of the candidates is a permissible means of identifying them under the slate card exemption. Including biographical information, other than that specifically mentioned above, would not be permissible under the stated exemption; nor would materials on the candidates’ positions on the issues or statements of ‘party philosophy.’” [AO 1978-09](#).

Slate Cards & Sample Ballots



To be Exempt:

- Must name ≥ 3 candidates
- No general public political advertising (except direct mail)
- Content limited
 - ▶ Name of candidate
 - ▶ Office held/sought
 - ▶ Party affiliation

2. **Campaign materials** (11 CFR [100.87](#) and [100.147](#))
(Includes pins, bumper stickers, brochures, yard signs, posters, newsletters and party tabloids)
- a) Activity may only be conducted for the general election on behalf of the party's nominees. (In [AO 2010-01](#), the Commission approved a state party committee's payment for exempt campaign materials on behalf of a state party's "presumptive nominees" before the primary election was held, but only after the date that the party is able to identify its presumptive nominee.)
 - b) Party committee must use volunteers to distribute;
 - c) No public political advertising, no direct mail;
 - d) Payments may not be made from funds designated for a particular candidate; and
 - e) Payments may not be made from funds provided by National committee for purchase of the materials, nor can the National committee provide the materials.
 - f) Note: any payment by state candidate committee to party for state candidate's share of materials is not a contribution to the party.



Get Out The Vote & Voter Registration

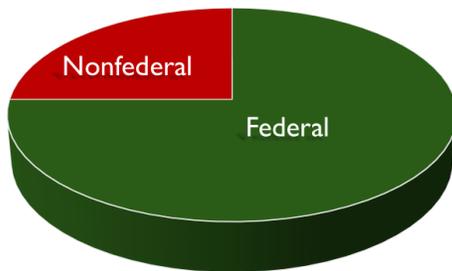
To be Exempt:

- Only Presidential/VP candidates mentioned
 - ▶ Contribution results if other candidates identified
- No general public political advertising
- Phone bank activity exempt if operated by volunteers
- No payment with:
 - ▶ Funds designated for a candidate or
 - ▶ Funds donated by national committee

3. **Presidential voter registration and Get-Out-the-Vote (GOTV) drives** (11 CFR [100.89](#) and [100.149](#))
- a) In order to be exempt, only the Presidential and Vice-Presidential nominees may be specifically mentioned and targeted;
 - b) If the activity refers to House or Senate candidate, then contribution results;
 - c) Phone bank activities exempt if operated by volunteers;
 - d) No public political advertising, no direct mail;
 - e) Payments may not be made from funds designated for a particular candidate; and
 - f) Payments may not be made from funds donated by the National committee for voter registration and GOTV activities.

Paying for Exempt Activities

Exempt activity with federal and nonfederal candidates = allocable



Exempt activity with federal candidates only

Exempt activity = FEA



4. Payment for exempt activities

a) Allocation of exempt activity

- (1) If conducted in conjunction with nonfederal activity, may allocate the costs of exempt activity between federal and nonfederal funds. [11 CFR 106.7\(d\)\(3\)](#).
- (2) May NOT allocate between federal and nonfederal funds any exempt activity that mentions ONLY federal candidates. [11 CFR 106.7\(e\)\(1\)](#).
- (3) **Example:** A slate card that lists only candidates for federal office and does not list a candidate for nonfederal office.

b) Exempt activity that is also FEA (11 CFR [100.24\(b\)\(3\)](#) and [300.33\(a\)\(1\)](#) and (2))

- (1) If exempt activity also meets one of the definitions of FEA, such activity is still exempt from the definition of “contribution” and “expenditure; however, the activity must be paid for as FEA, i.e., with federal funds. 11 CFR [100.24\(b\)\(3\)](#) and [300.33\(a\)\(1\)](#) and (2).
- (2) **Example:** A mass mailing (no direct mail) of a party brochure advocating for federal and nonfederal candidates would qualify as exempt activity (campaign material); however, the mass mailing would also qualify as a “public communication that PASOs a federal candidate,” which is Type 3 FEA. All Type 3 FEC must be paid for with 100% federal funds.



Poll Question #4

Two weeks before the November 5 general election, a county party wants to run an ad in the local newspaper that would feature an image of what the ballot will look like when voters go to the polls. Can the county party treat this as an exempt party activity?

- A: Yes, this activity qualifies as exempt party activity.
- B: No, newspaper/magazine/TV ads, etc. do not qualify as exempt activity.
The party could still do the activity, it just would not be considered exempt.

Poll Question #4 Answer

Two weeks before the November 5 general election, a county party wants to run an ad in the local newspaper that would feature an image of what the ballot will look like when voters go to the polls. Can the county party treat this as an exempt party activity?

- A: Yes, this activity qualifies as exempt party activity.
- B: No, newspaper/magazine/TV ads, etc. do not qualify as exempt activity. The party could still do the activity, it just would not be considered exempt.

(Remember, in order to qualify as exempt activity, the slate card/sample ballots must not be general public political advertising.)

- III. **Coordinated Party Expenditures** ([11 CFR 109.32 through 109.37](#)) (*Guide*, pp. 47-49)
Expenditures made by a party committee on behalf of its nominee in the general election. Committees have a “coordinated party expenditure” limit (calculated each election cycle) that is *separate* from its contribution limit to the candidate. Expenditures may range from paying bills for candidate to paying for “coordinated communications” on behalf of the candidate.



Coordinated Party Expenditures

- Funds spent by party
- On behalf of general election nominee
- Separate limits for coordinated spending
- May designate limit to other committee
- Party reports; candidate does not
- Disclaimer required

- A. **In connection with general election of party’s candidates**
May be made *before or after* candidate has been nominated ([11 CFR 109.34](#)).

Coordinated Party Expenditures

National Party Committee

- Limit for House, Senate, Presidential candidates

State Party Committee

- Limit for House, Senate candidates
- Presidential candidates (only if designated)

Local/District Party Committee

- No coordinated party spending authority unless designated



B. Who makes them ([11 CFR 109.32\(b\)](#)):

- 1. National party committee**
For House, Senate and Presidential candidates.
- 2. State party committee**
 - a) For House and Senate candidates.
 - b) For Presidential candidates, but *only* if designated, in advance and in writing, by the national committee.
- 3. Local or district party committee**
 - a) For House, Senate, Presidential candidates but
 - b) *Only if designated, in advance and in writing*, by national or state committee, as appropriate.

Coordinated Party Expenditures



Designation of Spending Authority

- In advance
- In writing
- Keep written designation for 3 years
- Monitor expenditures by designated agents

C. Designation

1. Committee may designate other party committees to spend **against** its limit.
2. Must be done in advance and in writing.
3. Must be received by the **designee** committee *before* any expenditure is made.
4. Retain, for recordkeeping **purposes**, copy of written designation for three years.

D. Payment

Party committee makes actual payment to the vendor—funds may not be given directly to the candidate's campaign committee.

Coordinated Party Expenditures

House Candidates

- \$10,000 increased by COLA, or
Senate limit for states with only one representative

Senate Candidates

- \$20,000 increased by COLA, or
State's VAP x \$.02 increased by COLA

Presidential Candidates

- National VAP x \$.02 increased by COLA



Coordinated Party Expenditures

House Candidates

- \$65,300 (\$130,600 in states with one representative)

Senate Candidates

- Ranges from \$130,600 to \$4,071,800

2026 Elections

- E. **Limits (based on formula – adjusted annually):**
1. **Separate limits for national and state parties.**
 2. **For congressional candidates**
\$10,000 plus Cost-of-Living Adjustment (COLA). **2026 limit:** \$65,300
[\$130,600 for states w/only one congressional district]

3. **For senate candidates**
\$20,000 plus COLA or state VAP x \$.02 plus COLA, whichever is greater.
2026 limit: ranges from \$130,600 in less populated states to \$4,071,800 in California.
4. **For presidential candidates**
National VAP x \$.02 plus COLA.

More: Information on 2026 limits available on FEC website: www.fec.gov/help-candidates-and-committees/making-disbursements-political-party/coordinated-party-expenditures/coordinated-party-expenditure-limits/

F. Reporting

1. Reported by party on Schedule F.
2. Candidate committee does not report the benefit of the activity.

G. Use only federal funds

Party must make expenditure from its federal account.

**Coordinated
Party
Expenditures**

NRSC et al v. FEC et al

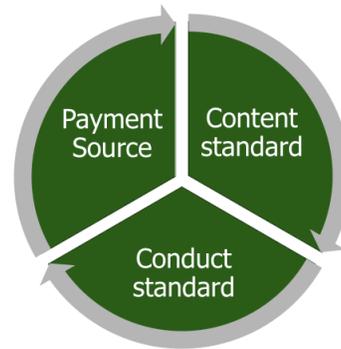
- Constitutional challenge to coordinated party expenditure limits
- Pending before Supreme Court



- H. Disclaimer requirements for public communications ([11 CFR 110.11\(d\)](#))**
(*Guide*, pp. 64-66)
- 1. Disclaimer must state:**
 - a) Name of party committee that paid for communication; and
 - b) If made with the approval of the candidate, that the communication is authorized by the candidate or his/her committee (not necessary if communication disseminated before candidate's nomination; consult [11 CFR 110.11\(d\)\(1\)\(ii\)](#)).
 - 2. Not subject to "stand by your ad" rules requiring voiceover/appearance by candidate.**
 - 3. Subject to rules for printed communications.**

Coordination Defined

Payments for communications that are coordinated result in coordinated party expenditures or in-kind contributions



Three-Part Coordination Test

- I. **Three-part coordinated communication test** (11 CFR [109.37](#) and [109.21\(d\)](#)) (*Guide*, pp. 59-62)
 1. **Three-part test overview:**
 - Source of payment;
 - Content is a public communication that is a republication of candidate material, express advocacy or that refers to a clearly identified candidate; and
 - Conduct involves the candidate or the candidate's agents in request or suggestion, material involvement, or substantial discussion, or involves use of common vendor, or use of former employee or independent contractor.

Three-Part Coordination Test



Paid for by Party



2. Source of payment

The source of payment for a coordinated party expenditure is the political party committee making the expenditure.

Three-Part Coordination Test



Public communication that:

- Republishes, disseminates or distributes campaign materials
- Contains express advocacy
- Refers to a federal candidate and is distributed in candidate's jurisdiction within certain timeframe before election

3. “Content standard”

Will satisfy standard if communication meets any one of these:

- a) **Public communication that republishes, disseminates or distributes candidate-prepared campaign materials;**
- b) **Public communication with express advocacy; or**
- c) **Public communication within certain time frame before election (No express advocacy required)**
 - (1) Refers to clearly identified candidate;
 - (2) Is directed to voters in the jurisdiction of the clearly identified candidate.

Public Communication Timeframes



House/Senate candidate:

Within **90 days** of candidate’s election
(primary, general)

Presidential or VP candidate:

Starting **120 days** before primary (or convention, caucus) through the date of the general election



(3) **Time frames**

- Senate and House candidates = 90 days before election.
- Presidential candidates = 120 days before the primary (or convention or caucus) through the date of the general election on a state-by-state basis.

More: Coordinated communications periods for 2026 elections:

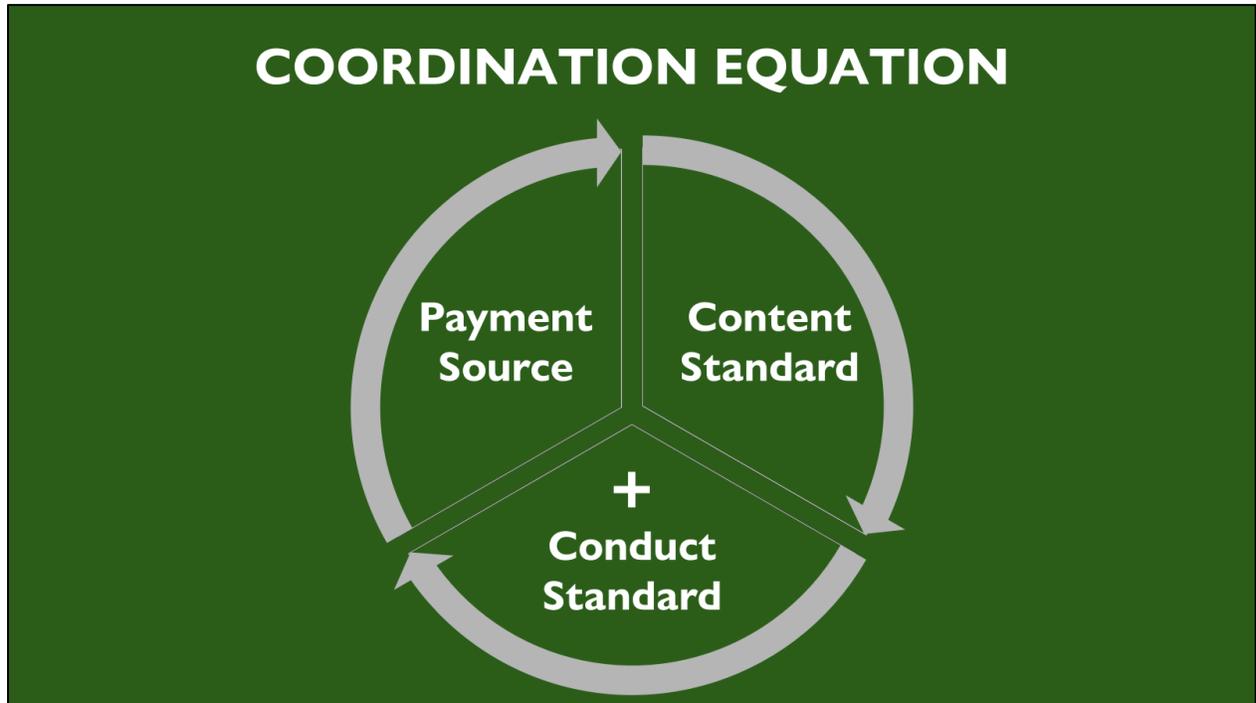
<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/coordinated-communications-periods-main-page-2026/>

<p>Three-Part Coordination Test</p>  <p>Conduct Standard</p>	<p>Includes at least one of the following:</p> <ul style="list-style-type: none">■ Request or suggestion■ Material involvement■ Substantial discussion■ Common vendor (120-day safe harbor)■ Former employee/independent contractor (120-day safe harbor)
---	--

4. “Conduct standard”

Will satisfy standard if communication meets any one of these:

- a) **Request or suggestion** ([11 CFR 109.21\(d\)\(1\)](#))
- b) **Material involvement** ([11 CFR 109.21\(d\)\(2\)](#))
- c) **Substantial discussion** ([11 CFR 109.21\(d\)\(3\)](#))
- d) **Employment of common vendor during previous 120 days** ([11 CFR 109.21\(d\)\(4\)](#))
- e) **Use of former employee/independent contractor during previous 120 days** ([11 CFR 109.21\(d\)\(5\)](#))



Safe Harbors

- Candidate's response to inquiry about legislative or policy issues
- Endorsements/solicitations by federal candidates
- 120-day time limit for common vendor and former employee conduct standards
- Establishment and use of "firewall"
- Use of publicly available information
- Certain commercial transactions

- J. Safe harbor for endorsements and solicitations by federal candidates**
1. A public communication in which a federal candidate endorses another candidate for federal or nonfederal office is not coordinated with the endorsing candidate unless the public communication

- PASOs the endorsing candidate (or another candidate who seeks election to the same office). [11 CFR 109.21\(g\)\(1\)](#).
2. A public communication in which a federal candidate solicits funds for another candidate for federal or nonfederal office, a political committee, or a charitable organization organized under 26 USC §501(c) is not coordinated unless the communication PASOs the soliciting candidate. [11 CFR 109.21\(g\)\(2\)](#).
 3. **120-day temporal limit for common vendor and former employee conduct standards**
 4. **Safe harbor for establishment and use of firewall**
Written firewall policy required. Must be designed and implemented to prohibit flow of information between:
 - Employees or consultants providing services for person paying for communication;
 - Vendors currently/previously providing services to candidate/authorized committee, candidate's opponent/authorized committee or party. [11 CFR 109.21\(h\)](#).
 5. **Safe harbor for use of publicly available information**
 6. **Safe harbor for certain commercial transactions**
Federal candidate may appear in public communications in his/her capacity as a business owner or operator that existed prior to the candidacy provided that:
 - The medium, timing, content and geographic distribution of the public communication(s) are consistent with public communications made prior to the candidacy; and
 - The public communication does not promote, attack, support or oppose that candidate or another candidate seeking the same office. [11 CFR 109.21\(i\)](#).

IV. Independent Expenditures ([11 CFR 100.16](#)) (*Guide*, pp. 62-63)

Independent Expenditures

Unlimited expenditure

Expressly advocates candidate

Not coordinated with candidate
or his/her campaign



- A. Definition**
Expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate, that is not made in cooperation, consultation, or concert with, or at the request or suggestion of a candidate, or his/her agents (i.e., is not coordinated). [11 CFR 100.16](#).
- B. Unlimited**
No limitation on amounts expended.

Independent Expenditures



Disclaimer:

- Name of party committee paying for the communication
- Statement that communication is not authorized by any candidate or candidate's committee

C. Disclaimer (*Guide*, pp. 64-66)

1. Must state:

- a) Name of party committee that paid for expenditure; and
- b) That the expenditure is not authorized by any candidate or candidate's committee. [11 CFR 110.11\(d\)\(3\)](#).

2. Specific disclaimer requirements

- a) Printed communications subject to specific rules at 11 CFR [110.11\(c\)\(1\)](#) and [\(2\)](#).
- b) Radio/television ads subject to special rules at [11 CFR 110.11\(c\)\(4\)](#).

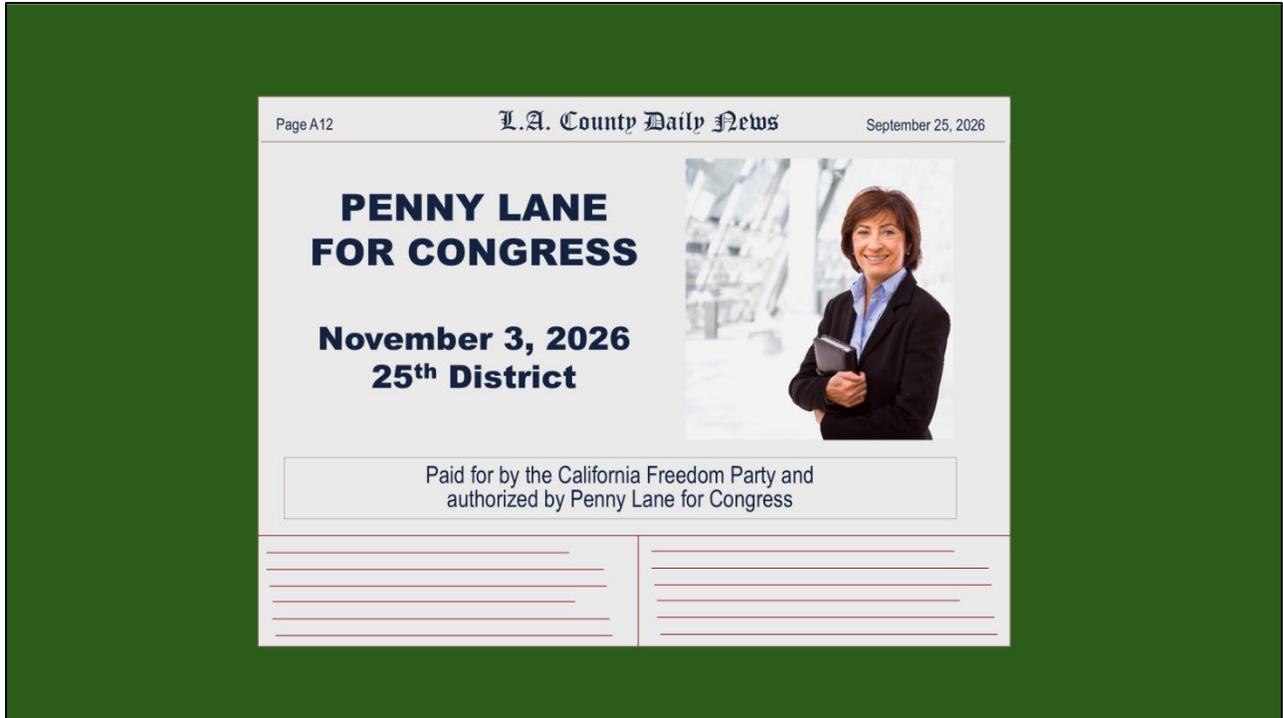
Reporting Independent Expenditures

D. Reporting

1. Reported by party committee on Schedule E.
2. Special reporting required for IEs aggregating \$10,000 or more any time up to 20 days before election, or IEs of more than \$1,000 after 20th day but before 24 hours before the election. (*Guide*, pp. 94-95)

More:

- **24- and 48-Hour Report of Independent Expenditures periods for 2026 elections:** <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/24-and-48-hour-reports-independent-expenditures-periods-main-page-2026/>
- **Special rules for reporting multistate independent expenditures at:** www.fec.gov/updates/commission-adopts-rules-for-reporting-multistate-communications/



Reporting Scenario #3: Coordinated Party Expenditures

Background: On September 25— a little over a month before the November general election for the 25th Congressional District in California—the California Freedom Party runs \$10,000 in advertisements in *The L.A. County Daily News* supporting the party’s House candidate, Penny Lane.

1. **How would you report this ad if you had coordinated it and treated it as a Coordinated Party Expenditure assuming payment was made on September 25?**

Scenario #3 Answer:

**Reporting
Coordinated Party
Expenditures**

**October Monthly (M10) Report:
Schedule F, Line 25**

SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE **1** OF **1**
FOR LINE 25 OF FORM 3X

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full)
California Freedom Party Committee

Has your committee been designated to make coordinated expenditures by a political party committee?
 YES NO

If YES, name the designating committee:

Full Name of Subordinate Committee

Mailing Address

City State ZIP Code

Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure

The L.A. County Daily News **Newspaper Ad**

Mailing Address **1700 Sunburst Ave.** Date **09 / 25 / 2026**

City **El Segundo** State **CA** Zip Code **90245**

Name of Federal Candidate Supported **Penny Lane** Office Sought: House Senate Presidential State: **CA** District: **25**

Amount **10,000.00**

Aggregate General Election Expenditure for this Candidate ▶ **10,000.00**

1. How would you report this ad if you had coordinated it and treated it as a Coordinated Party Expenditure assuming payment was made on September 25?

Answer: Coordinated party expenditures are reported on Schedule F.

Coordinated Party Expenditures

- Itemize on Schedule F.
- If contracted but not paid, itemize as memo entry.
- Reference date of dissemination in purpose box when reporting payment on subsequent report.



Reporting Scenario #4: Independent Expenditures

What if the party ran several advertisements but did NOT coordinate with the candidate?

Background: On October 13—in its final campaign push before the November general election—the California Freedom Party Committee runs \$10,000 in ads in *The L.A. County Daily News* newspaper supporting its 25th District House candidate, Penny Lane. Two days later—on October 15—the party runs \$8,000 more in ads in the *Daily News* attacking Lane’s opponent, Maggie May. Then, just a few days before the election—on October 31—the party runs a \$5,000 radio ad on KELC-AM supporting Lane. Payment for all three of these ads occurred on November 20.

- 1. How would you classify these ads for purposes of the law?**
- 2. If they are independent expenditures, how would you report them?**
- 3. How would you report these three ads if you had not coordinated them, assuming payment was again made on November 20?**

Scenario #4 Answers:

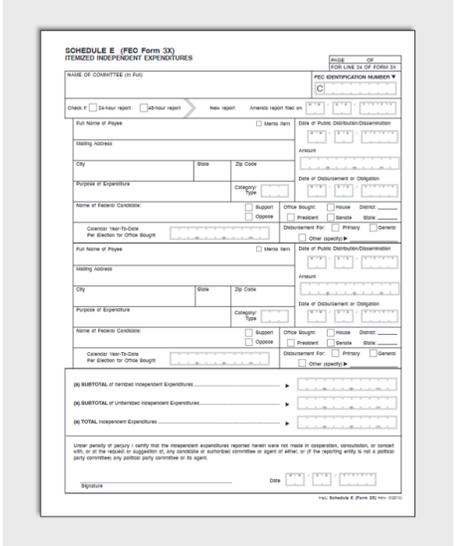
1. How would you classify these ads for purposes of the law?

Answer: If not coordinated, then they may possibly be independent expenditures or public communications (FEA). Since we will assume that the ads will expressly advocate the named candidates' election or defeat, they are independent expenditures.

Reporting Independent Expenditures

For reporting purposes, date made is date communication was disseminated

Independent expenditures are aggregated on a per calendar year, per election, per office sought basis



Commission Interpretive Rule on When Certain Independent Expenditures are Considered to be “Publicly Disseminated” for Reporting Purposes (76 FR 61254 (10/4/11))

- www.fec.gov/resources/cms-content/documents/fedreg_notice_2011-13_EO13892.pdf

- Applies to yard signs, mini-billboards, handbills, t-shirts, hats, buttons and similar communications.
- Reasonable dates that may be treated as date of public dissemination include, but are not limited to:
 1. The date filer receives delivery of communication;
 2. The date filer distributes communication to its members or employees for later public dissemination;
 3. The date a filer distributes the communications to its affiliate or member organizations for later public dissemination;
 4. The date as of which the filer authorizes its members or employees to display the communication; or
 5. The date of actual public dissemination, if that date is known to the filer.
- May NOT choose a date later than actual dissemination or a date after the election to which IE pertains.

Reporting Independent Expenditures

48-Hour Reports

IE's aggregate \geq \$10,000
made \geq 20 days before election

October 2026							November 2026						
SU	MO	TU	WE	TH	FR	SA	SU	MO	TU	WE	TH	FR	SA
				1	2	3	1	2	3	4	5	6	7
4	5	6	7	8	9	10	8	9	10	11	12	13	14
11	12	13	14	15	16	17	15	16	17	18	19	20	21
18	19	20	21	22	23	24	22	23	24	25	26	27	28
25	26	27	28	29	30	31	29	30					

24-Hour Reports

IEs aggregate \geq \$1,000 made
< 20 days but > 24 hours before election

October 2026							November 2026						
SU	MO	TU	WE	TH	FR	SA	SU	MO	TU	WE	TH	FR	SA
				1	2	3	1	2	3	4	5	6	7
4	5	6	7	8	9	10	8	9	10	11	12	13	14
11	12	13	14	15	16	17	15	16	17	18	19	20	21
18	19	20	21	22	23	24	22	23	24	25	26	27	28
25	26	27	28	29	30	31	29	30					

Reporting Independent Expenditures

2. If they are independent expenditures, how would you report them?

Answer: If not coordinated and if they contained express advocacy, yes, they would be considered independent expenditures. An independent expenditure is an expenditure for a communication that expressly advocates the election/defeat of a clearly identified candidate and that is not coordinated with a candidate or the candidate's agents. Party committees use Schedule E to report independent expenditures made.

- An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated.
- Committees must file a **48-Hour Report** for independent expenditures that aggregate \$10,000 or more, per election, per office, anytime during a calendar year up to and including the 20th day before an election.
- Committees must file a **24-Hour Report** for independent expenditures that aggregate \$1,000 or more, per election, per office, and is made less than 20 days but more than 24 hours before the day of an election, the committee must file a 24-Hour Report on Schedule E disclosing the independent expenditure. Must disclose again, on Schedule E, on the next regular FEC report.
- Committees must report both the date of dissemination and the date of payment (and debt, if these take place during different reporting periods).
- **Rules for reporting multistate independent expenditures at www.fec.gov/updates/commission-adopts-rules-for-reporting-multistate-communications/**

3. How would you report these three ads if you had not coordinated them, assuming payment was again made on November 20?

October 13 - \$5,000 newspaper ad
 October 15 - \$8,000 newspaper ad
 October 31 - \$5,000 radio ad

Answer: The first two ads aggregated \$10,000 or more for the calendar year for the California 25th District general election and were made **more than 20 days before election**. This triggers the requirement to file 48-Hour Reports on a stand-alone Schedule E *solely to indicate the date the communications were disseminated*. In this case, the requirement was triggered on October 15, so the 48-Hour Reports are due October 17.

Reporting Independent Expenditures

Initial Reporting: 48-Hour Report

Schedule E, Line 24

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES		PAGE 1 OF 1 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (in Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004
Check # <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on		
Full Name of Payee The L.A. County Daily News		Date of Public Distribution/Dissemination 10 / 13 / 2026
Mailing Address 1700 Sunburst Ave.		Amount 5,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Newspaper Ad		Date of Disbursement or Obligation
Name of Federal Candidate: Penny Lane		Category/Type
<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose		Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA
Calendar Year-To-Date Per Election for Office Sought 5,000.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

Reporting continues on next page

Initial Reporting: 48-Hour Report Schedule E, Line 24

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES		PAGE 1 OF 1 FOR LINE 24 OF FORM 3X	
NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004	
Check <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report		New report Amends report filed on	
Full Name of Payee The L.A. County Daily News		Date of Public Distribution/Dissemination 10 / 15 / 2026	
Mailing Address 1700 Sunburst Ave.		Amount 8,000.00	
City El Segundo	State CA	Zip Code 90245	Date of Disbursement or Obligation
Purpose of Expenditure Newspaper Ad		Category/Type	
Name of Federal Candidate: Maggie May		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> President <input type="checkbox"/> Senate	District: 25 State: CA
Calendar Year-To-Date Per Election for Office Sought 13,000.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	

Reporting Independent Expenditures

Don't let Maggie May steal
your heart!

ELECT PENNY LANE

**November 3, 2026
25th District**



Paid for by the California Freedom Party and
not authorized by any candidate or candidate's committee

- Now, while we have fulfilled the notice requirement for these two communications, where else must we disclose the dissemination date of these ads?
- So the money has not actually left our account. What else do we have to disclose in addition to the date of the independent expenditures, as disclosed on Schedule E?

4. Now, while we have fulfilled the notice requirement for these two communications, where else must we disclose the dissemination date of these ads?

Answer: On our next scheduled report (the Pre-General (12G) Report in this example) using Schedule E again. They are itemized as memo entries on Schedule E because we will not have paid the newspaper by the time the report is due.

Reporting Independent Expenditures

Memo Entry on Next Regular Report Pre-General (12G) Report: Schedule E, Line 24

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 1 OF 1
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004
Check <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report		Amends report filed on
Full Name of Payee The L.A. County Daily News X Memo Item		Date of Public Distribution/Dissemination 10 / 13 / 2026
Mailing Address 1700 Sunburst Ave.		Amount 5,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Newspaper Ad		Date of Disbursement or Obligation
Name of Federal Candidate: Penny Lane		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 13,000.00		Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

Memo Entry on Next Regular Report Pre-General (12G) Report: Schedule E, Line 24

Reporting Independent Expenditures

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 1 OF 1
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004
Check <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report		Amends report filed on
Full Name of Payee The L.A. County Daily News X Memo Item		Date of Public Distribution/Dissemination 10 / 15 / 2026
Mailing Address 1700 Sunburst Ave.		Amount 8,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Newspaper Ad		Date of Disbursement or Obligation
Name of Federal Candidate: Maggie May		<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 13,000.00		Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

5. **So, the money has not actually left our account. What else do we have to disclose in addition to the date of the independent expenditures, as disclosed on Schedule E?**

Answer: Show a debt owed to the newspaper on Schedule D, supporting Line 10, on the same report (Pre-General (12G) Report) and on subsequent reports until it is repaid.

Reporting Independent Expenditures



Other Reporting – Debt Owed

Pre-General (12G) Report: Schedule D, Line 10

SCHEDULE D (FEC Form 3X)		(Use separate schedule(s) for each numbered line)	PAGE 1 OF 1
DEBTS AND OBLIGATIONS		FOR LINE NUMBER: (check only one)	
Excluding Loans		<input type="checkbox"/> 9	<input checked="" type="checkbox"/> 10
NAME OF COMMITTEE (In Full)			
California Freedom Party Committee			
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor		Nature of Debt (Purpose):	
The L.A. County Daily News		Newspaper Ads/IEs	
Mailing Address		10/13/26 and 10/15/26	
1700 Sunburst Ave.			
City	State	Zip Code	
El Segundo	CA	90245	
Outstanding Balance Beginning This Period			
0.00			
Amount Incurred This Period		Payment This Period	Outstanding Balance at Close of This Period
13,000.00		0.00	13,000.00

6. **What will our reporting obligations be for the radio ad run on October 31?**

7. **Do we have anything left to report?**

6. What will our reporting obligations be for the radio ad run on October 31?

Answer: The third expenditure \$1,000 or more for the California District 25 general election and was made in the last 20 days of the election; therefore, it has triggered the requirement to file a 24-Hour Report on Schedule E, *again just a notice to report the date of dissemination*. Since the requirement was triggered on October 31, the 24-Hour Report is due November 1.

Reporting Independent Expenditures



Initial Reporting: 24-Hour Report Schedule E, Line 24

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES		PAGE 1 OF 1 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 0000004
Check if <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report New report Amends report filed on		
Full Name of Payee KELC-AM	<input type="checkbox"/> Memo Item	Date of Public Distribution/Dissemination 10 / 31 / 2026
Mailing Address 1000 Camino La Costa		Amount 5,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Radio Ad	Category/Type	Date of Disbursement or Obligation
Name of Federal Candidate: Penny Lane	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA
Calendar Year-To-Date Per Election for Office Sought	18,000.00	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶

7. Do we have anything left to report?

Answer:

1. Disclose payments made for the radio ad and payments made for the previous two newspaper ads on Schedules E on next scheduled report (Post General (30G) Report).

Reporting Independent Expenditures




Disclose on Next Regular Report Post-General (30G) Report: Schedule E, Line 24

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES		PAGE 1 OF 1 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report Amends report filed on		
Full Name of Payee <input type="checkbox"/> Memo Item KELC-AM		Date of Public Distribution/Dissemination 10 / 31 / 2026
Mailing Address 1000 Camino La Costa		Amount 5,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Radio Ad	Category/Type	Date of Disbursement or Obligation 11 / 20 / 2026
Name of Federal Candidate: Penny Lane	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA
Calendar Year-To-Date Per Election for Office Sought 18,000.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶

Reporting Independent Expenditures



**PENNY LANE
FOR CONGRESS
November 3, 2026
25th District**

Paid for by California Freedom Party and not authorized by any candidate or candidate's committee

Subsequent Payment Post-General (30G) Report: Schedule E, Line 24

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES		PAGE 1 OF 1 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full) California Freedom Party Committee		FEC IDENTIFICATION NUMBER C 00000004
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report Amends report filed on		
Full Name of Payee <input type="checkbox"/> Memo Item The L.A. County Daily News		Date of Public Distribution/Dissemination 10 / 13 / 2026
Mailing Address 1700 Sunburst Ave.		Amount 5,000.00
City El Segundo	State CA	Zip Code 90245
Purpose of Expenditure Newspaper Ad – 10/13/24	Category/Type	Date of Disbursement or Obligation 11 / 20 / 2026
Name of Federal Candidate: Penny Lane	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House District: 25 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA
Calendar Year-To-Date Per Election for Office Sought 18,000.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶

Subsequent Payment

Post-General (30G) Report: Schedule E, Line 24

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE **1** OF **1**
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)
California Freedom Party Committee

FEC IDENTIFICATION NUMBER
C 00000004

Check 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee Memo Item **The L.A. County Daily News** Date of Public Distribution/Dissemination **10 / 15 / 2026**

Mailing Address **1700 Sunburst Ave.** Amount **8,000.00**

City **El Segundo** State **CA** Zip Code **90245**

Purpose of Expenditure **Newspaper Ad – 10/15/24** Category/Type **11 / 20 / 2026**

Name of Federal Candidate: Support Oppose **Maggie May** Office Sought: House District: **25**
 President Senate State: **CA**

Calendar Year-To-Date Per Election for Office Sought **18,000.00** Disbursement For: Primary General
 Other (specify) ▶

Reporting Independent Expenditures

Don't let Maggie May steal your heart!

ELECT PENNY LANE

November 3, 2026
25th District

Paid for by the California Freedom Party and not authorized by any candidate or candidate's committee

2. Disclose debt payments for the debt of \$13,000 that we previously reported on Schedule D, also on the Post General (30G) Report.

Reporting Independent Expenditures

Other Reporting – Debt Payment

Post-General (30G) Report: Schedule D, Line 10

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

PAGE **1** OF **1**
FOR LINE NUMBER: (check only one) 9 10

NAME OF COMMITTEE (In Full)
California Freedom Party Committee

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor **The L.A. County Daily News** Nature of Debt (Purpose): **Newspaper Ads/IEs 10/13/24 and 10/15/24**

Mailing Address **1700 Sunburst Ave.**

City **El Segundo** State **CA** Zip Code **90245**

Outstanding Balance Beginning This Period **13,000.00**

Amount Incurred This Period **0.00** Payment This Period **13,000.00** Outstanding Balance at Close of This Period **0.00**

Tricky Issues: Reporting Last-Minute Advertising

- **Debts**
 - Debts include ads that are contracted for but not paid for in that reporting period.
 - When payment for ad is made in subsequent reporting period, report payment on Schedule E or F, and include date of dissemination in purpose field.
 - Update Schedule D with payment; cross-reference Schedule E or F.

- **24-Hour Reporting**
 - Must file a **24-Hour Report** for independent expenditures aggregating (per calendar year, per election, per office) \$1,000 or more made less than 20 days but more than 24 hours before the day of an election.
 - Aggregation is done on a per calendar year, per election, per office sought (race) basis.
 - Use Schedule E on Form 3X – check “24-Hour Report” box.
 - Must be received by FEC within 24 hours after the independent expenditure is publicly distributed or otherwise publicly disseminated.
 - Must be certified (signed) by treasurer (e-filers should type the treasurer’s name following the certification on the notice).
 - For paper filers, can use overnight delivery, hand-delivery or fax to 202-219-0174 (certified or registered mail date will not be considered filed date for these).
 - Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
 - A 24-Hour Report is required each time an additional \$1,000 is aggregated in independent expenditures.

- **48-Hour Reporting**
 - In addition, must file a **48-Hour Report** for independent expenditures that aggregate \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
 - Use Schedule E on Form 3X – check “48-Hour Report” box.
 - Must be received by FEC within 48 hours after expenditure is publicly distributed or otherwise publicly disseminated.
 - Must be certified (signed) by treasurer (e-filers should type the treasurer’s name following the certification on the notice).
 - For paper filers, can use overnight delivery, hand-delivery or fax to (202) 219-0174 (certified or registered mail date will not be considered filed date for these).
 - Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
 - Aggregation is done on a per calendar year, per election, per office sought (race) basis.
 - A 48-Hour Report is required each time an additional \$10,000 is aggregated in independent expenditures.

24- and 48-Hour Report of Independent Expenditures periods for 2026 elections:

<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/24-and-48-hour-reports-independent-expenditures-periods-main-page-2026/>

V. Local Party Activity (*Guide*, pp. 161-162)

Local parties can be divided into two classifications – “local party organizations” not registered with the FEC and “local party committees” that are registered with the FEC. Local parties may support candidates for federal office subject to source limitations and prohibitions, registration thresholds, and reporting requirements.

Local Party Activity



- ▶ Contributions
- ▶ Exempt Activities
- ▶ Coordinated Party Expenditures
 - ▶ With designation by state or national party committee.
- ▶ Independent Expenditures
- ▶ Federal Election Activities (FEA)

Local Party Activity



Local Party Organizations not registered with the FEC:

- Use federally-permissible funds for federal activity
- Keep federal spending below registration thresholds

A. Federal funds

Local party organizations that are involved in federal elections must establish an accounting procedure to ensure that they spend only “federally permissible funds” (funds subject to the limits and prohibitions of the Act) on activities related to federal elections. The organization must keep records of its receipts and disbursements for three years and must, upon request, make such records available for examination by the FEC. See 11 CFR [102.5\(b\)](#)

Local Party Activity

Local Party Organization must register if it:

- Raises more than \$5,000 for federal elections
- Makes contributions or expenditures, including independent expenditures, that exceed \$1,000
- Spends more than \$5,000 on exempt party activity

The image shows a sample of the FEC FORM 1, STATEMENT OF ORGANIZATION. The form includes fields for:

- 1. NAME OF COMMITTEE (or SUB) with checkboxes for 'is changed' and 'Example if typing, type over the lines.' and a 'DISPENSE' button.
- ADDRESS (number and street) with checkboxes for 'is changed' and fields for CITY, STATE, and ZIP CODE.
- COMMITTEE'S MAIL ADDRESS with checkboxes for 'is changed' and an 'Optional Second Mail Address' field.
- COMMITTEE'S WEB PAGE ADDRESS (URL) with checkboxes for 'is changed'.
- 2. DATE (MM/YY/YY)
- 3. FEC IDENTIFICATION NUMBER (with a dropdown menu showing 'C').
- 4. IS THIS STATEMENT NEW (N) OR AMENDED (A) with checkboxes.
- A certification statement: 'I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.'
- Signature of Treasurer and Date fields.
- A footer section with checkboxes for 'Official Use Only' and 'The Public Information Statement' and the text 'FEC FORM 1 (Revised 05/2007)'.

B. Registration thresholds

Local party organization - becomes a political committee and must register when, during a calendar year, it:

1. Raises more than \$5,000 in contributions
2. Spends more than \$1,000 in contributions and other expenditures
3. Spends more than \$5,000 on exempt activities

Local Party Committees registered with the FEC:

- Presumed to be affiliated with state committee and other registered local party committees within the state

Local Party Activity

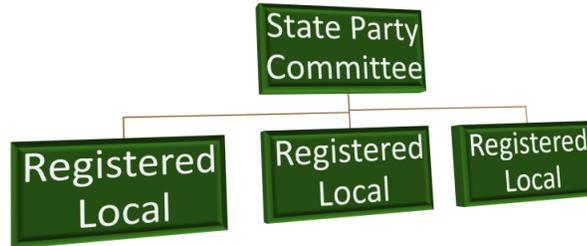


C. Affiliation

State party committees are normally affiliated with local party committees in same state; national party and state party have separate limits, but may transfer between each other. Rebuttable presumption. See [AO 1978-09](#).

Affiliated Committees

Committees established, financed
maintained or controlled by same entity

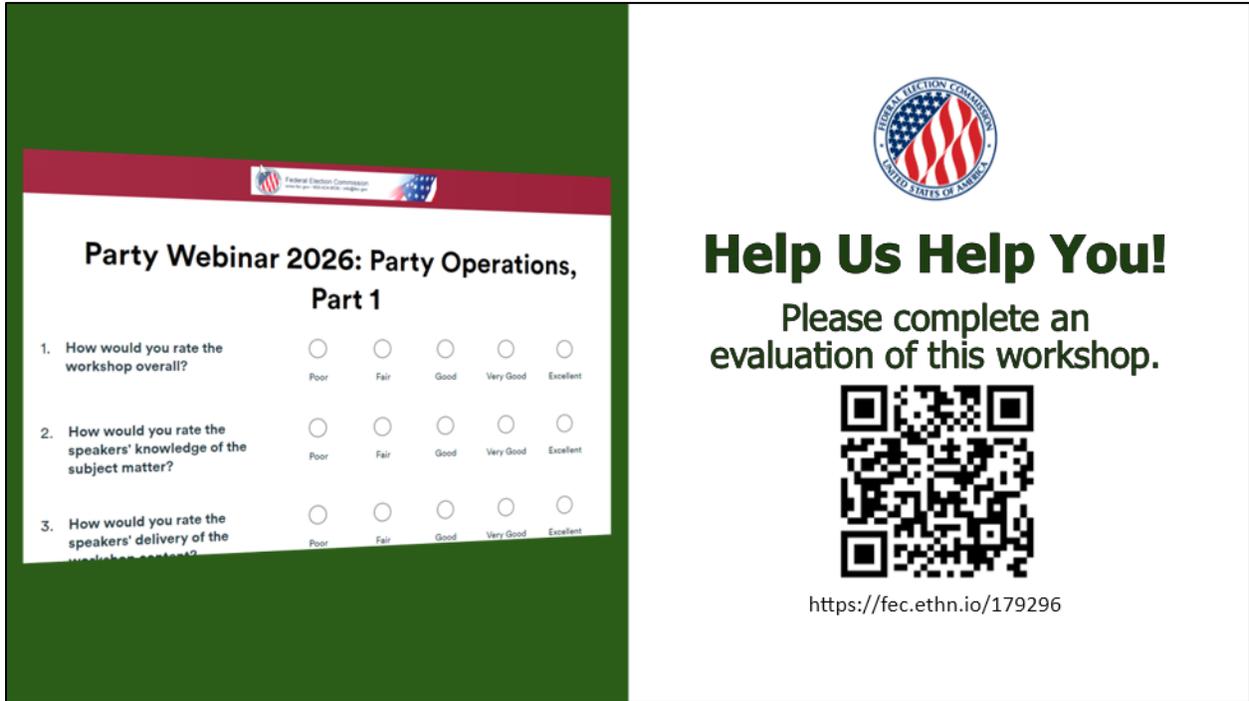


Affiliated Committees

Committees established, financed
maintained or controlled by same entity

**Treated as
one committee**

Share contribution limits



The image shows a composite graphic. On the left is a screenshot of a survey titled "Party Webinar 2026: Party Operations, Part 1". The survey has three questions, each with five radio button options labeled "Poor", "Fair", "Good", "Very Good", and "Excellent".

1. How would you rate the workshop overall?
Poor Fair Good Very Good Excellent

2. How would you rate the speakers' knowledge of the subject matter?
Poor Fair Good Very Good Excellent

3. How would you rate the speakers' delivery of the workshop content?
Poor Fair Good Very Good Excellent

On the right is a call to action with the Federal Election Commission logo at the top. Below the logo is the text "Help Us Help You!" in large green font, followed by "Please complete an evaluation of this workshop." in black. A QR code is centered below the text, and the URL "https://fec.ethn.io/179296" is at the bottom.

Evaluation Link: <https://fec.ethn.io/179296>

These materials were produced and disseminated at U.S. taxpayer expense.