



FECConnect
LIVE

Nonconnected PAC Operations, Part 2

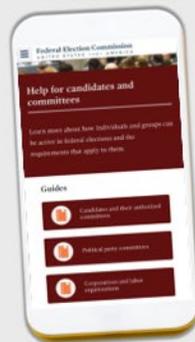


March 18, 2026 2:45 pm Eastern

Objectives



Identify ways PACs can support candidates



Highlight FEC compliance resources for PACs



Review rules on travel & lobbyist bundling

SUPPORT FOR FEDERAL CANDIDATES

I. Making Contributions (Traditional/Leadership/Partnership PACs) (11 CFR [110.1](#) and [110.2](#))

Supporting Candidates

▼ **Contributions**

Includes monetary and in-kind

Contributions are subject to the limits and prohibitions of FECA

Federal Funds

Nonconnected PAC Hybrid PAC

- A. **Made by Hybrid PACs and traditional federal PACs but not by Super PACs or non-contribution accounts.**
- B. **Includes monetary and in-kind contributions**
Note for leadership PACs: If PAC pays for costs that could and should otherwise be paid for by a candidate's authorized committee, payments are treated as in-kind contributions subject to limit. 11 CFR [100.52\(d\)\(1\)](#) and [110.2\(l\)](#).

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					00
Candidate Committee					
PAC: Multicandidate					00
PAC: Nonmulticandidate					00
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	

Super PACs and non-contribution accounts cannot make contributions of any amount

Contributions from the PAC



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	\$132,900
Candidate Committee	\$2,000	\$5,000	Unlimited Transfers	Unlimited Transfers	
PAC: Multicandidate	\$5,000	\$5,000	\$5,000 (combined)	\$15,000	\$45,000
PAC: Nonmulticandidate	\$3,500	\$5,000	\$10,000 (combined)	\$44,300	\$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	

C. Limits for nonmulticandidate PACs

1. May give **\$3,500/election** to federal candidates (2025-2026 election cycle).
2. Indexed for inflation each election cycle.

Multicandidate Status



1

2

3

OR

Registered with the FEC for at least six months

Received contributions from more than 50 donors

Contributed to at least five federal candidates

Affiliated with a multicandidate committee

D. Multicandidate PACs (11 CFR [100.5\(e\)\(3\)](#) and [110.2](#))

1. \$5,000/election to federal candidates.
 2. Limit unchanged - not subject to indexing.
 3. **Criteria**
 - a) Registered with FEC 6 months;
 - b) Received contributions from more than 50 persons; AND
 - c) Has made contributions to at least 5 federal candidates;

OR

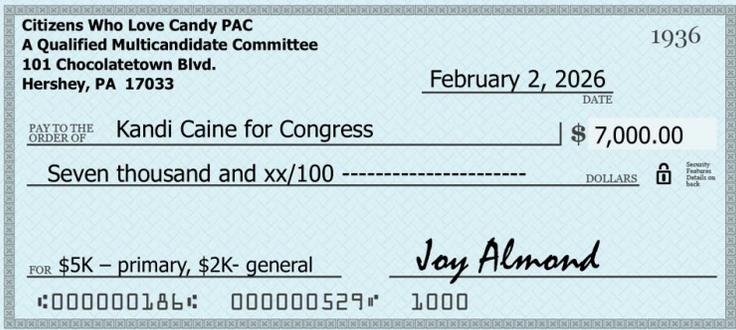
 - d) **Alternative:** Be affiliated with multicandidate committee
4. **Responsibility for informing FEC**
PAC must file [FEC Form 1M](#) within 10 days of qualifying as multicandidate committee.
5. **Responsibility for informing campaigns**
Multicandidate committee must inform recipients that it has qualified as multicandidate committee.

**Reporting Example #4:
Itemizing Monetary Contributions Made to Federal Candidates and Committees**

Itemizing Contributions Made



Rep. Kandi Caine



The Citizens Who Love Candy PAC, a monthly filer, really likes Congresswoman Kandi Caine from Pennsylvania. On February 2, 2026, it made out the check above to Congresswoman Caine’s campaign committee from its federal PAC. The Pennsylvania primary is scheduled for April 23, 2026.

1. What type of transaction(s) are these?
2. How must the committee disclose the transaction(s)?

**Answers to Reporting Example #4:
Itemizing Monetary Contributions Made to Federal Candidates and Committees**

1. What type of transaction(s) are these?

Answer: This check represents two separate contributions made by the PAC: The check for \$7,000 represents contributions to both the primary and the general election campaign of the Kandi Caine for Congress.

2. How must the committee disclose the transaction(s)?

Answer: The PAC must itemize each of these contributions on its monthly report covering February on a Schedule B for Line 23. It should show them as two separate contributions, \$5,000 to Kandi Caine for Congress for the primary and \$2,000 for the general.

For the campaign contributions, the payee’s name and address, the date made, amount, the candidate’s name and office sought (including state and congressional district), the election (including year) for which the contribution was made (check appropriate box). For purpose, note “contribution.” Note that FECFile allows users to get the committee’s information from a database.

**Itemizing
Contributions
Made**

FEC Form 3X: Schedule B, Line 23

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE	OF
			<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		
<small>Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</small>					
NAME OF COMMITTEE (In Full) Citizens Who Love Candy PAC					
Full Name (Last, First, Middle Initial) A. Kandi Caine for Congress			Date of Disbursement 02 / 02 / 2026		
Mailing Address 1225 Red Stripe Court			FEC Identification Number C		
City Confection		State PA	Zip Code 17000		
Purpose of Disbursement Contribution			Amount of Each Disbursement this Period 5,000.00		
Candidate Name Kandi Caine			Category/Type <input type="checkbox"/> Memo Item		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State: PA District: 10					
Full Name (Last, First, Middle Initial) B. Kandi Caine for Congress			Date of Disbursement 02 / 02 / 2026		
Mailing Address 1225 Red Stripe Court			FEC Identification Number C		
City Confection		State PA	Zip Code 17000		
Purpose of Disbursement Contribution			Amount of Each Disbursement this Period 2,000.00		
Candidate Name Kandi Caine			Category/Type <input type="checkbox"/> Memo Item		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			
State: PA District: 10					

Points to Remember:

- Itemize contributions to all federal campaigns and committees on Schedule B for Line 23, regardless of amount.
- For contributions to federal campaigns, include candidate information.
- Strongly recommended that PACs designate contributions to campaigns for particular elections (use year and type of election to properly designate).
- If designating for prior election, also note “debt.” (e.g., “2022 general debt”)
- Treat contributions made to a leadership PAC as a contribution to a PAC, not a contribution to a campaign.
- Itemize any contributions to **nonfederal** candidates on Line 29 when they exceed \$200 to the same payee during a calendar year. Full candidate information in the purpose box is not required – simply input “nonfederal contribution.”

Recommended:

- For all contributions to federal candidates

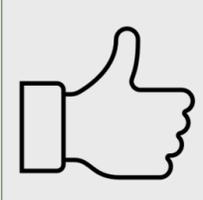
Undesignated contributions:

- Count toward limit for candidate's next election

Required if contributing to:

- **Future election** (i.e., not next election)
- **Retire debt** from a past election

Designating Contributions







E. Designation of campaign contributions by PAC

1. General rule:

Undesignated contribution counts towards the candidate's next scheduled election.

2. PAC must designate contribution if:

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

Designated vs. Undesignated

Primary Election is April 23

Citizens Who Love Candy PAC
A Qualified Multicandidate Committee
101 Chocolatetown Blvd.
Hershey, PA 17033

1936

April 21, 2026
DATE

PAY TO THE ORDER OF Kandi Caine for Congress \$ 7,000.00

Seven thousand and xx/100 ----- DOLLARS

FOR **UNDESIGNATED** Joy Almond

⑆000000186⑆ 000000529⑆ 1000

Rep. Kandi Caine

Example (For purposes of this example, assume the contributions illustrated in Reporting Example #4 had never been made.)

The Citizens Who Love Candy Federal PAC decides to contribute \$7,000 to its local Congresswoman, Kandi Caine, for her re-election campaign. Kandi is in a tough primary in Pennsylvania on April 23. The PAC treasurer, Joy Almond, issues a check to the campaign for \$7,000 on April 21 but does not mail it until April 22. As a result, the campaign receives the contribution after the primary.



POLL QUESTION:

What is the main issue with this check?

- A: It was mailed before the primary but received afterwards
- B: It is not designated for an election

POLL ANSWER:

What is the main issue with this check?

- A: It was mailed on the date of the primary but received afterwards
- B: It is not designated for an election

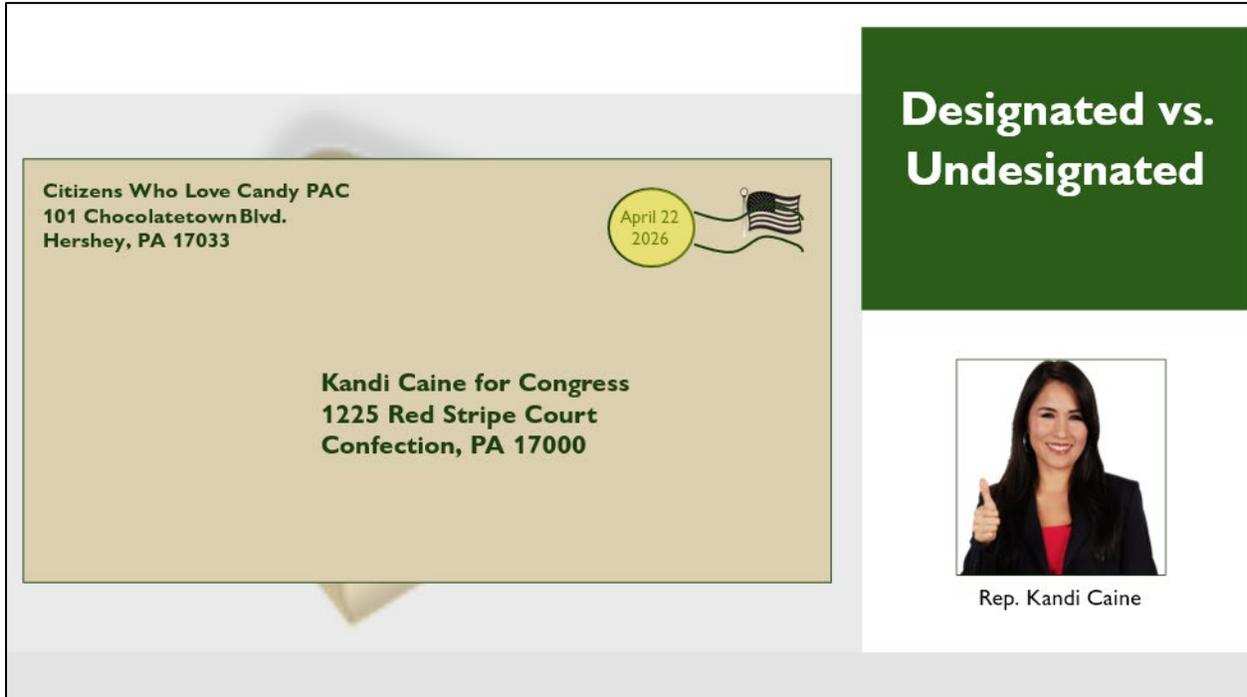
Example, continued:

Let's work through the check. The date on the check is April 21 and the contribution is from a qualified multicandidate committee (identified as such on the check).

The image displays a check from Citizens Who Love Candy PAC, a qualified multicandidate committee, for \$7,000.00 dated April 21, 2026, payable to Rep. Kandi Caine. A callout indicates the primary election is April 23, and another callout shows the check was dated April 22, 2024. A third callout states the contribution limit is \$5,000 per election. A red banner at the bottom of the check area reads "EXCESSIVE CONTRIBUTION". To the right, a green box contains the text "Designated vs. Undesignated" and a photo of Rep. Kandi Caine with the caption "Rep. Kandi Caine".

Since the contribution was not designated, the **date made** determines which election it counts against. To determine date made, the campaign must use the date a contribution is postmarked or hand-delivered (and NOT the date on the check).

(Had the PAC designated the contribution, the designation would have determined the election limit that the contribution counts against. However, campaigns can only accept post-election contributions to the extent they have debt from that election.)



This contribution was mailed on April 22, the day before the primary date, and thus will count against the primary limit, because the date of the postmark is on or before the date of the primary.

However, because it was undesignated, it is a \$7,000 contribution to the primary, and therefore excessive.

To resolve the situation, the campaign has two choices:

- 1. Refund the excessive portion, OR**
- 2. Ask the PAC to redesignate that amount to another election.**

Designating Contributions

Generally, campaigns may presumptively redesignate contributions received from an individual or nonmulticandidate committee to another election within the same cycle.

Since Candy PAC is a multicandidate PAC, campaign must request and receive redesignation

Campaign Requests Redesignation

1

Campaign must offer PAC the option to receive a refund

2

Campaign must receive signed redesignation within 60 days of receipt of contribution

3

If process is not completed within 60 days, campaign must refund excessive portion to PAC

F. Redesignation procedures

1. Refund

Campaign must refund or seek redesignation within 60 days.

2. **Redesignate** (11 CFR [110.1\(b\)\(5\)\(ii\)\(B\)\(1\)-\(4\)](#))
- a) Campaign must offer refund option when asking PAC for redesignation.
 - b) Signed redesignation authorization must be received by campaign within 60 days of their receipt of original contribution.
 - c) If redesignation process not completed within 60 day window, campaign must refund the excessive portion back to the PAC.
 - d) Electronic contributor redesignations: Possible if they can provide a sufficient level of assurance as to the contributors' identities and intents.

More: Interpretive Rule Regarding Electronic Contributor Redesignations, 76 FR 16233 (March 23, 2011) - www.fec.gov/resources/cms-content/documents/fedreg_notice_2011-02_EO13892.pdf

Redesignating contributions given - www.fec.gov/help-candidates-and-committees/filing-pac-reports/redesignating-contributions-given/

Designated vs. Undesignated



Ken D. Crusher



G. Avoiding excessive contributions

- 1. Designate election for all contributions – highly recommended.

2. Designation required if:
 - a) PAC intends contribution to count toward a future election, beyond the upcoming election.
 - b) Making debt retirement contribution for past election.

More: Designating contributions made by nonconnected PACs - www.fec.gov/help-candidates-and-committees/making-disbursements-pac/designation-contributions-made-nonconnected-pac/

Best practice: avoid excessive contributions by designating all contributions!

SCENARIO: Hosting Events for Candidates & In-Kind Contributions

Event for Candidate



Ken D. Crusher

Heath wants to invite partners and clients to a breakfast in the main reception room at his partnership's headquarters to meet with candidate Ken D. Crusher.



Heath Bahr, Esq.

Heath directs his secretary to reserve the room and email the invitation that asks the guests to bring their checkbooks.

Heath Bahr, a partner in the law firm of Candy Kingdom LLP, has an idea to help broaden the support base for candidate Ken D. Crusher. Heath would like to host a meet and greet at his partnership's headquarters and invite all his partners and clients.

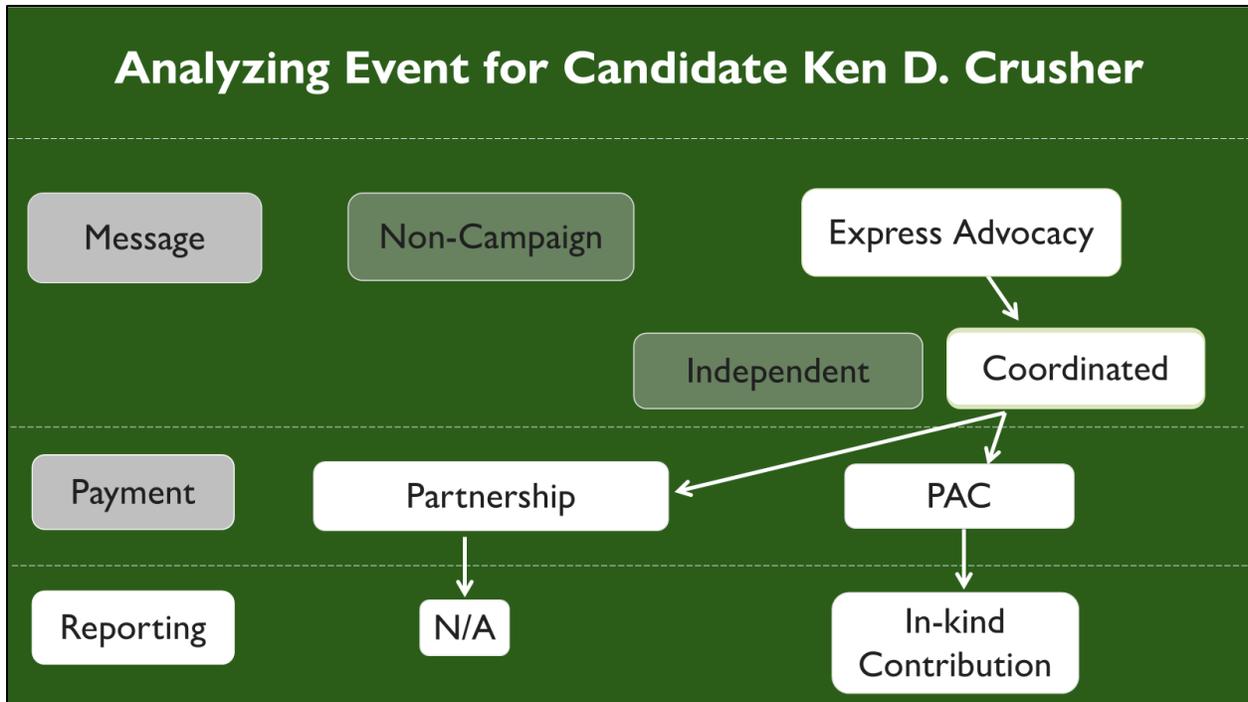
Heath discusses his idea with the Crusher Campaign Manager and they agree that a fundraising breakfast held at the partnership's very nice boardroom on March 30, 2026, would work best for candidate Crusher.

On March 14, 2026, a couple weeks prior to the scheduled event, Heath enlists his secretary to assist with event logistics. He directs her to reserve the boardroom at the partnership for March 30, 2026, and to draft the email invitation. He reviews the invitation to ensure it includes a note for the invited guests to bring their checkbooks. Heath signs off on the draft and his secretary emails the invitation out that same afternoon.

Let's look at the factors that we need to consider for this event...

Hosting events for candidates (meet and greet or fundraiser)

When planning an event, the **message** will determine **who may pay** for the event and the kind of **reporting** needed.

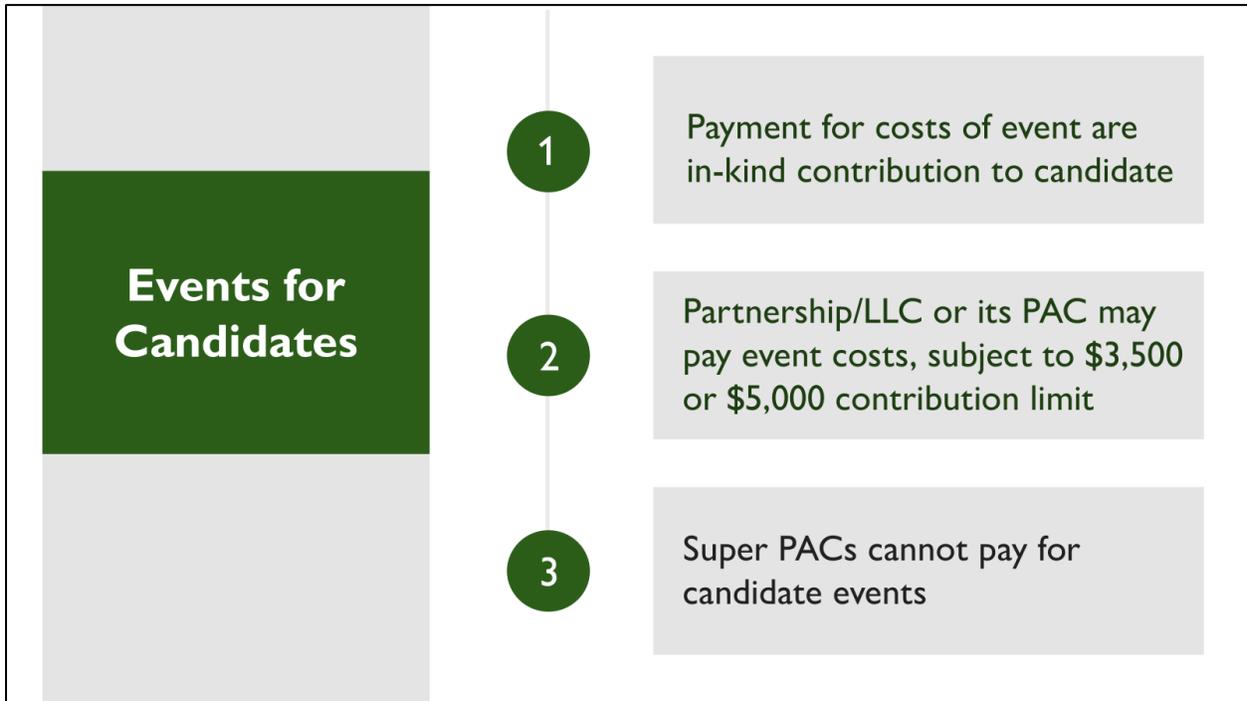


In this case, the message contains express advocacy (fundraising), coordinated with the partnership and the campaign. Thus, the activity results in an in-kind contribution. As permissible sources of contributions, either the partnership or its PAC may pay for the expenses of the event.

If the PAC pays, it must report the in-kind contribution. Assuming the PAC has qualified as a multicandidate committee, the contribution counts against the \$5,000 limit.

If the partnership pays, it is dually attributed to the partnership's \$3,500 limit and to the individual limits of the partners based on their share in the partnership (or alternative agreement).

In any case, the campaign must report receiving the contribution and all must follow the rules for hosting such events.



Rules for hosting events and fundraisers for candidates:

- **Costs incurred for events held on behalf of candidates are in-kind contributions subject to limitations, prohibitions and reporting requirements.**
Costs incurred might include such items as meeting space, food and catering, invitations, staff time, and an email or mailing list.
- **Who may pay for such events?**
Traditional nonconnected PACs and the federal accounts of Hybrid PACs
- **Who may NOT pay for such events?**
Super PACs and non-contribution accounts of Hybrid PACs
- **Partnership PACs - special notes**
Either the partnership may pay for the costs of the event (\$3,500 limit; dually attributed to partnership and eligible partners) or the PAC may pay (\$5,000 limit if PAC is multicandidate).
- **Disclose costs of event as in-kind contribution**

**Reporting Example #5:
Itemizing PAC Payment for Candidate Fundraiser as In-Kind Contribution**

Event for Candidate

Ken D. Crusher

Heath Bahr, Esq.

Candy Kingdom LLP PAC

To pay for the arrangements for the fundraiser, Heath asks the Candy Kingdom LLP PAC to write a check to the partnership on March 30, 2026, to cover the costs of the event.

To pay for the arrangements for the fundraiser, Heath asks the Candy Kingdom LLP PAC to write a check to the partnership on March 30, 2026, to cover the costs of the event.

1. How does the PAC disclose the transaction?

2. What information do we need to disclose?

**Answers to Reporting Example #5:
Itemizing PAC Payment for Candidate Fundraiser as In-Kind Contribution**

1. How does the PAC disclose the transaction?

Answer: The payment for the use of the Candy Kingdom LLP meeting room, email list and staff time to organize the event represent in-kind contributions to the federal candidate, Ken D. Crusher.

2. What information do we need to disclose?

Answer: For in-kind contributions, the date the contribution is “made” is the date the candidate receives the benefit of the goods or services. Here, the in-kind contribution was made on March 30, 2026, the date of the fundraiser, and must be disclosed on a Schedule B for Line 23. Candy Kingdom LLP is listed as the payee (provider of the resources), and the purpose box includes a notation that it is an in-kind contribution. All candidate and election information for Senate candidate Crusher is noted in the appropriate boxes.

**Payment for
Use of Facilities**

Report contribution
made on date of event

**FEC Form 3X:
Schedule B, Line 23**

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

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)
Candy Kingdom LLP PAC

Full Name (Last, First, Middle Initial)
A. Candy Kingdom LLP

Mailing Address
15101 Candytuft Lane

City
Rockville State **MD** Zip Code **20853**

Purpose of Disbursement
Email list/meeting room/staff time (in-kind)

Candidate Name
Ken D. Crusher

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: **MD** District:

Date of Disbursement
03 / 30 / 2026

FEC Identification Number
C

Amount of Each Disbursement this Period
1,000.00

Memo Item



POLL QUESTION

Who may collect the contributions for the PAC's candidate fundraiser?

- A: Partners who aren't otherwise prohibited
- B: The PAC
- C: The campaign
- D: Any of the above

POLL ANSWER

Who may collect the contributions for the PAC's candidate fundraiser?

- A: Partners who aren't otherwise prohibited
- B: The PAC
- C: The campaign
- D: Any of the above**

Points to Remember:

- In-kind contributions for events include the fair market value of staff time, which includes compensation, benefits and overhead. It also includes the fair market value of meeting rooms, catering/food services or mailing/phone lists.
- Date of disbursement = date on which good/service is provided (event date)
- Include all candidate and election information in the appropriate fields.

Events for Candidates

Collecting Campaign Contributions at Event

Who may collect contributions?
Campaign, PAC, partnership or partner (provided partner/partnership is not a prohibited source)

If PAC collects contributions:

- Campaign/PAC reports as earmarked contributions

If partnership/partner collects contributions:

- Partnership/partner files conduit report with FEC
- Campaign reports as earmarked contributions



Avoid earmarking rules by having campaign collect contributions

B. Collecting contributions at events for candidates

1. Campaign, PAC, partnership or partner may collect contributions.
2. **Exception:** A partner or partnership that is prohibited from making contributions (because it is incorporated, a foreign national or a federal contractor) is also prohibited from collecting them.
3. If PAC collects contributions for campaign, PAC is considered conduit and both campaign and PAC must follow rules for reporting earmarked contributions.
4. If partnership, partner or individual collects contributions and forwards them to campaign, earmarking rules at [11 CFR 110.6](#) are triggered (along with complex reporting) for both individual (or firm) and campaign.

More: Making in-kind contributions to candidates - www.fec.gov/help-candidates-and-committees/making-disbursements-pac/making-kind-contributions-candidates/

Best practice: Avoid triggering earmarking rules and reporting by having a campaign representative collect the contributions

II. Independent Expenditures (All Nonconnected Committees)

▼ **Independent Expenditures**

- No coordination
- Express advocacy
- Unlimited

Supporting Candidates

Federal Account

Noncontribution Account

Nonconnected PAC Super PAC Hybrid PAC

- A. **Who makes them and what funds may be used?**
1. **Super PACs** – May use unlimited contributions raised from any source (except foreign nationals, federal contractors, national banks or federally chartered corporations.)
 2. **Traditional federal nonconnected PACs** – May use funds that are raised within normal federal contribution limits and prohibitions.
 3. **Hybrid PACs** – May use either its federal PAC (#2) subject to restrictions or its non-contribution account which may use unlimited contributions raised from any source (except foreign nationals, federal contractors, national banks or federally chartered corporations.).

Independent Expenditures

Communications that:

- Expressly advocate the election or defeat of a clearly identified candidate; and
- Are made without cooperation, consultation, request or suggestion of candidate or party committee



B. Definition ([11 CFR 100.16](#))

Expenditure for communication that “expressly advocates” the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.

C. Clearly identified ([11 CFR 100.17](#))

A candidate’s name, nickname, photograph or drawing appears or identity is otherwise apparent through references.

- “The President”
- “Your Congressman”
- “The incumbent”

Independent Expenditures



Express Advocacy

- Message unmistakably urges election or defeat of a clearly identified federal candidate
- Two-part definition:
 - ▶ Specific call to action
 - ▶ Only reasonable interpretation test

D. Express advocacy ([11 CFR 100.22](#))

Message unmistakably urges election or defeat of one or more clearly identified candidates.

1. **Two-part definition of unmistakably urging election or defeat**
 - Part A: Specific call to action
 - Part B: “Only reasonable interpretation test”

Express Advocacy

Specific Call to Action

- Explicit words of advocacy for or against a federal candidate
- Urging action with respect to candidates associated with a particular issue
- Campaign slogan or words



2. **Part A: Specific call to action ([11 CFR 100.22\(a\)](#))**
 - a) **Explicit words of advocacy for or against a federal candidate**
 - “Re-elect your Congressman”
 - “Support your Democratic nominee”
 - “Reject the incumbent”
 - b) **Urging action with respect to candidates associated with a particular issue**

Example: “Vote Pro-Environment,” when accompanied by names or photographs of candidates identified as supporting the issue.
 - c) **Campaign slogan or words that can have no other reasonable meaning than to support or oppose candidate**

Examples: posters, bumper stickers, pins with campaign slogans

Only Reasonable Interpretation Test

When taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidates.

Express Advocacy



3. Part B: “Only reasonable interpretation test” ([11 CFR 100.22\(b\)](#))

Absent explicit words of advocacy for or against a candidate, the communication, when taken as whole and with limited reference to external events, can only be interpreted by reasonable person as “encouraging action to elect or defeat” federal candidate.

E. No limits

The PAC may spend an unlimited amount because the expenditure is not coordinated.

F. Not coordinated

- If coordinated, in-kind contribution results
- Coordination is determined by three-prong test

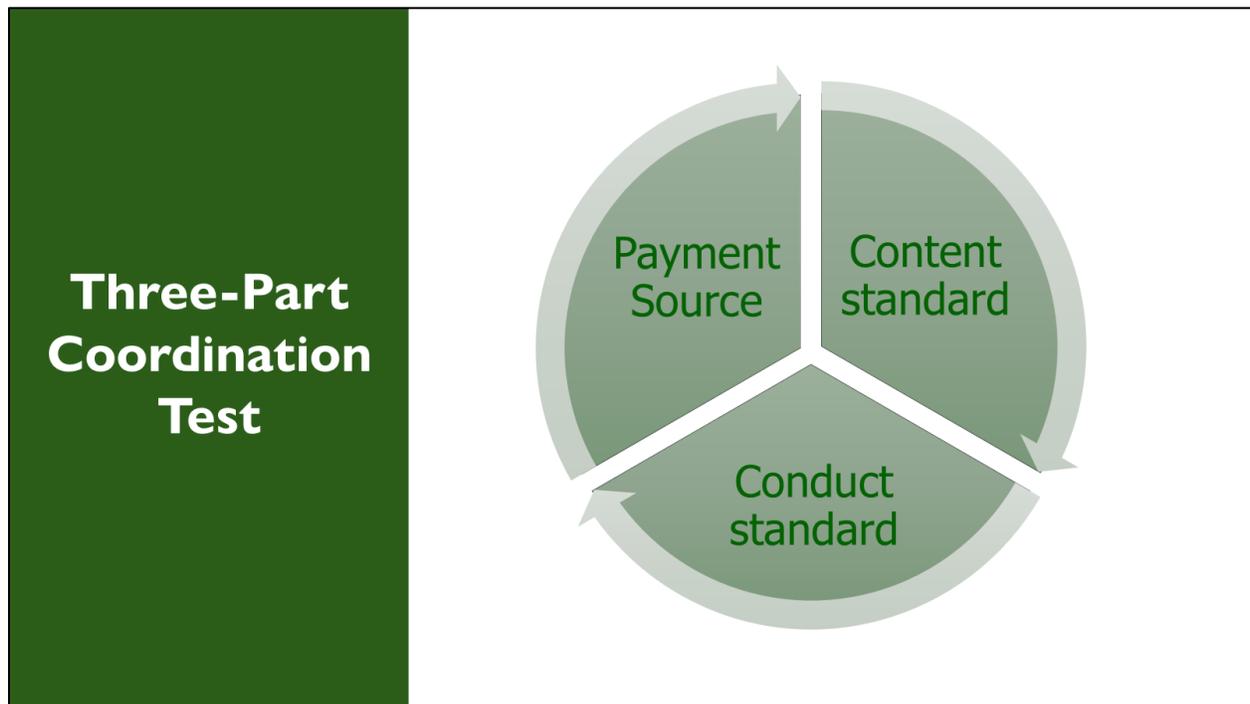
III. Coordinated Communications

A. Definition of coordination ([11 CFR 109.20](#))

Coordination means “made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or their agents, or a political party committee or its agents.”

B. Coordinated communication = in-kind contribution ([11 CFR 109.21\(b\)\(1\)](#))

1. Prohibited by Super PACs and non-contribution account of Hybrid PACs as well as corporations and labor organizations.
2. Subject to contribution limitations when done by individual or traditional PAC.
3. In many cases, reportable by campaign or party committee as in-kind contribution.



C. Three-part test to determine if coordinated communication ([11 CFR 109.21](#))

Three-part test; all three must be satisfied to justify conclusion that payments for a coordinated communication are for the purpose of influencing a federal election.

Three-Part Coordination Test



Paid for by someone other than the
referenced candidate



- 1. Source of payment**
Communication must be paid for by someone other than a candidate, an authorized committee or political party committee with whom the message is coordinated. PAC pays for communication.

<p>Three-Part Coordination Test</p>  <p>Content Standard</p>	<p>Includes at least one of the following:</p> <ul style="list-style-type: none">■ Electioneering communication■ Republication of campaign materials■ Express advocacy or its functional equivalent■ Public communication referring to a candidate, distributed in candidate's jurisdiction within certain timeframe before election
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2. **“Content standard” ([11 CFR 109.21\(c\)\(1\)-\(5\)](#))**
Applicable to PACs: republication of candidate material, express advocacy, public communication made within certain time frames that refers to a clearly identified candidate and a communication that is the “functional equivalent of express advocacy.”
- a) **Express advocacy**
 - b) **Republication of candidate material**
 - c) **Public communications that are the functional equivalent of express advocacy ([11 CFR 109.21\(c\)\(5\)](#))**
A communication is the functional equivalent of express advocacy if it is susceptible of no reasonable interpretation other than as an appeal to vote for or against a clearly identified federal candidate.
 - (1) Applies without regard to the timing of the communication or the targeted audience.
 - (2) Applies outside the pre-election period used for other public communications.
 - (3) In its application of this test, Commission will follow Supreme Court’s reasoning in [FEC v. Wisconsin Right to Life](#).

More: Explanation and justification for rules on coordinated communications - sers.fec.gov/fosers/showpdf.htm?docid=5395

- d) **Public communications content standard**
- (1) **If ad is a public communication that:**
- Does NOT contain express advocacy;
 - Mentions candidate;
 - Is disseminated in jurisdiction where candidate is running; AND
 - Is done so during certain time frames,
- Then it will meet content standard.
- (2) **Time frames**

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



- (a) **Senate and House candidates** = 90 days before a primary or general election.
- (b) **Presidential candidates** = Entire period from 120 days before the primary through date of general election.
- (c) **Political parties (with no reference to candidate):**
- **Presidential cycle (2026)** = 120 days before the date of a primary (on a state-by-state basis) through the general election;
 - **Non-presidential cycle (2026)** = 90 days before a primary or general election.

Three-Part Coordination Test

Conduct Standard



Includes at least one of the following:

- Request or suggestion
- Material involvement
- Substantial discussion
- Common vendor (120-day safe harbor)
- Former employee/independent contractor (120-day safe harbor)

3. “Conduct standard”

Test satisfied if communication meets any one of these five standards:

- 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** ([11 CFR 109.21\(d\)\(4\)](#))
Safe harbor of 120 days applies.
- e) **Former employee/independent contractor** ([11 CFR 109.21\(d\)\(5\)](#))
Safe harbor of 120 days applies.

Firewall policy may be put in place in cases of common vendors, former employees or former contractors; document in writing.
See [11 CFR 109.21\(h\)](#).

COORDINATION EQUATION



COORDINATION EQUATION

= In-kind Contribution



SCENARIO: Coordinated Communications

Coordinated Communications

Larry Licorice, a founding member of Citizens Who Love Candy PAC, is a friend of Lolly Pop, an incumbent Senator from Pennsylvania facing a tough primary challenge in 2026.

Licorice tells Senator Pop that he wants to help, and they set up meetings between the PAC's Director, Joy Almond, and Senator Pop's Campaign Manager, Marshall Mello.



Larry Licorice



Sen. Lolly Pop

Coordinated Communications

Ms. Almond and Mr. Mello met several times to discuss the campaign's needs. From these discussions emerged a plan that Citizens Who Love Candy PAC followed.

The plan includes two ads...



Joy Almond



Marshall Mello

Let's analyze both of these advertisements...

We'll discuss the following questions...

1. Who is paying for the communication (source of payment)?
2. Is there express advocacy involved?
3. What is triggered by the content and timing of the communication?
4. How does the conduct of the candidate's campaign and the PAC affect our analysis?

First, Citizens Who Love Candy PAC paid for a radio ad to be broadcast on radio stations across the state two weeks before the April 23 primary election. The ad’s text read:

Ad #1: Statewide Radio Ad



“We are at an important moment. Over the next several weeks, Congress will debate how to make our economy stronger. Fortunately, your Senators have always voted for legislation that keeps our economy strong and supports working people in our state. Please call Senators Lolly Pop and Peggy Parker and urge them to support the American Economic Improvement Act when it comes up for a vote in May. Call the Capitol switchboard today at 202-224-3121 and ask for your Senators.”

1. Who is paying for the communication (source of payment)?

Answer: Citizens Who Love Candy PAC



POLL QUESTION

Does Ad #1 contain express advocacy?

- A: Yes
- B: No

POLL ANSWER

Does Ad #1 contain express advocacy?

A: Yes

B: No

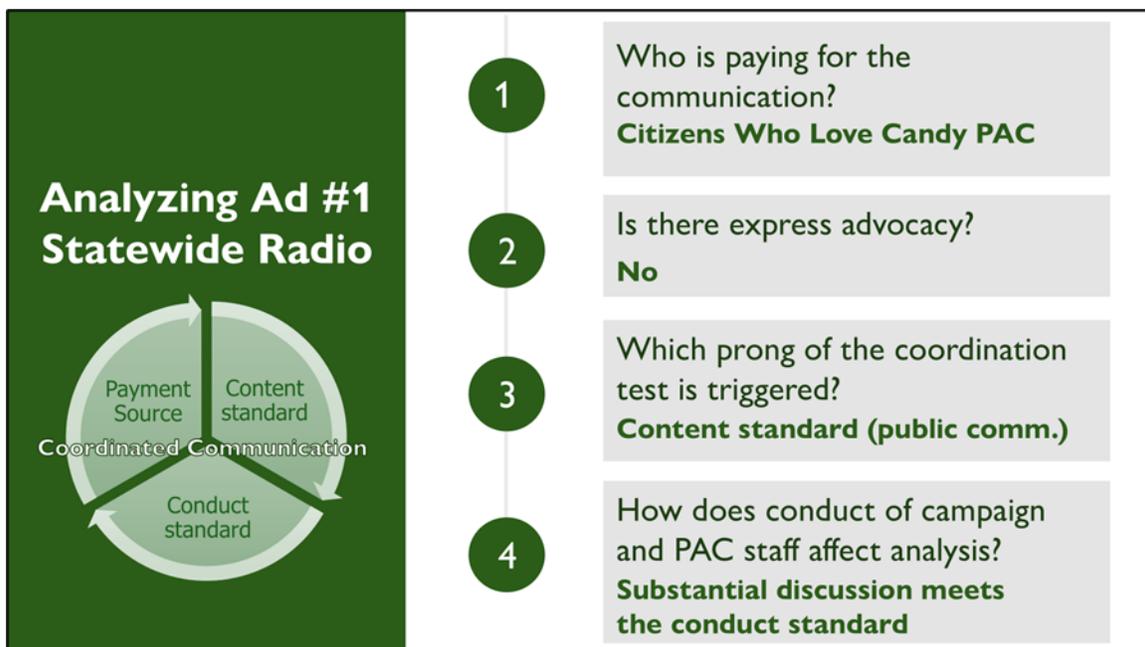
Answer: Ad #1 cannot be construed as express advocacy, because it neither contains the explicit words of election or defeat nor can it only be interpreted by reasonable person as “encouraging action to elect or defeat” federal candidate.

2. What is the content and timing of the communications?

Answer: Even though this seems to be more of an issue advocacy communication, for purposes of coordination, we need to look further than simply express advocacy. Since it mentions Senator Lolly Pop within 90 days of her primary election and runs in Pennsylvania, this meets the content standard for public communication aired during a certain time frame in candidate’s jurisdiction.

3. How does the conduct of the candidate’s campaign and the PAC affect our analysis?

Answer: According to our scenario, the ads were done as a result of “substantial discussion” between an agent of Senator Pop’s authorized committee (Campaign Manager Mello) and the PAC’s Executive Director (Almond). As such, this meets the “conduct standard” of the coordination rules.



Result: This advertisement results in an in-kind contribution subject to contribution limits. Thus, it could not be paid for by a Super PAC or the non-contribution account of a Hybrid PAC.

Let's look at Ad #2...

Ad #2:

One week before the April 23 primary election, Citizens Who Love Candy PAC airs the following ad on a cable system serving a county of less than 25,000 people, where polling showed Senator Pop having trouble.

Ad #2: Targeted Cable Ad

CANDY PAC

April 2026

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

Re-Elect Lolly Pop for Senate

Juniata County Pop. 24K

“In nearly six years as a United States Senator, Lolly Pop has never missed a vote. She is putting the interests of Pennsylvania first and working hard to ensure that the voice of Pennsylvania’s families are heard loud and clear in Washington. Let’s fight to keep Senator Pop in Washington for another term. Vote for her on April 21!”

We'll discuss the following questions...

1. Who is paying for the communication (source of payment)?
2. Is there express advocacy involved?
3. What is triggered by the content and timing of the communication?
4. How does the conduct of the candidate's campaign and the PAC affect our analysis?

1. Who is paying for the communication (source of payment)?

Answer: Citizens Who Love Candy PAC. Therefore, the “source of payment” standard is met.

2. Is there express advocacy involved?

Answer: Yes, the communication contains the explicit words “vote for.”

3. What is the content and timing of the communications?

Answer: Ad #2 runs just one week before the election and is clearly express advocacy (thus meeting the content prong), as it states, “Let’s fight to keep Senator Pop in Washington for another term. Vote for her on April 23!”

4. How does the conduct of the candidate’s campaign and the PAC affect our analysis?

Answer: The ads were done as a result of “substantial discussion” between an agent of Senator Pop’s authorized committee (Campaign Manager Mello) and the PAC’s Executive Director (Almond). As such, this meets the “conduct standard” of the coordination rules.

Analyzing Ad #2 Targeted Cable Ad

Coordinated Communication

- 1 Who is paying for the communication?
Citizens Who Love Candy PAC
- 2 Is there express advocacy?
No
- 3 Which prong of the coordination test is triggered?
Content standard (exp. advocacy)
- 4 How does conduct of campaign and PAC staff affect analysis?
Substantial discussion meets the conduct standard

Result: *This advertisement results in an in-kind contribution subject to contribution limits. Thus, it could not be paid for by a Super PAC or the non-contribution account of a Hybrid PAC.*



POLL QUESTION

If Senator Lolly Pop had merely asked PAC director Licorice to have the PAC air the ads, would that have changed the result?

- A: Yes
- B: No

POLL ANSWER:

If Senator Lolly Pop had merely asked PAC director Licorice to have the PAC air the ads, would that have changed the result?

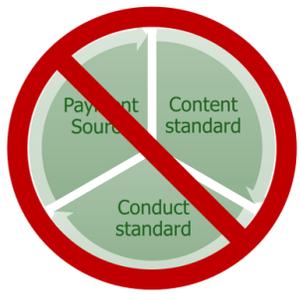
- A: Yes
- B: No

Answer: No, in that case, they would meet a different conduct standard (request or suggestion by candidate). The communications would still be coordinated and thus in-kind contributions.

To avoid triggering limitations and prohibitions, avoid meeting all three prongs of the coordination test:

- Source of payment
- Conduct
- Content

Best Practice



Best practice: To avoid triggering contribution limits and prohibitions, avoid meeting all three prongs of the coordination test.

Now let's cover the rules for disclaimers, which are required for any public communication by a PAC (whether coordinated or independent).

IV. Disclaimers ([11 CFR 110.11](#))

Disclaimers



Identify who paid for a communication

Clarify whether a campaign authorized it

Appear on “public communications,”
widely distributed emails, public websites

Public Communications



A. Public communication defined (11 CFR 100.26)

Includes communications made using the following media:

- Broadcast, cable or satellite;
- Newspaper or magazine;
- Mass mailing (> 500 substantially similar mailings within 30 days);
- Outdoor advertising facility;
- Phone bank (> 500 substantially similar calls within 30 days);
- Communications placed or promoted for a fee on another person's website, digital device, application, or advertising platform.

B. Disclaimer also required on:

1. Electronic mail (> 500 substantially similar communications sent by a political committee); and
2. Websites of political committees.

Disclaimers



Must be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of who is responsible for the message

3. Disclaimer must be clear and conspicuous

Print Disclaimer

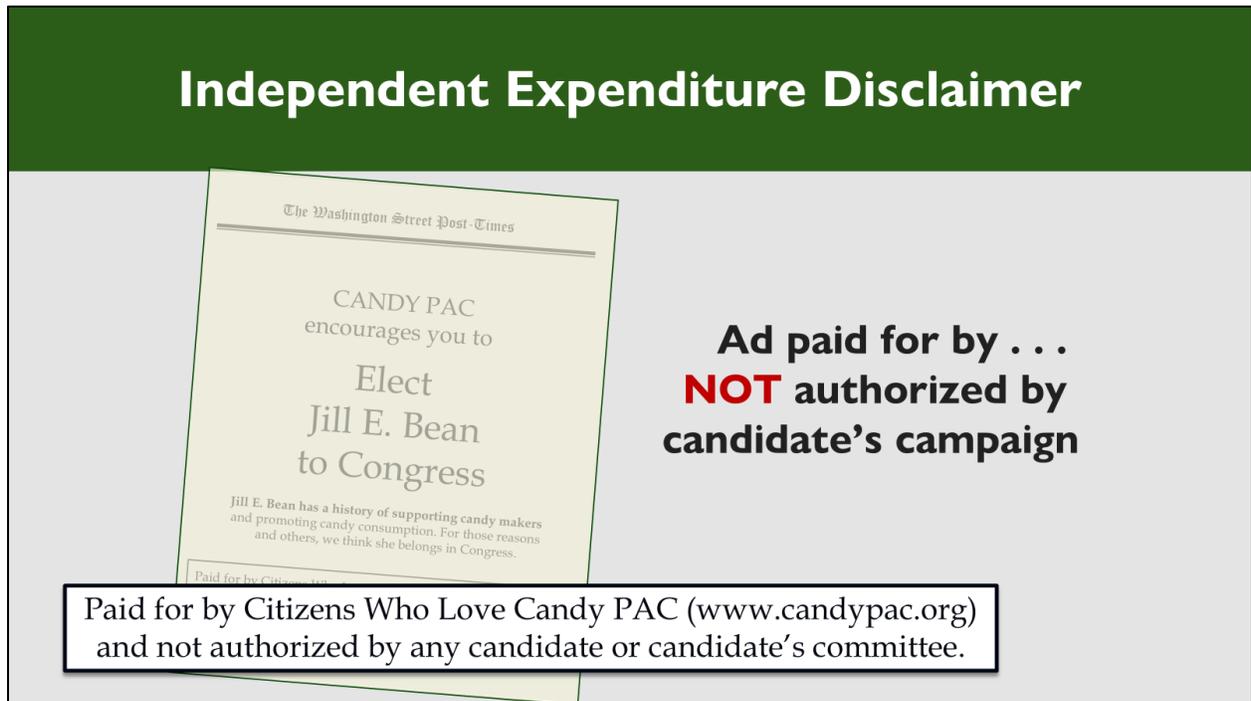


Disclaimer must be contained within a printed box set apart from content of communication

4. **Special rules for printed communications ([11 CFR 110.11\(c\)\(2\)](#))**
 - a) Disclaimer must be contained within a printed box set apart from content of communication.
 - b) Print must be of sufficient type size to be “clearly readable” and must have a reasonable degree of color contrast between the background and the printed statement.
 - c) **Safe harbor:** 12-point type in newspapers, magazines, flyers, signs and other printed communications no larger than 24” x 36.”

Example: In this example of a printed communication, the disclaimer for an independent expenditure appears in a box with color contrast. The notice indicates that the PAC paid for the ad and that it was not authorized by any candidate or candidate's committee, and gives contact information for the PAC.

Independent Expenditure Disclaimer



The image shows a printed communication from 'The Washington Street Post-Times'. The text on the page reads: 'CANDY PAC encourages you to Elect Jill E. Bean to Congress'. Below this, it says: 'Jill E. Bean has a history of supporting candy makers and promoting candy consumption. For those reasons and others, we think she belongs in Congress.' At the bottom of the page, it says: 'Paid for by Citizens Who Love Candy PAC (www.candypac.org)'. To the right of the page, there is a bolded text: 'Ad paid for by . . . **NOT** authorized by candidate's campaign'. Below the printed communication, there is a black-bordered box with white text: 'Paid for by Citizens Who Love Candy PAC (www.candypac.org) and not authorized by any candidate or candidate's committee.'

**Ad paid for by . . .
NOT authorized by
candidate's campaign**

Paid for by Citizens Who Love Candy PAC (www.candypac.org)
and not authorized by any candidate or candidate's committee.



Approval statement voiced by sponsor
Disclaimer \geq 4% picture height; \geq 4 seconds

Television Disclaimer

5. “Stand by your ad” requirements for TV and radio ads (11 CFR [110.11\(c\)\(3\)](#) and [\(4\)](#))

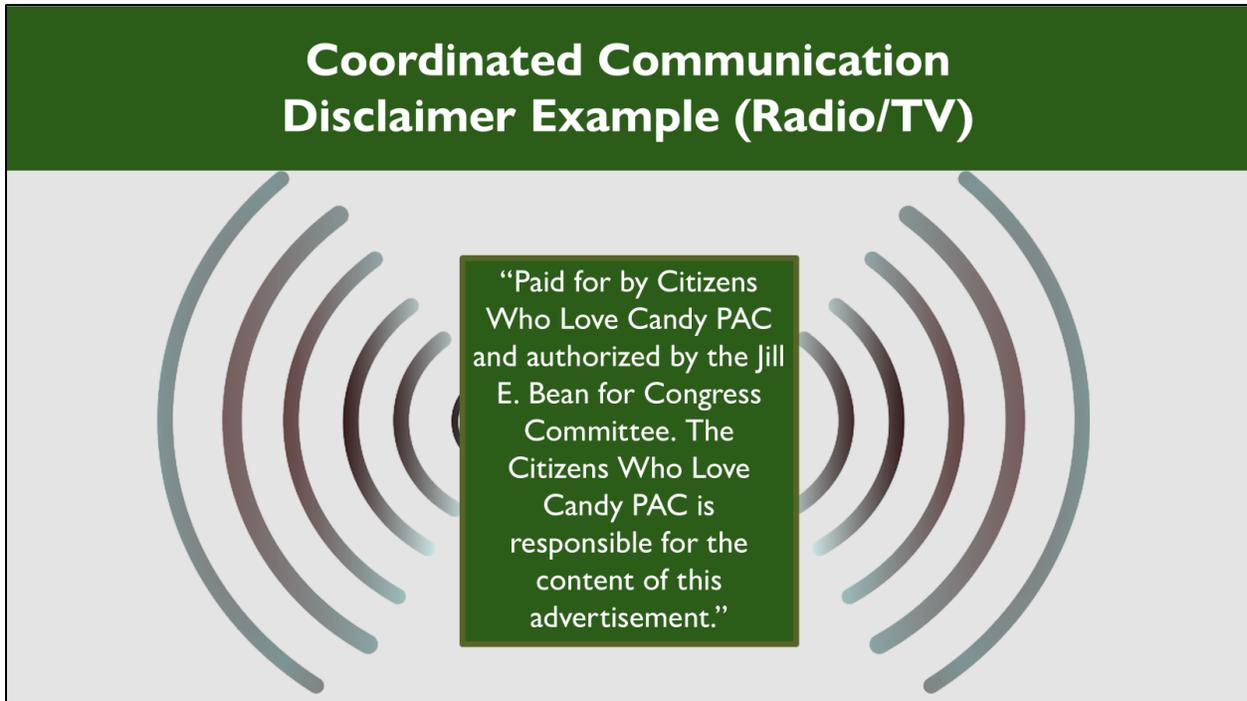
Additional statement required for TV and radio ads; content varies depending on whether candidate authorized ad or not.

a) **If authorized by the candidate and candidate’s committee:**

- (1) Candidate must deliver an audio statement identifying himself/herself, and stating that he/she has approved the communication.
- (2) **TV only: Written and audio statement required**
 - Full-screen view of the candidate making the statement; or photo of candidate that appears during candidate’s voice-over statement (**safe harbor:** 80% vertical picture height).
 - “Clearly readable” written statement at end of communication: \geq 4% vertical picture height, \geq 4 seconds, reasonable degree of color contrast between background and statement.

b) **If not authorized by the candidate’s committee (for example, an independent expenditure)**

- (1) There must be an audio statement by the entity responsible for the communication stating that he/she/they are responsible for the communication.
- (2) **TV only:** A similar statement must also appear in writing, following safe harbors above.



C. Wording of disclaimer

1. Communications authorized by candidate ([11 CFR 110.11\(b\)\(2\)](#))

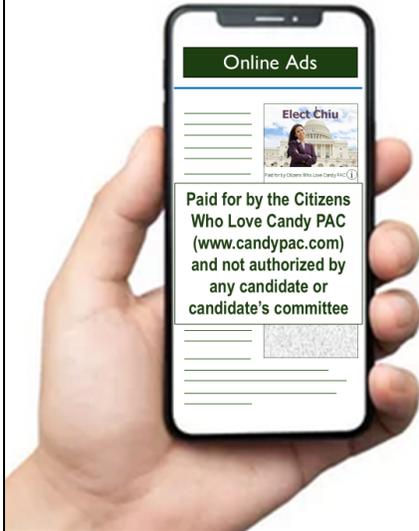
- a) If a committee pays for a communication that is authorized by a candidate or candidate’s committee, it must identify the committee that paid for the communication and the name of the candidate or campaign that authorized the communication.
- b) *“Paid for by Citizens Who Love Candy PAC and authorized by Jill E. Bean for Congress.”*
- c) Include “Stand by your ad” message on radio and TV ads.

Independent Expenditure Disclaimer Example (Radio/TV)



2. **Communications not authorized by candidate (for example, independent expenditures, public communications that were not coordinated) ([11 CFR 110.11\(b\)\(3\)](#))**
 - a) Communications not authorized by a candidate or his/her campaign, including any solicitation, must disclose the full name and permanent street address, telephone number or website address of the person who paid for the communication, and also state that the communication was not approved by any candidate.
 - b) *“Paid for by the Citizens Who Love Candy PAC (www.candypac.org) and not authorized by any candidate or candidate’s committee.”*
 - c) **TV/radio version of wording:**
Paid for by Citizens Who Love Candy PAC (www.candypac.org) and not authorized by any candidate or candidate’s committee. The Citizens Who Love Candy PAC is responsible for the content of this advertisement.

Internet Disclaimers



Similar to print and broadcast media, but no stand-by-your-ad requirement

Adapted disclaimer when full disclaimer would occupy >25% of communication, plus:

- Visible/audible indicator that full disclaimer is available; and
- Technological mechanism to access full disclaimer

3. **Specific requirements for internet public communications** **(11 CFR 110.11(c)(5))**

- a) Communication with text or graphic components must include clearly readable written disclaimer that “can be viewed without taking any action”
- b) Audio-only communications must include audio disclaimer that recipient can hear without taking any action
- c) Communication with disclaimer displayed within video, disclaimer must be visible for at least four seconds and appear without the recipient taking any action
- d) Adapted “paid for by” disclaimer when full disclaimer would occupy >25% of communication, plus:
- e) Visible/audible indicator that full disclaimer is available (e.g., word, image, sound, symbol, or icon); and
- f) Technological mechanism to access full disclaimer (e.g., hover-over text, pop-up screen, scrolling text, rotating panel, or hyperlink)

More: Commission adopts final rule on internet communications disclaimers and the definition of public communication (FEC Record) -
www.fec.gov/updates/commission-adopts-final-rule-internet-communications-disclaimers-and-definition-public-communication/

Independent Expenditures



No limit on amount of expenditures

Disclosure is required

- Include disclaimer on message
- Report expenditure to FEC

Earlier we defined independent expenditures and mentioned that there is no limit on how much is spent on them, provided there was no coordination. Disclaimers, which we just covered, are required. In addition, there are substantial disclosure requirements.

V. Disclosure of Independent Expenditures

Reporting Independent Expenditures

Report on Schedule E, FEC Form 3X
Date made = date disseminated
Aggregated on a per calendar year, per election, per office sought basis

A. Report using FEC Form 3X/Schedule E during appropriate reporting period

B. Date made = date disseminated

An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated.

More: Interpretive rule on When Certain Independent Expenditures are "Publicly Disseminated" for Reporting Purposes at 76 FR 16233

(October 4, 2011) - www.fec.gov/resources/cms-content/documents/fedreg_notice_2011-13_EO13892.pdf

C. Aggregation

Done on a per calendar year, per election, per office sought (race) basis.

Reporting Independent Expenditures

48-Hour Reports

IE's aggregate **≥\$10,000**
made **≥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 **≥\$1,000** made
<20 days but **>24 hours** before election

Reporting Independent Expenditures

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					

- D. Additional reporting on 24- and 48-hour basis**
1. 24-hour reporting ([11 CFR 104.5\(g\)\(2\)](#))

- a) Must file a **24-Hour Report** for independent expenditures aggregating \$1,000 or more made less than 20 days but more than 24 hours before the day of an election.
 - b) A 24-Hour Report is required each time an additional \$1,000 is aggregated in independent expenditures.
2. **48-hour reporting ([11 CFR 104.5\(g\)\(1\)](#))**
- a) Must file a **48-Hour Report** for independent expenditures aggregating \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
 - b) A 48-Hour Report is required each time an additional \$10,000 is aggregated in independent expenditures.
3. **24- and 48-Hour Reports** are filed using stand-alone Schedule E; check appropriate box to note type of report.

More: 24- and 48-Hour Report time frames can be found on our website - www.fec.gov/help-candidates-and-committees/dates-and-deadlines/

24- and 48-Hour Report webforms - webforms.fec.gov/

E. Multistate IEs in presidential primary elections

1. If IE disseminated in six or more states, must be reported as a single expenditure on 24-Hour Report.
2. Indicate which state, among those states where the IE is distributed, has the next presidential primary and use that primary date to determine whether the IE falls within the 24-hour reporting period.
3. The report must indicate the specific states (or regions, such as “nationwide” or “New England”) where the communication is distributed as memo text.

More: Explanation and Justification for Reporting Multistate Independent Expenditures and Electioneering Communications - sers.fec.gov/fosers/showpdf.htm?docid=401326

Guidance on how to report multistate independent expenditures - www.fec.gov/help-candidates-and-committees/filing-pac-reports/multistate-independent-expenditures/

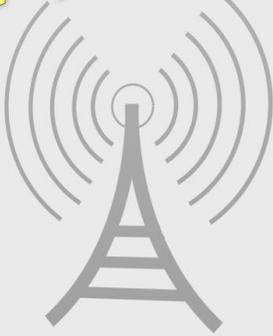
**Reporting Example #6:
Large Last-Minute Independent Expenditures**



Independent Expenditures


Peter Peppermint

CANDY PAC

On October 27, 2026, Candy PAC runs a \$7,500 radio ad on WBQW-FM supporting Peter Peppermint for Congress. The PAC pays for the ad on November 29, 2026.

Background: House candidate Peter Peppermint wouldn't accept PAC contributions and his campaign would not speak to representatives of the Citizens Who Love Candy PAC. However, the PAC still wanted to lend its support to candidate Peppermint.

On October 27, 2026, just before the November 3 general election, the PAC runs a \$7,500 radio ad on WBQW-FM supporting Peter. The bill for the ad was paid on November 29, 2026.

- 1. What type of transaction is this?**

- 2. How must the committee disclose the transaction(s)?**

**Answers to Reporting Example #6:
Large Last-Minute Independent Expenditures**

1. What type of transaction is this?

Answer: The PAC is making an independent expenditure, defined as an expenditure for a communication that “expressly advocates” the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the request or suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.

2. How must the committee disclose the transaction(s)?

Answer: An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated. If it aggregates \$1,000 or more and is made less than 20 days but more than 24 hours before the day of an election, as this expenditure did, the PAC must file a 24-Hour Report on Schedule E disclosing the independent expenditure. The PAC must disclose the independent expenditure again, on Schedule E, for the next regular FEC report (30-Day Post-General Report).

**Reporting
Independent
Expenditure**

**24-Hour Report
FEC Form 3X: 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) Citizens Who Love Candy PAC		FEC IDENTIFICATION NUMBER C 0000004	
Check <input checked="" 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 WBQW-FM		Date of Public Distribution/Dissemination 10 / 27 / 2026	
Mailing Address 22 Commercial Street		Amount 7,500.00	
City Portland	State ME	Zip Code 04101	Date of Disbursement or Obligation
Purpose of Expenditure Radio Ad		Category/Type 004	
Name of Federal Candidate: Peter Peppermint		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House District: 1 <input type="checkbox"/> President <input type="checkbox"/> Senate State: ME
Calendar Year-To-Date Per Election for Office Sought		7,500.00	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

Key facts in the scenario include the date of dissemination (10/27/2026), the fact that it is an advertisement that contained express advocacy, and was not coordinated with the campaign. The PAC will also need to disclose the payee’s name and address, the candidate information, the purpose of the expenditure, the amount and the calendar year-to-date per election for the office sought.

Reporting example continues on next page

**Reporting
Independent
Expenditure**

**Post-General Report
FEC Form 3X: 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) Citizens Who Love Candy PAC		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 WBQW-FM		Date of Public Distribution/Dissemination 10 / 27 / 2026	
Mailing Address 22 Commercial Street		Amount 7,500.00	
City Portland	State ME	Zip Code 04101	Date of Disbursement or Obligation
Purpose of Expenditure Radio Ad		Category/Type 004	
Name of Federal Candidate: Peter Peppermint		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> President <input type="checkbox"/> Senate District: 1 State: ME
Calendar Year-To-Date Per Election for Office Sought		7,500.00	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶

On the next report filed (Post-General report, covering activity through 11/23/2026, and due on 12/03/2026), the PAC must report the same information disclosed on the 24-Hour Report on Schedule E as a MEMO entry because the payment has not been made yet.

Reporting example continues on next page

**Post-General Report
FEC Form 3X: Schedule D, Line 10**

SCHEDULE D (FEC Form 3X) DEBTS AND OBLIGATIONS Excluding Loans		(Use separate schedule(s) for each numbered line)	PAGE 1 OF 1 FOR LINE NUMBER: (check only one) <input type="checkbox"/> 9 <input checked="" type="checkbox"/> 10
NAME OF COMMITTEE (In Full) Citizens Who Love Candy PAC			
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor WBQW-FM		Nature of Debt (Purpose): Radio Ad for Peter Peppermint	
Mailing Address 22 Commercial Street			
City Portland	State ME	Zip Code 04101	
Outstanding Balance Beginning This Period 0.00			
Amount Incurred This Period 7,500.00	Payment This Period 0.00	Outstanding Balance at Close of This Period 7,500.00	

**Reporting Debt
for Independent
Expenditure**

Accordingly, the PAC must report a debt on Schedule D to “WBQW-FM” until it is settled.

When full payment is made to vendor on 11/29/2026, it should be reflected on Schedule E, Line 24 and Schedule D, Line 10 of the Year End Report (covering activity through 12/31/2026, and due on 1/31/2027).

Reporting example continues on next page

Reporting Independent Expenditure Payment

Year-End Report FEC Form 3X: 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) Citizens Who Love Candy PAC		FEC IDENTIFICATION NUMBER C 0000004
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 WBQW-FM		Date of Public Distribution/Dissemination 10 / 27 / 2026
Mailing Address 22 Commercial Street		Amount 7,500.00
City Portland	State ME	Zip Code 04101
Purpose of Expenditure Radio Ad disseminated on 10/27/26		Date of Disbursement or Obligation 11 / 29 / 2026
Name of Federal Candidate: Peter Peppermint		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate District: 1 State: ME
Calendar Year-To-Date Per Election for Office Sought 7,500.00		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶

Year-End Report FEC Form 3X: Schedule D, Line 10

SCHEDULE D (FEC Form 3X) DEBTS AND OBLIGATIONS Excluding Loans		PAGE 1 OF 1
(Use separate schedule(s) for each numbered line)		FOR LINE NUMBER: (check only one) <input type="checkbox"/> 9 <input checked="" type="checkbox"/> 10
NAME OF COMMITTEE (In Full) Citizens Who Love Candy PAC		
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor WBQW-FM		Nature of Debt (Purpose): Radio Ad for Peter Peppermint
Mailing Address 22 Commercial Street		
City Portland	State ME	Zip Code 04101
Outstanding Balance Beginning This Period 7,500.00		
Amount Incurred This Period 0.00	Payment This Period 7,500.00	Outstanding Balance at Close of This Period 0.00

Paying off Debt for Independent Expenditure

Help Reporting Independent Expenditures

Reporting independent expenditures

Political committees that make independent expenditures must disclose them on Schedule E of their regular FEC report and also as required on 24-hour and 48-hour reports.

[Learn how to report independent expenditures on Form 3X ▶](#)

Similarly, individuals, groups, corporations and labor organizations that make independent expenditures must disclose them quarterly on Form 5 and also as required on 24-hour and 48-hour reports.

[Learn how to report independent expenditures on Form 5 ▶](#)

Submit a question to the Reports Analysis Division (RAD)

Authorized representatives

If you represent a committee or another entity registered with the FEC, RAD staff can help answer your reporting questions.

Submit this form and your committee's RAD analyst will email you, usually within 3 business days. Or, for immediate assistance, use your designated analyst's provided contact information to call the analyst by phone during business hours.

Available on FEC.gov

Points to Remember: Reporting Last-Minute Independent Expenditures

- **Debts**
 - Debts include ads that are contracted for but not paid for.
 - When payment for ad is made in subsequent reporting period, report payment on Schedule E, and include date of dissemination in purpose field.
 - Update Schedule D with payment; cross-reference Schedule E.
- **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 per calendar year, per election, per office sought (race) basis.
 - Use Schedule E on FEC Form 3X – check “24-hour” 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 report).
 - 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 FEC Form 3X – check “48-hour” 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 Report).
 - For paper filers, use online webform.
 - 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.

More: Time frames for independent expenditures reporting for the current year -
www.fec.gov/help-candidates-and-committees/dates-and-deadlines/

Making independent expenditures - www.fec.gov/help-candidates-and-committees/making-independent-expenditures/

Reporting independent expenditures on FEC Form 3X - www.fec.gov/help-candidates-and-committees/making-independent-expenditures/reporting-independent-expenditures-form-3x/

Reporting independent expenditures on FEC Form 5 - www.fec.gov/help-candidates-and-committees/making-independent-expenditures/reporting-independent-expenditures-form-5/

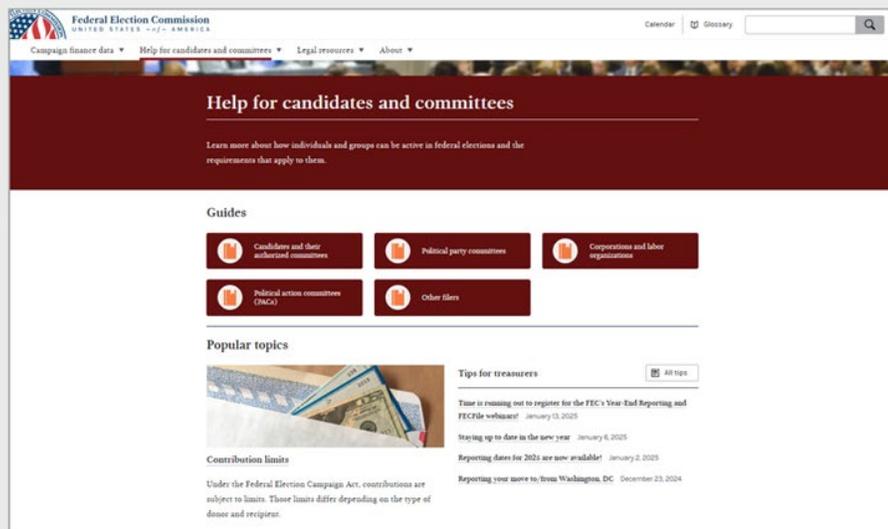
How to get help from the FEC

- Use our online resources
- Call our toll-free information line
- Email your questions to us

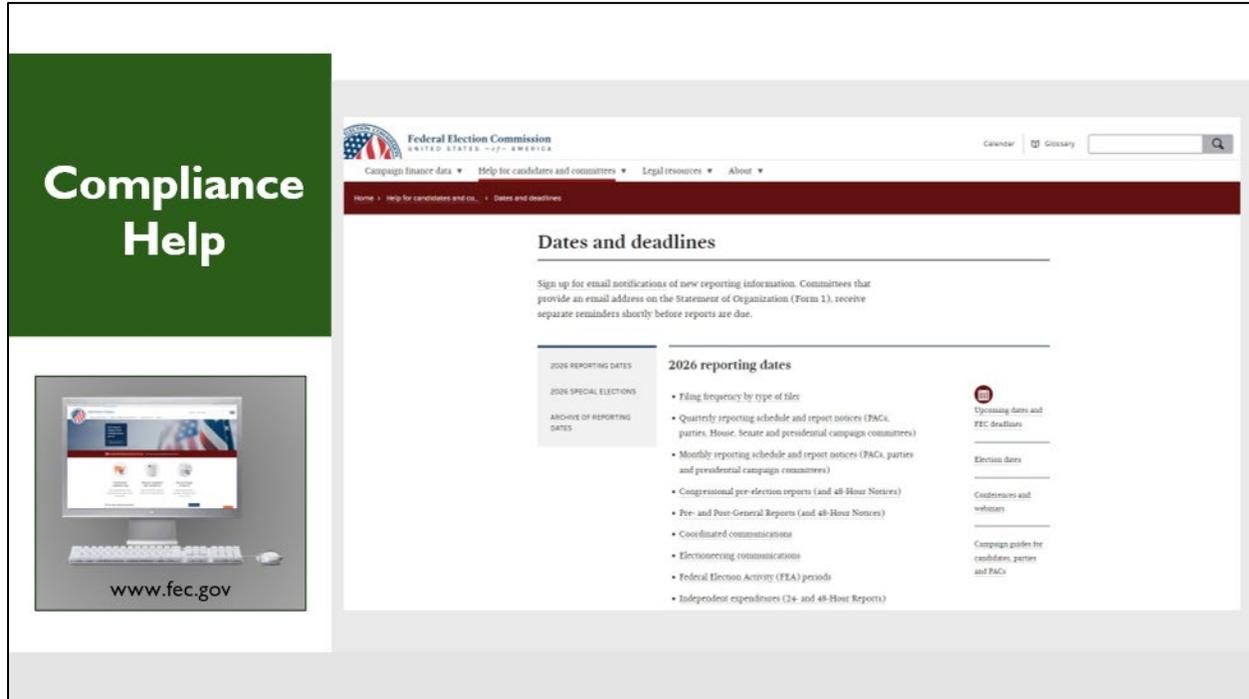
Compliance Help



Compliance Help



<https://www.fec.gov/help-candidates-and-committees/>



Compliance Help

www.fec.gov

Federal Election Commission
UNITED STATES — 57 — AMERICA

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Dates and deadlines

Sign up for email notifications of new reporting information. Committees that provide an email address on the Statement of Organization (Form 1), receive separate reminders shortly before reports are due.

2026 reporting dates

- Filing frequency by type of filer
- Quarterly reporting schedule and report notices (PACs, parties, House, Senate and presidential campaign committees)
- Monthly reporting schedule and report notices (PACs, parties and presidential campaign committees)
- Congressional pre-election reports (and 48-Hour Notices)
- Pre- and Post-General Reports (and 48-Hour Notices)
- Coordinated communications
- Electronoting communications
- Federal Election Activity (FEA) periods
- Independent expenditures (24- and 48-Hour Reports)

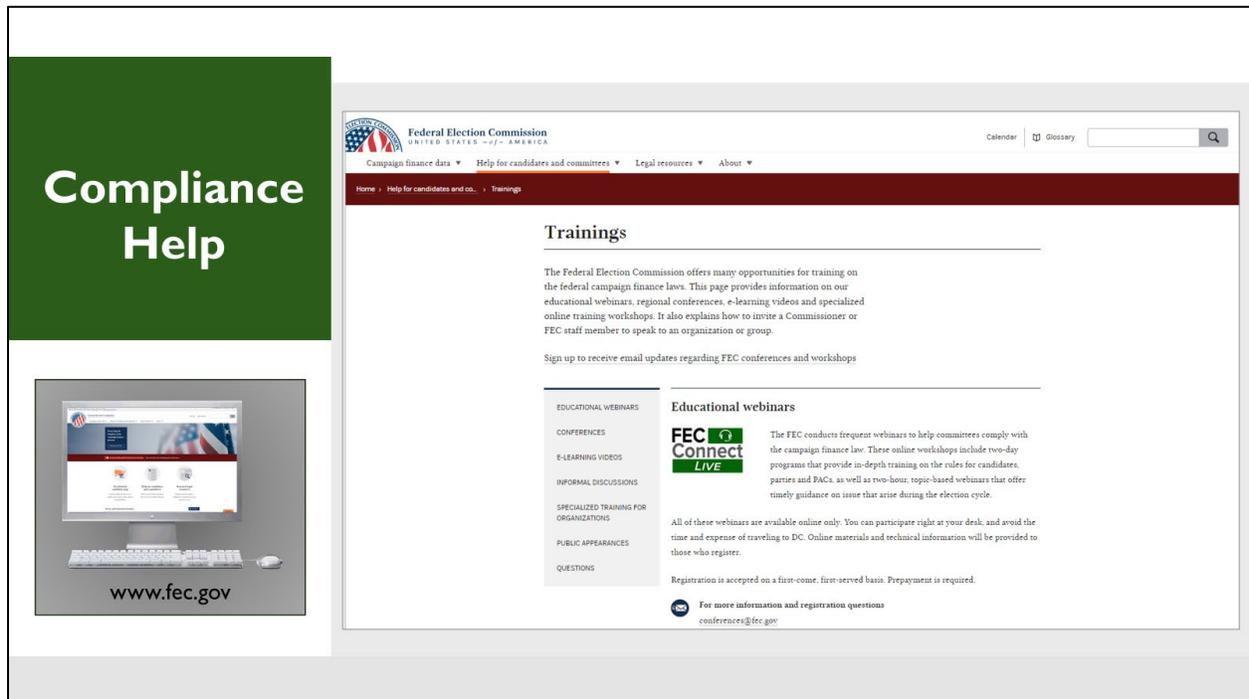
Specializing dates and FEC deadlines

Election dates

Customers and webinars

Campaign guides for candidates, parties and PACs

<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/>



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Trainings

The Federal Election Commission offers many opportunities for training on the federal campaign finance laws. This page provides information on our educational webinars, regional conferences, e-learning videos and specialized online training workshops. It also explains how to invite a Commissioner or FEC staff member to speak to an organization or group.

Sign up to receive email updates regarding FEC conferences and workshops

Educational webinars

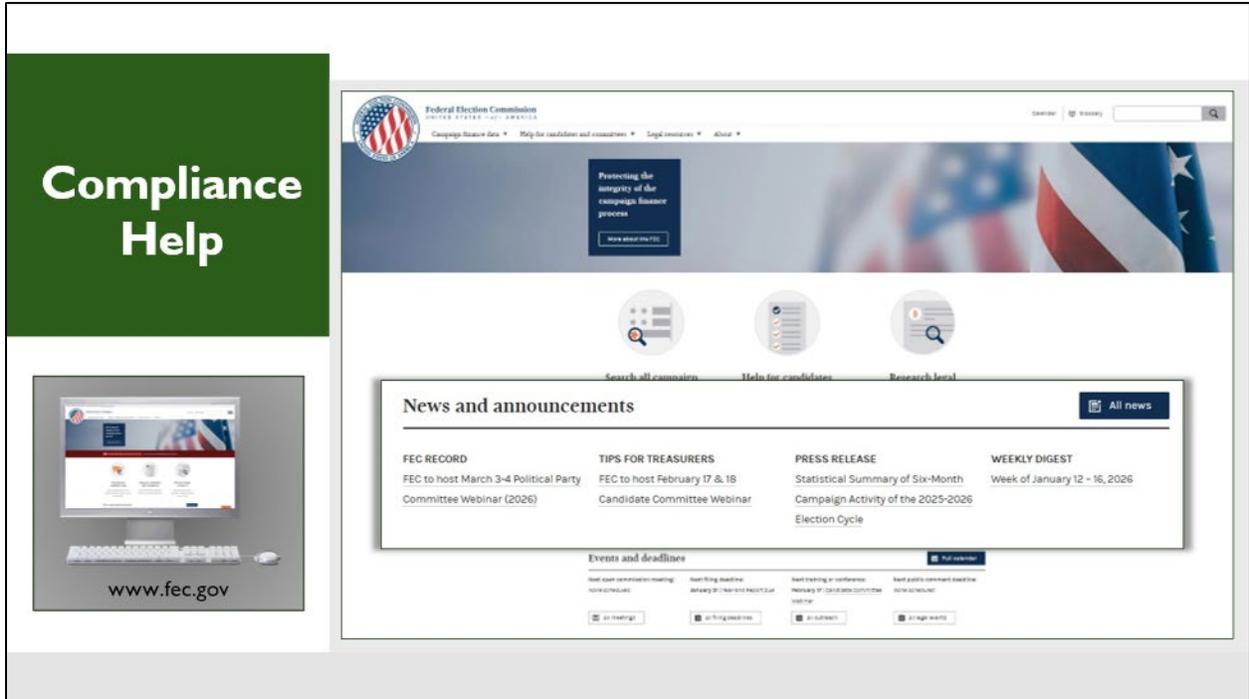
The FEC conducts frequent webinars to help committees comply with the campaign finance law. These online workshops include two-day programs that provide in-depth training on the rules for candidates, parties and PACs, as well as two-hour, topic-based webinars that offer timely guidance on issue that arise during the election cycle.

All of these webinars are available online only. You can participate right at your desk, and avoid the time and expense of traveling to DC. Online materials and technical information will be provided to those who register.

Registration is accepted on a first-come, first-served basis. Prepayment is required.

For more information and registration questions
conferences@fec.gov

<https://www.fec.gov/help-candidates-and-committees/trainings/>



<https://www.fec.gov/updates/>



public.govdelivery.com/accounts/USFEC/subscriber/new?gsp=CODE_RED

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www.fec.gov



Federal Election Commission
Washington, DC

FECCONnect OnDemand

Home Videos Playlists Channels About

The FEC and the Federal Campaign Finance Law
3,630 views 1 year ago
An overview of the Commission and the law it administers.

YouTube

Popular channels

- FECCONnect OnDemand: Citizens Guide to Supporting Federal Candidates (7:02)
- FECCONnect OnDemand: Contributions (2012-2016 Election Cycle) (4:39)
- FECCONnect OnDemand: Lance Stewart (Subscribe)
- FECCONnect OnDemand: Volunteer Activity (6:01)
- FECCONnect OnDemand: Erika Crutell

<https://www.youtube.com/user/FECTube>

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800-424-9530

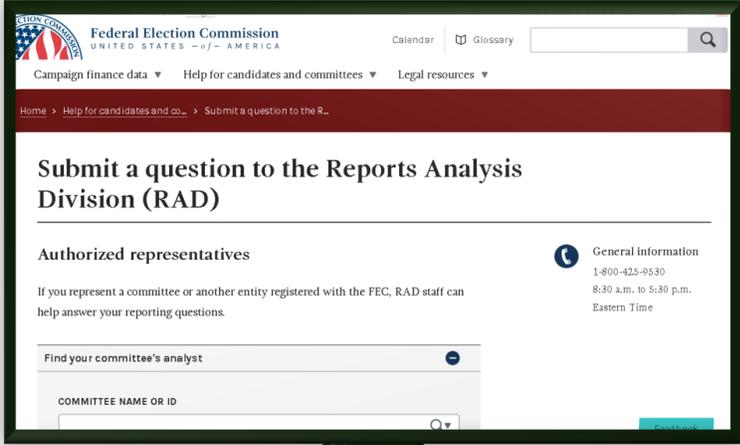
Phone menu:

- For e-filing tech support, press 4 for the Electronic Filing Office
- For reporting help, press 5 to reach your RAD Analyst
- For other questions, press 6 for an Information Specialist

Compliance Help



info@fec.gov



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Submit a question to the Reports Analysis Division (RAD)

Authorized representatives

If you represent a committee or another entity registered with the FEC, RAD staff can help answer your reporting questions.

General information
1-800-425-9530
8:30 a.m. to 5:30 p.m.
Eastern Time

Find your committee's analyst

COMMITTEE NAME OR ID

<https://www.fec.gov/help-candidates-and-committees/question-rad/>



Advisory opinions are official Commission responses to questions on how federal campaign finance law applies to specific situations.

Compliance Help

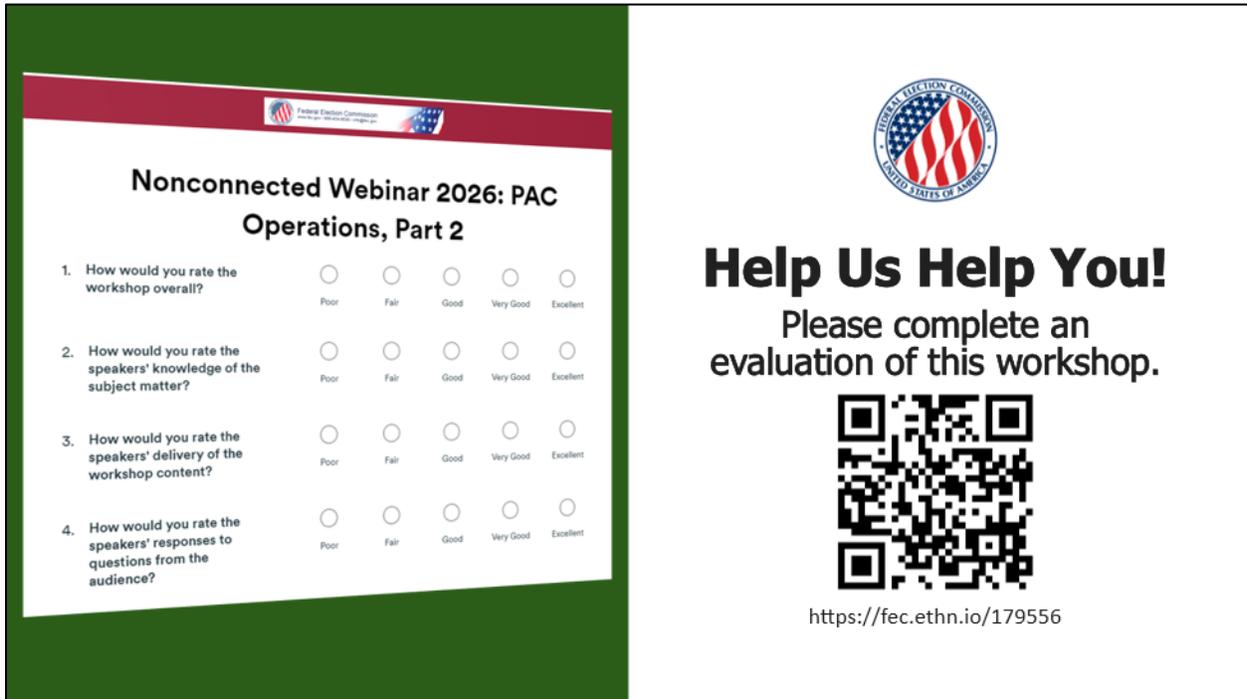


Advisory Opinions

<https://www.fec.gov/legal-resources/advisory-opinions-process/>

Leadership PACs, stay on for information pertinent to your type of committee.

All other PACs, please fill out the evaluation form...



The image shows a screenshot of a webinar evaluation form on the left and a call to action graphic on the right. The form is titled "Nonconnected Webinar 2026: PAC Operations, Part 2" and features four questions with five-point Likert scales. The call to action graphic includes the Federal Election Commission logo, the text "Help Us Help You! Please complete an evaluation of this workshop.", a QR code, and the URL <https://fec.ethn.io/179556>.

Nonconnected Webinar 2026: PAC Operations, Part 2

1. How would you rate the workshop overall?

2. How would you rate the speakers' knowledge of the subject matter?

3. How would you rate the speakers' delivery of the workshop content?

4. How would you rate the speakers' responses to questions from the audience?

Help Us Help You!
Please complete an evaluation of this workshop.

<https://fec.ethn.io/179556>

Evaluation link: <https://fec.ethn.io/179556>

**LEADERSHIP PACS:
TRAVEL USING NON-COMMERCIAL AIRCRAFT AND
LOBBYIST BUNDLING DISCLOSURE**

Noncommercial Air Travel



Lobbyist Bundling



BONUS

**Additional Topics
for Leadership PACs**

I. Travel on Behalf of House Leadership PACs (11 CFR [100.93\(c\)\(2\)](#) and [113.5\(b\)](#))

<p>Noncommercial Air Travel</p>	<p>House Leadership PACs</p> <p>Travel on non-commercial aircraft PROHIBITED</p> <ul style="list-style-type: none">▪ Even if third party pays as an in-kind contribution <p>Payment for air travel only if the aircraft is operated by:</p> <ul style="list-style-type: none">▪ A commercial air carrier▪ Federal/state government entity
	

A. Use of non-commercial aircraft prohibited

Campaign travelers traveling on behalf of House candidates, their authorized committees **and leadership PACs are prohibited from using non-commercial aircraft.**

1. The campaign traveler may utilize air travel only if the aircraft is operated by a:
 - a) Commercial air carrier; or
 - b) Federal or state government entity.
2. Prohibition cannot be avoided by third-party payment to the service provider or third-party payments treated as an “in-kind” contribution.
Example: An individual may not pay another person to take house leadership PAC-related flight on private aircraft.
3. House leadership PAC representative **may** travel on non-commercial aircraft when traveling on behalf of another committee (i.e. presidential, senate, party committees, etc.) but **may NOT** travel on non-commercial aircraft when traveling on behalf of the leadership PAC.

B Use of government conveyance – [11 CFR 100.93\(e\)](#)

Campaign travelers traveling on behalf of house leadership PACs must reimburse a government entity for travel on any government-operated aircraft at either the “per candidate campaign traveler” or “private traveler reimbursement” rates.

More: Travel on behalf of campaigns - www.fec.gov/help-candidates-and-committees/making-disbursements/travel-behalf-campaigns/

Presidential/Senate Leadership PACs & Other Nonconnected PACs

Noncommercial Air Travel

To avoid in-kind contribution, private aircraft provider must be paid within 7 days no less than:

- Lowest unrestricted, non-discounted fare (if regular service is available)
- Otherwise, charter rate for comparable aircraft



NOTE: If traveling with candidate, campaign must pay entire charter rate; PAC pays \$0.

- C. **Travel on behalf of other nonconnected PACs (including presidential or senate leadership PACs) ([11 CFR 100.93\(c\)\(3\)](#))**
1. Campaign traveler traveling on behalf of a **presidential or senate candidate's leadership PAC**, party committee, separate segregated fund **or nonconnected PAC** must pay the service provider no less than the following to avoid receipt of in-kind contribution (formulae determined by travel cities).
 - a) **Travel between cities with regularly scheduled first-class air service:** Lowest unrestricted and non-discounted first-class air fare.
 - b) **Travel between cities served by regularly scheduled coach service but *not* regularly scheduled first-class airline service:** Lowest unrestricted and non-discounted coach airfare.
 - c) **Travel between cities not served by regularly scheduled commercial airline service:** Usual charter rate for comparable commercial aircraft of sufficient size to accommodate campaign travelers, and security personnel if applicable.
 2. **Date of public availability:** Payment rate must be the rate available to the general public for the dates traveled or within seven (7) calendar days thereof. [11 CFR 100.93\(f\)](#).
 3. **Travel with candidate campaign traveler:** When campaign committee (senate/president/vice-president) pays for flight on non-commercial aircraft, campaign required to pay full rate. Any non-candidate campaign traveler on flight pays \$0 – may not relieve any of campaign's payment obligation.

- D. Basic rule for senate/presidential leadership PACs and nonconnected committees ([11 CFR 100.93\(b\)](#))**
1. No contribution results if political committee on whose behalf the travel is conducted pays the provider the full value of the travel by all campaign travelers who **travel on behalf of** that committee.
 2. Reimbursement must be provided **no later than seven (7) calendar days after the date the flight began** at one of the following rates to avoid the receipt of an in-kind contribution from service provider.

More: Travel on behalf of campaigns - www.fec.gov/help-candidates-and-committees/making-disbursements/travel-behalf-campaigns/

II. Disclosure of Contributions Bundled by Lobbyists/Registrants and Lobbyist/Registrant PACs ([11 CFR 104.22](#)) (*Leadership PACs*)

Lobbyist Bundling for Leadership PACs

Bundled Contributions Defined

- If intermediary is lobbyist or lobbyist/registrant PAC = bundled contribution
- If leadership PAC received two or more bundled contributions from a lobbyist during a covered period, additional disclosure is required on FEC Form 3L
- 2026 threshold = \$24,000



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

B. Disclosure threshold for lobbyist bundling activity

Leadership PACs that receive two or more bundled contributions from a lobbyist/registrant or lobbyist/registrant PAC aggregating in excess of lobbyist bundling disclosure threshold during a specific *covered period* are required to disclose activity on FEC Form 3L.

- **2026 disclosure threshold = \$24,000**

C. Bundled contributions disclosed on FEC Form 3L

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

- **FEC Form 3L** - www.fec.gov/resources/cms-content/documents/fecfrm3l.pdf
- **FEC Form 3L instructions** - www.fec.gov/resources/cms-content/documents/fecfrm3li.pdf

More: Lobbyist bundling disclosure requirements - www.fec.gov/help-candidates-and-committees/lobbyist-bundling-disclosure/

Nonconnected Webinar 2026: PAC Operations, Part 2

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
4. How would you rate the speakers' responses to questions from the audience?
Poor Fair Good Very Good Excellent

Help Us Help You!
Please complete an evaluation of this workshop.

<https://fec.ethn.io/179556>

Evaluation link: <https://fec.ethn.io/179556>

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