



Trade PAC Basics for Beginners

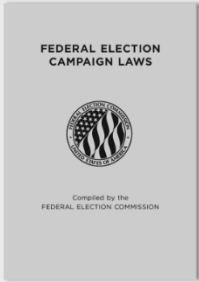


June 2, 2026 1:00pm Eastern

Objectives

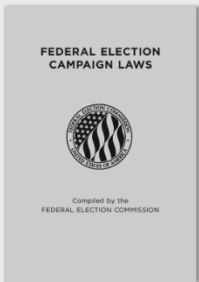
| | | |
|---|--|---|
|  |  |  |
| Basic Provisions Review basic provisions of the Federal Election Campaign Act | Filing Requirements Examine recordkeeping and filing requirements for trade association PACs | Compliance Resources Highlight compliance resources available to trade association PACs |

BASIC PROVISIONS OF THE FEDERAL CAMPAIGN FINANCE LAW



Federal Election Campaign Act

- 1 Limits funding
- 2 Requires registration and reporting
- 3 Establishes FEC



Federal Election Campaign Act

- 1 Limits funding
 - Sources of contributions
 - Contribution amounts

I. Contribution Prohibitions



- A. Corporations (including incorporated membership, trade and cooperative organizations or associations), labor organizations and national banks** are prohibited from making contributions in connection with federal elections. [11 CFR 114.2](#).
1. Therefore, they may not:
 - a) Act as conduit for earmarked contribution.
 - b) Give discount to campaign or committee that is not in normal business practice.
 - c) Allow use of facilities or resources without reimbursement, and, in some cases, advance payment.
 2. The corporate/labor ban does not apply to contributions to an independent expenditure-only committee (i.e., Super PAC) or to a non-contribution account (i.e., Hybrid PAC).
 3. **Separate Segregated Fund exception:** These incorporated entities may use treasury funds to create and run a separate segregated fund (sometimes called an SSF or PAC) to support federal candidates.
- B. Federal government contractors ([11 CFR Part 115](#))**
- C. Foreign nationals ([11 CFR 110.20](#))**
1. **US subsidiary of foreign corporation may establish SSF only if:**
 - a) Foreign nationals do not control or participate in decisions of SSF; and
 - b) SSF is not administered or otherwise funded with foreign revenues.

2. Ban does not apply to permanent resident aliens (green card holders).

3. Individuals who are foreign nationals may:

- a) Volunteer for congressional campaign and participate in decision-making, (note: because volunteer is engaged to candidate). [AO 2004-26](#).
- b) Attend campaign fundraising events (Note: because attendee is engaged to candidate). [AO 2004-26](#).
- c) They may not, however, participate in decision-making regarding election activities for a corporation or a political committee. [AO 2004-32](#).

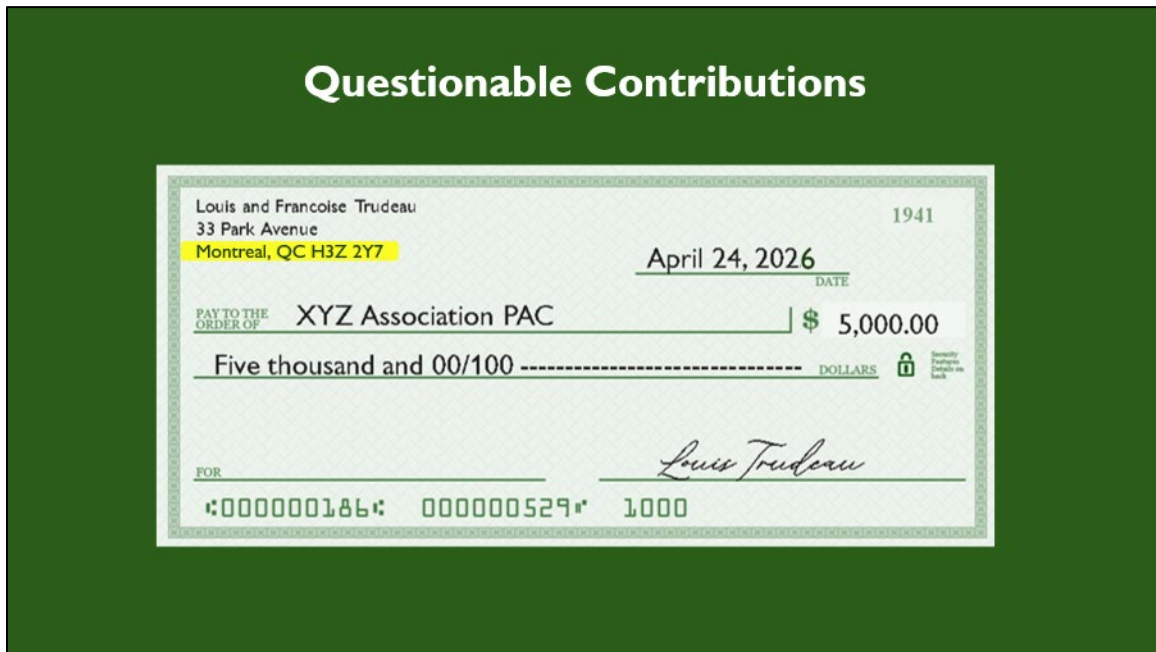
D. Contributions in name of another ([11 CFR 110.4\(b\)](#))

1. Cannot reimburse or be reimbursed for contributions.
2. Parents cannot give in names of children.
3. BCRA increased penalties for violations of this ban.

E. Certain prohibitions apply to all elections ([11 CFR 114.2\(a\)](#))

1. Foreign nationals
2. National banks
3. Federally-chartered corporations

II. Handling Questionable Contributions to Federal Account ([11 CFR 103.3](#))



Steps to take:

- Deposit or return check – 10 days
- Contact the donor – 30 days to confirm legality
- If donor is US citizen or green card holder, contribution is acceptable
- If not, contribution is prohibited – must issue a refund

Questionable Contributions



Deposit while checking. If unsure whether contribution is from a permissible source, committee may deposit it while confirming permissibility.

Refund after 30 days if unable to verify legality. Within 30 days of receipt, must refund if unable to determine if contribution is permissible.

III. Contribution Amount Limits ([11 CFR 100.52](#))

A. Broad definition

Anything of value given or loaned to influence a federal election.

B. Types

1. Money
2. In-kind (goods and services)
3. Loans of money or advances of goods and services
4. Bank loan endorsements and guarantees
5. Advances of personal funds by staff and volunteers
6. Proceeds from sales of fundraising items
7. Extension of credit to committee outside ordinary course of business

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 | \$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. Contribution limits (11 CFR [110.1](#) and [110.2](#))

1. **Certain limits increased and indexed for inflation**
 - a) Candidate and party limits increased and indexed; multicandidate committee limits unchanged.
 - b) Indexing began in 2005 – odd-numbered years.
2. **How applied**
 - a) Limits apply to contributions received and contributions made by committee.
 - b) If made by an individual, counts against the limit of the person signing the check or accompanying note.
3. **Presidential**
 - a) Primaries – one limit for all.

- b) General – no contributions if candidate accepts public funds. See [AO 2007-03](#) (Obama).
- c) General Election Legal and Compliance (GELAC) Fund – OK if donations comply with limits.

Limits to Trade Association PACs


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 | \$132,900 |
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| 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 | |

Limits from Trade Association PACs

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 | \$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 | |

Multicandidate Status

- 1 Registered with the FEC for at least six months
- 2 Received contributions from more than 50 donors
- 3 Contributed to at least five federal candidates

D. Multicandidate committee status ([11 CFR 100.5\(e\)](#))

1. Why important:

Determines whether PAC or party committee can give up to \$5,000 to candidate, per election (and whether candidate can accept it).

2. Criteria

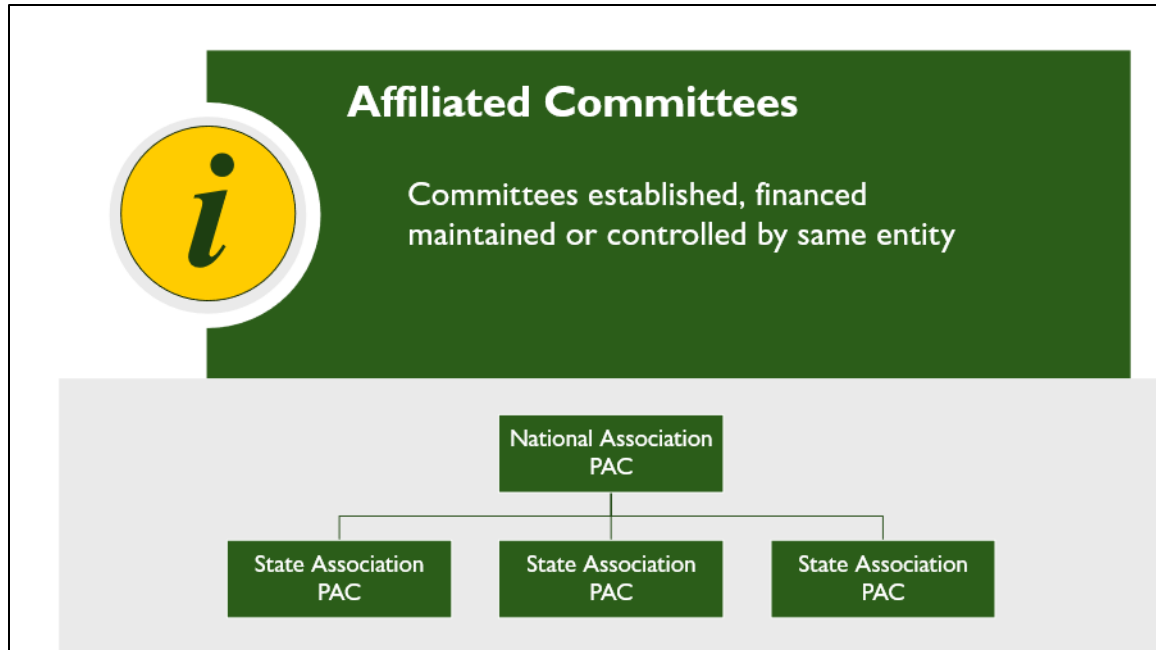
- Registered with FEC 6 months.
- Received contributions from more than 50 contributors.
- Has made contributions to at least 5 federal candidates (not needed for state party committee).

Multicandidate Status

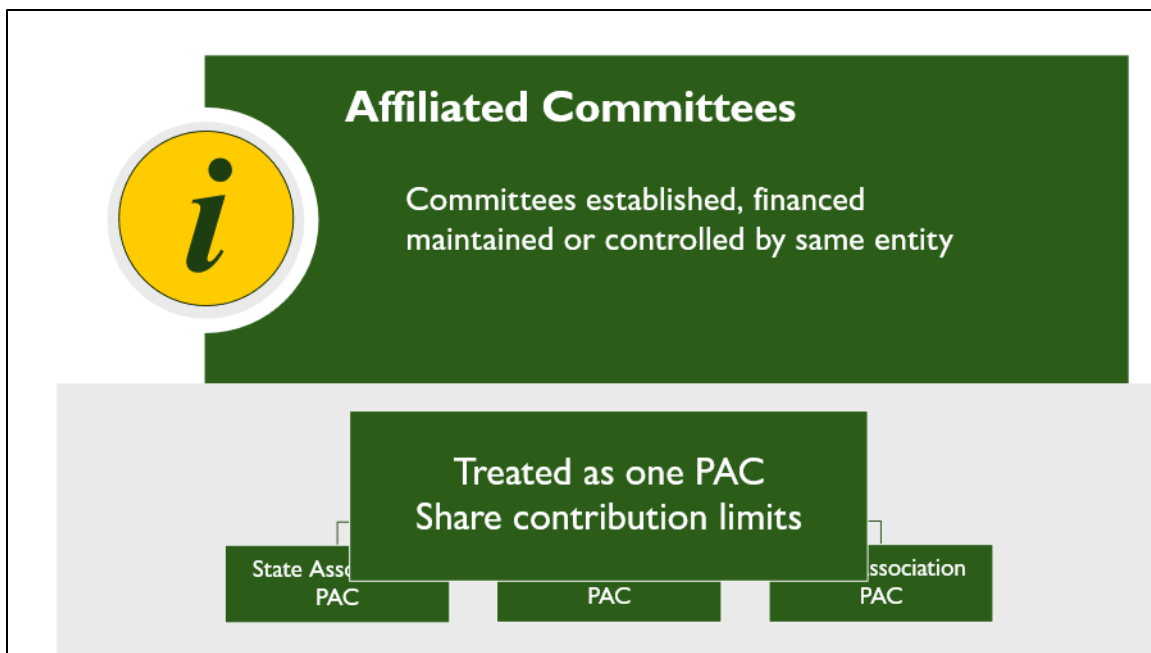
OR

Affiliated with a multicandidate committee

d) Alternative: be affiliated with multicandidate committee.



- E. Affiliated committees (11 CFR [100.5\(e\)](#) and [110.3\(a\)\(3\)](#))**
- 1. How to determine:**
 - a) Principle: committees established, financed, maintained, or controlled by same entity or group of persons.
 - b) Others may also be affiliated depending on various factors, such as similar patterns of contributions, common officers, etc. See 11 CFR [100.5\(g\)](#) & [110.3\(a\)](#).
 - 2. Examples:**
 - a) **Trade association**
PACs established by federation and its regional, state and local associations are affiliated, but PACs of member corporations not affiliated with trade association's PAC.



3. **Why important:**
- a) Same contribution limit applies to contributions received and made by affiliated committees.
 - b) If one committee qualifies as multicandidate, all its affiliated committees qualify.
 - c) No limit on transfers between affiliated committees.

Steps to take:

- File FEC Form 1M
- Inform contribution recipients
- Check multicandidate box on Form 3X (p. 2)

Multicandidate Status

NOTIFICATION OF MULTICANDIDATE STATUS
The form is filed by the committee.
The committee must file this form if it is a multicandidate committee.

4. STATUS BY AFFILIATION. The committee qualified as a committee of registered voters (CRV) under 11 CFR 101.11.

5. REVIEWER QUALIFICATION.

| Name | Office Sought | Rank/Office | State |
|------|---------------|-------------|-------|
| | | | |
| | | | |
| | | | |
| | | | |

XYZ PAC
A Multicandidate Committee
1344 Queens Blvd.
Queens, NY 11101

PHONE: 718.277.2000
FAX: 718.277.2000
WWW: www.xyzpac.com

FEC FORM 3X
REPORT OF RECEIPTS AND DISBURSEMENTS

The committee must file this form if it is a multicandidate committee.

1. FILING REQUIREMENTS

2. FILING DEADLINE

3. FILING LOCATION

4. FILING METHOD

5. FILING FEE

6. FILING INSTRUCTIONS

F. Multicandidate committee responsibilities

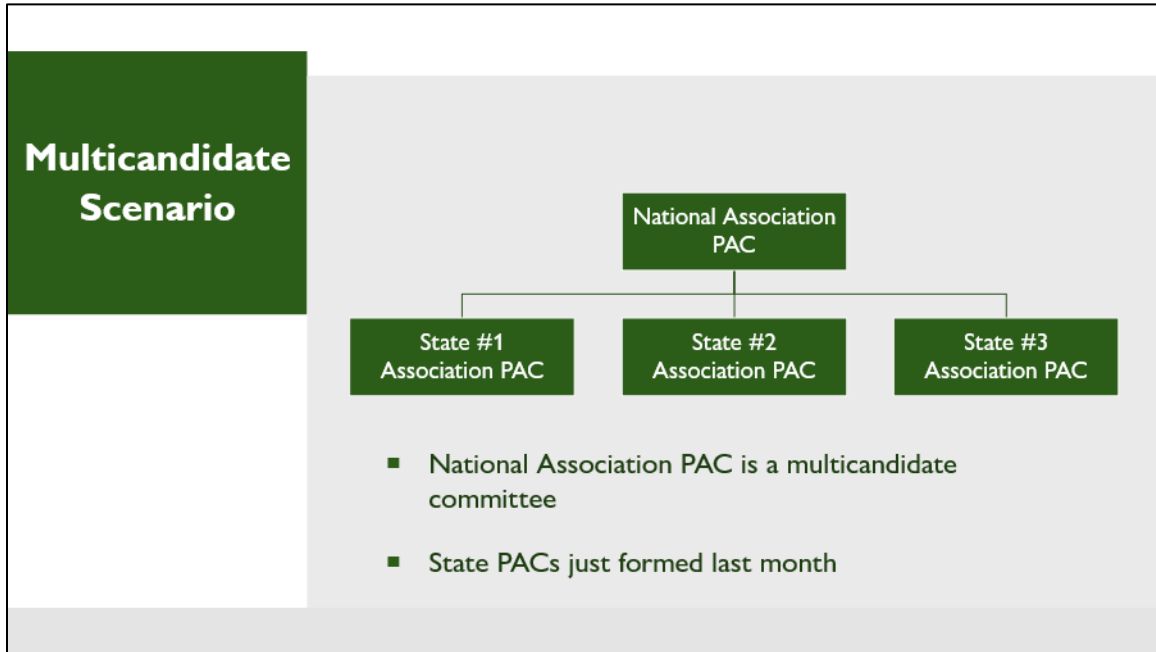
1. How to inform the FEC

- a) PAC must file [FEC Form 1M](#) within 10 days of qualifying as multicandidate committee.
- b) Check box at end of page 2, FEC Form 3X.

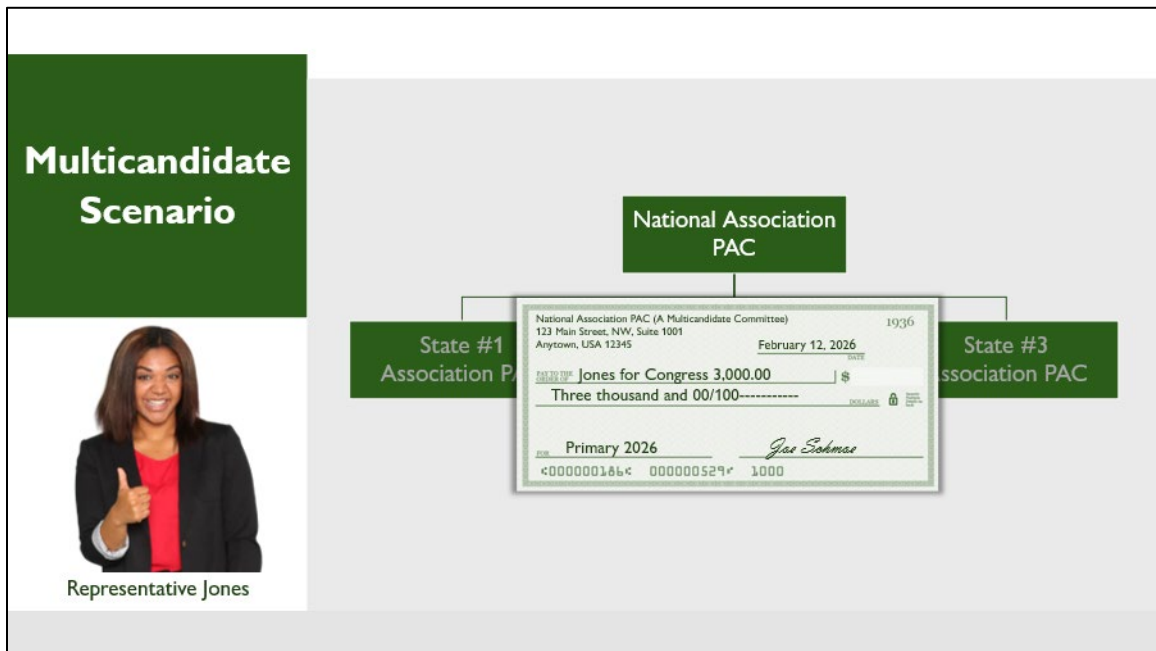
2. How to inform the campaigns

- a) Multicandidate committee must inform recipients that it has qualified as multicandidate committee.
- b) Call FEC's Public Records Office to verify status as *qualified* multicandidate committee.

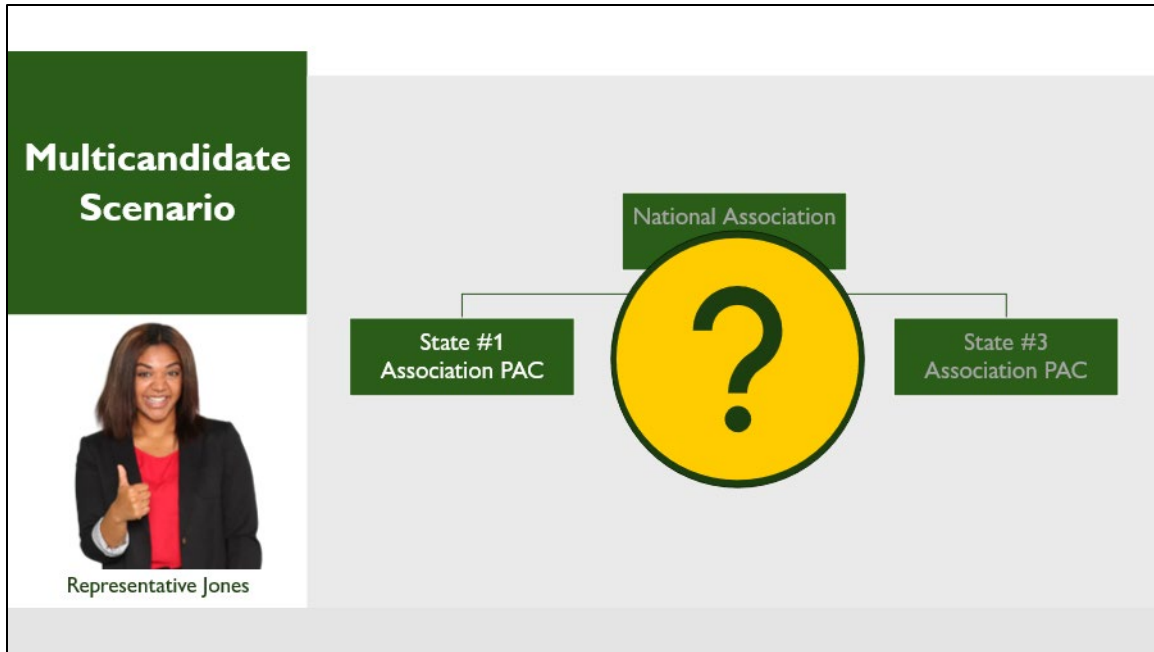
SCENARIO #1: Multicandidate Status



National Association has three affiliated State Associations. All sponsor PACs.



National Association PAC contributes \$3,000 to Rep. Jones for her primary 2026 election.



Now, State #1 PAC wants to contribute to Representative Jones.



POLL QUESTION:

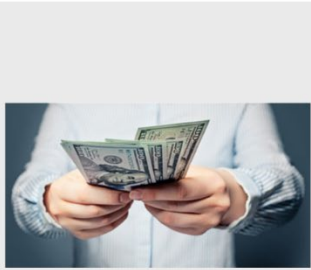

How much can State #1 PAC contribute to Representative Jones' primary campaign?

- A: As a non-multicandidate committee, it can contribute up to \$3,500.
- B: Given its affiliation with National Association PAC, it can only contribute up to \$2,000.
- C: As a non-multicandidate committee affiliated with National Association PAC, it can only contribute \$500.

POLL ANSWER:

How much can State #1 PAC contribute to Representative Jones' primary campaign?

- A: As a non-multicandidate committee, it can contribute up to \$3,500.
- B: **Given its affiliation with National Association PAC, it can only contribute up to \$2,000.**
- C: As a non-multicandidate committee affiliated with National Association PAC, it can only contribute \$500.

| | | |
|--|--|---|
|  |  | Additional Contribution Limits |
| Cash contributions cannot exceed \$100 | Maximum anonymous contribution \$50 | |

- G Other contribution limits**
- 1. Cash contributions – \$100**
 - 2. Anonymous contributions – \$50**

IV. Independent Expenditures ([11 CFR 100.16](#))


| For 2015-26 Elections | Individual | Political Committee | PAC | Multi-candidate PAC | State, District & Local Party Committee | National Party Committee | State, District & Local Party Committee |
|---|------------|---------------------|---------------------|---------------------|---|--------------------------|---|
| Individual | \$10,000 | \$10,000 (combined) | \$10,000 (combined) | \$10,000 (combined) | \$10,000 (combined) | \$10,000 (combined) | \$10,000 (combined) |
| Political Committee | \$1,000 | Unlimited | Unlimited | Unlimited | Unlimited | Unlimited | Unlimited |
| PAC | \$5,000 | \$5,000 | \$5,000 (combined) | \$5,000 (combined) | \$5,000 (combined) | \$5,000 (combined) | \$5,000 (combined) |
| Multi-candidate PAC | \$1,000 | \$1,000 | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) |
| State, District & Local Party Committee | \$1,000 | \$1,000 | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) |
| National Party Committee | \$1,000 | \$1,000 | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) |
| State, District & Local Party Committee | \$1,000 | \$1,000 | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) | \$1,000 (combined) |

No Amount Limitations

Independent Expenditures

Corporate/Labor Funds Okay

- Expressly advocate election or defeat of candidate
- Not coordinated with candidate or campaign committee
- No limit on amount of expenditure
- Corporations and labor organizations may make IEs, but prohibited in-kind contribution results if coordinated



Independent Expenditures

- A. Definition**
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 request or suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.


- B. No limits if definition met**
One may spend an unlimited amount because the expenditure is not coordinated (and thus, not a contribution).
 - C. If coordinated, in-kind contribution results ([11 CFR 109.21](#))**
Corporation prohibited from making (coordinated) in-kind contribution.
 - D. Disclaimer required**
- V. Disclaimer Notices on Communications ([11 CFR 110.11](#))**

Disclaimers

Must identify who paid for the ad and whether the candidate authorized it

Must appear on all public communications, widely distributed emails & websites

Must be presented in a clear and conspicuous manner



- A. Identifies who paid for a public communication and clarifies whether a campaign authorized it.**



1. **Disclaimer wording for communication not authorized by campaign (i.e., independent expenditure, electioneering communication)**
“Paid for by XYZ PAC (www.xyzpac.com) and not authorized by any candidate or committee.”



2. **Disclaimer wording for communication authorized, but not financed, by campaign**
“Paid for by XYZ PAC and authorized by the Elizabeth Chiu for Congress.”

Disclaimers

Must identify who paid for the ad and whether the candidate authorized it

Must appear on all public communications, widely distributed emails & websites

Must be presented in a clear and conspicuous manner



B. Required on all “public communications,” widely distributed emails and public websites



Public Communications



- 1. **Public communication defined ([11 CFR 100.26](#))**
Includes communications made using the following media:
 - a) Broadcast, cable or satellite;


- b) Newspaper or magazine;
 - c) Outdoor advertising facility;
 - d) Mass mailing (>500 substantially similar mailings w/in 30 days);
 - e) Phone bank (>500 substantially similar calls w/in 30 days);
 - f) Communications placed for a fee on another person's web page, digital device, application, or advertising platform.
2. **Disclaimer also required on:**
- a) Electronic mail (> 500 substantially similar communications sent by a campaign committee); and
 - b) Websites of political committees.

Disclaimers

Must identify who paid for the ad and whether the candidate authorized it

Must appear on all public communications, widely distributed emails & websites

Must be presented in a clear and conspicuous manner



- C. **Clear and conspicuous placement of disclaimer notice**
Disclaimer notices must be clearly and conspicuously displayed.
Cannot be difficult to read or placed where it is easily overlooked.



Elect Chiu

Paid for by the XYZ PAC (www.xyzpac.org) and not authorized by any candidate or candidate's committee

Television Disclaimer

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

1. **Special rules for TV and radio ads not authorized by a candidate's committee ([11 CFR 110.11\(c\)\(4\)](#))**
Identify the committee responsible for the communication (e.g., "The XYZ PAC is responsible for the content of this ad.")



Print Disclaimer

NEWS

MONDAY
march, 11 2013

Only fresh news

www.news.com

Founded 1953

No 34747/53

Man Bites Dog

Elect Chiu

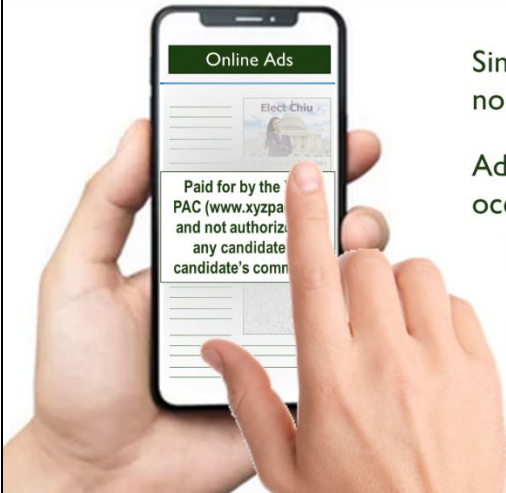
Paid for by the XYZ PAC (www.xyzpac.org) and not authorized by any candidate or candidate's committee

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

2. **Special rules for printed communications**
 - 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.”

Internet Disclaimers



The image shows a hand holding a smartphone. The screen displays an advertisement titled 'Online Ads' with a sub-header 'Elect Chiu'. Below the header, there is a disclaimer text: 'Paid for by the PAC (www.xyzpa) and not authorized by any candidate or candidate's comm'. A finger is pointing at the disclaimer text.

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:
 - (1) Visible/audible indicator that full disclaimer is available (e.g., word, image, sound, symbol, or icon); and
 - (2) Technological mechanism to access full disclaimer (e.g., hover-over text, pop-up screen, scrolling text, rotating panel, or hyperlink)

4. **Disclaimer is not required when:**
- a) It cannot be conveniently printed (e.g., pens, bumper stickers, campaign pins and buttons);
 - b) Its display is not practical (e.g., wearing apparel, skywriting, water towers); or
 - c) Item is of minimal value, does not contain a political message and is used for administrative purposes (e.g., committee checks and receipts).



POLL QUESTION:

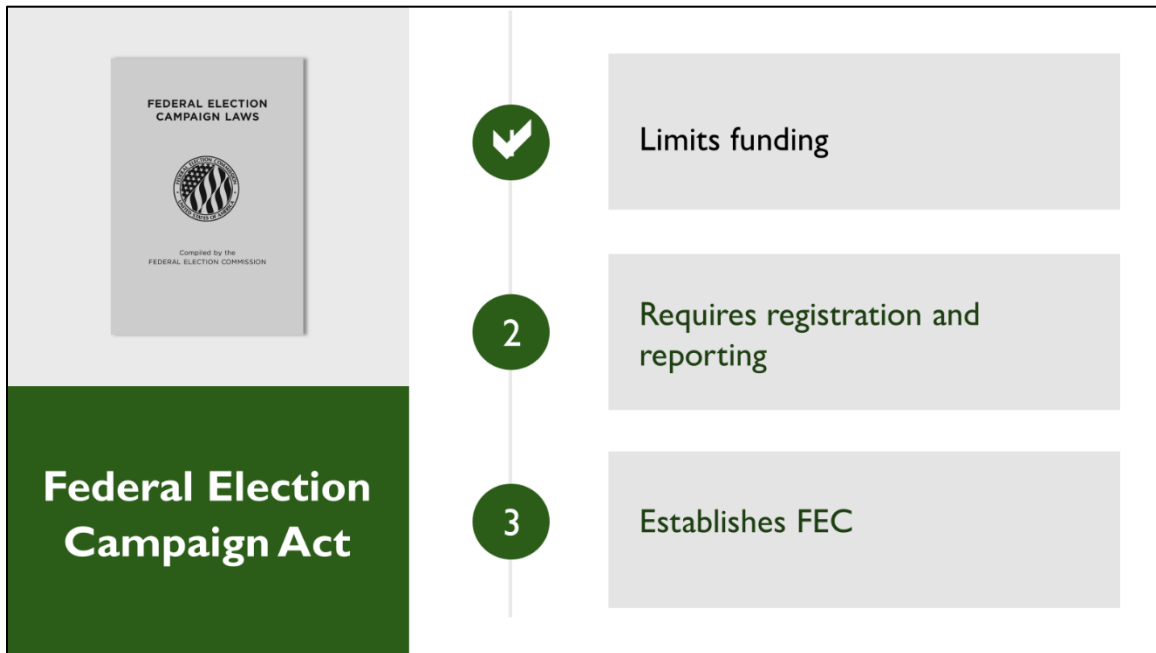
Is a disclaimer required on an SSF solicitation sent to the restricted (i.e., solicitable) class?

- A: Yes, disclaimers are required on all SSF communications.
- B: No, the SSF solicitation is not a public communication, so no disclaimer is required.

POLL ANSWER:

Is a disclaimer required on an SSF solicitation sent to the restricted (i.e., solicitable) class?

- A: Yes, disclaimers are required on all SSF communications.
- B: **No, the SSF solicitation is not a public communication, so no disclaimer is required**



The infographic features a central vertical line with three green circular markers containing a checkmark, the number 2, and the number 3. To the left of this line is a book cover titled 'FEDERAL ELECTION CAMPAIGN LAWS' with the FEC seal and the text 'Compiled by the FEDERAL ELECTION COMMISSION'. Below the book cover is a dark green box with the text 'Federal Election Campaign Act'. To the right of the line are three light gray boxes containing the text: 'Limits funding', 'Requires registration and reporting', and 'Establishes FEC'.

VI. Committee Registration (11 CFR [102.1\(c\)](#) and [102.2](#))

Unlike other political committees, trade association PACs (SSFs) register upon formation; there is no financial threshold for registration



Committee Registration

A. FEC Form 1 (Statement of Organization)

1. When to file

- a) Political committees (other than campaign committees) file within 10 days of triggering registration.
- b) An SSF (PAC connected to incorporated entity such as corporation, labor/membership organization, trade association) must register with the FEC within 10 days of establishment – for example within 10 days of the date when:
 - (1) The board of directors (or comparable governing body) votes to create the SSF
 - (2) Officers are selected to administer the fund, or
 - (3) The SSF's initial operating expenses are paid.

2. How to file

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

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

4. Amendments

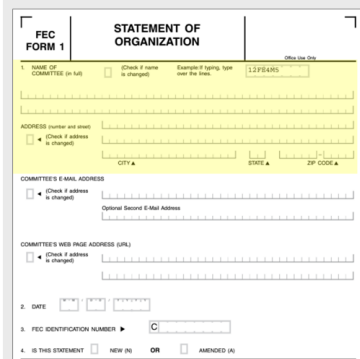
Amend FEC Form 1 (and other filings) when necessary within 10 days of change.

SSF's name must include full name of connected organization

Full name required on FEC reports and in disclaimers

Optional acronym by which connected organization is commonly known

Committee Registration



The image shows a portion of the FEC Form 1, titled 'STATEMENT OF ORGANIZATION'. It includes fields for the committee name, address, email address, and website address, along with checkboxes for 'is changed' and 'is amended'. The form is partially filled out with example text.

B. Name and address of committee

1. Separate Segregated Funds

Name must include full name of the connected organization.

2. Use committee's official name on:

- a) FEC reports and statements.
- b) Disclaimer notices for public advertising.

3. May use abbreviation or acronym by which connected organization is commonly known

Both abbreviation (or acronym) and full name must appear on FEC Form 1, FEC reports and all disclaimer notices.

(cf. [AO 2004-04](#))

FEC Form 1, Line 6: Affiliated Committee(s)

Committee Registration

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

XYZ State Association PAC

Mailing Address **345 City Street**

Anytown **US** **00000**

CITY STATE ZIP CODE

Relationship: Connected Organization **Affiliated Committee** Joint Fundraising Representative Leadership PAC Sponsor

- C. **Treasurer & Assistant Treasurer (11 CFR [102.7](#), [102.9](#) and [104.14](#))**
 - 1. **Treasurer required – Asst. Treasurer recommended**
 - a) Identify on FEC Form 1.

FEC Form 1, Line 8: Treasurer

Committee Registration

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer _____

Mailing Address _____

CITY STATE ZIP CODE

Title or Position _____ Telephone number _____

Full Name of Designated Agent _____

Mailing Address _____

CITY STATE ZIP CODE

Title or Position _____ Telephone number _____

REQUIRED

FEC Form 1, Line 8: Assistant Treasurer

Committee Registration

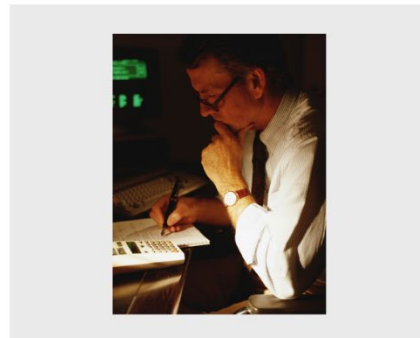
8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

| | | | |
|------------------------|----------------------|----------------------|---------------------------------------|
| Full Name of Treasurer | <input type="text"/> | | |
| Mailing Address | <input type="text"/> | | |
| | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| | CITY | STATE | ZIP CODE |
| Title or Position | <input type="text"/> | | Telephone number <input type="text"/> |

| | | | |
|-------------------------------|----------------------|----------------------|---------------------------------------|
| Full Name of Designated Agent | <input type="text"/> | | |
| Mailing Address | <input type="text"/> | | |
| | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| | CITY | STATE | ZIP CODE |
| Title or Position | <input type="text"/> | | Telephone number <input type="text"/> |

RECOMMENDED

- ✓ Deposits receipts
- ✓ Authorizes all expenditures
- ✓ Monitors contributions
- ✓ Keeps all required records
- ✓ Signs reports
- ✓ Files accurate reports on time

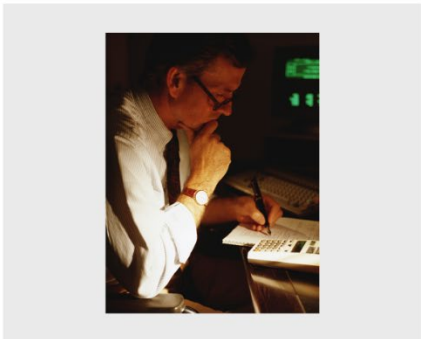


**Committee
Treasurers**

2. Duties:

- a) Depositing receipts
- b) Authorizing all expenditures
- c) Monitoring contributions

- d) Keeping all required records
- e) Signing reports
- f) Filing accurate reports on time



**Committee
Treasurers**

Treasurer generally named as enforcement respondent

Personal liability possible if:

- Knowingly & willfully violated the Act;
- Recklessly failed to fulfill duties; or
- Intentionally ignored information that led to the violation

3. Treasurer responsible for compliance.

- a) Usually named in enforcement actions.
- b) Online resources:
 - (1) Treasurer liability:
www.fec.gov/updates/treasurers-liability/
 - (2) Information on misappropriated funds:
www.fec.gov/help-candidates-and-committees/keeping-records/misappropriated-funds/
 - (3) Policy statements:
 - [Treasurers Subject to Enforcement Proceedings \(January 3, 2005\)](#)
 - [Safe Harbor for Misreporting Due to Embezzlement \(April 5, 2007\)](#)

D. Amendments to FEC Form 1 ([11 CFR 102.2\(a\)\(2\)](#))

- 1. Required within 10 days after change in information.
- 2. Paper filers may amend by letter or FEC Form 1; electronic filers must amend electronically by submitting a replacement FEC Form 1.

Objectives

| | | |
|--|---|--|
|  <p>Basic Provisions</p> <p>Review basic provisions of the Federal Election Campaign Act</p> |  <p>Filing Requirements</p> <p>Examine recordkeeping and filing requirements for trade association PACs</p> |  <p>Compliance Resources</p> <p>Highlight compliance resources available to trade association PACs</p> |
|--|---|--|

FILING REPORTS: RECORDKEEPING AND FILING REQUIREMENTS

I. Recordkeeping Requirements (11 CFR [102.8](#) and [102.9](#))

Recordkeeping: Receipts

Contributions over \$50:

- Date and amount received
- Donor's name and address

Complete image of written instrument

- Contributions aggregate over \$200:
- Above information plus occupation and employer for individual donors



A. Recordkeeping for receipts

1. For any amount, need date received and amount.
2. Over \$50, name and address of contributor/payor.
3. Over \$200, above plus occupation and employer.



Recordkeeping: Disbursements

All disbursements, record:

- Date and amount of disbursement
- Name and address of payee

Purpose of disbursement

- For contributions:
- Above information, plus candidate's name, state, district and election designation

B. Recordkeeping for disbursements

1. For any amount, need name of payee, address, purpose, date made.
2. Clear and descriptive purpose of disbursement (www.fec.gov/help-candidates-and-committees/purposes-disbursements/)
3. For contributions made, also need name of candidate, state, district, and election designation.

Recordkeeping

Retain records for three years from the date of the report to which the records relate

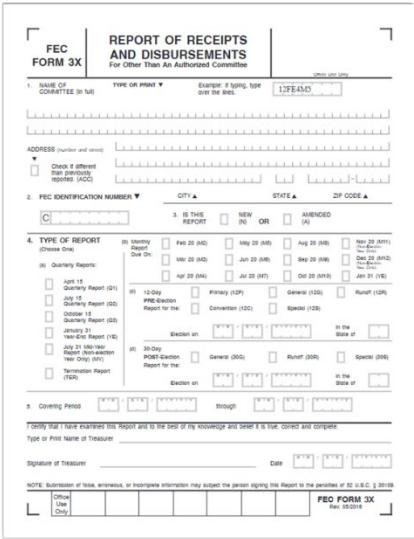




- C. **Record retention**
Retain each record for three years from the date of the report on which it was last disclosed.


II. Filing FEC Reports ([11 CFR 104.5\(c\)](#))

Filing FEC Reports



FEC Form 3X

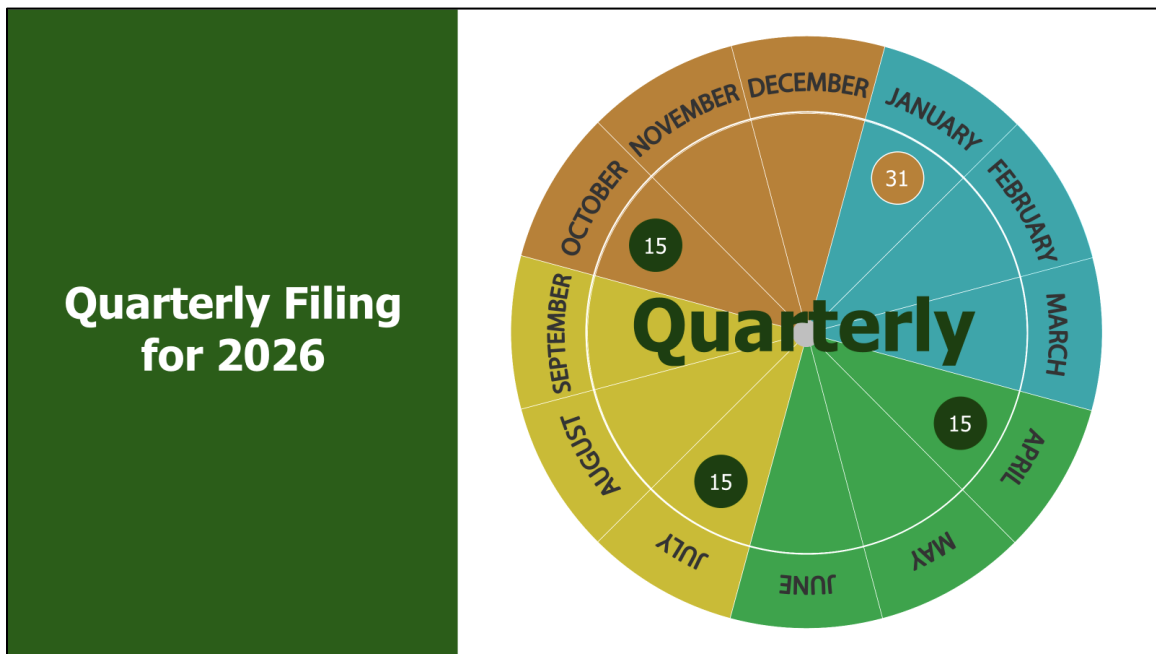
SSFs file monthly or quarterly



A. Quarterly filers

1. Non-election year (odd-numbered year)

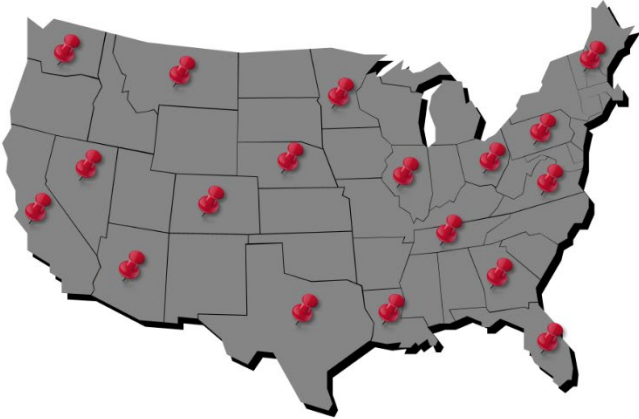
- a) Quarterly filing PACs file on a semi-annual schedule in non-election years.
- b) Semi-annual reporting schedule:
 - (1) Mid-Year Report due July 31; Year-End Report due January 31; special election pre-/post-election reports (if applicable).
 - (2) Reporting period begins the day after close of books of last report filed.



2. Election year (even-numbered year)

- a) Quarterly filing PACs file quarterly in election year, semi-annually in non-election year.
- b) Quarterly reporting schedule:
 - (1) Quarterly reports due April 15, July 15 and October 15, Year-End Report due January 31; Pre-Primary, Pre-General (if applicable), and a Post-General Report.
 - (2) Reporting period begins the day after close of books of last report filed.

**Additional Filing
for 2026**



Pre-Primary Reports

**Additional Filing
for 2026**

| 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 | ★ | 23 | 24 | 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 25 | 26 | 27 | 28 | 29 | 30 | 31 | 29 | 30 | | | | | |

**Pre-General Report
Due October 22**

Additional Filing for 2026

| 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 | | | | | |

**Post-General Report
Due December 3**

B. Monthly filers


1. Non-election year (odd -numbered year)

Monthly filers must file report on 20th of each month; Year-End Report due January 31.

The graphic displays a calendar for the year 2026. The months are arranged in two rows: January, February, and March in the top row; April, May, and June in the middle row; and October, November, and December in the bottom row. A large, light gray box is centered over the calendar, containing the text "Monthly Reports Due on the 20th". To the right of the calendar is a dark green vertical bar with the text "Monthly Filing for 2026" in white.

2. During election year (even-numbered year)

- a) Monthly filers must file report on 20th of each month, except Pre-General and Post-General in lieu of November and December Monthly reports; Year-End Report due January 31.
- b) Reporting period begins the day after close of books of last report filed.



No Pre-Primary Reports

**Additional Filing
for 2026**

| 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 | ★ | 23 | 24 | 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 25 | 26 | 27 | 28 | 29 | 30 | 31 | 29 | 30 | | | | | |

**Pre-General Report
(in lieu of November 20)**

**Additional Filing
for 2026**

| 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 | | | | | |

Post-General Report
(in lieu of December 20)

Additional Filing
for 2026

SSFs may switch
once per year

C. Changing filing schedule

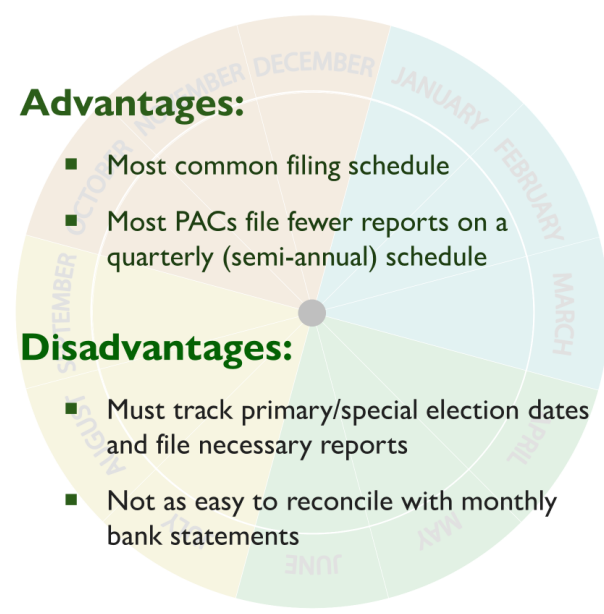
1. Timing

- a) PACs and party committees may change their filing schedule only after notifying the Commission in writing (or electronically, if an e-filer) of their intention. The committee can provide this notification along with a required report filed under the committee’s current

filing schedule or in a separate Miscellaneous Text Submission (FEC Form 99).

- b) The committee should wait to receive a letter from the FEC acknowledging its filing frequency change. The committee will then be required to file the next required report under the new filing schedule. However, party committees that engage in reportable federal election activity (FEA) must automatically switch to monthly filing.
2. **May only change filing schedule once per calendar year.**
 3. A PAC that files quarterly in 2026 automatically files on semi-annual schedule in 2027. No need to notify FEC (unless switching to monthly).

Pros & Cons Quarterly Filing



Advantages:

- Most common filing schedule
- Most PACs file fewer reports on a quarterly (semi-annual) schedule

Disadvantages:

- Must track primary/special election dates and file necessary reports
- Not as easy to reconcile with monthly bank statements

Advantages:

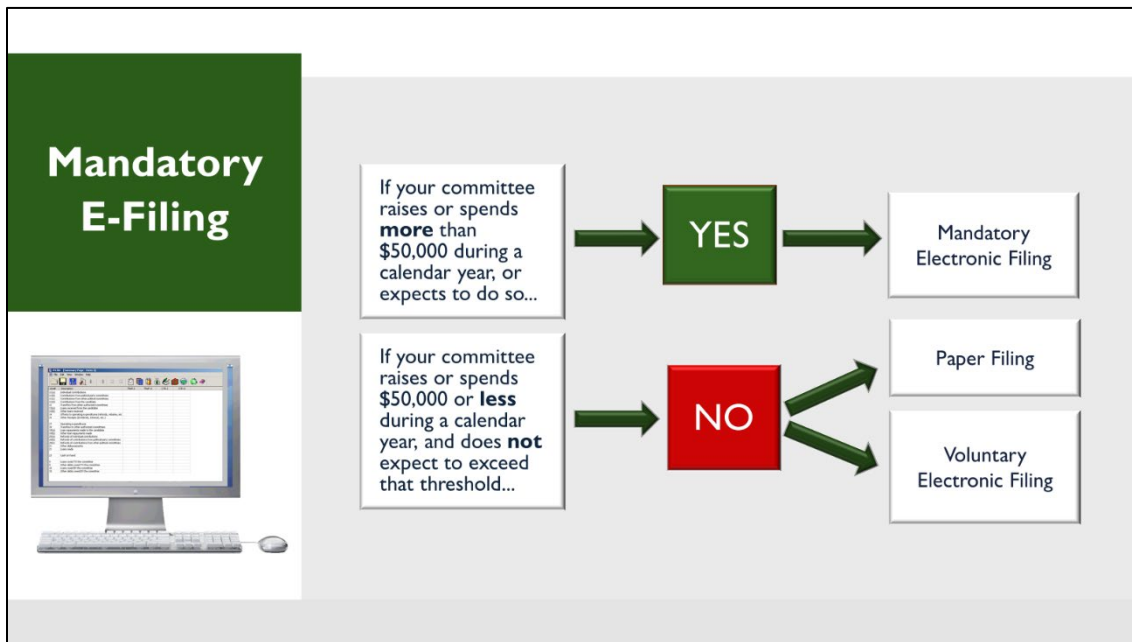
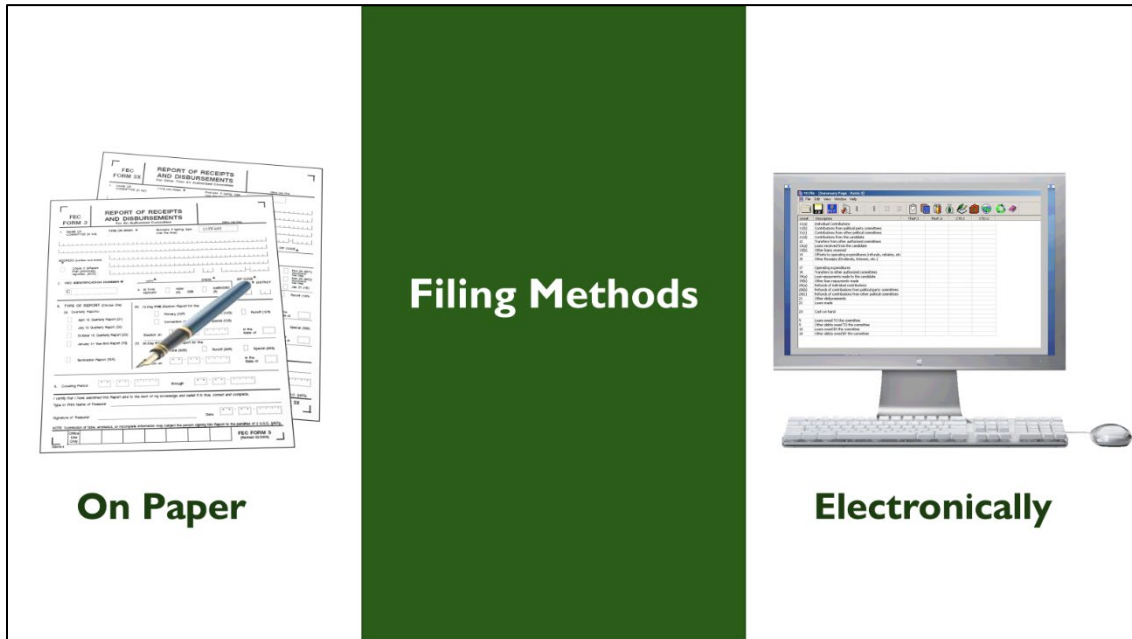
- No need to track primary/special election dates or file reports
- Easier to reconcile with monthly bank statements

Disadvantages:

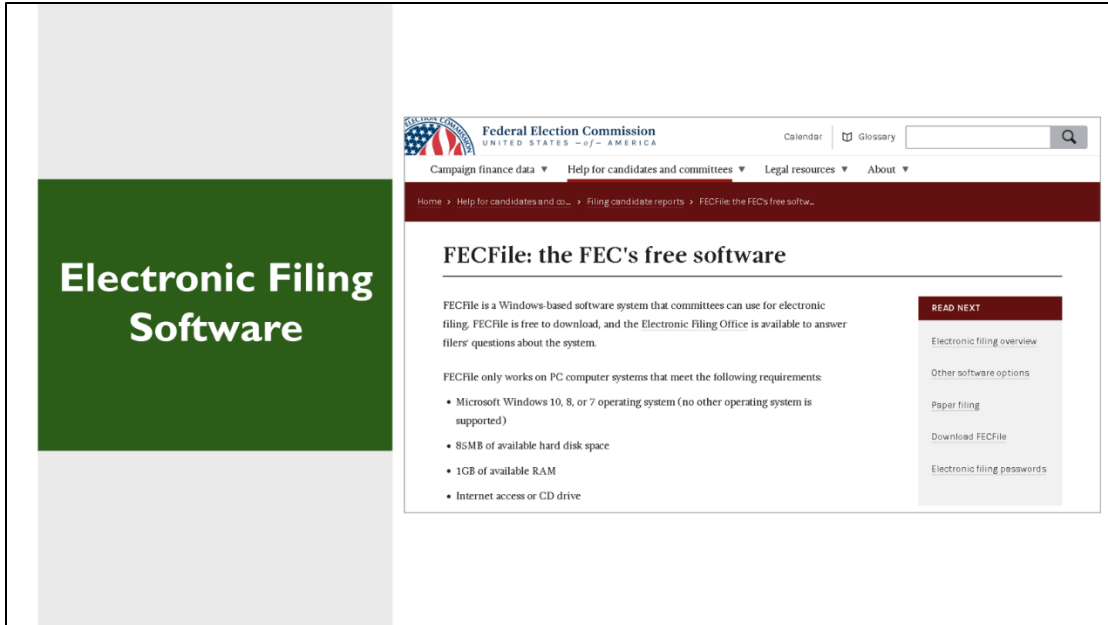
- Most PACs file more reports on monthly schedule

**Pros & Cons
Monthly Filing**

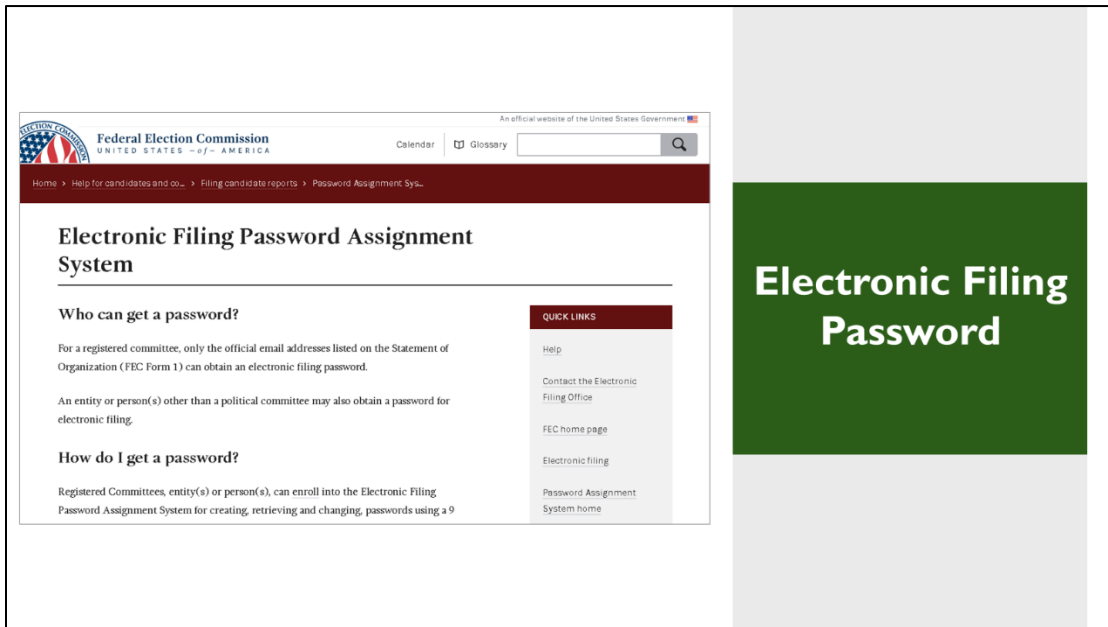
III. Other Filing Issues



- A. **Electronic filing ([11 CFR 104.18](#))**
 - 1. **Mandatory v. voluntary**
 - a) **Mandatory:** campaigns, PACs and party committees that raise or spend more than \$50,000 in calendar year or have reason to expect to do so.
 - b) **Voluntary:** All other filers.



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



webforms.fec.gov/psa/getstarted.htm

2. Passwords

a) Required

Before you can electronically file your report, you will have to obtain a password. You cannot file without one.

- b) **Who can get a password?**
Only the official treasurer. It is important that the committee has provided a valid email address on its FEC Form 1, as a validation email will be sent to the committee.
 - c) **How do you get a password?**
 - (1) To obtain or change password online:
webforms.fec.gov/psa/getstarted.htm.
 - (2) Existing committees that have not previously used the online system should contact the Electronic Filing Office for assistance at 202-694-1307.
 - 3. **Use updated software**
 - a) Software revised when forms changed – always use the latest version. Auto update feature makes it simple.
 - b) Latest version of FECFile – build 8.5 available for download: efilingapps.fec.gov/registration/fecfile.htm.
 - 4. **Paper filing by e-filer**
Committees that submit a report on paper that should have been filing electronically will be treated as non-filers and may be subject to enforcement actions (including administrative fines).
 - 5. **For more information:** www.fec.gov/help-candidates-and-committees/filing-reports/electronic-filing/.
- B. Filing amendments required for:**
- 1. **Errors**
Committee discovers that an earlier report contained erroneous information or mathematical errors.
 - 2. **Disclosure of late information**
Committee obtains required reporting information concerning a particular transaction after the transaction has been reported.
 - 3. **Response to Request for Additional Information (RFAI)**
FEC sends letter (email) and requests amendment. Response due date appears in upper right corner of RFAI.
 - 4. **Procedures for filing amendments:**
 - a) **Paper filers**
It is not necessary to resubmit the entire report.
 - (1) Complete the signature page of the Summary Page, checking box indicating that it is an amended report.
 - (2) Attach corrected schedules, if necessary.
 - (3) Attach cover letter explaining change (recommended).
 - b) **Electronic filers**
 - (1) Must submit amendments in electronic format (if original was filed electronically).
 - (2) Amendment must include complete report (as opposed to just the portion requiring an amendment).



- C. **Reporting considerations for paper filers**
1. **Statute prohibits extensions** (applicable to paper and electronic filers).
 2. **Weekends and holidays**
Filing dates not extended for weekends or holidays. Must be received on business day preceding filing date.
 3. **Registered vs. overnight mail**
 - a) If filing using USPS registered mail, keep receipt.
 - b) “Overnight Mail” means express or priority mail with a delivery confirmation or an overnight service with an online tracking system. File using same terms as certified/registered mail. (Keep receipt.)
 - c) **Zip code**
 - (1) USPS: 20463
 - (2) Delivery services: 20002



Administrative Fines

Civil money penalties for filing late
Size of fine depends several factors, including:

- Proximity to election
- Amount disclosed on report
- Prior violations

D. Administrative Fine Program (AFP)

www.fec.gov/legal-resources/enforcement/administrative-fines/

1. Background

Program for assessing civil money penalties for violations for failure to file reports on time and/or at all.

2. **Applies to:**
 - a) Late filers
 - b) Non-filers
 - c) Regulations found at [11 CFR 111.30-111.45](#)
3. **Civil money penalties -- factors in determining:**

The interaction of several factors will determine the size of the penalty (calculator on FEC website: www.fec.gov/legal-resources/enforcement/administrative-fines/calculating-administrative-fines/)

 - a) **Election sensitivity**
 - (1) Election sensitive reports include:
 - October Quarterly of election year,
 - October Monthly of election year, and
 - Pre-election reports for primary, general and special elections.
 - (2) All other reports are considered nonsensitive.
 - b) **Whether committee is a late filer or a non-filer**
 - (1) **For sensitive reports**
 - (a) **Late filer** – when report is filed after the due date but more than four (4) days prior to the election.
 - (b) **Non-filer** - report filed after due date and four (4) days or less before the election, or not at all.
 - (2) **For nonsensitive reports**
 - (a) **Late filer** – when report is filed within 30 days after the due date.
 - (b) **Non-filer** – when report is filed 31 or more days after due date, or not at all.
 - (3) Can still be considered a “nonfiler” even if report is eventually filed.
 - c) **Prior civil money penalties for reporting violations under the AFP.**
 - d) **Financial activity**
 - (1) Amount of financial activity in the report – total amount of receipts and disbursements.
 - (2) Committees with less than \$50,000 in financial activity during the reporting period in question are subject to reduced penalties.
 - (3) Most recent revision to the AFP regulations – [Civil Monetary Penalties Annual Inflation Adjustments \(January 3, 2025\)](#).

- (4) Campaign Finance Analysts will not be able to tell you if you will be fined or how much. You can use the administrative fine calculator to estimate your fine: www.fec.gov/legal-resources/enforcement/administrative-fines/calculating-administrative-fines/
Your committee will be notified in writing if the FEC assesses a civil penalty against your committee under the AFP.



Best Efforts to File on Time

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

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

- E. Timely filing/using best efforts**
NOT the same as “best efforts” for obtaining contributor information
- 1. Reports required on time;** no extensions.
 - 2. If report not filed on time,** committees may use “best efforts” defense if committee took normal precautions and trained staff, but failure to report was due to circumstances beyond committee’s control and the late report was filed within 24 hours after those circumstances ended.

“Reasonably unforeseen circumstances” include

- Severe weather or other disaster-related events
- FEC computer/software failures that tech support cannot resolve
- Widespread disruptions of internet transmissions

Best Efforts to File on Time



3. **When can best efforts defense be used:**
- a) Committee may use best efforts defense if failure to report is due to failure of Commission computers or software, despite receiving Commission technical assistance, widespread disruption of information transmissions over the internet, or severe weather or other disaster-related event.

Inapplicable factors:

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

Not Considered Best Efforts



- b) Committee may not use best efforts defense if failure to report is due to unavailability, inexperience or negligence of staff, counsel or organization, failure of committee's computer system, delays caused by vendors, failure to understand or know the law or failure to use filing software properly.
4. **For more information, review:**
- [Final Rules for Best Efforts in Administrative Fines Challenges \(March 29, 2007\)](#) and
 - [Record article \(May 2007\)](#)
 - [Statement of Policy Regarding Treasurers' Best Efforts to Obtain, Maintain, and Submit Information as Required by the Federal Election Campaign Act \(June 7, 2007\)](#) and
 - [Record article \(July 2007\)](#)



- F. **Finding reporting dates**
1. **Dates and deadlines page:** www.fec.gov/help-candidates-and-committees/dates-and-deadlines/
 2. **Commission calendar:** www.fec.gov/calendar/
 3. **FEC Record:** www.fec.gov/updates/?update_type=fec-record&category=reporting
 4. **Tips for Treasurers:** www.fec.gov/updates/?update_type=tips-for-treasurers
 5. **Email notices** sent to address(es) listed on FEC Form 1
 6. **Phone or email:** 800-424-9530; info@fec.gov

IV. Best Practices: Filing

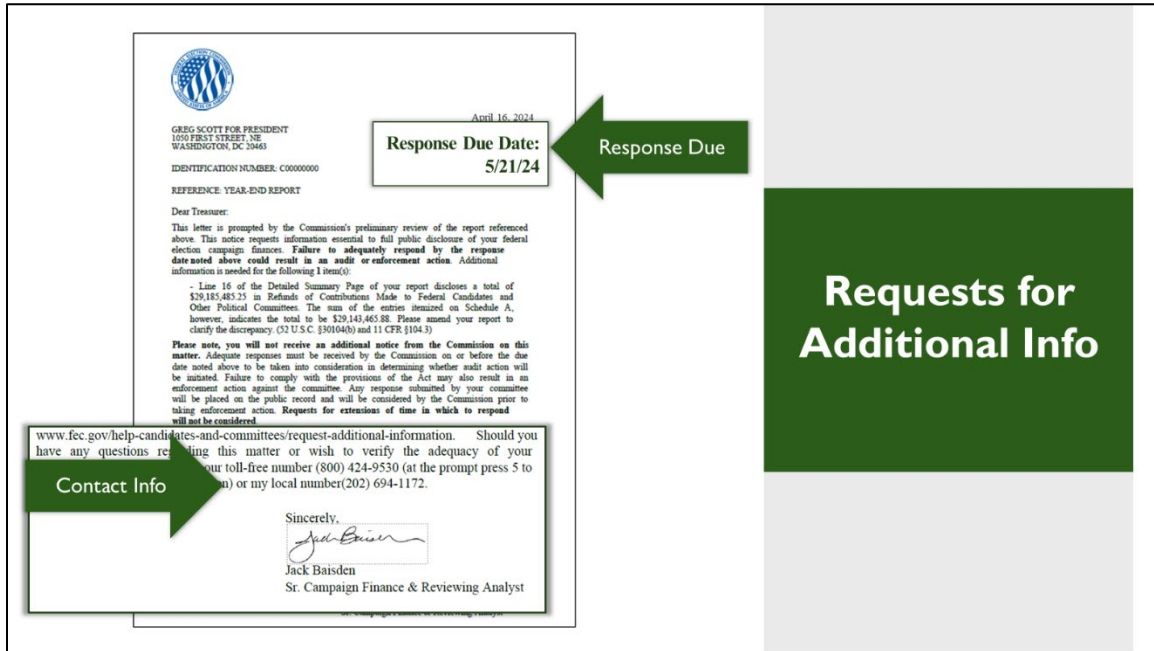
Best Practices: Filing

| | | | |
|---|---|--|---|
| Brief Staff/Vendors | Update Software | List Email Address | Respond to RFAIs |
|  |  |  |  |

- A. Brief staff/vendors**
Ensure your staff, vendors and counsel understand reporting and filing rules and deadlines.
- B. Update your software regularly**
- C. List email address**
To keep up with filing deadlines, make sure your committee has a current email address on its FEC Form 1 for receiving courtesy reminders. To do this, submit a complete electronic FEC Form 1 with a new email address.
- D. Respond to Requests for Additional Information (RFAIs)**

More: Report deadlines posted online at www.fec.gov/help-candidates-and-committees/dates-and-deadlines/ and in January of each year in the Record: www.fec.gov/updates/?update_type=fec-record

V. Request for Additional Information (RAFI)



A. If internal thresholds are met, an RAFI is sent

1. RAFI has a “Response Due Date” in the upper right hand corner of the letter, extensions are not granted. The committee analyst’s name and contact telephone number are also provided in the letter.
2. **Tip:** You can find out who your analyst is by visiting: www.fec.gov/help-candidates-and-committees/question-rad/

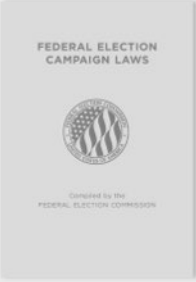
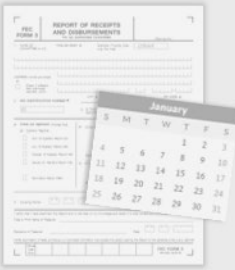
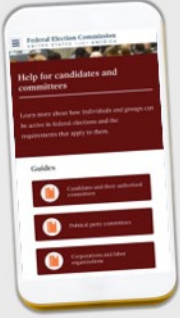
The image shows a screenshot of the Federal Election Commission (FEC) website. On the left, a green box contains the text "Responding to RFAIs". To the right, there is a navigation menu with the text "IS THIS REPORT" followed by a radio button, "NEW (N)", the word "OR", a radio button with an "X" inside, and "AMENDED (A)". Below this is the main content area for "Miscellaneous Report To FEC (Form 99)". The page header includes the FEC logo and the text "FEDERAL ELECTION COMMISSION". A breadcrumb trail reads "HOME / ELECTRONIC FILING / ONLINE FILING / ONLINE WEBFORMS / FORM 99". The main heading is "Miscellaneous Report To FEC (Form 99)". Below this is a "Sign-In For Registered Committees" section with the note "(Requires Committee ID and Electronic Filing Password)". A red asterisk indicates required fields. The form includes fields for "Committee ID" (containing "C12345678"), "Password" (masked with dots), and "E-mail" (containing "treasurer@committeename.fec"). A note below the email field says "(A receipt will be emailed to this address)". At the bottom of the form are three buttons: "LOGIN", "CLEAR", and "HELP".

- B. Must amend report when changing information that affects entries on a report**
This would include additions, changes or deletions.

- C. Miscellaneous text submission (FEC Form 99)**
Used for narrative responses that do not affect actual entries within a report. (For example, when outlining procedures for “best efforts” in obtaining contributor information.)

HIGHLIGHT COMPLIANCE RESOURCES

Objectives

| | | |
|---|--|---|
|  |  |  |
| Basic Provisions Review basic provisions of the Federal Election Campaign Act | Filing Requirements Examine recordkeeping and filing requirements for trade association PACs | Compliance Resources Highlight compliance resources available to trade association PACs |

How to get help from the FEC

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


Compliance Help



www.fec.gov



800-424-9530



info@fec.gov

Compliance Help

Federal Election Commission
UNITED STATES OF AMERICA

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Campaign finance data | **Help for candidates and committees** | Legal resources | About

Help for candidates and committees

Learn more about how individuals and groups can be active in federal elections and the requirements that apply to them.

Guides

- Candidates and their authorized committees
- Political party committees
- Corporations and labor organizations
- Political action committees (PACs)
- Other filers

Popular topics

Contribution limits
Under the Federal Election Campaign Act, contributions are subject to limits. These limits differ depending on the type of donor and recipient.

Tips for treasurers

- Time is running out to register for the FEC's Year-End Reporting and FECFile webinar! January 13, 2025
- Staying up to date in the new year: January 6, 2025
- Reporting dates for 2025 are now available! January 2, 2025
- Reporting your name to/from Washington, DC: December 23, 2024

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

Compliance Help

Federal Election Commission
UNITED STATES OF AMERICA

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home | help for candidates and committees | **Dates and deadlines**

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
- Electronically transmitted communications
- Federal Election Activity (FEA) periods
- Independent expenditures (24- and 48-Hour Reports)

2026 SPECIAL ELECTIONS

ARCHIVE OF REPORTING DATES

Sign-up dates and FEC deadlines

Excise dates

Conferences and webinars

Campaign guides for candidates, parties and PACs

www.fec.gov/help-candidates-and-committees/dates-and-deadlines/

Compliance Help

www.fec.gov

Federal Election Commission
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Home | Help for candidates and co. | Trainings

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

- CONFERENCES
- E-LEARNING VIDEOS
- INFORMAL DISCUSSIONS
- SPECIALIZED TRAINING FOR ORGANIZATIONS
- PUBLIC APPEARANCES
- QUESTIONS

Educational webinars

FEC Connect LIVE

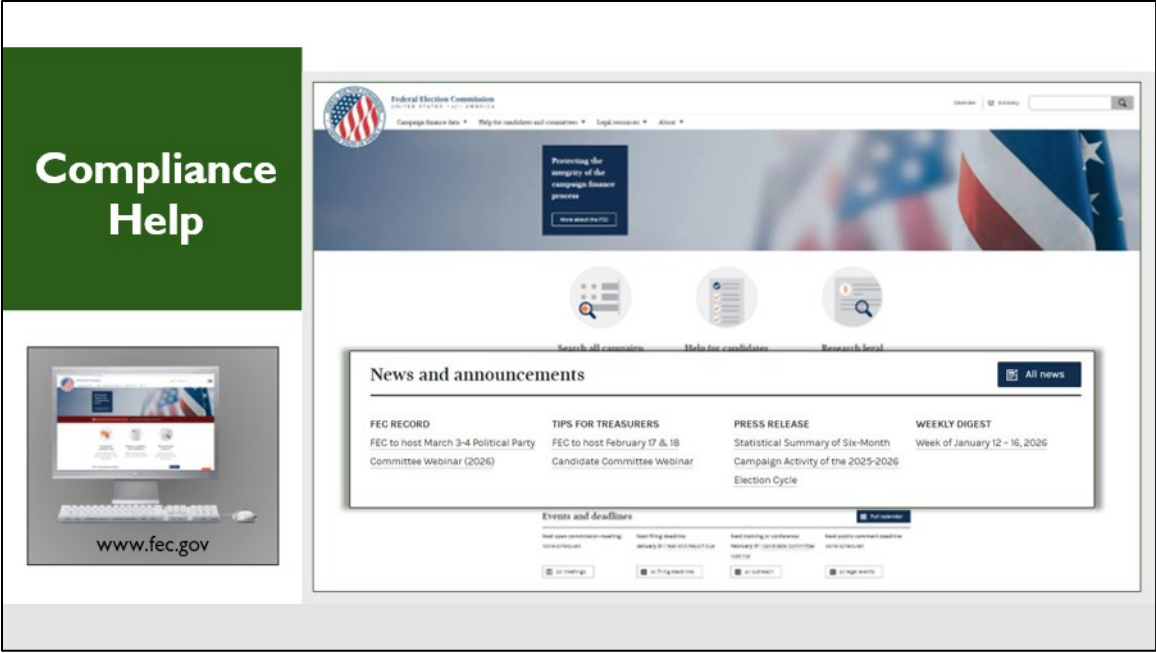
The FEC conducts frequent webinars to help committees comply with the campaign finance law. These online workshops include two-day programs that provide in-depth training on the rules for candidates, parties and PACs, as well as two-hour, topic-based webinars that offer timely guidance on issue that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

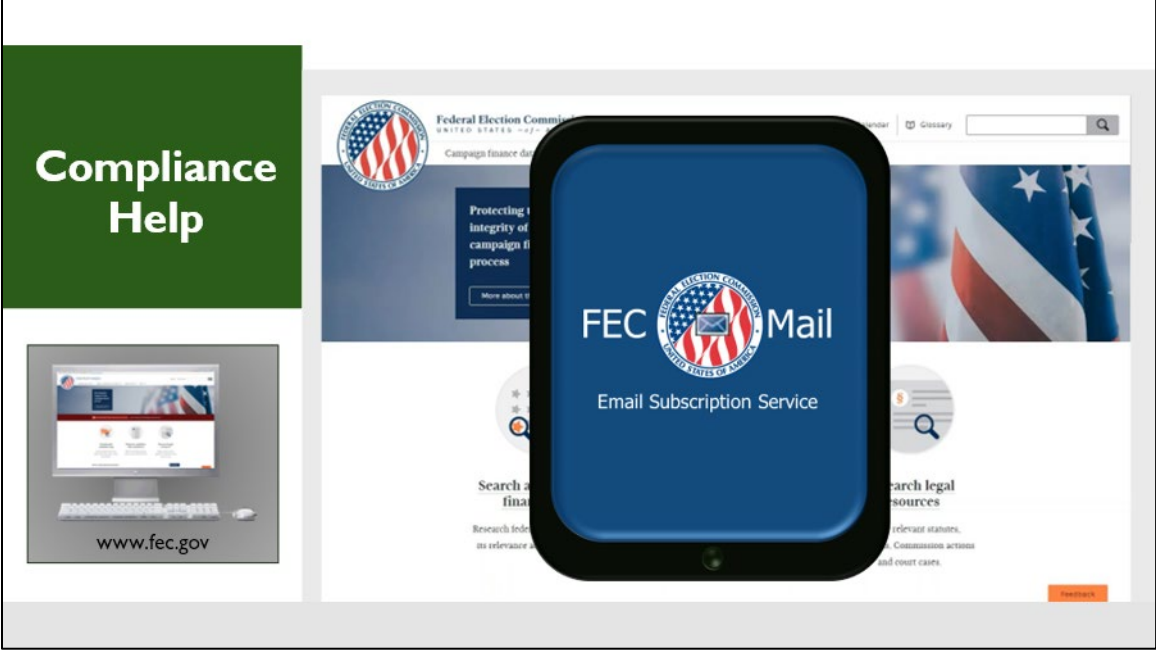
Registration is accepted on a first-come, first-served basis. Prepayment is required.

For more information and registration questions: conferences@fec.gov

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




www.fec.gov/updates/

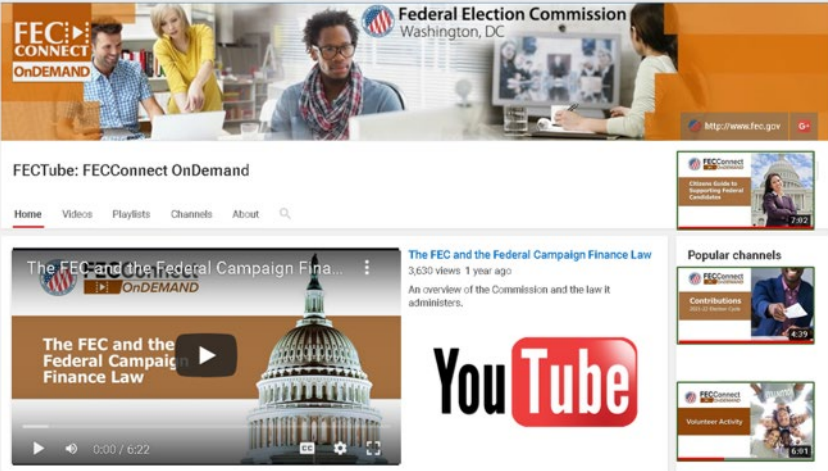


public.govdelivery.com/accounts/USFEC/subscriber/topics?qsp=CODE_RED

Compliance Help




www.fec.gov



www.youtube.com/FECTube

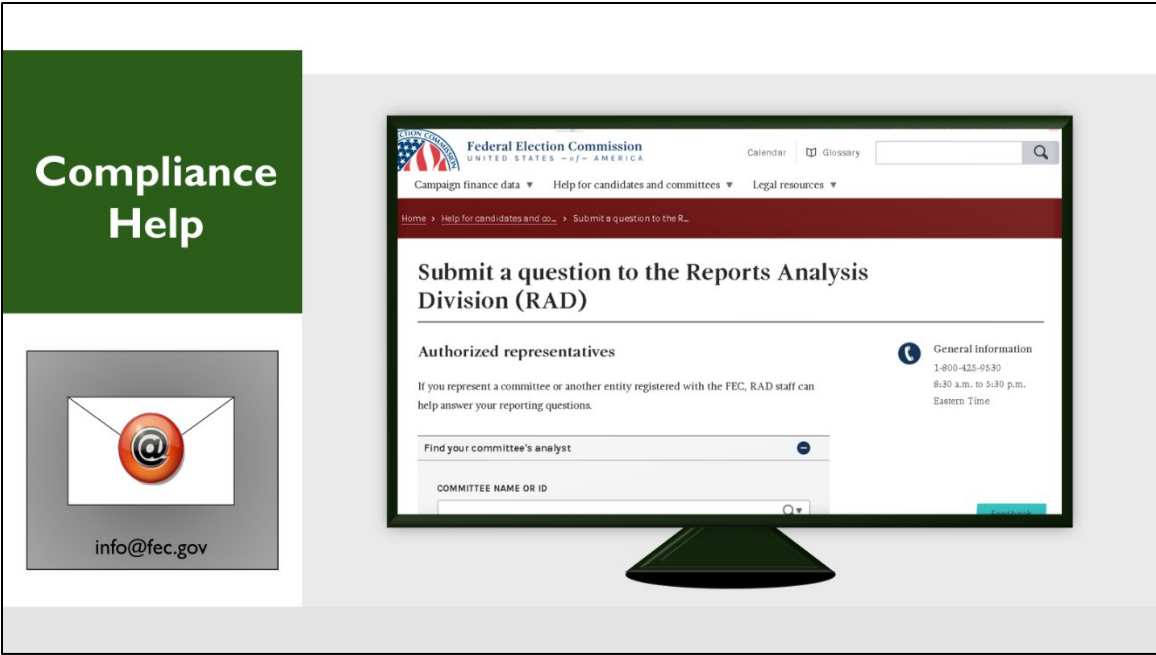
Compliance Help



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

Federal Election Commission
UNITED STATES OF AMERICA

Calendar Glossary

Campaign finance data Help for candidates and committees Legal resources

Home > Help for candidates and co... > Submit a question to the R...

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.

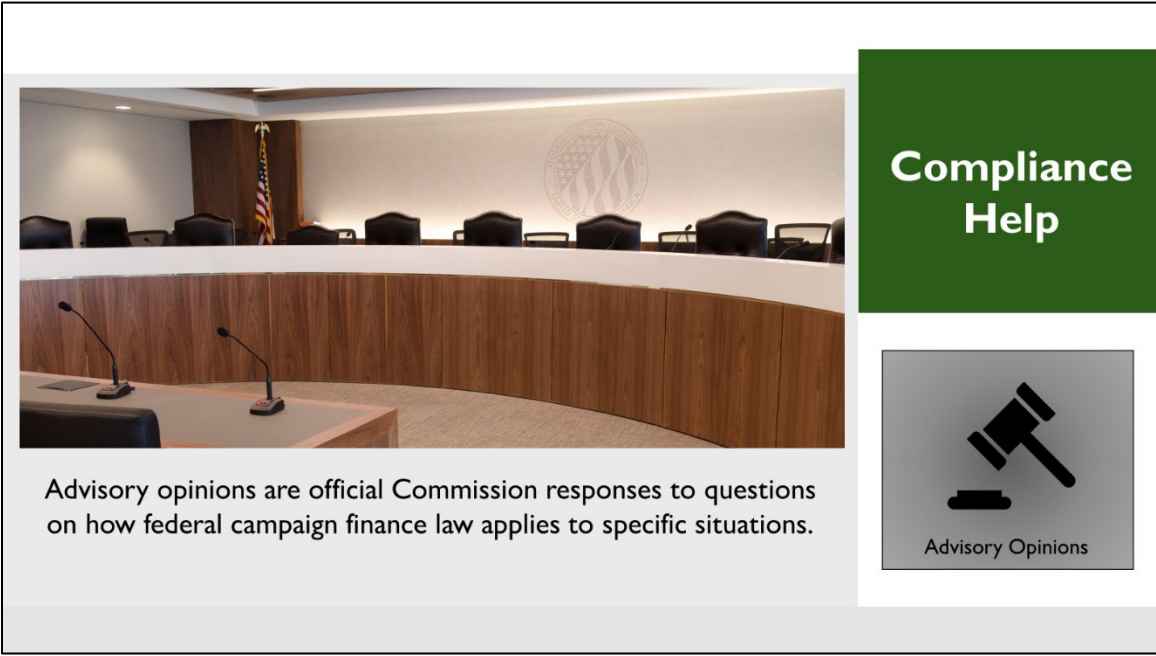
General Information
1-800-425-9530
8:30 a.m. to 5:30 p.m.
Eastern Time

Find your committee's analyst

COMMITTEE NAME OR ID

info@fec.gov

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



Compliance Help

Advisory Opinions

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

Compliance Help

Advisory Opinions

www.fec.gov/legal-resources/advisory-opinions-process/

**Trade Association PAC Webinar 2026:
Basics for Beginners**

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/192101>

Workshop Evaluation: <https://fec.ethn.io/192101>

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