



Trade Association PAC Operations, Part 2



June 3, 2026 2:45pm Eastern


Objectives

		
Review rules for supporting candidates	Examine association & PAC communications	Discuss use of association facilities

OBJECTIVES

- **Highlight methods for supporting federal candidates**
- **Evaluate Communications: Audience, message, payment and disclosure**
- **Identify and apply rules for use of trade association facilities**

SUPPORTING FEDERAL CANDIDATES



Review rules for supporting candidates

1

2

3

Contribution limits

Excessive contributions

Returned vs refunded contributions

PAC-to-candidate per-election limits*

Nonmulticandidate SSFs = **\$3,500**

Multicandidate SSFs = **\$5,000**

* Limit available only for elections in which candidate participates

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	

Contribution Limits

I. Making Contributions (11 CFR [110.1](#) and [110.2](#))

A. Limitations apply:

- 1. Non-multicandidate PACs**
 - a) Indexed for inflation.
 - b) May give \$3,500 per election to federal candidates for 2025-2026 elections.
- 2. Multicandidate PACs**
May give \$5,000 per election to federal candidates for 2025-2026 elections (limits unchanged).
- 3. Both in-kind and monetary contributions count against limits.**
- 4. Trade associations may not make contributions (except to Super PAC or non-contribution account of Hybrid PAC).**

Undesignated contributions count toward candidate's next election

Designation required if:

- Contributing to future election
- Retiring debt from previous election

For 2025-26 Elections	Candidate Committee per election	PAC (SPF 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	



5. Designation of campaign contributions by PAC

- **Undesignated contributions**
 - Count towards the candidate's next scheduled election.
 - Date contribution is made determines which election limit it counts against.

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



Practical Application:

The Snowboard Association decides to contribute \$10,000 to Senator Jocelyn Jones, for her re-election campaign. Jocelyn is in a tough primary in Colorado on June 25. The PAC treasurer, Trek Smith, issues a check to the campaign for \$10,000 on June 24.

Any red flags?



Example, continued:

Let's work through the check. The date on the check is June 24 and the contribution is from a qualified multicandidate committee (identified as such on the check).

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).

This contribution was mailed on June 25, the primary date, and thus will count against the primary limit because the **date made** was on or before the date of the primary.

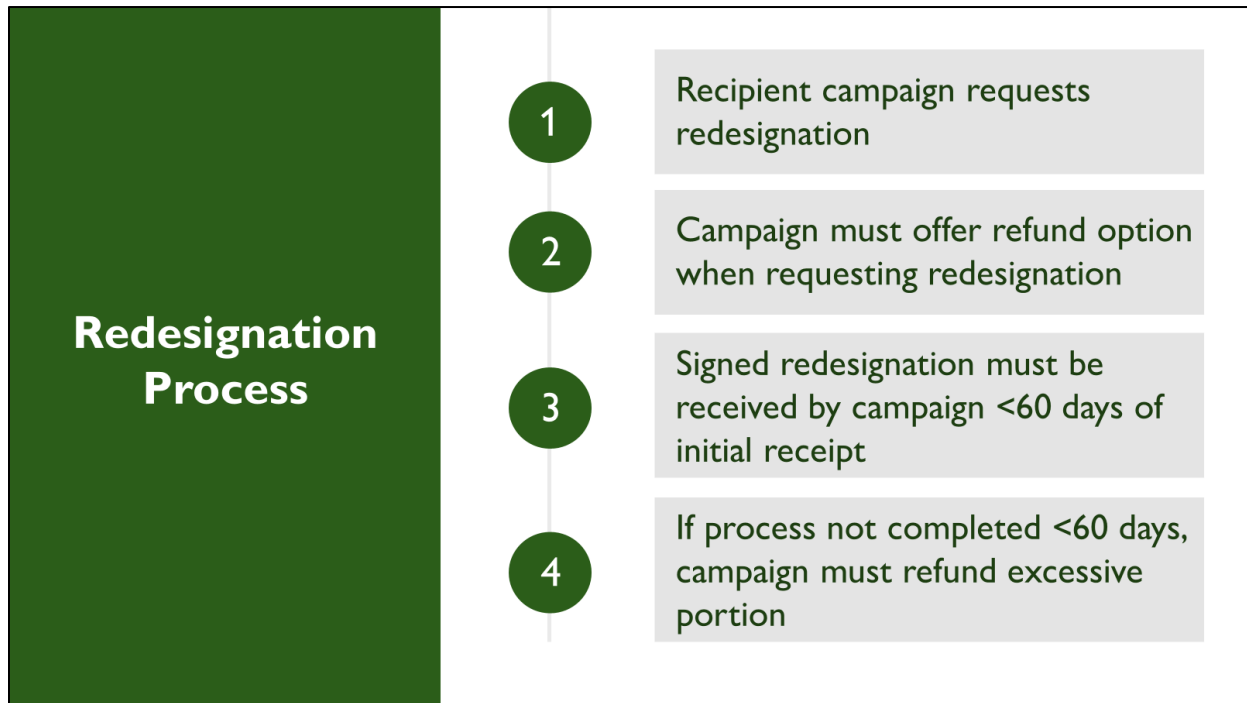
However, because it was undesignated, it is a \$10,000 contribution to the primary, and therefore excessive.

More: [Final Rule on Technological Modernization, 89 FR 196 \(January 2, 2024\)](#)

How do the campaign and PAC resolve this situation?

B. Methods for fixing excessive contributions

- Refund
- Redesignate



1. Procedures for redesignation request

- Campaign must offer refund option when asking PAC for redesignation.
- Signed redesignation authorization must be received by campaign within 60 days of their receipt of original contribution.
- If redesignation process not completed within 60-day window, campaign must refund the excessive portion back to the PAC.

2. Electronic contributor redesignations

Campaigns may rely on an online process to assure the contributor's identity and intent in a way that satisfies the electronic signature requirements. Consult [the Final Rule on Technological Modernization, 89 FR 196 \(January 2, 2024\)](#).




3. **Avoid excessive contributions!**
- **Designate election for all contributions – highly recommended.**
 - **Designation required if:**
 - PAC intends contribution to count toward a future election, beyond the upcoming election.
 - Making debt retirement contribution for past election.

Best Practice: Avoid Excessive Contributions – Designate All Contributions!


Reporting Example:

Itemizing Monetary Contributions Made to Federal
Candidates and Committees


Reporting Example



Contribution to Leadership PAC




Senator Jocelyn Jones



Senator Jocelyn Jones

Reporting Example



Contribution to Campaign

Answers to Reporting Example:

1. What type of transaction is this?

Answer: Both checks represent contributions made by the Snowboard Association PAC. The \$5,000 check is a contribution to a Senator's Leadership PAC and the \$7,000 check is an undesignated contribution to the Senator's authorized committee. Note that the Leadership PAC and the authorized committee of the Leadership PAC's sponsor are not considered affiliated.

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

Answer: The Snowboard Association PAC must itemize the contributions on its June Monthly report (covering the month of May) on a Schedule B for Line 23.



Poll Question:

When itemizing a leadership PAC contribution, must candidate and election info be listed?

- A: Yes
- B: No

Answer to Poll Question:

When itemizing a Leadership PAC contribution, must candidate and election info be listed?

- A: Yes
- B: No – CORRECT ANSWER

3. What information from the scenario do we need to disclose this correctly?

Answer: Disclose the Leadership PAC’s name and address, the date made and the amount. For purpose, note “contribution.” The candidate and election information is not required because the Leadership PAC is not an authorized committee that is affiliated with the campaign.

Contribution to Leadership PAC

June Monthly (M6) Report 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	
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) Snowboard Association PAC			
Full Name (Last, First, Middle Initial) A. Winter Wonderland PAC		Date of Disbursement 05 / 21 / 2026	
Mailing Address 333 Pine Street		FEC Identification Number C 00512018	
City Boulder	State CO	Zip Code 80302	Amount of Each Disbursement this Period 5,000.00
Purpose of Disbursement Contribution		Category/Type	<input type="checkbox"/> Memo Item
Candidate Name Not Applicable			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> State: <input type="checkbox"/> District: <input type="checkbox"/> Other (specify) ▼			

Users can search for Leadership PACs by sponsor, using the “committee type” filter on the committee data table (www.fec.gov/data/committees/). Each Leadership PAC’s profile lists its sponsor on the “about this committee” tab.

Leadership PAC Sponsor Search

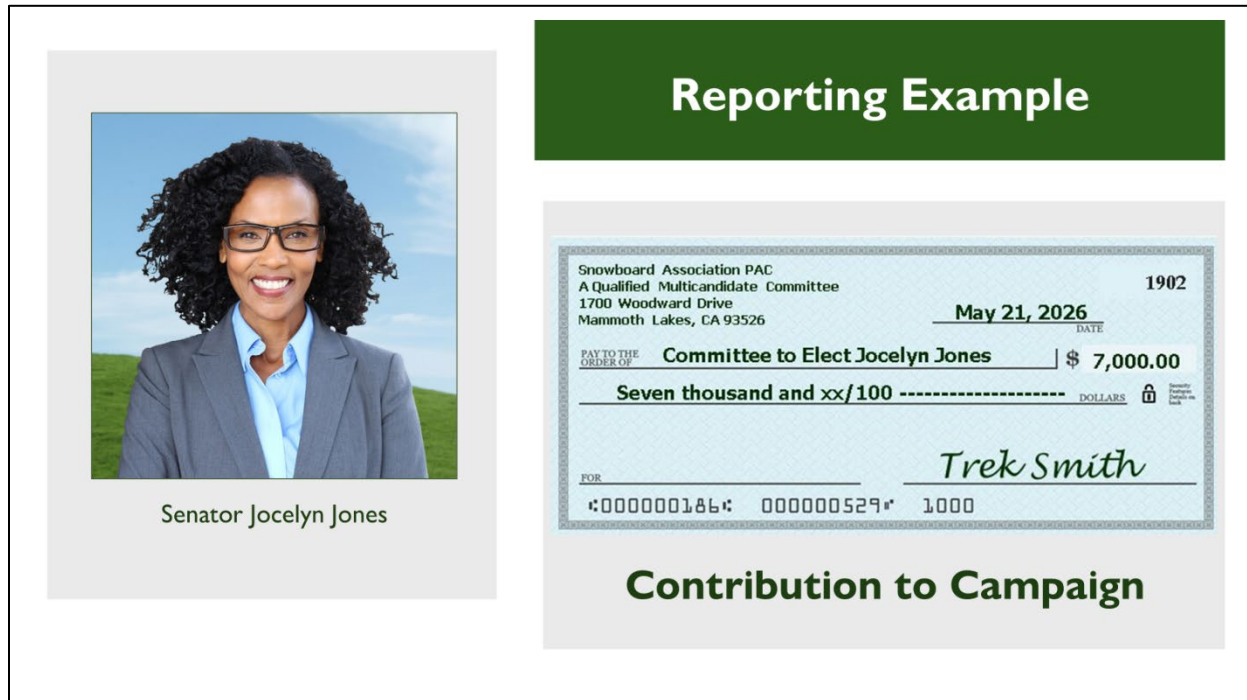
The screenshot shows the Federal Election Commission's website interface for searching committees. The page title is "Leadership PAC Sponsor Search". The search results table is as follows:

Name	Committee ID	Treasurer	Type	Designation	First filing date
ALASKANS FOR A NEW CONGRESS	C00889935	ELSTUN W LAJESSEN	Single Candidate Independent Expenditure	Unauthorized	2018-10-14
STEVEN SHARP COMMITTEE	C00887061	SHARP, RYAN PATRICK MR.	Single Candidate Independent Expenditure	Unauthorized	2018-09-08
INTERNATIONAL LONGSHOREMENS ASSOCIATION (ILA) LOCAL 1969 AFL-CIO POLITICAL ACTION COMMITTEE	C00898316	PEREZ, JOSEPH III	PAC - Nonqualified	Unauthorized	2019-03-04
CHAMPIONS OF GUN SENSE	C00890164	NEDELKA, LAWRENCE	PAC - Nonqualified	Unauthorized	2018-10-22
WORKERS DEFENSE ACTION FUND PAC	C00888929	TIMM, EMILY	Super PAC (Independent Expenditure-Only)	Unauthorized	2018-10-04

www.fec.gov/data/committees/

www.fec.gov/data/committees/

Answers to Reporting Example (Cont'd):



The Jones campaign receives the PAC check on May 24, and notes that the undesignated \$7,000 check is an excessive contribution. As such, the campaign sends the Snowboard Association PAC a redesignation request. As a big supporter of the Senator, the PAC does not want a refund. On June 2, the PAC treasurer sends the campaign a redesignation letter which is received by the campaign treasurer on June 5.

1. What type of transaction is this?

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 Committee to Elect Jocelyn Jones. However, as an undesignated contribution, it's an excessive primary contribution. To remedy this, the campaign has asked the PAC to redesignate the excessive portion (\$2,000) to the general election.

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

Answer: The PAC is required to disclose the original disbursement since the close of books for the June Monthly report (covering the month of May) falls before the redesignation letter is sent by the PAC. The PAC then must disclose the redesignation on the July Monthly report (covering the month of June) since the redesignation occurred during that reporting period.

3. What information from the scenario do we need to disclose this correctly?

Answer:

Report original disbursement (June Monthly) - show reporting on Schedule B for Line 23. The itemization information includes candidate committee’s name and address, the date made, amount, the candidate’s name and office sought (including state and congressional district (if applicable; for Senate, just put the state)), 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. Include notation “Redesignation pending.”

Contribution to Campaign

June Monthly (M6) Report 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 type="checkbox"/>
<input type="checkbox"/>	28a	<input type="checkbox"/>	23	<input checked="" type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	26	<input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	27	<input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	28b	<input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	28c	<input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	29	<input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	30a	<input type="checkbox"/>

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) Snowboard Association PAC	
Full Name (Last, First, Middle Initial)	
A. Committee to Elect Jocelyn Jones	
Date of Disbursement 05 / 21 / 2026	
Mailing Address 2632 Retro Drive	
City Denver	State CO Zip Code 80202
Purpose of Disbursement Contribution	
Candidate Name Jocelyn Jones	
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State: CO	District:
FEC Identification Number C 00011011	
Amount of Each Disbursement this Period 7,000.00	
<input type="checkbox"/> Memo Item Redesignation Pending	
Category/Type 011	



Poll Question:

When disclosing a redesignation to another election, are separate entries needed?

- A: Yes
- B: No

Answer to Poll Question:

When disclosing a redesignation to another election, are separate entries needed?

- A: Yes – CORRECT ANSWER**
- B: No

Answer to question #3 continued:

Report Redesignation (July Monthly) - show reporting on Schedule B for Line 23. There will be two separate entries.

- \$7,000 contribution as disclosed on June monthly – MEMO entry.
- -\$2,000 contribution shown as negative entry for primary – MEMO entry.
- \$2,000 contribution shown with general checked – REDESIGNATION; MEMO entry.

Disclose all these entries as MEMO entries since this is not new money leaving the PAC account, but new information on a previous disbursement.

Redesignation

July Monthly (M7) Report;

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"/> 21a	<input type="checkbox"/> 27
		<input type="checkbox"/> 21b	<input type="checkbox"/> 28
		<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 29
		<input type="checkbox"/> 25a	<input type="checkbox"/> 30a
		<input type="checkbox"/> 25b	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (in Full)
Snowboard Association PAC

Full Name (Last, First, Middle Initial)

A. Committee to Elect Jocelyn Jones

Date of Disbursement: **05 21 2026**

Mailing Address: **2632 Retro Drive**

City: **Denver** State: **CO** Zip Code: **80202**

Purpose of Disbursement: **Contribution** Category/Type: **011**

Candidate Name: **Jocelyn Jones**

Office Sought: Senate House Disbursement For: Primary General Other (specify) _____

State: **CO** District: _____

FEC Identification Number: **C 00011011**

Amount of Each Disbursement this Period: **7,000.00**

Memo Item **See 2026 June Monthly**

B. Committee to Elect Jocelyn Jones

Date of Disbursement: **06 05 2026**

Mailing Address: **2632 Retro Drive**

City: **Denver** State: **CO** Zip Code: **80202**

Purpose of Disbursement: **Contribution** Category/Type: **011**

Candidate Name: **Jocelyn Jones**

Office Sought: Senate House Disbursement For: Primary General Other (specify) _____

State: **CO** District: _____

FEC Identification Number: **C 00011011**

Amount of Each Disbursement this Period: **-2,000.00**

Memo Item

C. Committee to Elect Jocelyn Jones

Date of Disbursement: **06 05 2026**

Mailing Address: **2632 Retro Drive**

City: **Denver** State: **CO** Zip Code: **80202**

Purpose of Disbursement: **Contribution** Category/Type: **011**

Candidate Name: **Jocelyn Jones**

Office Sought: Senate House Disbursement For: Primary General Other (specify) _____

State: **CO** District: _____

FEC Identification Number: **C 00011011**


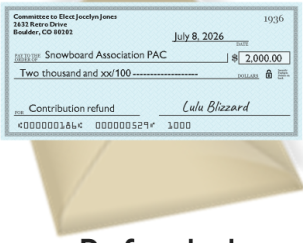
Amount of Each Disbursement this Period: **2,000.00**

Memo Item **Redesignated**

Points to Remember:


- Itemize contributions to all federal campaigns and committees on Schedule B for Line 23, regardless of amount.
 - For contributions to federal campaign committees, include candidate information.
- **Memo entries** are transactions that are itemized, but the dollar total is excluded from the committee’s total receipts or expenditures.
 - **For example**, committees would use memo entries when itemizing a credit card bill on a Schedule B. The lump sum payment for the bill is itemized as a regular expenditure. The committee would use memo entries to list any specific charges that meet the itemization threshold. By using memo entries, the specific charges are not included in calculations for total expenditures.
- If redesignated after the close of books, show the redesignation on the next report and indicate the report on which it was previously itemized.
- Previous report should not be amended.
- 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” (for example, “2024 General Debt”).
- Treat contributions to a Leadership PAC as a contribution to a PAC, not to a campaign.
- Reporting examples: www.fec.gov/help-candidates-and-committees/reporting-examples/

Reporting Example: Itemizing Refunded, Lost and Returned Contributions Made to Federal Candidates and Committees

<p>Returned, Lost or Voided Checks</p>  <p>Snowboard Association PAC 1700 Woodward Drive Mammoth Lakes, CA 93526</p> <p>July 5, 2026</p> <p>RETURN TO SENDER</p> <p>Winter Wonderland PAC 333 Pine Street Boulder, CO 80302</p>	<p>Contributions: Returned vs. Refunded</p>	 <p>Committee to Elect Jocelyn Jones 3433 Karna Drive Boulder, CO 80503</p> <p>July 8, 2026</p> <p>Snowboard Association PAC</p> <p>Two thousand and xx/100</p> <p>2,000.00</p> <p>Contribution refund</p> <p>Lulu Blizzard</p> <p>40000001464 0000005294 1000</p> <p>Refunded Contribution</p>
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<p>Returned</p>	<p>Report as negative entry on same line number as original disbursement</p>  <p>Snowboard Association PAC 1700 Woodward Drive Mammoth Lakes, CA 93526</p> <p>July 5, 2026</p> <p>RETURN TO SENDER</p> <p>Winter Wonderland PAC 333 Pine Street Boulder, CO 80302</p>
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Report refund from a political committee as a **receipt** on Schedule A, Line 16



Refunded

On July 10, the Snowboard Association PAC receives the envelope containing its May 21 \$5,000 check to the Winter Wonderland PAC in the mail. It is marked “Return to Sender.”

On the same day, the PAC receives a refund check from the Jones Campaign for \$2,000. Senator Jones lost in the primary and has refunded the PAC’s general election contribution.

- 1. What types of transactions are these?**
- 2. How must the committee disclose the transaction(s)?**
- 3. What information from the scenario do we need to disclose this correctly?**

**Answers to Reporting Example:
Itemizing Refunded, Lost and Returned Contributions Made to Federal Candidates and
Committees**

1. What types of transactions are these?

Answer: The uncashed check to the Winter Wonderland PAC is a negative expenditure, since the funds never left the committee's account. The check containing the refund from the Committee to Elect Jocelyn Jones represents a refund to be deposited, and thus, is a receipt.

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

Answer: Voided or returned/uncashed checks should be disclosed as negative entries on the Line number the transaction was originally disclosed (in this case, Schedule B for Line 23). On the other hand, when a refund check is actually received from another committee and deposited into the federal account, it should be disclosed on Schedule A for Line 16 as a receipt.

3. What information from the scenario do we need to disclose this correctly?

Answer: The committee will need the information that was originally disclosed on a previous report regarding the transaction and will also need to reference that report on its disclosure. The committee should also reference the original contribution date in the "purpose" section of the report.

Reporting example continues on next page

Report Lost/Voided/Returned Contribution:

Returned
Contribution

August Monthly (M8) Report 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"/> 28 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b		

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NAME OF COMMITTEE (In Full)
Snowboard Association PAC

Full Name (Last, First, Middle Initial)
A. Winter Wonderland PAC

Mailing Address
333 Pine Street

City: **Boulder** State: **CO** Zip Code: **80302**

Purpose of Disbursement
Check returned – original contribution 5/21/26

Candidate Name: _____ Category/Type: _____

Office Sought: House Senate President Disbursement For: Primary General Other (specify) ▼

State: _____ District: _____

Date of Disbursement: **07 / 10 / 2026**

FEC Identification Number: **C 00512018**

Amount of Each Disbursement this Period: **- 5,000.00**

Uncashed check from 2026 June Monthly

Report Refunded Contribution Received:

August Monthly (M8) Report FEC Form 3X: Schedule A, Line 16

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

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

NAME OF COMMITTEE (In Full)
Snowboard Association PAC

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
A. Committee to Elect Jocelyn Jones

Mailing Address
2632 Retro Drive

City: **Denver** State: **CO** Zip Code: **80202**

FEC ID number of contributing federal political committee: **C 00011011**

Name of Employer (for Individual): _____ Occupation (for Individual): _____

Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ **2,000.00**

Date of Receipt: **07 / 10 / 2026**

Amount of Each Receipt this Period: **2,000.00**

Memo Item

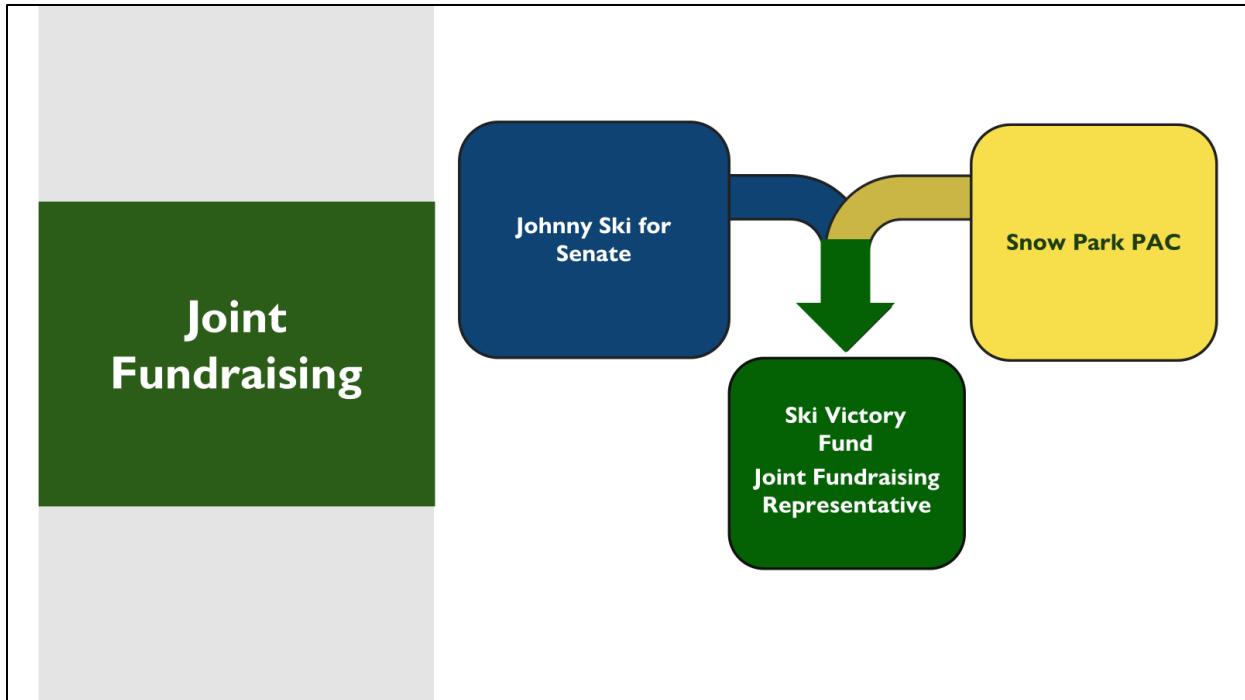
Contribution itemized in 2026 June Monthly

Refunded
Contribution

Points to Remember:

- If SSF receives its original check, not deposited (or if its check is lost or otherwise not deposited):
 - Report amount as negative entry on Schedule B for Line 23.
 - Subtract from the total amount for that schedule.
 - Note that check is lost, voided, etc. (FECFile users: use description field).
- If SSF receives refund check issued by candidate:
 - Itemize on Schedule A for Line 16 (check appropriate election designation box).
 - Reference previous report of contribution made (FECFile users: use description field).
- Reporting examples: www.fec.gov/help-candidates-and-committees/reporting-examples/

II. Contributions to a joint fundraising committee ([11 CFR 102.17](#))

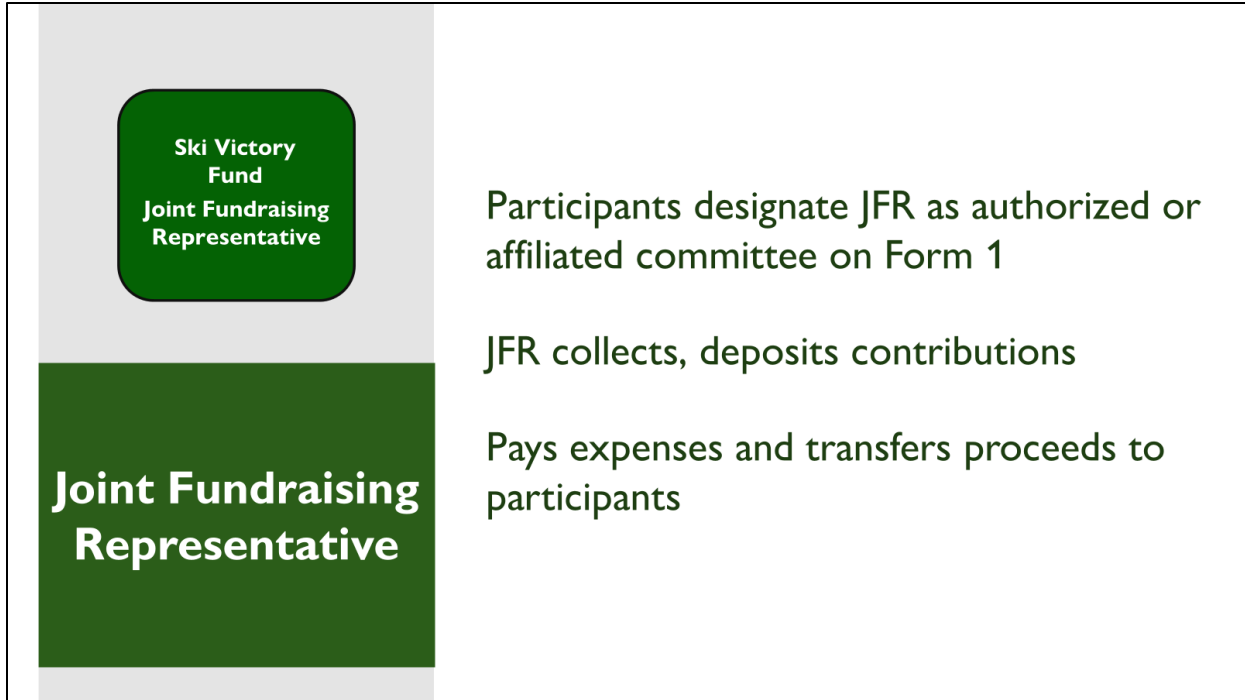


A. **What is joint fundraising?**

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


More: www.fec.gov/help-candidates-and-committees/making-disbursements/joint-fundraising-candidates-political-committees/

NOTE: While SSFs may be invited to contribute to a joint fundraising committee, FEC rules prohibit them from being one of the committees jointly fundraising. See [11 CFR 102.17](#), which is titled “Joint fundraising by committees **other than** separate segregated funds.”




B. Basics of how joint fundraisers work:

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




Ski Victory Fund is a joint fundraising committee for Johnny Ski for Senate and the Snow Park PAC.




Contributions to the Ski Victory Fund will be split 50/50 between the committees, but contributors may specify a different allocation. The allocation formula may change if any contribution would cause a contributor to exceed the limit to one of the committees.

Joint Fundraising

Allocation Ratio





Donor Designation

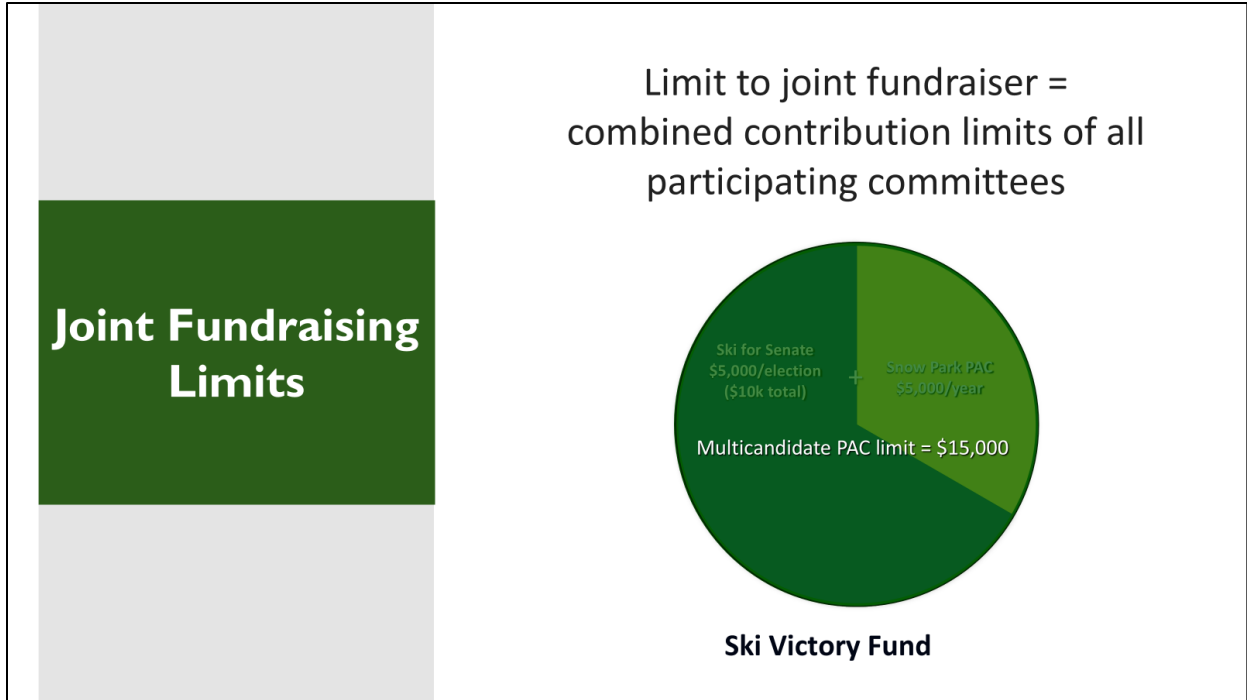
Year 2025-26 Elections	Candidate	Committee	Contribution Limit	Actual Contribution	Excess Contribution	Adjusted Contribution
Candidate A	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate B	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate C	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate D	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate E	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate F	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate G	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate H	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate I	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000
Candidate J	Committee A	\$10,000	\$10,000	\$10,000	\$0	\$10,000
	Committee B	\$10,000	\$10,000	\$10,000	\$0	\$10,000

Adjustments made to stay within limits

C. Solicitations by joint fundraising representatives (JFR)

Joint fundraising solicitations must state:

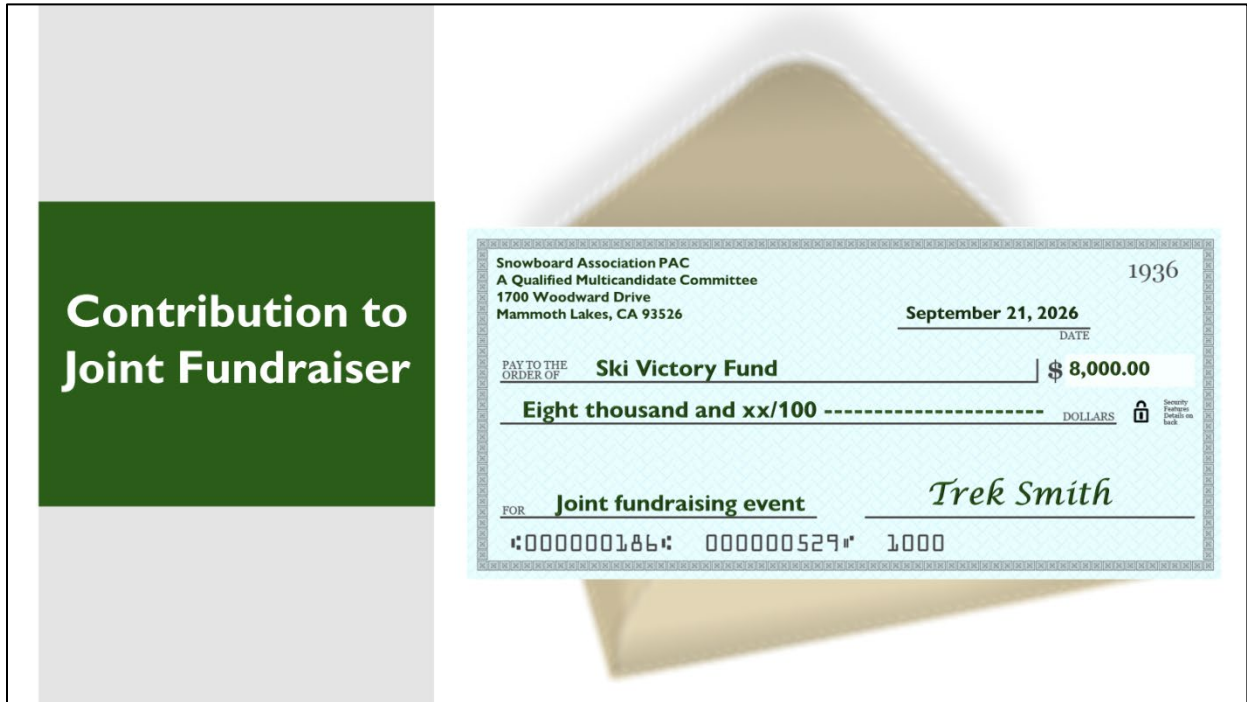
- Names of all participants (regardless of whether they are registered political committees)
- Allocation formula (how contributions will be split)
- Allowance for alternate designation by contributors
- Excessive contributions may change allocation formula
[11 CFR 102.17\(c\)\(2\)\(i\)](#)
- JFR and participants must screen contributions to make sure they are neither prohibited nor in excess of contribution limits.



D. Application of limits

Maximum limit a PAC may contribute to the joint fundraising committee = Total amount it may contribute to all participants, without exceeding any limits.

Reporting Example: Contribution made by SSF to a joint fundraiser (Check #1936)



Senator Johnny Ski and his leadership PAC, the Snow Park PAC, are holding a joint fundraising event on September 21. They plan to divide the expenses and proceeds equally and designate the “Ski Victory Fund” as their joint fundraising representative (JFR).

The Snowboard Association PAC plans to attend the event. Since it has not previously given to the Snow Park PAC, it has a limit of \$5,000 to give to the leadership PAC. Since the Snowboard Association PAC had already contributed the maximum to Senator Ski’s primary election and \$2,000 towards his general election campaign, it has a limit of \$3,000 left for the general.

The PAC ultimately made a contribution of \$8,000 to the joint fundraising representative.

1. How should the Snowboard Association PAC disclose the contribution to the Ski Victory Fund?



Poll Question:

Who will the Snowboard Association PAC list as the payee for this contribution?

- A: The joint fundraising representative (JFR)
- B: Each committee participating in the joint fundraiser
- C: The JFR, then allocate as memo entries the committees participating in the joint fundraiser

Answer to Poll Question:

Who will the Snowboard Association PAC list as the payee for this contribution?

- A: The joint fundraising representative (JFR) – CORRECT ANSWER**
- B: Each committee participating in the joint fundraiser
- C: The JFR, then allocate as memo entries the committees participating in the joint fundraiser

Answer to Reporting Example:

1. How should the Snowboard Association PAC disclose the contribution to the Ski Victory Fund?

The PAC must disclose the contribution on Schedule B for Line 23; itemizing the JFR as the payee and noting “contribution to joint fundraising representative” as Purpose of Disbursement.

Contribution to Joint Fundraiser

October Monthly (M10) Report
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 type="checkbox"/> 28a	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<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) Snowboard Association PAC	
Full Name (Last, First, Middle Initial)	
A. Ski Victory Fund	Date of Disbursement 09 / 21 / 2026
Mailing Address 1111 First Street SW	
City Washington	State DC
Zip Code 20228	
Purpose of Disbursement Contribution to joint fundraiser	
Candidate Name	FEC Identification Number C 00558742
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State: District:	Amount of Each Disbursement this Period 8,000.00
<input type="checkbox"/> Memo Item	

Note that the Snowboard Association PAC does not have to disclose how the contribution was allocated between the campaign and the leadership PAC. Although the participants have a 50/50 formula, they will need to reallocate the Snowboard Association PAC's contribution in order to avoid an excessive contribution to the candidate (because half of \$8,000 (\$4,000) is more than the limit the PAC has left for the candidate; remember, they previously gave \$2,000 to the general).

After its contribution is reallocated, Snowboard Association PAC will make a \$5,000 contribution to the leadership PAC and a \$3,000 general election contribution to the candidate's campaign committee. However, that will be disclosed by the JFR and the participants on their reports; the PAC only needs to show the total amount contributed to the JFR on its report.

More: Examples of how the JFR and the participants disclose the contributions received, www.fec.gov/help-candidates-and-committees/filing-reports/joint-fundraising-transfers/

KEY POINTS – Reporting by SSFs that contribute to joint fundraising committees:

- Report the contribution as a contribution to the joint fundraising representative.
- **Do not break out the amounts per candidate or per committee.** This is done on the JFR's report.
- **Reporting examples:** www.fec.gov/help-candidates-and-committees/reporting-examples/

Objectives		
		
Review rules for supporting candidates	Examine association & PAC communications	Discuss use of association facilities

III. Trade Association Communications and Use of Facilities

Remember...




Most permissible trade association activity in connection with federal elections results from exemptions from the ban on corporate-labor contributions

- A. **General prohibition (11 CFR [114.2](#))**
Trade associations are generally prohibited from making contributions (direct or in-kind) to influence federal elections.

Trade associations may finance certain election-related communications and may permit limited use of their facilities for campaign purposes

Shifting Focus from PAC to Trade Association Activity

Communications & Facilities Exemptions



B. Overview: Communications/Facilities exemptions permit:

1. Financing election-related communications to the restricted class (express advocacy and coordination with candidates OK for restricted class communications) ([11 CFR 114.3](#))
2. Financing certain election-related communications beyond the restricted class ([11 CFR 114.4](#))
3. Financing independent expenditures and electioneering communications ([11 CFR 114.10](#))
Trade associations may make independent expenditures and electioneering communications to the general public using general treasury funds, provided that they do not coordinate those communications with candidates or political party committees.
4. Using trade associations facilities for election-related activities, subject to certain conditions. ([11 CFR 114.2\(f\)](#), [114.9](#) and [114.13](#))

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/

IV. Communications Exemptions

Trade associations may communicate with restricted class on any subject.

Communications to general public are generally more limited.

Key Terms:

- Express Advocacy
- Coordination

Communications Exemptions



Message unmistakably urges election or defeat of clearly identified federal candidate.

Two Part Definition:

- Part A: Specific Call to Action
- Part B: Only Reasonable Interpretation Test

Express Advocacy



A. Definition: Express advocacy

Two part definition of unmistakably urging election or defeat

1. Part A: Specific call to action ([11 CFR 100.22\(a\)](#))

- **Explicit words of advocacy for or against a federal candidate**
Examples: “Re-elect your Congressman,” “support your Democratic nominee,” “reject the incumbent.”
- **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.
- **Campaign slogan or words (such as seen on bumper stickers and pins) that can have no other reasonable meaning than to support or oppose candidate**
Examples: “Bush/Cheney!”; “Obama 2012!”

2. Part B: Express advocacy by context—“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 context, can only be interpreted by reasonable person as “encouraging action to elect or defeat” federal candidate.

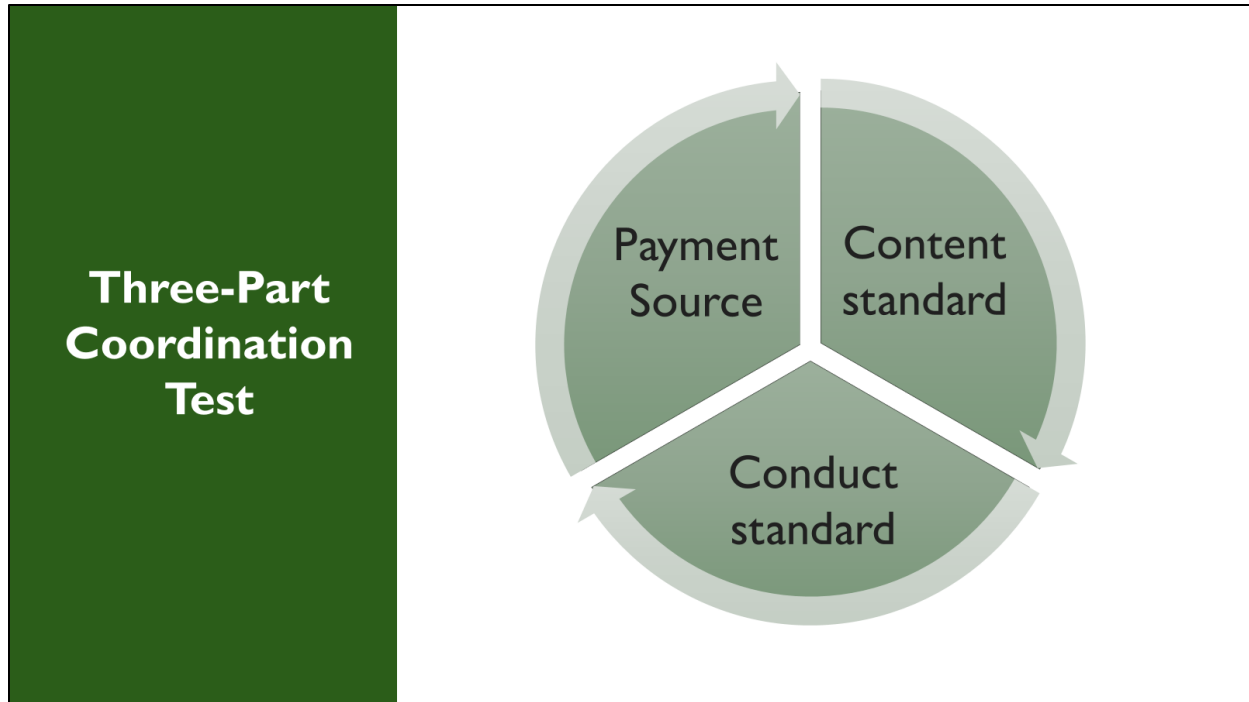
B. Definition: Coordination ([11 CFR 109.20](#))

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.”

1. Why important? Coordination = in-kind contribution (unless exempt communication by trade association to restricted class) ([11 CFR 109.21\(b\)\(1\)](#))

- a) **Connected organization** prohibited from making contributions.
- b) **Subject to contribution limitations.**
- c) **Appropriate disclaimer required.**
- d) **Reporting**

In many cases, reportable by campaign or party committee as in-kind contribution received (and by PAC if in-kind contribution made by PAC).




- 2. Coordinated communications – three-part test ([11 CFR 109.21\(d\)](#))**
All three parts must be satisfied to justify conclusion that payments for a coordinated communication are for the purpose of influencing a federal election (and that costs incurred are in-kind contributions).

**Three-Part
Coordination
Test**


Payment Source

Paid for by someone other than the
referenced candidate

A photograph showing a coin on the left and a large, soft shadow of a dollar sign on the right, set against a light green background.

- a) **Source of payment**
- (1) To be considered coordinated, communication must be paid for by someone other than a candidate, an authorized committee or a political party committee. (If campaign paid for it themselves, coordination wouldn't be an issue.)
 - (2) Payment prong is satisfied if communication is paid for by the PAC.

Three-Part Coordination Test



Content Standard

Includes at least one of the following:

- 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**

b) **“Content standard” ([11 CFR 109.21\(c\)\(1\)-\(5\)](#))**

Will satisfy prong if communication meets any one of these **five** standards:

- (1) **Electioneering communication;**
- (2) **Public communication that republishes, disseminates or distributes campaign materials;**
- (3) **Public communication with express advocacy;**
- (4) **Communication that is “functional equivalent of express advocacy;”**

A communication that is susceptible of no reasonable interpretation other than as an appeal to vote for or against a clearly identified federal candidate.

- Applies without regard to the timing of the communication or the targeted audience.
- In its application of this test, Commission will follow Supreme Court’s reasoning in [FEC v. Wisconsin Right to Life](#).

See [Final Rules on Coordinated Communications, 75 Fed. Reg. 55947 \(September 15, 2010\)](#)

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



(5) **Public communication referring to candidate within certain time frame before election (no express advocacy required)**

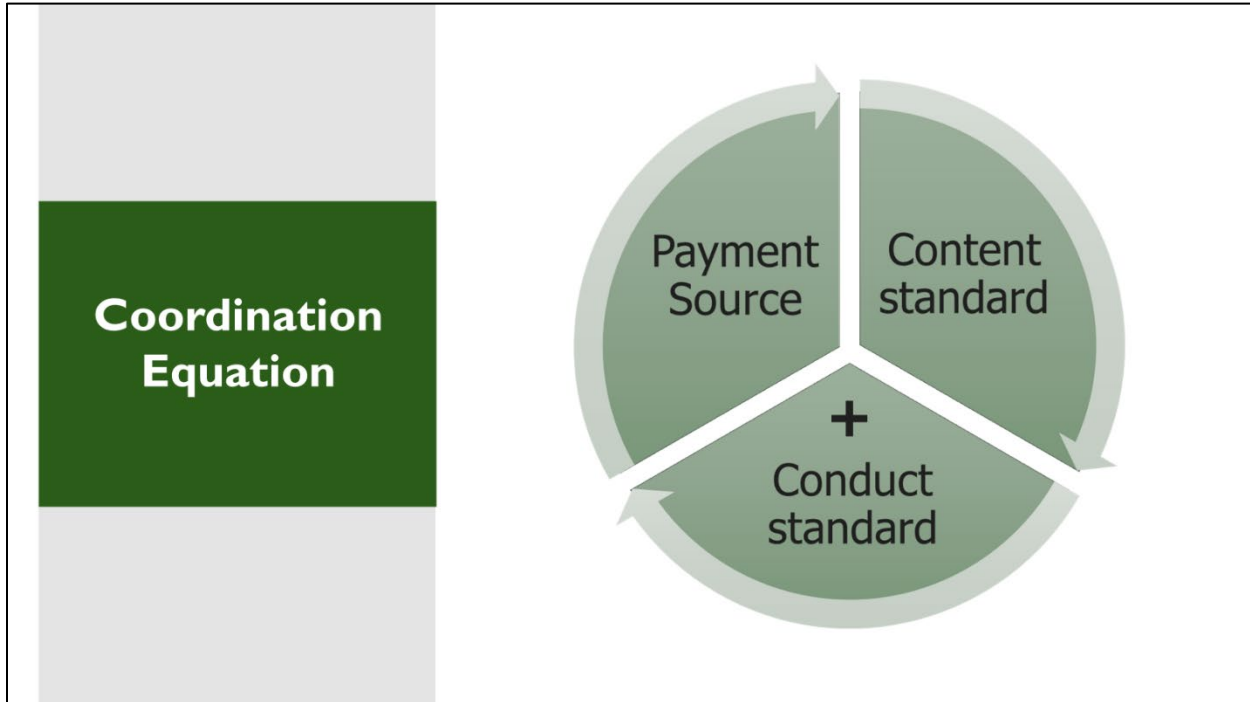
Communication meets content standard, even without express advocacy if it:

- Refers to clearly identified candidate
- Is directed to voters in the jurisdiction of the clearly identified candidate or to voters in a jurisdiction where one or more candidates of the political party appear on the ballot; and
- Is publicly disseminated during certain time frames:
 - **Senate and house candidates** = 90 days before a primary or general election.
 - **Presidential candidates** = entire period from 120 days before the clearly identified candidate's primary in that jurisdiction where disseminated up through the date of the general election.
 - **Political parties** = 90 days before a primary or general election (Congressional cycle).
 - **Time frames for 2026 elections:**
<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/coordinated-communications-periods-main-page-2026/>

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

- c) **“Conduct standard”**
Test satisfied if communication meets any one of these **five** standards:
- (1) **Request or suggestion** ([11 CFR 109.21\(d\)\(1\)](#))
 - (2) **Material involvement** ([11 CFR 109.21\(d\)\(2\)](#))
 - (3) **Substantial discussion** ([11 CFR 109.21\(d\)\(3\)](#))
 - (4) **Employment of common vendor**
([11 CFR 109.21\(d\)\(4\)](#)) Safe harbor of 120 days applies.
 - (5) **Former employee/independent contractor**
([11 CFR 109.21\(d\)\(5\)](#)) Safe harbor of 120 days applies.
- d) **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\(h\)](#).

Remember...



UNRESTRICTED

Communications to Restricted Class

Communication may be coordinated with candidate or party

Message may be about any topic, including express advocacy

Reporting depends on message and payment

Restricted Class for Trade Association PAC

Executive and Administrative Personnel



Noncorporate Members



Individual Corporate Representative



- C. **Definition: Trade association restricted class for communications**
1. Restricted class as defined for purposes of receiving communications is **not** identical to group that can be solicited for contributions to the association's PAC.

2. Who is included

- a) Executive and administrative personnel and noncorporate members,
- b) Representatives of corporate members with whom association normally conducts business.
- c) [AO 1991-24](#): Representatives of member corporations could distribute communication to corporation's restricted class

MORE LIMITED


**Connected Org.
Communications
to the Public**

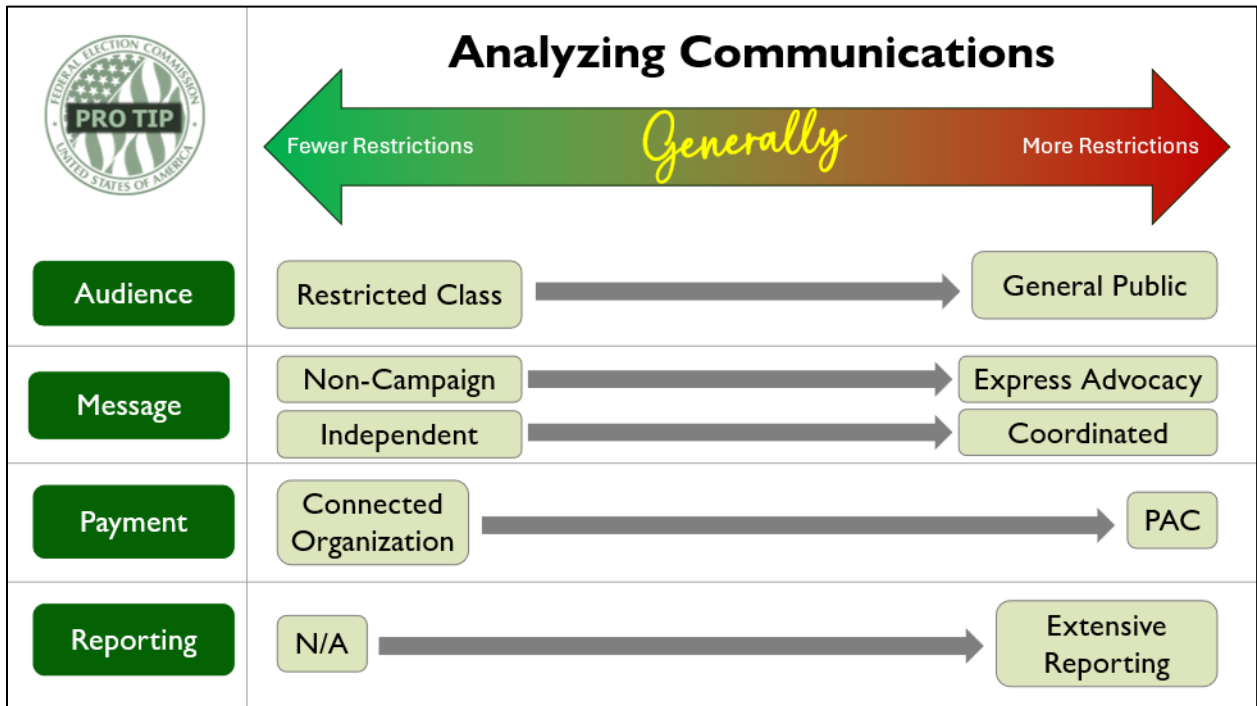
Non-campaign
communications are
generally okay

Express advocacy only
for independent
expenditures
(and endorsements)

Reporting required
for IEs

V. Analyzing Communications

 <p>Audience</p>	<h2 style="text-align: center;">Analyzing Communications Step by Step</h2> <p>Is it your restricted class or the general public?</p>
<p>Message</p>	<p>Is it campaign related? Does it contain express advocacy? Is it coordinated with campaign?</p>
<p>Payment</p>	<p>Based on the audience and message, who can pay for the communication?</p>
<p>Reporting</p>	<p>How is the payment for the communication reported to the FEC and by whom?</p>



SCENARIO: CANDIDATE APPEARANCE

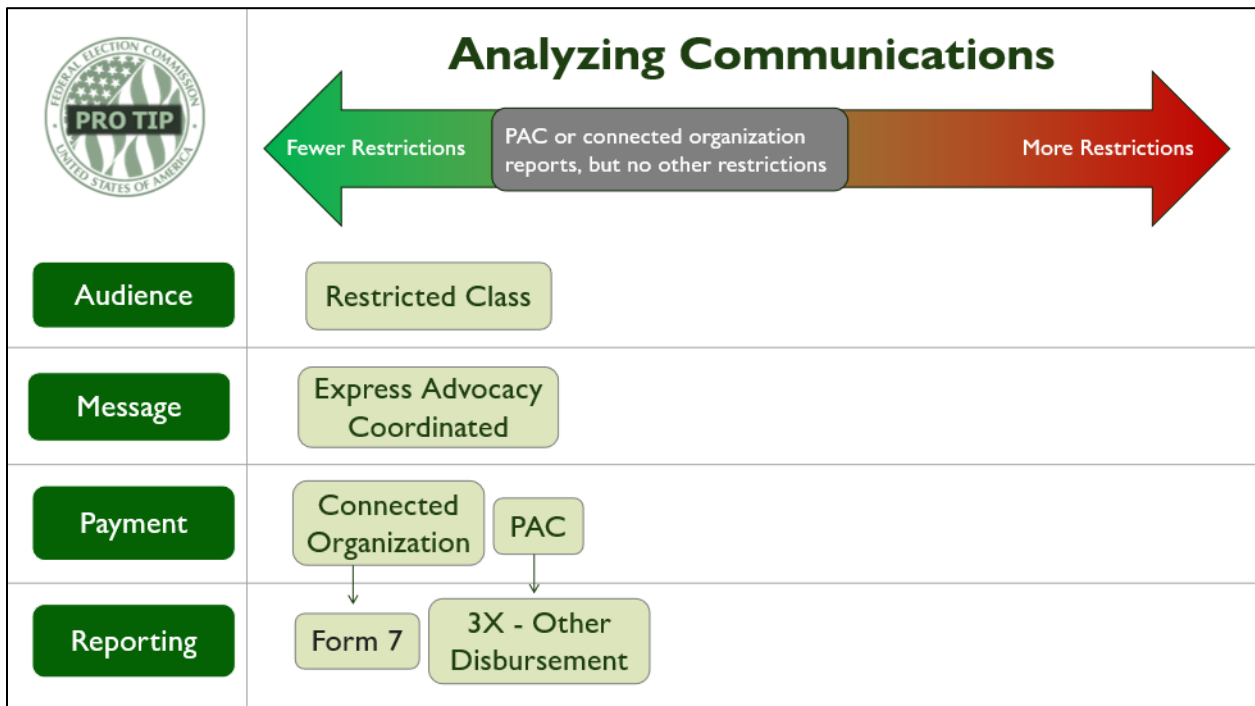
Scenario: Candidate Appearance



Joe Rodriguez

Flip Winters, Executive Director of the Snowboard Association, invites the association’s restricted class to a luncheon where Senate Candidate Joe Rodriguez delivers a campaign speech and asks for contributions.

As Flip introduces the candidate, he tells everyone to “Vote for Joe!”



Reporting Communications to Restricted Class



If...

Message includes express advocacy and cost exceeds \$2,000 for election

Then...

Association files
FEC Form 7

www.fec.gov/resources/cms-content/documents/fecform7.pdf

If...

PAC pays for an express advocacy message to restricted class

Then...

PAC reports payment on FEC Form 3X as Other Disbursement

Reporting Communications to Restricted Class



www.fec.gov/resources/cms-content/documents/fecfrm3x.pdf

A. **Express advocacy communications before the restricted class ([11 CFR 114.3](#))**

1. **Reporting express advocacy communications before restricted class**

a) **By association (election years ONLY)**

Required if express advocacy communication costs exceeds \$2,000 when aggregated for all candidates running in the same election (primaries or general elections).

(1) **Use FEC Form 7:** Download at www.fec.gov/help-candidates-and-committees/forms/#other-filers

(2) **Continuous filing**

If additional express advocacy communication expenses for primaries or general elections.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/corporation-labor-organization-communications-restricted-class/

b) **By SSF**

(1) If the communication costs are paid for by the SSF, they will not result in a contribution or expenditure.

(2) **Use FEC Form 3X**

Such costs are reported on Line 29 as “Other Disbursements.” See [AO 2000-03](#).

(Note that you should reference this AO on your FEC report when itemizing such costs.)

Before the restricted class...

- ✓ Candidate and association may both expressly advocate and solicit contributions
- ✓ Candidate may collect contributions
- ✓ SSF may act as conduit, but the contributions count against its limit



**Key Points for
Candidate
Appearance**

2. General guidelines for candidate appearance

- a) Candidate and association can expressly advocate for candidate
- b) Both candidate and association can solicit contributions for candidate.
- c) Candidate/campaign may collect contributions at event. **Best option.**
- d) Association's SSF may collect contributions; will trigger requirements as conduit for earmarked contributions (limits count all the way around).
See 11 CFR [110.6](#) and [114.2\(f\)](#).

Strongly recommended: Let the campaign collect the money.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/events-and-programs-candidates-or-party-committees-by-ssf/

SCENARIO: APPEARANCE BEYOND RESTRICTED CLASS

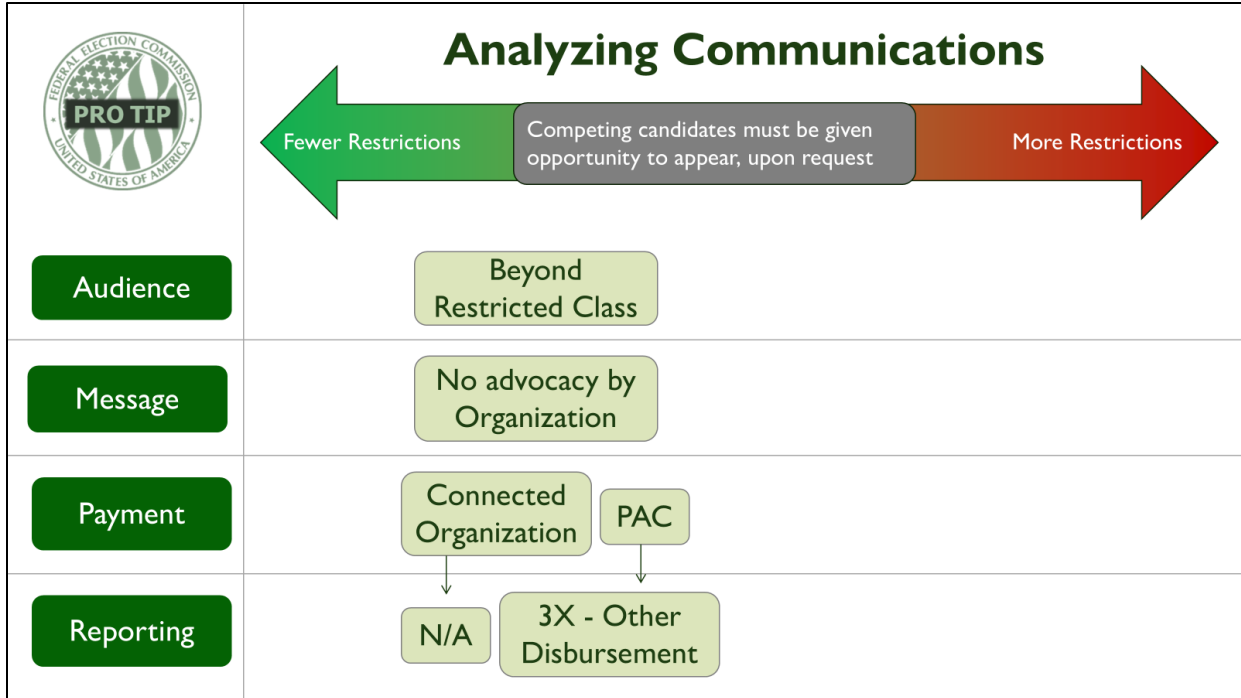
Scenario: Appearance beyond Restricted Class

Representative Jessica Johnson visits the Snowboard Association to speak with all its employees and members about legislation affecting the snowboard industry and her re-election campaign.

The association's Executive Director, Flip Winters, introduces Rep. Johnson, but does not mention the campaign.



Rep. Jessica Johnson





Beyond the restricted class...

- ✓ Candidate may advocate election, but association cannot
- ✓ No collection of contributions
- ✓ Opposing candidates must be given similar opportunity, upon request

Key Points for Candidate Appearance

B. Candidate appearance beyond the restricted class paid for by connected organization ([11 CFR 114.4](#))

1. General guidelines

- a) Candidate can expressly advocate for their election.
- b) Organization **cannot** expressly advocate for the candidate. If the organization does expressly advocate for candidate will result in a prohibited contribution.
- c) The candidate may solicit but may not accept contributions before, during or after the appearance.
- e) The organization may not solicit, direct or control contributions.
- d) The organization must allow other candidates for the same office to appear upon request.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/events-and-programs-candidates-or-party-committees-by-ssf/

SCENARIO: INDEPENDENT TELEVISION AD

Scenario: Independent Television Ad

House candidate Paula Skater is not accepting PAC contributions, but Snowboard Association wants to support her campaign

Association plans to purchase a TV ad advocating her election

Association has had no contact with Paula or her campaign

Remember...

Independent Expenditure

Expressly advocates election or defeat of candidate

Not coordinated with candidate or campaign committee

No limit on amount of expenditure

Trade associations may make IEs, but prohibited in-kind contribution results if coordinated



C. Independent expenditure

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.

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

A candidate's name, nickname, photograph or drawing appears or identity is otherwise apparent through references such as “the President,” “your Congressman,” “the incumbent.”

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

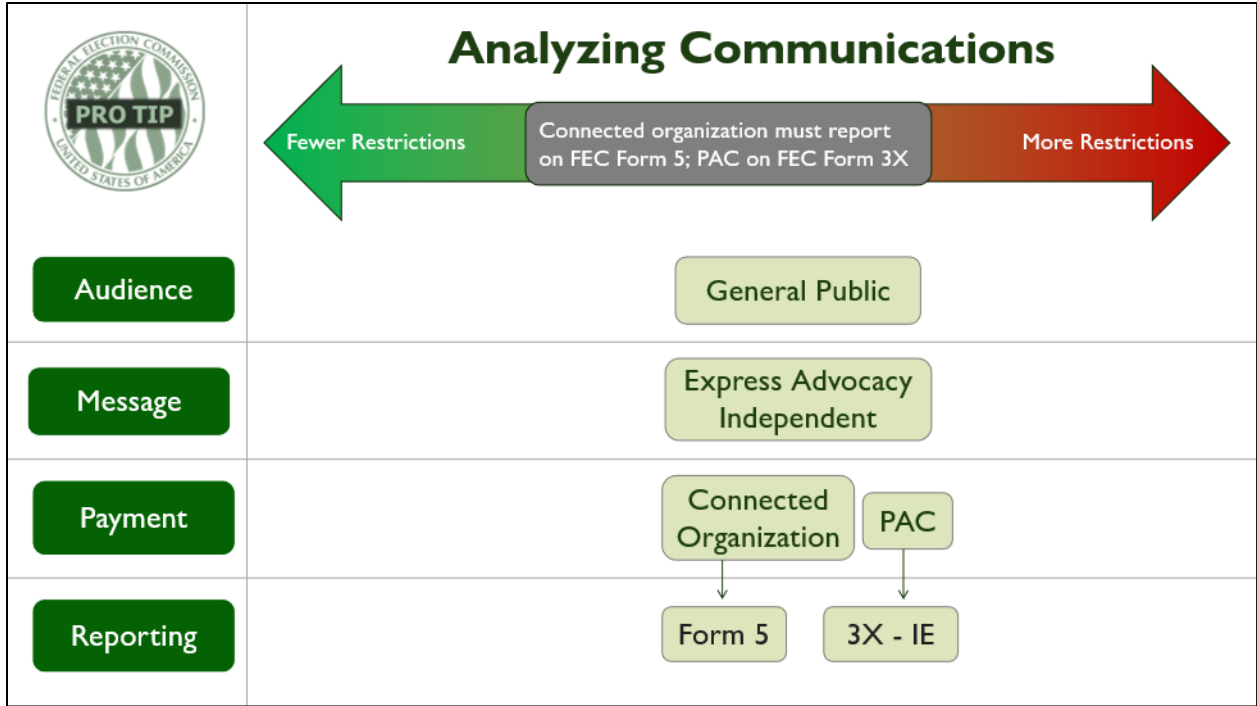
Message unmistakably urges election or defeat of one or more clearly identified candidates.

3. No coordination ([11 CFR 109.20](#))

Must not satisfy the three-part coordination test described above.

D. Trade association or PAC may make independent expenditure

1. Unlimited
2. Disclaimer required
3. Must be reported



Disclaimers for Independent Expenditures

! Remember...

- Paid for by statement
- Not authorized by any candidate or committee
- Stand by your ad requirement for radio and TV

E. Disclaimer rules for independent expenditures

Independent expenditures must include a disclaimer to explain who has paid for the communication and that it is not authorized by any candidate or candidate's committee.

1. **Content of "paid for by" disclaimer:** payor, contact info, not authorized by a candidate ([11 CFR 110.11\(b\)\(3\)](#))
 - a) **Print ads – requirements** ([11 CFR 110.11\(c\)\(2\)](#))
Box, safe harbor, color contrast
 - b) **TV and radio ads – requirements** ([11 CFR 110.11\(c\)\(4\)](#))
 - Paid for by disclaimer
 - Stand by your ad ("**XYZ PAC is responsible for the content of this advertising**") – orally spoken and also for TV ad, in writing at end of ad.
 - Color contrast, 4 seconds visible and 4% percent of vertical picture height rule applies to TV ads.
 - c) **Internet ads** ([11 CFR 110.11\(c\)\(5\)](#))
 - Communication with text or graphic components must include clearly readable written disclaimer that "can be viewed without taking any action"
 - Audio-only communications must include audio disclaimer that recipient can hear without taking any action
 - Communication with disclaimer displayed within video, disclaimer must be visible for at least four seconds and appear without the recipient taking any action
 - Adapted "paid for by" disclaimer when full disclaimer would occupy >25% of communication, plus:
 - Visible/audible indicator that full disclaimer is available (e.g., word, image, sound, symbol, or icon); and
 - Technological mechanism to access full disclaimer (e.g., hover-over text, pop-up screen, scrolling text, rotating panel, or hyperlink)

More:

- **Making independent expenditures:** www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/making-independent-expenditures-ssf-corporation-labor-organization/
- **Record articles**
 - **Basic rules for disclaimers on radio and TV ads**
www.fec.gov/updates/basic-rules-for-disclaimers-on-radio-and-tv-ads/
 - **Commission adopts final rule on internet communications disclaimers and the definition of public communication**
www.fec.gov/updates/commission-adopts-final-rule-internet-communications-disclaimers-and-definition-public-communication/

Reporting Independent Expenditures

For reporting purposes, date made is date communication was disseminated

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

The image shows a screenshot of the FEC Form 5, Schedule B (PAC Form 5B) titled 'REPORT OF INDEPENDENT EXPENDITURES MADE AND CONTRIBUTIONS RECEIVED'. The form is divided into sections for reporting independent expenditures and contributions received. It includes fields for the name of the organization, the date of the expenditure, the amount, and the name of the recipient. The form also includes checkboxes for whether the expenditure was made for the purpose of influencing the outcome of an election and whether it was made for the purpose of influencing the appointment, removal, or confirmation of an officer, director, or other person.

F. Reporting Independent Expenditures

1. 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, 76 FR 61254 \(October 4, 2011\)](#)

2. Aggregation

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

More: www.fec.gov/help-candidates-and-committees/making-independent-expenditures/aggregating-independent-expenditures/

Reporting Independent Expenditures

Trade associations file Form 5 on a quarterly basis and file 48-Hour and 24-Hour Reports, as required

Reporting Independent Expenditures

Membership/Labor Organizations report on Form 5

File on a quarterly basis and file 48-Hour and 24-Hour Reports, as required

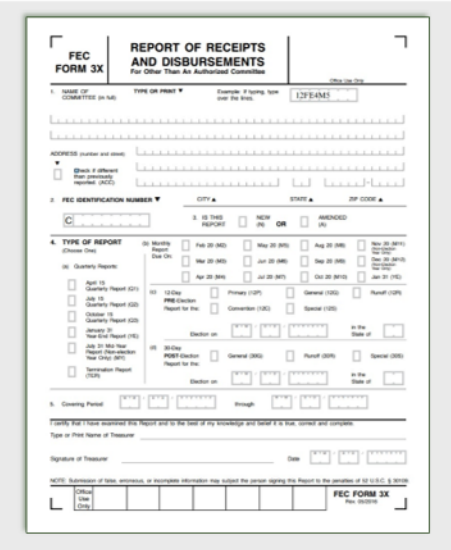
3. **By the association:**
 - a) **Report using FEC Form 5**
Download or access webform at www.fec.gov/help-candidates-and-committees/forms/#other-filers
More: Information and reporting examples for Form 5: www.fec.gov/help-candidates-and-committees/making-independent-expenditures/reporting-independent-expenditures-form-5/

- b) **Filed on quarterly basis**
No pre- or post- election reports for connected organization.

More: www.fec.gov/help-candidates-and-committees/making-independent-expenditures/quarterly-reports-independent-expenditure-filers/

Reporting Independent Expenditures

SSFs report on FEC Form 3X on a quarterly or monthly basis and file 48-Hour and 24-Hour Reports, as required



- 4. **By the PAC:**
 - a) **Report using FEC Form 3X/Schedule E**

More: Information and reporting examples for Form 3X, Schedule E:
www.fec.gov/help-candidates-and-committees/making-independent-expenditures/reporting-independent-expenditures-form-3x/

- b) **File in regularly scheduled report all independent expenditures made which aggregate over \$200 in a calendar year.**

More: www.fec.gov/help-candidates-and-committees/making-independent-expenditures/reporting-independent-expenditures-form-3x/

G. Additional Reporting of Independent Expenditures on 48- and 24- Hour Basis

Reporting Independent Expenditures

48-Hour Reports

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

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

1. **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.

More: www.fec.gov/help-candidates-and-committees/filing-pac-reports/48-hour-reports/

24-Hour Reports

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

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

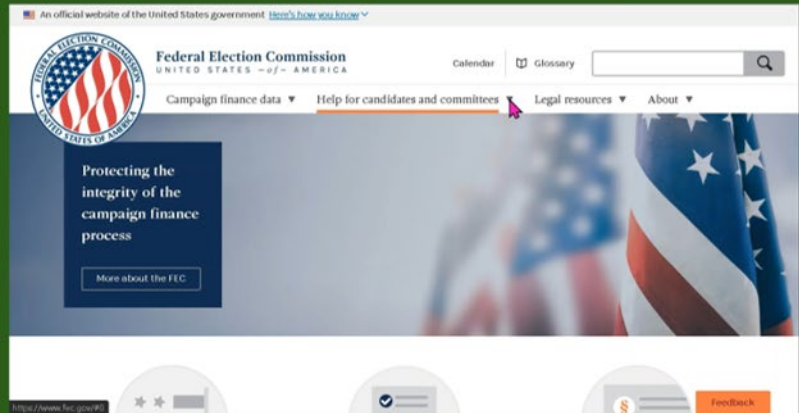
Reporting Independent Expenditures

2. **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.

More: www.fec.gov/help-candidates-and-committees/filing-pac-reports/24-hour-reports/

3. **24- and 48-Hour Reports** are filed using stand-alone Schedule Es; check appropriate box to note type of report.
4. **24- and 48-Hour Report time frames for the 2026 elections** are available at www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/24-and-48-hour-reports-independent-expenditures-periods-special-elections-2026/

24- and 48-Hour Reports of Independent Expenditures periods



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

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

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)

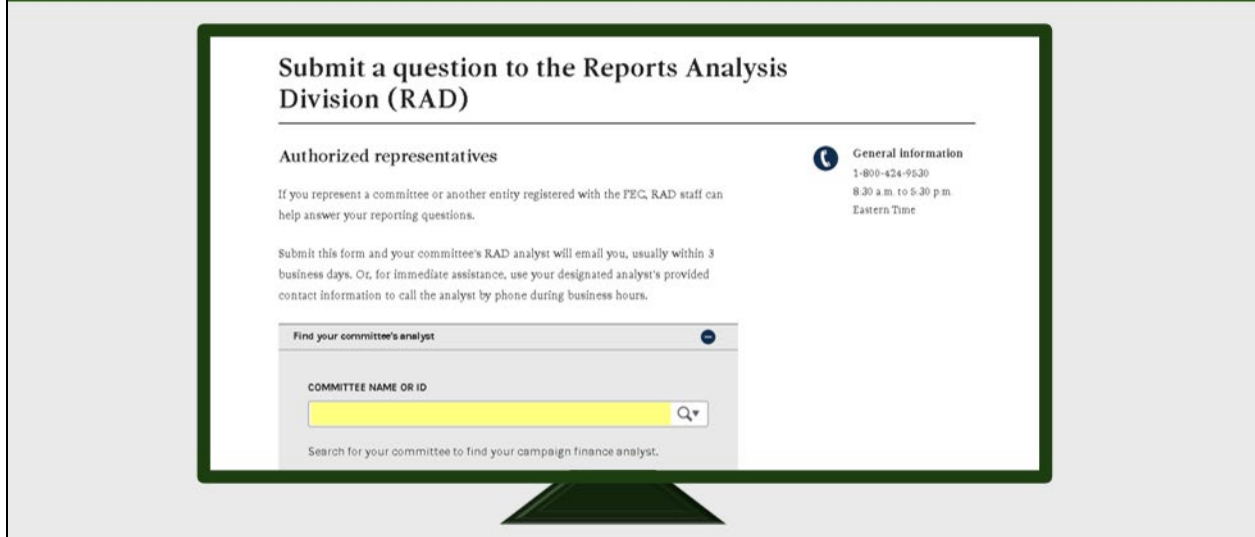
Authorized representatives

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

Find Your Campaign Finance Analyst



More:

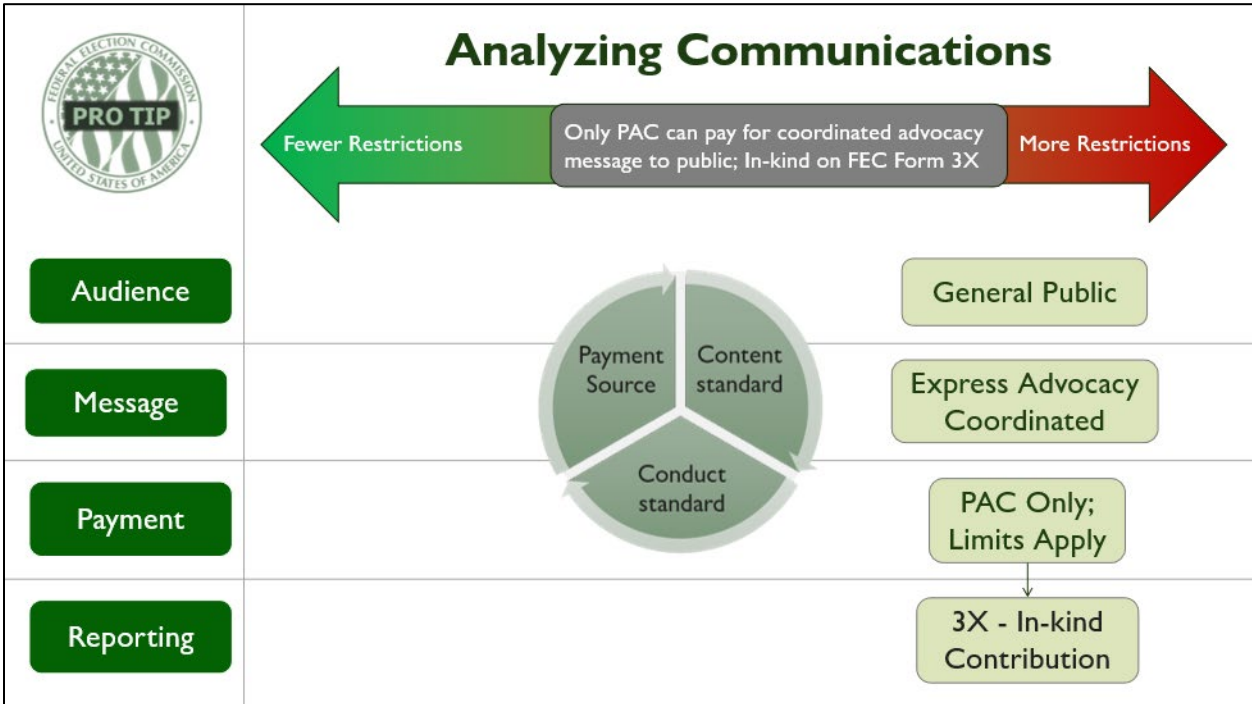
- Reporting independent expenditures: www.fec.gov/help-candidates-and-committees/making-independent-expenditures/
- Submit a question to RAD: www.fec.gov/help-candidates-and-committees/question-rad/
- Reporting examples: www.fec.gov/help-candidates-and-committees/reporting-examples/

Scenario: Coordinated Campaign Ads

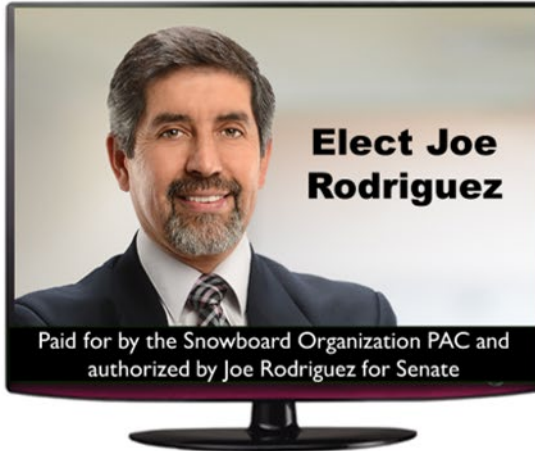


Joe Rodriguez is in a tight race, so he asks Flip Winters if the Snowboard Association could run some ads this fall that highlight his support for the snowboarding industry and encourage the public to vote for him in November.

Based on their conversation, Flip agrees to purchase the ads.



Disclaimers for In-kind Contributions



Remember...

Paid for by
statement

Authorized by
any candidate or
committee

Stand by your ad
requirement for
radio and TV

H. Coordinated communications

1. Disclaimer rules for coordinated communications

Coordinated communications must include a disclaimer to explain who has paid for the communication and that it was authorized by the candidate's committee.

2. Reporting coordinated communications

a) By SSF

(2) Use FEC Form 3X

Such coordinated communications are reported on Line 23 as an "in-kind" contribution.

Reporting example: <https://www.fec.gov/help-candidates-and-committees/filing-ssf-reports/-kind-contributions-candidates/>

As you can see, there's a lot to consider when undertaking communications that support or oppose candidates. To do it right, we suggest you ask yourself a series of questions:


1. *Who is the audience for the communication?*
2. *What is the message?*
3. *Who is (or can) pay for the communication?*
4. *Finally, based on all of that, what reporting is required?*

IV. Limited Use of Facilities for Campaign Activity

Trade Associations may permit limited use of their facilities for campaign-related purposes

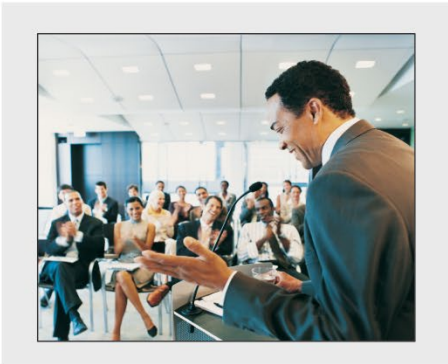
- In most cases, payment is required to avoid prohibited association contribution
 - Advance payment
 - Reimbursement
- In a few cases, free use of facilities is permitted

Facilities Exceptions



A. Use of facilities/resources in candidate/party fundraising (11 CFR [114.2\(f\)](#) and [114.9](#))

1. As part of the broad prohibition on corporate contributions, corporations, trade associations, labor and membership organizations are generally prohibited from providing goods or services at less than the usual or normal charge.
2. This includes permitting the SSF's use of their facilities or other resources for fundraising or other activities in connection with federal elections, without proper payment made in advance.



Use of Facilities for Campaign Event

Campaign or donor must pay in advance for:

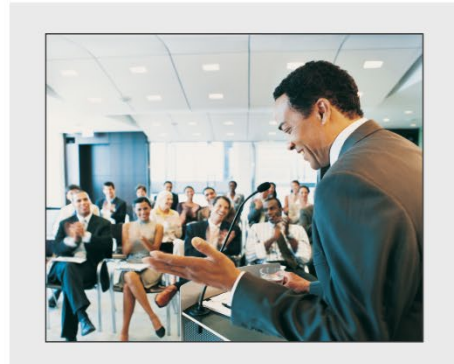
- **Staff:** fair market value of salary and benefits
- **Mailing lists:** fair market value
- **Catering/food services:** fair market value

Other facilities: reimburse in commercially reasonable time

SSF may host candidate fundraiser/event at organization's facilities

SSF must pay **in advance** for use of facilities

Costs incurred by SSF = **in-kind contribution**



Use of Facilities for Campaign Event

B. Use of association facilities

1. Candidate fundraiser/event coordinated with campaign

a) Results in in-kind contribution

An SSF may hold a fundraiser or other event for a campaign and invite the general public (e.g., other SSFs and PACs,

individuals outside its restricted class); however, any costs incurred are in-kind contributions, including personnel, invitations, food, equipment, etc.

b) Advance payment required

- (1) The connected organization of the SSF must receive **advance** payment for the use of its staff, mailing list and/or food services (regardless of who is paying for them). See AOs [1984-37](#) and [1984-24](#);
- (2) **Advance** payment to connected organization also required if SSF is paying for use of other connected organization facilities (e.g., meeting rooms, phones); and
- (3) **Payment by SSF counts as an in-kind contribution (reported by campaign and SSF)**

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/events-and-programs-candidates-or-party-committees-by-ssf/

2. Use of directed staff for SSF events on behalf of candidates

Association officials or employees may direct subordinate staff to work on fundraising for candidate or party, using organization resources, provided that the following rules are observed:

a) Advance payment

Association must receive advance payment for value of staff services, including benefits and overhead.

b) No coercion

No threats of force, detrimental job actions or financial reprisal if employee refuses to engage in fundraising.

c) Collection and forwarding prohibited (except through SSF)

Employees may not collect or forward contributions to candidate or party. If the association wishes to collect and forward contributions, this must be done using the SSF.

3. Use of customer/client lists

a) Association may permit use with advance payment

Association may allow use of its lists of members, employees, vendors or others to send invitations or solicit the contributions, provided that the association receives advance payment for fair market value of lists.

b) Application to email address lists of organization

- (1) Advance payment required under [11 CFR 114.2\(f\)](#).
 - (2) Counts as in-kind contribution by payee.
 - (3) Not exempt from definition of contribution:
 - Payment for email list made at direction of political committee; or
 - Email list transferred to political committee.
- 11 CFR [100.94\(e\)\(2\)](#) and [\(3\)](#) and [100.155\(e\)\(2\)](#) and [\(3\)](#).

4. Use of catering or food services

In connection with fundraising for candidate or party's federal account, the association may operate or arrange for catering or other food services, provided that the association receives advance payment for fair market value of services.

Use of Facilities – Collection of Campaign Contributions at Event



Do **NOT** collect contributions

PAC collects contributions =
earmarked contributions

Avoid earmarking rules have a
campaign representative collect
contributions

C. Campaign event: rules on collecting campaign contributions

1. Association

Association personnel MAY NOT collect the checks - prohibited facilitation.

2. Association's SSF

Individual representing the PAC may collect campaign contributions at the event. In that instance, the PAC must follow the rules for reporting earmarked contributions 11 CFR [110.6](#) and [114.2\(f\)\(3\)](#).

3. RECOMMENDED: Campaign

The campaign may collect checks at the event. Reported by campaign only; no reporting by association or SSF necessary.

More:

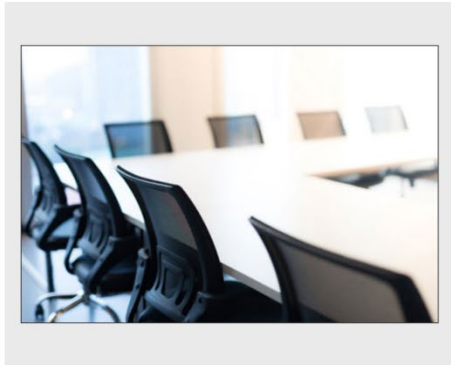
• **Events and programs for candidates and parties:**

www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/events-and-programs-candidates-or-party-committees-by-ssf/

• **Earmarked contributions forwarded by the SSF:**

www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/earmarked-contributions-forwarded-ssf/

Use of Facilities: Meeting Rooms



General rule:

Reimburse at fair market value within commercially-reasonable time

Exception:

Free/discounted rate if normally offered to civic groups under same conditions and available to any other political committee upon request

If PAC pays:

Must pay in advance (unless civic group exemption applies)

5. Use of meeting rooms (11 CFR [114.9](#) and [114.13](#))

a) General rule

Campaigns and political parties may rent meeting rooms of an association if they reimburse the association at the normal rental charge, within a commercially reasonable time.

b) Exception

An association may offer meeting room to candidate or party at discount or for free if it customarily makes meeting room available to civic, community or other groups under the same conditions and if it makes it available to any other candidate or committee on the same terms, upon request.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/use-corporate-or-labor-organization-facilities-and-resources-political-committees-and-persons-other-volunteers/

c) PAC paying for room

If a PAC pays for its connected organization's meeting room for an event as an in-kind contribution, the payment must be made in advance.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/events-and-programs-candidates-or-party-committees-by-ssf/

6. Other uses (e.g., office equipment)

The association's office equipment and other resources may be used for an SSF event on behalf of a candidate/party, provided the association is reimbursed as follows:

a) If campaign/party pays:

Campaign or party must reimburse the usual and normal charge within a commercially reasonable time – generally 30 days.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/use-corporate-or-labor-organization-facilities-and-resources-political-committees-and-persons-other-volunteers/

b) If PAC pays

If association's SSF is paying as in-kind contribution, must pay in advance.

Incidental use:

- Doesn't prevent employee from completing normal work
- Safe Harbor: one hour per week or four hours per month

Reimbursement:

- For increased overhead
- If use is more than incidental, reimburse association for entire cost of using facilities

**Use of Facilities:
Volunteer Activity**



**7. Employee/member use of facilities for volunteer activity:
incidental use ([11 CFR 114.9\(a\)](#))**

OK for employees of association (and members and officials of the association) to make "incidental use" of facilities for their own individual volunteer activity in connection with federal election.


More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/using-corporate-or-labor-organization-facilities-individual-volunteer-activity/

- a) **What is “incidental use?”**
 - (1) “Incidental use” means use that does not prevent employee or association from completing normal work that would be completed during that period.
 - (2) Safe Harbor: 1 hour per week or 4 hours per month.
- b) **Reimbursement**
 - (1) Individual must reimburse association for any increased overhead (e.g., no need to pay for regular local phone bill, but would have to pay for long distance calls).
 - (2) If more than incidental use: Individual must reimburse association the entire cost of using the facilities within commercially reasonable time.

It's **not volunteer** activity if the employee is “asked” to volunteer

Use of directed staff without advance payment = **prohibited contribution**

**Use of Facilities:
Volunteer Activity**



- c) **Employee “asked” to “volunteer”**

The “incidental use” allowance does not apply if the employee is asked by a superior to do the work as part of his/her regular duties.

More: www.fec.gov/help-candidates-and-committees/making-disbursements-ssf-or-connected-organization/using-corporate-or-labor-organization-facilities-individual-volunteer-activity/

SCENARIO: CANDIDATE FUNDRAISER

Scenario: Candidate Fundraiser at HQ



Joe Rodriguez

Flip wants to invite other industry executives and friends to meet Joe Rodriguez at a breakfast in the main reception room at the Snowboard Association's headquarters.

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

Flip has another idea to help broaden the support base for Candidate Rodriguez. Flip would like to have another meet and greet event at his association's headquarters but this time, he would like to invite friends and other industry executives who are not affiliated with Snowboard Association. Flip discusses his idea with the Rodriguez campaign manager, and they agree that a breakfast held at the Snowboard headquarters on March 30 would work best for Candidate Rodriguez.

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



Poll Question:

Since the event is aimed at the public, involves express advocacy and was coordinated with the campaign, who may pay?

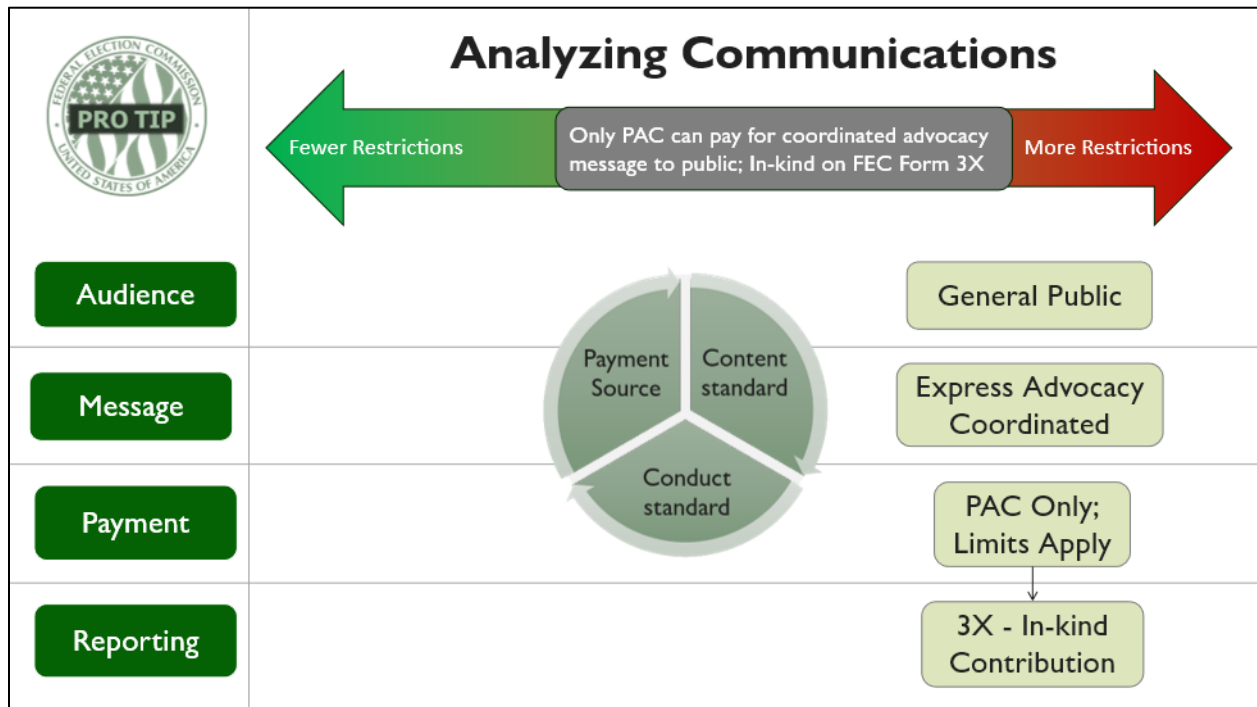
- A: Campaign or PAC
- B: Association or PAC
- C: Campaign, Association, or PAC

Answer to Poll Question:

Since the event is aimed at the public, involves express advocacy and was coordinated with the campaign, who may pay?

- A: Campaign or PAC – CORRECT ANSWER**
- B: Association or PAC
- C: Campaign, Association, or PAC

Answer to poll question: Campaign or PAC may pay. If campaign pays, it's an operating expenditure by the campaign. If PAC pays, it results in an in-kind contribution.





Poll Question:

If the Snowboard Association PAC pays for the use of the association's meeting space and staff time as an in-kind contribution to the Rodriguez campaign, when would that payment need to be made?

- A: Within a commercially reasonable time
- B: In advance
- C: Staff time in advance; meeting space within commercially reasonable time

If the Snowboard Association PAC pays for the use of the association’s meeting space and staff time as an in-kind contribution to the Rodriguez campaign, when would that payment need to be made?


- A: Within a commercially reasonable time
- B: In advance -- CORRECT ANSWER**
- C: Staff time in advance; meeting space within commercially reasonable time

Advance payment to connected organization is required if SSF is paying for use of any connected organization facilities.

**Reporting Example #5:
Itemizing SSF Payment for Use of Association Resources for Candidate Fundraiser**

Reporting Example

**Itemizing SSF payment for use
of association’s resources for
a candidate fundraiser**



Joe Rodriguez



Poll Question:

Which date do you list on Schedule B for Line 23—the date the in-kind contribution is made, payment date, or both?

- A: In-kind contribution date
- B: Payment date
- C: Both the contribution date and the payment date

Answer to Poll Question:

Which date do you list on Schedule B for Line 23—the date the in-kind contribution is made, payment date, or both?

- A: In-kind contribution date
- B: Payment date
- C: Both the contribution date and the payment date – CORRECT ANSWER

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

Answer: Disclosure of this activity has two parts.

Part 1: Disclosure of advance payment

The SSF will report the advance payment on their Schedule B for Line 21b as an “Operating Expenditure.” Note that the payment was made to the association on March 14, as the date the room was reserved and the staff time was spent organizing the event — a couple weeks prior to the March 30 event. The SSF itemizes:

- \$1,000.00 advance payment on March 14 to the association for staff time and use of the meeting room.
- -\$1,000.00 contribution shown as a negative entry. The entry will use the date the candidate receives the benefit of the resources provided, which is the date of the event — March 30. The SSF reports the entry as a negative entry to negate the in-kind contribution reported on the committee’s Schedule B, Line 23 (see Part 2 below). All candidate and election information for Senate Candidate Shelton is noted in the appropriate boxes.

**Advance
Payment for Use
of Facilities**

**April Monthly (M4) Report
FEC Form 3X: Schedule B, Line 21(b)**

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)	PAGE	OF
		<input checked="" type="checkbox"/> 21a	<input type="checkbox"/> 22	<input type="checkbox"/> 23
		<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)
Snowboard Association PAC

Full Name (Last, First, Middle Initial)

A. Snowboard Association

Date of Disbursement: 03 / 14 / 2026

Mailing Address: 1700 Woodward Drive
City: Mammoth Lakes, State: CA, Zip Code: 93526

Purpose of Disbursement: Use of Meeting Room/Staff Time/Email List, Category/Type: 011

Candidate Name: Scott Rodriguez

Office Sought: House, Senate, President, District: CA

Disbursement For: 2026, Amount of Each Disbursement This Period: 1,000.00

B. Snowboard Association

Date of Disbursement: 03 / 30 / 2026

Mailing Address: 1700 Woodward Drive
City: Mammoth Lakes, State: CA, Zip Code: 93526

Purpose of Disbursement: Use of Meeting Room/Staff Time/Email List (in-kind), Category/Type: 011

Candidate Name: Scott Rodriguez

Office Sought: House, Senate, President, District: CA

Disbursement For: 2026, Amount of Each Disbursement This Period: -1,000.00

Memo Item: In-kind See Sch. B, Line 23

Part 2: Disclosure of in-kind contribution

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, the date of the candidate fundraiser, and must be disclosed on a Schedule B for Line 23. The connected organization 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 Rodriguez is noted in the appropriate boxes.

In-Kind Contribution	April Monthly (M4) Report FEC Form 3X: Schedule B, Line 23										
	<p>SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS</p> <p>Use separate schedule(s) for each category of the Detailed Summary Page</p> <p>FOR LINE NUMBER: (check only one) PAGE OF</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/> 21b</td> <td style="text-align: center;"><input type="checkbox"/> 22</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 23</td> <td style="text-align: center;"><input type="checkbox"/> 26</td> <td style="text-align: center;"><input type="checkbox"/> 27</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 28a</td> <td style="text-align: center;"><input type="checkbox"/> 28b</td> <td style="text-align: center;"><input type="checkbox"/> 28c</td> <td style="text-align: center;"><input type="checkbox"/> 29</td> <td style="text-align: center;"><input type="checkbox"/> 30b</td> </tr> </table> <p><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></p> <p>NAME OF COMMITTEE (In Full) Snowboard Association PAC</p> <p>Full Name (Last, First, Middle Initial) A. Snowboard Association</p> <p>Mailing Address 1700 Woodward Drive</p> <p>City Mammoth Lakes State CA Zip Code 93526</p> <p>Purpose of Disbursement Use of Meeting Room/ Staff Time/Email List (In-Kind)</p> <p>Candidate Name Scott Rodriguez</p> <p>Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President</p> <p>Disbursement For: 2026 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼</p> <p>State: CA District:</p> <p>Date of Disbursement 03 / 30 / 2026</p> <p>FEC Identification Number C</p> <p>Amount of Each Disbursement this Period 1,000.00</p> <p><input type="checkbox"/> Memo Item</p>		<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"/> 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							


3. What information from the scenario do we need to disclose this correctly?

Answer: We need both the date of the advance payment to the connected organization for the use of resources and the date of the contribution (the date that the candidate benefited from the use of facilities, in this case, the date of the fundraising event. Also needed: itemization of the name/address of the entity providing the resources (the connected organization), purpose of disbursement, a notation of “in-kind” and all of the candidate and election information.

KEY POINTS TO REMEMBER:

- Date on Schedule B, Line 21b = date on which the advance payment for the good/service is provided.
- Negative entry date on Schedule B, Line 21b = date on which the good/service is provided.
- Date on Schedule B, Line 23 = date on which good/service is provided.
- Negative entry for the amount of the good or service provided to the candidate on Schedule B, Line 21b. Electronic filers will need to contact their software providers to work through the negative entry in their software. Filers using FECFile, contact your Campaign Finance Analyst.
- Indicate all candidate and election information for entries on Schedule B, Line 21b and Line 23 in the appropriate fields.
- Remember with advance payment, there is no initial disbursement of the connected organization's treasury funds because that constitutes an illegal loan, advance, or anything of value to either the candidate or the SSF
- PAC must pay the fair market value of the services, which includes compensation, benefits and overhead. PAC must also pay the fair market value of meeting rooms, catering/food services or mailing/phone lists. All payments must be made in advance to avoid illegal facilitation by the connected organization.
- Must report each payment as an expenditure for the reporting period in which it is made and provide allocation of such expenditure (as a contribution in-kind) per candidate on Schedule B, Line 21b.
- **Reporting examples:** www.fec.gov/help-candidates-and-committees/reporting-examples/

<h2>Objectives</h2>		
		
Review rules for supporting candidates	Examine association & PAC communications	Discuss use of association facilities




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LIVE

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Please complete an evaluation of this workshop.



<https://fec.ethn.io/192103>



Trade Association PAC Webinar 2026: Operations, Part 2

1. How would you rate the workshop overall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
2. How would you rate the speakers' knowledge of the subject matter?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
3. How would you rate the speakers' delivery of the workshop content?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
4. How would you rate the speakers' responses to questions from the audience?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent


Coming up: Bonus content on Independent Expenditure Reporting

Evaluation link: <https://fec.ethn.io/192103>

BONUS MATERIAL: INDEPENDENT EXPENDITURE REPORTING

Reporting Example: Disclosing Large Last-Minute Independent Expenditures

Reporting Independent Expenditures



On October 26, 2026, Snowboard Association PAC buys a \$7,500 TV ad advocating the election of candidate Paula Skater

The PAC pays for the ad on November 29

Flip would like to help Paula Skater who is running in the November 3, 2026, general election for California's 8th district. The Skater Campaign would not accept a contribution check from the Snowboard PAC, nor would they speak to Flip or any other representative of Snowboard Association or the PAC.

Nevertheless, Flip would like the Snowboard PAC to do something to help and decides to run a television ad to support Skater's election campaign. Just before the November 5 general election, the Snowboard PAC contracts with The TV Station to run a \$7,500 television ad on October 26, supporting Skater. The bill for the ad was paid on November 29.

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

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

3. **What information from the scenario do we need to disclose this correctly?**

Answers to Example #6: Disclosing 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 coordinated with 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 (Post-General Report).

**Initial Reporting:
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) Snowboard Association PAC			FEC IDENTIFICATION NUMBER C 00000004	
Check if <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 The TV Station		Date of Public Distribution/Dissemination 10 / 26 / 2026		
Mailing Address 855 Battery St		Amount 7,500.00		
City San Francisco	State CA	Zip Code 94111	Date of Disbursement or Obligation	
Purpose of Expenditure TV Ad		Category/Type 004		
Name of Federal Candidate: Paula Skater		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate	District: 08 State: CA
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) ▶ 2026 General	

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 as of the close of books for the Post-General Report.

Memo Entry on Next Regular Report

**Post General (30G) 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) Snowboard Association PAC		FEC IDENTIFICATION NUMBER C 00000004
Check it <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report		Amends report filed on
Full Name of Payee The TV Station <input checked="" type="checkbox"/> Memo Item		Date of Public Distribution/Dissemination 10 / 26 / 2026
Mailing Address 855 Battery St		Amount 7,500.00
City San Francisco	State CA	Zip Code 94111
Purpose of Expenditure TV Ad		Category/Type 004
Name of Federal Candidate: Paula Skater		Office Sought: <input checked="" type="checkbox"/> House District: 08 <input type="checkbox"/> President <input type="checkbox"/> Senate State: CA
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2026 General
		7,500.00

Accordingly, the PAC must report a debt on Schedule D to “The TV Station” until it is settled.

Other Reporting – Debt Owed

**Post-General (30G) 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) Snowboard Association PAC			
A. Full Name (Last, First, Middle Initial) of Debtor or Creditor The TV Station		Nature of Debt (Purpose): TV Ad for Paula Skater	
Mailing Address 855 Battery St			
City San Francisco	State CA	Zip Code 94111	
Outstanding Balance Beginning This Period			
Amount Incurred This Period 7,500.00		Payment This Period 0.00	Outstanding Balance at Close of This Period 7,500.00

When full payment is made to the vendor on 11/29/2026, it must be reflected on Schedule E supporting Line 24, as well as on Schedule D supporting Line 10 of the Year-End Report (coverage period: 11/24/2026-12/31/2026) due 01/31/2027.

NOTE: the date of disbursement reflects the date of the payment to the vendor.

Subsequent Payment

**Year-End (YE) 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)
Snowboard Association PAC

FEC IDENTIFICATION NUMBER
C 00000004

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

Full Name of Payee Memo Item
The TV Station

Date of Public Distribution/Dissemination
10 / 26 / 2026

Mailing Address
855 Battery St

Amount
7,500.00

City **San Francisco** State **CA** Zip Code **94111**

Purpose of Expenditure
TV Ad disseminated on 10/26/24

Category/Type **004**

Date of Disbursement or Obligation
11 / 29 / 2026

Name of Federal Candidate: Support Oppose
Paula Skater

Office Sought: House President Senate District: **08** State: **CA**

Calendar Year-To-Date Per Election for Office Sought **7,500.00**

Disbursement For: Primary General Other (specify) ▶ 2026 General

**Other Reporting
– Debt Owed**

**Year-End (YE) 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) 9 10

NAME OF COMMITTEE (In Full)
Snowboard Association PAC

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor
The TV Station

Nature of Debt (Purpose):
TV Ad for Paula Skater

Mailing Address
855 Battery St


City **San Francisco** State **CA** Zip Code **94111**

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**


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 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 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, can use overnight delivery, hand-delivery or fax to 202-219-0174 (certified or registered mail date will not be considered filed date for these).
 - Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
 - Aggregation is done on a per calendar year, per election, per office sought (race) basis.
 - A 48-Hour Report is required each time an additional \$10,000 is aggregated in independent expenditures.
- **24- and 48-Hour Report time frames for the 2026 elections** are available at www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/24-and-48-hour-reports-independent-expenditures-periods-special-elections-2026/



Help Us Help You!

Please complete an evaluation of this workshop.



<https://fec.ethn.io/192103>

**Trade Association PAC Webinar 2026:
Operations, Part 2**

1. How would you rate the workshop overall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
2. How would you rate the speakers' knowledge of the subject matter?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
3. How would you rate the speakers' delivery of the workshop content?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent
4. How would you rate the speakers' responses to questions from the audience?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Poor	Fair	Good	Very Good	Excellent

Thank you for attending!

Evaluation link: <https://fec.ethn.io/192103>

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