## COMMISSIONER OF POLITICAL PRACTICES



## STATE OF MONTANA

JEFF MANGAN COMMISSIONER TELEPHONE (406) 444-2942 FAX (406) 444-1643 www.politicalpractices.mt.gov 1209 EIGHTH AVENUE P.O. BOX 202401 HELENA, MT 59620-2401

## Tip #5: Reporting contributions received at fundraiser events

Greetings political committees!

COPP Compliance Specialists have recently received a few calls questioning how to properly report contributions received at fundraisers or similar mass collection events. All contributions received of under \$50.00 at a fundraiser or similar mass collection event may be reported together in the Campaign Electronic Reporting System (CERS) as one lump sum amount- report using the 'Contributions' tab, 'Fundraiser' subtab. The type of event, location, date, and approximate number of attendees/tickets sold must all be included when reporting a fundraiser or similar mass collection event, and each individual fundraiser or similar mass collection event must be reported separately.

Political committees should be aware that the source of any campaign contribution must be known. Anonymous contributions are not allowed under Montana campaign finance law, 13-37-217, MCA. Best practice would be for the committee to utilize contributor envelopes, sign-in sheets, or similar documentation allowing a contributor to include their name, address, etc. directly with the contribution.

Example #1: The Montana Coffee PAC hosts an event in Bozeman on March 1, 2022, which includes a 'pass the hat'. The Montana Coffee PAC's 'pass the hat' collects \$150.00 in total contributions from 15 attendees, all under \$50.00. Montana Coffee PAC would report proceeds from this 'pass the hat' using the 'Fundraisers' subtab, as a single \$150.00 receipt. The type of event (pass the hat), location of the event (Bozeman), approximate number of attendees (15), and date of the event (March 1, 2022) must all be included. Montana Coffee PAC would need to know the source of all under \$50.00 contributions received from the 'pass the hat'.

Montana Coffee PAC's event also includes a silent auction. As noted above, contributions of less than \$50.00 collected from the silent auction could be aggregated and reported as a single lump-sum receipt using the 'Fundraisers' subtab. Contributions collected from the silent auction would need to be reported separately from those collected from the 'pass the hat'. Montana Coffee PAC would need to know the source of all under \$50.00 contributions received from the silent auction.

If an individual contributor's aggregate (total) contributions equal \$50.00 or more, those contributions must be reported using the 'Individuals' subtab, with the name, address, occupation, and employer information of the contributor provided. Similarly, contributions of \$50.00 or more from a single source received at a fundraiser or similar mass collection event would need to be reported using the 'Individuals' subtab.

Example #2: An individual named Michael Scott, who has previously contributed \$20.00 to Montana Coffee PAC, attends Montana Coffee PAC's event and purchases a silent auction item for \$40.00. Contributor Scott's aggregate (total) contributions to Montana Coffee PAC now total \$60.00, meaning his silent auction contribution would need to be reported as an individual contribution, using the 'Individuals' subtab.

An individual named Dwight Schrute, who has not previously contributed to Montana Coffee PAC, also attends Montana Coffee PAC's event and purchases a silent auction item for \$150.00. Because it exceeds \$50.00, contributor Schrute's silent auction contribution would need to reported as an individual contribution using the 'Individuals' subtab.

I hope this helps! If you have any questions, please call or email for more information. You may contact us via telephone at (406) 444-4627 or via email at cpphelp@mt.gov and cppcompliance@mt.gov. Previous tips issued by COPP Compliance Specialists can be found on the COPP's website <a href="here">here</a>.

Scott Cook
Compliance Specialist
(406) 444-2942
(406) 444-1643 (fax)
CPPCompliance@mt.gov