

Committee Campaign Finance Reporting and Disclosure

2024

Office of Political Practices

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COMMISSIONER

Outline

1. Political Committees- General Information
2. Committee Finance Reporting- Forms and Dates
3. Committee Finance Reporting- Disclosing Contributions received, Expenditures made, and Debts owed
4. Campaign Finance Review Process





1. Political Committees- General Information

Committee Treasurer to Keep Records

- Political committees are required to designate a campaign treasurer, MCA 13-37-201. Committees may also designate a deputy treasurer, but not more than one per county, MCA 13-37-202
- Committees are required to keep records of all contributions received and expenditures made, MCA 13-37-208
- Committees are also required to utilize a designated bank account in which to deposit all contributions received and through which to make all expenditures, MCA 13-37-205

Candidate Campaign Contribution Limits

- Candidates have campaign contribution limits- i.e., they can only accept so much from political committees
 - Contribution limits apply to coordinated activity, but not independent expenditures
- Aggregate contribution limits apply for political party committees
- Current limits available at <https://politicalpractices.mt.gov/Home/Contribution-Limits>

Prohibited Contributions for Candidates

- Candidates may not accept contributions from corporate or union sources, even indirectly, MCA 13-35-227(1) and (2)
- Candidates may accept contributions from political committees established by corporate or union entities, provided those funds come solely from non-corporate/union sources (i.e., individual members)
- Federal law prohibits the acceptance of campaign contributions from foreign nationals



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Attribution of Campaign Material

PAID FOR BY

- Any paid communication in support or opposition to a candidate or ballot issue must include a “**Paid for by**” attribution message, MCA 13-35-225
- For materials financed by a political committee, the attribution message must include the name of the committee, name of the designated treasurer or other officer, and address.
- For example: Paid for by Hiking is Better than Fishing PAC. Hiking Boot, Treasurer. PO Box 123, Helena, MT 59601
- <https://politicalpractices.mt.gov/Education-and-Resources/Attribution-Information>

An aerial photograph of a wide river valley, likely the Snake River Valley, showing a winding river, agricultural fields, and distant mountains. The top portion of the image is overlaid with a semi-transparent teal color.

2. Campaign Finance Reporting- Forms and Dates

Statement of Organization (Form C-2)

- All political committees must file form C-2, the Statement of Organization, within 5 days of making or authorizing the initial expenditure
- The Statement of Organization must include the committee's name, address, and contact information, the name and contact information for the designated treasurer, deputy treasurer, and any other officers, the name and address of the bank where the committee's account is located, and name each candidate or ballot issue the committee has made expenditures to support or oppose

Statement of Organization (Form C-2)

- Update form C-2 within five (5) days of making any changes- new committee officers are elected, for example
- Timely updates to the C-2 help ensure that COPP can contact the committee to provide necessary information or relevant guidance throughout a campaign cycle

Committee Finance Report

- Independent committees (PACs), political party committees, and ballot issue committees all disclose contributions received and expenditures made via form C-6, the committee finance report
- Incidental committees disclose certain earmarked contributions received (see MCA [13-37-232](#)) and expenditures made via form C-4, the incidental committee finance report

Committee Finance Report Due Dates

Committee Even Election Year Calendar

Committee Finance Report Calendar

June Primary/November General elections

Report form C-4 or C-6 must be filed for each reporting period to disclose all transactions that occurred during the specific reporting period.

Filing Deadline	Reporting Period
January 5	Quarterly- Oct. 1, 2023 through December 31, 2023
March 30	Monthly- January 1 through March 25
April 30	Monthly- March 26 through April 25
May 25 through June 3 (C-7 and C-7E Reporting Period)	File form C-7 within 2 business days if a contribution of \$500 or more is received from a single source between May 25 and June 3 (the day before the primary election)
	File form C-7E within 2 business days if an expenditure of \$500 or more is made between May 25 and June 3 (the day before the primary election)
May 30	Monthly- April 26 through May 24
June 30	Post Primary- May 25 through June 25
August 30	Monthly- June 26 through August 25
September 30	Monthly- August 26 through September 25
October 25 through November 4 (C-7 and C-7E Reporting Period)	File form C-7 within 2 business days if a contribution of \$500 or more is received from a single source between October 25 and November 4 (the day before the general election)
	File form C-7E within 2 business days if an expenditure of \$500 or more expenditure is made between October 25 and November 4 (the day before the general election)
October 30	Monthly- September 26 through October 24
November 30	Monthly- October 25 through November 25
	Reference 13-37-226(1)(e) , Mont. Code Ann. for post-election year reporting dates

1. In 2024, C-6 committee finance reports are due monthly: on the 30th of March, April, May, June, August, September, October, and November
2. The full 2024 committee Reporting Calendar is available on COPP's website
3. Incidental committees with one-time or limited activity file form C-4 within 30 days of making the expenditure

Campaign Finance Reporting Due Dates

1. Reports can be filed anytime from the end of the reporting period to the due date. Don't wait until the 30th to file a report- file anytime between the 26th and the 30th
2. Committees can update reports regularly throughout the reporting period- no need to wait until reporting day to begin this process
3. Contact COPP with questions as soon as they come up



3. Campaign Finance Reporting- Disclosing Contributions received, Expenditures made, and Debts owed

Types of Contributions

- **Monetary contributions:** cash or check provided to the committee and deposited in the designated committee account
- **In-kind contributions:** Items or services of value provided to the committee for free, or at a reduced rate

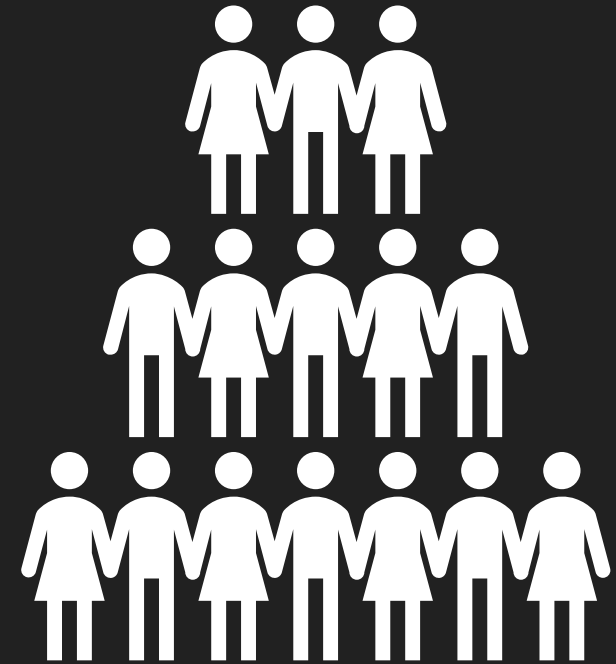
Contributions: Types of Contributors

1. Individuals
2. Political Committees
3. Fundraisers and “Mass Collection” events
4. Refunds, rebates, etc.
5. Loans



Individual Contributors

- ****Anonymous contributions are not allowed under Montana law!****
- Required contributor information:
 - Amount of the contribution
 - Whether contribution was monetary or in-kind
 - Name of contributor
 - Address of contributor
 - Occupation and Employer of contributor (if contributions total \$50 or more)



Political Committee Contributors

- Required contributor information:
 - Amount of the contribution
 - Whether the contribution was monetary or in-kind
 - Name of the committee making the contribution
 - Type of Committee (political party, independent (PAC), incidental, or ballot issue)



Fundraisers and “Mass Collection” events

- Contributions of less than \$50 from a fundraiser or related “mass collection” event can be reported together, as a lump sum.
- Any individual contribution of \$50 or more must be reported as an Individual contribution, under that individual’s name
- **** Anonymous contributions are not allowed under Montana law!**** The source of contributions from a fundraiser or related “mass collection” event must always be recorded, even if an individual’s fundraising-related contribution is less than \$50. This also ensures that if an individual contributes \$50 or more in the aggregate, their contributions can be correctly reported.

Fundraisers and “Mass Collection” events

- Each individual fundraiser or “mass collection” event held by the committee must be reported separately!
- Details to include:
 - Date and location of the event
 - Event description (Raffle, pass-the-hat, banquet, silent auction, etc.)
 - Number of attendees/tickets sold
 - Total amount raised (<\$50 contributions only)



Entering Contributions

- All contributions are entered in the committee finance report using the “Contributors” tab
- Click the ‘Add’ icon to add a new entry
- Use the corresponding subtab for each type of contributor (the “individuals” subtab for contributions from individuals; the “committees” subtab for contributions from political committees, etc.)

Entering Contributions

Committee Information

Committee Full Name: Coffee (TEST) Incidental

Election Year: 2020

Mailing Address: 111 8th Helena, MT 59401

Committee Type: Incidental

Reporting Period:

*From

01/01/2024



*To

03/25/2024



Status: Pending

Contributions

Expenditures

Debts

Payments

Attachments

Summary

File

Help

Individuals

Committee

Fundraiser

Refunds, Etc

Help

Entity	Election Type	Occupation	Employer	Date	Cash/Check Amount	In-Kind Value	In-Kind Description
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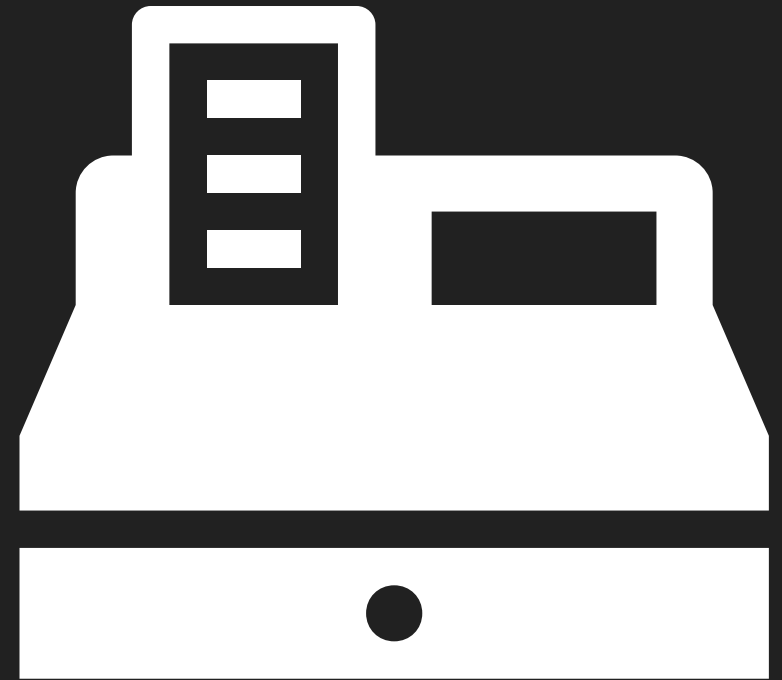
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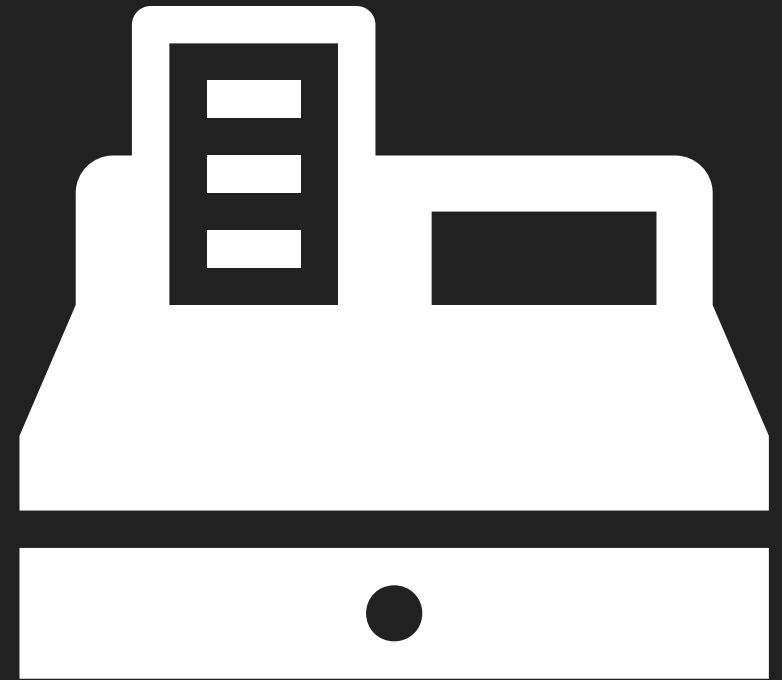
Expenditures

- A committee must be able to identify all funds expended. Hold onto receipts/invoices/etc. for all expenses!
- Expenditure detail are required to report includes:
 - Date of the expenditure
 - Amount of the expenditure
 - Name and address of the entity to whom the expenditure was made
 - Brief description of the expense



Expenditures

- Expenditures made to a “consultant, advertising agency, polling firm, or other person that performs services” on behalf of the committee need to be “itemized and described in sufficient detail to disclose the specific services performed”, MCA 13-37-229(2)(b)

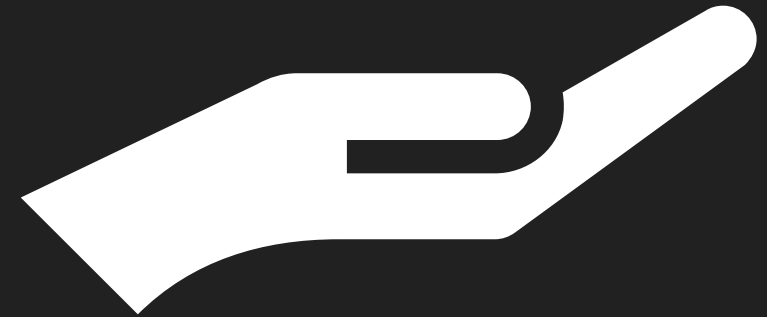


Independent Expenditures

- An independent expenditure is an expenditure made to support or oppose a candidate or ballot issue that is not coordinated with that candidate/issue, MCA 13-1-101(28)
- Independent expenditures must be reported with the name of the candidate/issue the expenditure was intended to benefit

Debts

- A debt is an obligation owed by the committee to a vendor for their provision of goods/services provided
- ****Debts must be reported within the campaign finance report reporting period where incurred, not when paid!**** If the exact amount is unknown, the estimated amount must be reported
- Report all debts with the same level of detail as expenditures



Entering Expenditures and Debts

- Expenditures are entered in the committee finance report using the “Expenditures” tab
- Use the “Independent Expenditures” subtab to report independent expenditures
- Click the ‘Add’ icon to add a new entry
- All debts are entered in the committee finance report using the “Debts” tab
- Report payments made on outstanding Debts or Loans owed using the “Payments” tab
- Click the ‘Add’ button to add a new entry

Entering Expenditures and Debts

Committee Information

Committee Full Name: Coffee (TEST) Incidental

Election Year: 2020

Mailing Address: 111 8th Helena, MT 59401

Committee Type: Incidental

Reporting Period:

*From

01/01/2024



*To

03/25/2024



Status: Pending

Contributions

Expenditures

Debts

Payments

Attachments

Summary

File

Help

Expenditures

Independent Expenditures

Help

Entity	Election Type	Description of Expense	Refund	Platform	Quantity	Specific Services	Attachment	Corp Funds	Date
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No records

Filing your Report

- When all contributions and expenditures have been entered, make sure to File your report!
- To file: navigate to the 'File' tab, follow the instructions to Certify and File
- A report is not filed- and therefore not available for public review- until you have Certified and Filed!

The screenshot shows the 'File' tab in a reporting system. At the top, there is a 'Committee Information' section with the following details: Committee Full Name: Coffee (TEST) Incidental, Election Year: 2020, Mailing Address: 111 8th Helena, MT 59401, and Committee Type: Incidental. Below this, the 'Reporting Period' is set from 01/01/2024 to 03/25/2024, with a status of 'Pending'. The navigation menu includes 'Contributions', 'Expenditures', 'Debts', 'Payments', 'Attachments', 'Summary', 'File', and 'Help'. The 'File' tab is active, showing a 'Certify and File' section with several checkboxes: 'Check this box to display the name and address of contributors who have contributed less than \$50.', 'Lockout ePass User', 'Stop Status Change', and 'Do Not Send Email'. A 'Receive and File Date' is set to 03/26/2024. A yellow warning box titled 'Only End of Campaign' states: 'A closing report should be filed only when all debts and obligations are settled and no further financial activity will occur by the committee (MCA 13-37-228(3)).' Below this, there is a checkbox: 'Check this box ONLY if this is the committee's closing report.' The 'Certification' section contains two checkboxes: 'I certify the foregoing report of committee finances is true, complete and correct to the best of my knowledge, in accordance with Montana Code Annotated Title 13, Chapter 37.' and 'Check this box to skip the validation of contribution limits.' At the bottom, there are two buttons: 'Certify and File' and 'View Report'.

A landscape photograph of a river with a teal overlay at the top and a white jagged shape at the bottom. The river flows from the left towards the right, with some rapids visible in the foreground. The background shows a shoreline with trees and a cloudy sky.

4. Campaign Finance Review Process

Inspection of reports by COPP staff

○ Congratulations! You've filed a committee finance report

- After a committee finance report is filed, COPP Compliance Specialists will review. After this review, we may send the committee an Inspection Report identifying entries that may require additional information, need to be reported differently, etc.
- If you receive an Inspection Report, please make all requested changes by amending the committee finance report! If you have questions, contact COPP to discuss

Orders of Noncompliance

- The Commissioner may file an order of noncompliance against a political committee for their failure to file required documents or for failing to meet Montana's campaign finance reporting requirements, MCA [13-37-121](#)
- Once a formal Order of Noncompliance is issued, the committee is provided five (5) days to file the required documents or otherwise submit the necessary information
- If the committee does not comply with an Order of Noncompliance in the five (5) days provided, the Commissioner or local county attorney "shall" initiate the appropriate civil or criminal action

Campaign Finance Complaints

- Failure to file reports as required or fully/accurately disclose contributions received and expenditures made may lead to a formal campaign finance complaint being filed against a committee
- Complaint process is public- anyone can file a complaint. Unlike Orders of Noncompliance, formal Complaints are not initiated by COPP
- COPP is compelled to accept and investigate Complaints alleging violation of relevant election law under MCA Title 13, Chapters 35 and 37, MCA 13-37-111

Questions? Contact COPP!



**Address: 1209 8th Avenue
(Helena)**

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Email: cpphelp@mt.gov

or

cppcompliance@mt.gov