

Political Party Committee Campaign Finance Reporting and Disclosure

2024
Office of Political Practices

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COMMISSIONER

Outline

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





1. Political Party Committees- General Information

What is a political party committee?

- A political party committee is a political committee “formed by a political party organization”, MCA 13-1-101(35)
- This includes recognized county and city central committees

Treasurer, Record Keeping, and Banking

- Political party committees are required to designate a campaign treasurer, MCA 13-37-201. The designated treasurer must be a resident of Montana
- Political party committees are required to keep records of all contributions received and expenditures made, MCA 13-37-208
- Political party 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 party committees
- Aggregate contribution limits for political party committee contributions
- Current limits available at <https://politicalpractices.mt.gov/Home/Contribution-Limits>

Candidate Campaign Contribution Limits

- Coordinated expenditures must be reported by both the candidate benefitting from it (as a contribution received) and the political party committee financing it (as an expenditure made), 44.11.602, ARM
- A coordinated expenditure is an expenditure “made in cooperation with, in consultation with, at the request of, or with the express prior consent of a candidate”, MCA 13-1-101(10)
- Coordinated expenditures are subject to Montana’s campaign contribution limits

Candidate Campaign Contribution Limits

- There is an exemption to this-coordinated expenditures “in the form of provision of personal services by paid staff of the political party committee” to a candidate/candidate’s campaign are not subject to Montana’s campaign contribution limits, 44.11.225(3), ARM
- The candidate does not have to report these “personal services” expenditures as contributions received, per 13-37-229(4)(a)
- **This activity is still reportable as an expenditure by the political party committee!**

Attribution of Campaign Material

- 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 party committee, the attribution message must include the name of the political party committee, the name of its 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>

PAID FOR BY

A landscape photograph showing a wide river valley. The river flows from the background towards the foreground, winding slightly. The valley floor is covered with sparse vegetation and some patches of snow or light-colored soil. In the distance, there are rolling hills and mountains under a clear sky. The top portion of the image is overlaid with a solid teal color.

2. Campaign Finance Reporting- Forms and Dates

Statement of Organization (Form C-2)

- All political party 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 full name and address, the name and contact information for the designated treasurer, deputy treasurer, and any other officers, the name and address of the depository (bank), 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 officers are elected, for example
- Timely updates to the C-2 help ensure that COPP can contact the political party committee to provide necessary information or relevant guidance throughout a campaign cycle

Committee Finance Report

- Political party committees disclose contributions received and expenditures made via form C-6, the committee finance report
- In 2024, C-6 committee finance reports are due monthly: on the 30th of March, April, May, June, August, September, October, and November
- Reports cover from the end of the previous reporting period through the 25th of the month. For example: the March 30 report covered all activity from January 1, 2024 through March 25, 2024; the April 30 report covers March 26 through April 25; etc.

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. The full 2024 committee Reporting Calendar is available on COPP's website

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

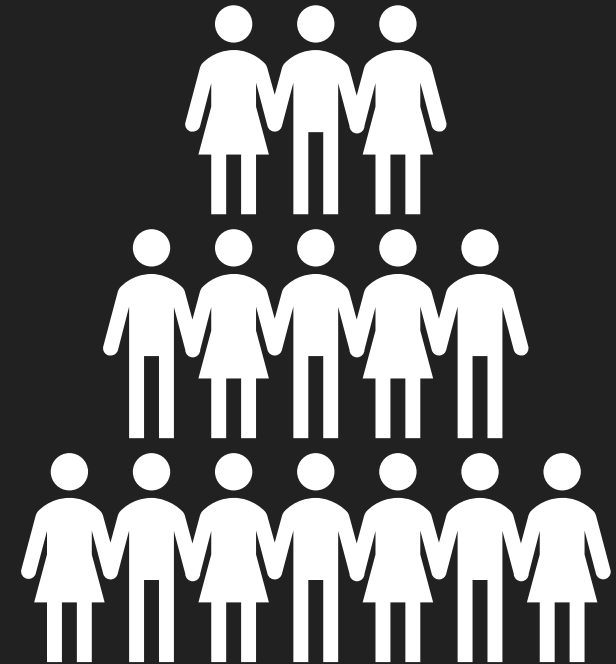
Contributions: Types of Contributors

1. Individuals
2. Political Committees
3. Fundraisers and “Mass Collection” events



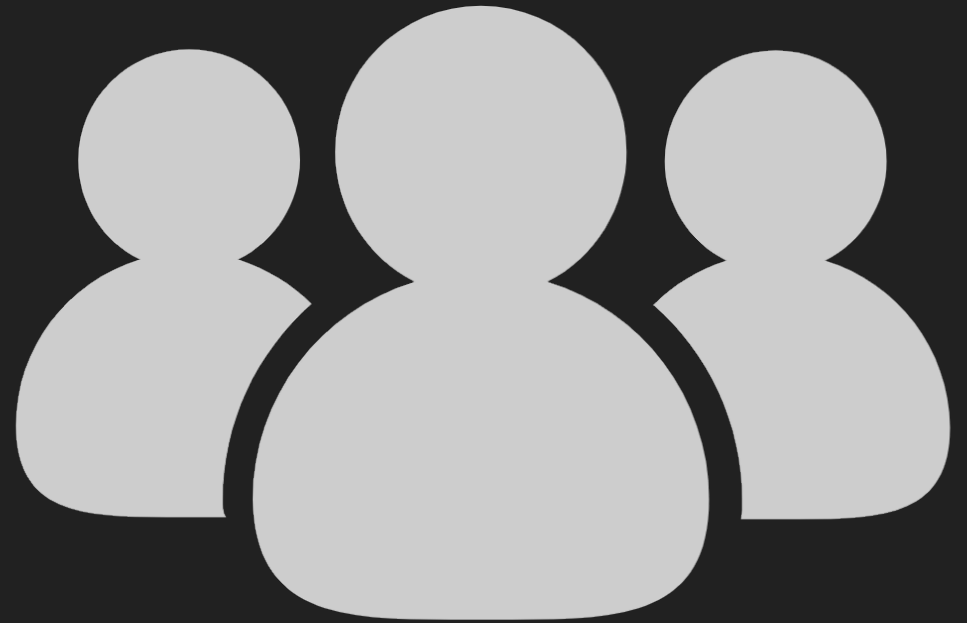
Individual Contributors

- ****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 and address of the committee making the contribution



Fundraisers and “Mass Collection” events

- Contributions of less than \$50 received at a single fundraiser or related “mass collection” event can be reported together, as a lump sum
- Any contribution of \$50 or more from an individual contributor at a fundraiser or related “mass collection” event 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 for individual contributors of 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:

 Montana Democratic Party aka Montana Democratic State Central Cmte

Mailing Address:

 PO Box 802 Helena, MT 59624

Committee Type:

 Political Party

Reporting Period:

*From

01/01/2024

*To

03/25/2024

Status:

 Filed

Contributions

Expenditures

Debts

Payments

Attachments

Summary

File

Help

Individuals

Committee

Fundraiser

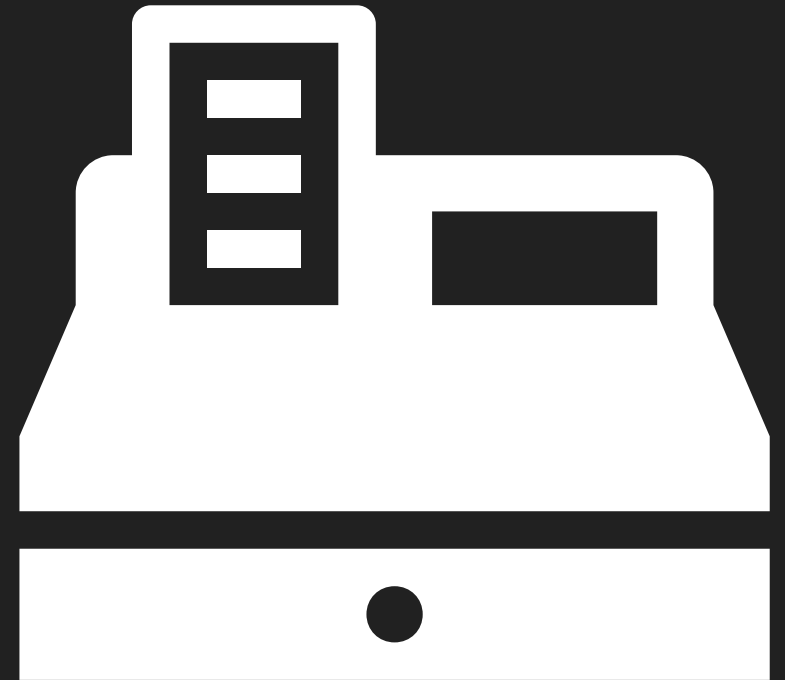
Refunds, Etc

Loan

Help

Expenditures

- A political party 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)

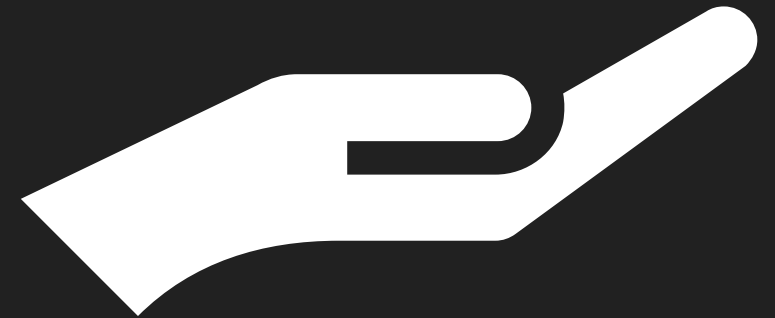


Independent Expenditures

- 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)
- Political party committees are not limited in how much they can spend on independent expenditures
- 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:

 Montana Democratic Party aka Montana Democratic State Central Cmte

Mailing Address:

 PO Box 802 Helena, MT 59624

Committee Type:

 Political Party

Reporting Period:

*From

01/01/2024

*To

03/25/2024

Status:

 Filed

Contributions

Expenditures

Debts

Payments

Attachments

Summary

File

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Expenditures

Independent Expenditures

Help

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 the Montana Campaign Finance Reporting System. At the top, under 'Committee Information', the 'Committee Full Name' is 'Montana Democratic Party aka Montana Democratic State Central Cmte' and the 'Mailing Address' is 'PO Box 802 Helena, MT 59624'. The 'Committee Type' is 'Political Party'. The 'Reporting Period' is set from '01/01/2024' to '03/25/2024', and the 'Status' is 'Filed'. Below this are tabs for 'Contributions', 'Expenditures', 'Debts', 'Payments', 'Attachments', 'Summary', 'File', and 'Help'. The 'File' tab is active, showing a 'Certify and File' section with a 'Help' link. It includes checkboxes for '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' of '03/30/2024' is shown. 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)).' It includes a checkbox to 'Check this box ONLY if this is the committee's closing report.' Below this is a blue 'Certification' bar with 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 are 'Certify and File' and 'View Report' buttons.



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)**

Phone: (406) 444-2942

Email: cpphelp@mt.gov

or

cppcompliance@mt.gov