## My organization's advocacy meets the definition of a campaign-related disbursement (CRD) — what do we need to disclose?

NO. It was for a CRD that was not a

covered transfer.

Information about CRDs of more

Disclose the following information:

than \$1000 must be disclosed.

· The amount of each CRD; and

· Name and address of person

made; and the following:

or entity to which the CRD was

1. Disclose information about the organization making the CRDs.

- Name and principle place of business;
- Name and address of people with control over organization (board of directors and probably executive director);
- Name of any other entity that controls organization, and information about people that control that entity

YES. If covered transfer was to an entity that meets definition of affiliate, disclose transfers if:

- Transferring affiliate makes \$50,000 in transfers to affiliate during the year; or
- Transfer is a comprised of dues, fees and assessments paid by members on a periodic basis on a per-individual calculation, and is more than \$10,000 during an election disclosure period.

non-501(c)(3) entities that engage in communications

2. Disclose information about the organization's CRDs.

Was the CRD a covered transfer?

YES

Was the transfer an affiliated organization?

entity receiving

NO. Disclose name and address of any transfers of more than \$1000.

- · The election to which the campaign-related disbursement pertains:
- If the CRD is a public communication, the name of any candidate mentioned and whether the communication supports or opposes that candidate;
- · A certification from CEO that the communication was not made in coordination with a candidate or political party.

3. Disclose information about organization's donors unless donor restricted funds in writing from being used for CRDs, and funds were put in an account segregated from any account used for CRDs.

Were the funds paying for the CRD from a segregated account to be used for CRDs and consisting of only funds donated by persons other than the organization?

YES. Disclose the following about donors of funds to that segregated account to be used for CRDs:

- Name and address of each donor or funder aiving more than \$10,000 over a 2-year election cycle to that segregated account;
- Date and amount of each contribution;
- The aggregate amount the donor or funder gave during the 2-year election cycle.

NO. Disclose the following information about the organization's donors:

- Name and address of each donor or funder giving more than \$10,000 over a 2-year election cycle;
- · Date and amount of each contribution:
- The aggregate amount the donor or funder gave during the 2-year election cycle.

Donor names and addresses do not have to be disclosed if disclosure WOULD (impossible to show) subject donor to serious threats, harassment, or reprisals.

This provision seemingly attempts to ban covered meeting the definition of a CRD from discussing lobbying strategies and messaging with the President and members of Congress



NOTE: A CRD election reporting cycle runs from the earlier of the beginning of the two-year election cycle or one year before the date of disclosure, unless expenditure is a federal judicial nominee communication, which has a calendar year reporting cycle.