



Philadelphia Campaign Finance Resource Guide

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Philadelphia Campaign Finance Resource Guide

You are in the right place...

Whether you are a candidate, committee treasurer, or a concerned citizen with questions about Philadelphia's Campaign Finance Law, this site is designed to provide answers to key questions about the requirements, restrictions, and process of funding campaigns for City office.

New to the City's Campaign Finance Law? Start with [Campaign Finance Basics](#).

Looking for more in-depth explanations? Choose an option below to find answers to your pressing questions.

For even more information, check out these [additional online resources](#) or [find the right person](#) to answer your questions.

How can we help you?

Starting a Campaign for City Office

Want to run for City office but not sure where to start? Here's a [checklist](#), plus plenty of resources to support you along the way.

Independent Expenditures

Contributions to candidates aren't the only way to spend money on City campaigns. Understand what an independent expenditure is and which rules & reporting requirements apply.

Contributions to City Candidates

Whether you are a candidate or donor, understanding the rules for contributions to City campaigns is key to staying out of trouble!

Filing Campaign Finance Reports

Electronic filing is required, so learn how to register, how to use the filing system, who files which reports, and how to make changes once you've filed. Also check here for our [2021 Campaign Finance Filing Schedule](#).

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Campaign Finance Basics

The City's Campaign Finance Law, found at [City Code Chapter 20-1000](#) and [Board Regulation No. 1](#), supplements the [Pennsylvania Election Code](#) with additional rules and requirements related to campaigns for City elective office.

Does the City's Campaign Finance Law apply to me?

The City's Campaign Finance Law applies to:

- **candidates** for City elective office;
- those who **contribute** to candidates for City elective office; and
- **political committees** or others that make expenditures to influence a City election.

What is City elective office?

- Mayor
- Councilmember (District & At-Large)
- Controller
- City Commissioner
- District Attorney
- Sheriff

What are the main components of the City's Campaign Finance Law?

Electronic filing of campaign finance reports

All campaign finance reports filed with the Board must be filed electronically. This site provides additional guidance on [who must file](#), [when reports are due](#), and [what information must be included](#) in a report.

Contribution limits

The City's Campaign Finance Law limits the amount of money that can be donated to candidates for City elective office. For more details on the rules for contributions, click [here](#).

Special rules regarding use of political committees by candidates

Generally speaking, candidates for City elective office must use a single checking account and political committee for all contributions received and all expenditures made for their campaign. A candidate may establish a special committee to raise and spend money for the defense of litigation arising directly from their campaign. If a candidate wishes to raise and spend money for inauguration or transition to City office, they must set up a separate Transition and Inauguration Committee. Click [here](#) for more information about the use of political committees.

Starting a Campaign for City Office

Make sure your campaign starts off on the right path! This checklist is an overview of the basic requirements under the [City's Campaign Finance Law](#) and the [State Election Code](#).

Is this checklist for me??

This checklist is designed for campaigns for City Elective Office, which means the following offices in the City of Philadelphia:

- Mayor
- Councilmember (District & At-Large)
- Controller
- City Commissioner
- District Attorney
- Sheriff



Announce your candidacy

Once you publicly announce that you are running for City Elective Office (or file nominating papers with the City Commissioners), you are subject to the City's Campaign Finance Law. This includes:

- contribution limits
- reporting requirements
- restrictions on the use of political committees and bank accounts



File a Candidate Information Form

Within **three business days** of becoming a candidate, you must complete and submit a [Candidate Information Form](#) to the Board of Ethics. You must submit this form even if you used the same political committee for a previous City election.

Haven't set up a committee yet? That's okay! Just provide a street address, phone number, and email address. You will need to update your form once you establish a committee. These forms are publicly posted on the Board of Ethics website.



Set up a Political Committee

Candidates can only accept and spend money through a political committee. To set up a committee, you must file two forms with the [City Commissioners](#):

- [Political Committee Registration Statement](#)
- [Authorization for a Political Committee to Receive Funds on Behalf of a Candidate](#)

These forms are required by the State Election Code. *The Board of Ethics cannot accept these forms.* They must be received by the City Commissioners.



Create Campaign Finance Filing System accounts

Electronic filing is **mandatory**. You need to create two accounts separate accounts with the City's [Campaign Finance Filing System](#): one for you personally and another for your political committee. *(If your committee already has an account, you do not need to create a new one.)*



Register for Campaign Finance training

The Board of Ethics hosts several Campaign Finance training sessions each election season. These sessions cover the requirements of the City's Campaign Finance Law as well as the process for electronic filing of reports. Training is currently conducted via Zoom. Click [here](#) to register for upcoming sessions.



Check out our Campaign Finance resources

The requirements of the City's Campaign Finance Law are set forth in [Board Regulation No. 1](#). The Board provides additional guidance through this guide and a compilation of [FAQs](#).



Stay informed

Make sure you have the latest information about the City's Campaign Finance Law by joining our [Campaign Finance mailing list](#).

Pre-candidacy

Before you **become a candidate for City office**, you can raise and spend money. These pre-candidacy transactions are technically not subject to the City's contribution limits or reporting rules. But once you become a candidate, any funds already raised or spent must be handled differently.

Basic rules for pre-candidacy contributions & expenditures:

Once you **become a candidate for City office**:

- You may not spend excess pre-candidacy contributions to influence your election.
- You must account for all excess pre-candidacy contributions received by the committee.
- Within ten days of becoming a candidate, you must remove any excess pre-candidacy contributions from the campaign's account.

As a practical matter, if you are considering becoming a candidate for City office, you can avoid the need to calculate and exclude excess pre-candidacy contributions by only raising money within the City's contribution limits. Another way to streamline the handling of pre-candidacy contributions is by using a segregated pre-candidacy excess contribution (SPEC) account. For more information about using SPEC accounts, see [Regulation No. 1, §§1.46-1.48](#).

What is an excess pre-candidacy contribution?

An excess pre-candidacy contribution is the portion of a pre-candidacy contribution to a political committee that, had it been made to a candidate for City elective office, would have been in excess of the contribution limits.

Example 1: *On January 10th, Mr. Rochester donates \$5,000 to Friends of Eyre. On February 12th, Ms. Eyre announces her candidacy for City elective office. Now that Ms. Eyre is a candidate, \$1,900 of Mr. Rochester's contribution (\$5,000 contribution minus the \$3,100 contribution limit) was an excess pre-candidacy contribution that Ms. Eyre must exclude from her candidate committee's checking account.*

Example 2: *On November 1, 2020, Friends of Brown receives a contribution of \$3,500 from Mr. Van Pelt (\$3,100 within limits, \$400 excess) and a contribution of \$3,500 from Ms. Reichart (same). On December 1, 2020, Mr. Brown declares his candidacy for the May 2021 Controller primary election. By December 11, 2020, Friends of Brown must exclude \$800 (\$400 each in excess contributions from Mr. Van Pelt and Ms. Reichart) from its checking account.*

I accepted excess pre-candidacy contributions —now what?

You can exclude the excess funds by either:

- transferring those funds to a separate account **OR**
- returning the excess amounts to their donors.

For more information about how to identify, calculate, and exclude excess pre-candidacy contributions, see [Subpart J of Regulation No. 1](#).

Becoming a Candidate

Are you a candidate? Once you become a candidate, you are subject to the City's Campaign Finance Law. This means knowing whether you are officially considered a candidate for City office is key to understanding how the rules apply to you.

Looking for pre-candidacy rules? Click [here](#).

When am I considered a candidate for City office?

You become a candidate by either:

- publicly announcing your candidacy for City elective office **OR**
- filing nominating petitions or papers with the City Commissioners,

whichever happens first.

Note: The State Election Code uses a broader definition of "candidate" than the City's Campaign Finance Law. As a result, you may be a candidate under State law (and therefore subject to State reporting requirements) even if you are not yet considered a candidate under City law. For guidance on the [State Election Code](#), please contact the [City Commissioners](#) or the [PA Department of State](#).

What new obligations do I have once I become a candidate for City office?

Within **three days** of becoming a candidate for City elective office, you must submit a [Candidate Information Form](#) to the Board of Ethics. This form includes basic information about the candidate, office sought, and any political committee established to handle campaign business.

I want to use a political committee I created for a previous election —do I still need to file a Candidate Information Form?

Yes. You can use the same candidate committee from a previous election, but you must file a new [Candidate Information Form](#) for each election, even if none of the other information has changed.

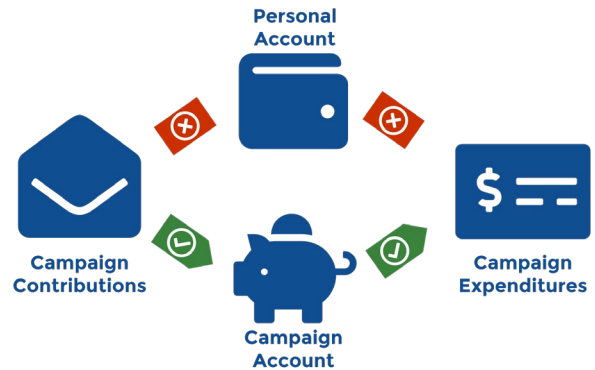
I don't have a political committee for my campaign do I still need to submit a Candidate Information Form?

Yes. While we do not recommend operating a campaign without a campaign committee, if you chose to proceed this way you must still file a [Candidate Information Form](#) with the Board of Ethics.

Use of Political Committees

One Committee, One Account

Candidates for City elective office may use only **one political committee** and **one checking account** per campaign.* Funds held in other accounts may not be used to influence a City election. This means that all contributions to a campaign must be deposited into the campaign account, and all campaign expenditures must be made out of that account.



Transition/inauguration and litigation committees are not campaign committees and do not violate the one committee rule if properly established and operated. See Subparts **G (Litigation Fund) and **H (Transition & Inauguration)** of Regulation No. 1 for more information about these limited-purpose committees.*

More about campaign transactions

Can I use PayPal (or another Payment Service Provider) to accept campaign contributions or make campaign expenditures?

Yes. You may use PayPal (or another Payment Service Provider) to accept campaign contributions, but those must be promptly transferred to your committee's checking account. You can also use a Payment Service Provider to make campaign expenditures so long as the funds are drawn directly from the committee's checking account. This means you cannot leave contributions in your PayPal balance, even if you expect to use them later for campaign expenses. You must also ensure that the Payment Service Provider collects all of the information about donors required for reporting.

Can I (or someone working on my campaign) use personal funds to make purchases for the campaign?

Yes, so long as:

1. it is reasonably necessary that such purchases are not made from the candidate committee's checking account;
2. the campaign reimburses you (or the campaign worker) within 45 days of the purchase;
3. the reimbursement is disclosed and accurately described in the required campaign finance report; **and**
4. the campaign keeps records of both the purchase and reimbursement.

Can I reimburse a campaign vendor for its expenses?

Yes, so long as:

1. the vendor's expenses are incidental to providing the agreed-upon services to the campaign;
2. the expenses are consistent with standard business practice; and
3. the campaign promptly reimburses the vendor.

Use of Political Committees (continued)

Are there special rules for sample ballots distributed in my ward?

Yes. As a candidate for City office, you may make expenditures through one additional committee (i.e. a political committee other than your campaign committee) if those expenditures are:

- for the printing and distribution of sample ballots AND
- the resulting ballots are distributed in your ward.

Note that sample ballot expenditures through another committee are permitted but not required. For further discussion of sample ballots, click [here](#).

Special use committees

In addition to a candidate committee, you may establish one of these separate special use committees so long as you follow the corresponding restrictions on how you raise and spend money. If you establish one of these special use committees, you must notify the Board of Ethics within **three business days** and provide basic information about the committee. You can use the [Candidate Information Form](#) to submit this information for a special use committee.

Litigation fund committees

You **may** create a litigation fund committee if you need to pay for the defense of certain legal proceedings related to your campaign.

Contributions to litigation fund committees. A litigation fund committee can receive contributions. Those contributions are subject to the same dollar limits as contributions to a candidate committee, but the contributions are computed separately. For example, if an individual donor gave \$3,100 to your candidate committee, they can still give up to \$3,100 to your litigation committee. For more about contribution limits, click [here](#).

Expenditures by litigation fund committees. A litigation fund committee can only spend money on professional fees and expenses that are part of the defense of a civil, criminal, or administrative proceeding arising directly out of your campaign. You cannot transfer funds from your litigation fund to your candidate committee. You can, however, make payments from your candidate committee for litigation expenses. Within six months after the general election for which you sought election, you must terminate the committee and return all remaining funds to contributors.

Transition and inauguration committees

If you want to raise and spend money for transition or inauguration to office, you **must** establish a transition and inauguration committee. As a candidate or former candidate for City office, any money raised for or spent on your transition or inauguration to office must be handled through a separate committee. You may transfer money from your candidate committee to your transition and inauguration committee. You cannot, however, transfer funds from the transition and inauguration committee to the candidate committee. Within six months of your inauguration to City office, you must terminate the committee and return any remaining funds to contributors.

Contributions to Campaigns for City Office

What are political contributions?

Under the City's Campaign Finance Law, contributions are anything of value received by a candidate committee, litigation fund committee, or transition & inauguration committee. It is important to be able to recognize when something is a contribution and know which **contribution limit** applies.

Monetary contributions

Monetary contributions include cash, checks, gift cards, credit card payments, electronic transfers, and loans.

In-kind contributions

In-kind contributions include goods or services provided to a campaign either directly or by paying (or agreeing to pay) a third party. Debt forgiveness is one type of in-kind contribution. **Coordinated expenditures** are also in-kind contributions.

Contribution Limits

Know your limits!

The City's Campaign Finance Law limits the **amount** of money individuals, political committees, and others can donate to a candidate for City Elective Office. The limits change every four years (next due for revision in 2024). State law places additional restrictions on the **sources** of political contributions.

Contribution Limits Effective January 1, 2020		Per calendar year to:		
		Candidate Political Committee*	Litigation Fund Committee	Transition & Inauguration Committee
From:	Individual	\$3,100	\$3,100	\$3,100
	Political Committee, partnership, sole proprietorship	\$12,600	\$12,600	\$12,600
	Corporation	prohibited see 25 P.S. § 3252(a)		
	LLC	prohibited unless taxed as partnership see 25 P.S. § 3252(d)		

*Includes committees of former candidate if carrying debt incurred to influence a covered election.

Contribution Limits (continued)

Know how to handle contributions from...

Partnerships and sole proprietorships

To qualify for the \$12,600 contribution limit, the finances of a sole proprietorship or partnership must be distinct and segregated from the personal finances of its proprietor or partners.

Example: *Mr. Darcy is a partner in the Meryton Partnership. All of Mr. Darcy's personal funds are distinct and segregated from the Meryton Partnership and his fellow partners. Under the Campaign Finance Law, Mr. Darcy can donate up to \$3,100 to a City candidate for elective office. At the same time, the Meryton Partnership can donate up to \$12,600 to the same candidate.*

Corporations

State law prohibits corporations, union general funds, banks, and unincorporated associations from making contributions to any candidates running for office in Pennsylvania, including to any candidate for City elective office. Corporations and unincorporated associations may make contributions to registered **Independent Expenditure Committees**. For more information please contact the **Department of State** or the **City Commissioners Office**.

Joint checking accounts

A contribution made by a check that reflects a joint checking account of two or more individuals shall be attributed to the joint account holder who signs the check. If more than one account holder signs a contribution check, the contribution shall be apportioned evenly between the signers.

Know the date of acceptance

The date of acceptance is the date that a contribution came into your campaign's possession. The date of acceptance of a contribution determines on which report(s) it must be disclosed and in which calendar year it counts toward the limit. Campaigns are prohibited from assigning a different date (i.e. you cannot pre- or post-date contributions).

Type	Delivery method	Date of acceptance
Monetary	Handed to candidate or campaign staff	Date handed to candidate or staff member
Monetary	Delivered to mailbox	Date found in mailbox
Monetary	Credit card donation via website	Date credit card information submitted
In-kind	Providing goods or services directly to campaign	Date goods or services received
In-kind	Paying third party to provide goods or services to campaign	Date goods or services provided, or date of payment, whichever is earlier

Contribution Limits (continued)

Know the doubling rules

If a candidate contributes **\$250,000 or more** of his or her personal resources, the contribution limits for **all candidates for that office** double. The limits remain doubled for that year and each year up to and including the year of the covered general election. Once the limits double, they remain doubled even if the candidate who triggered the doubling drops out or loses in a primary. Doubling cannot be reversed by the candidate returning, repaying, or refunding the contributions that triggered the doubling.

Coordinated Expenditures

Identifying coordinated expenditures

A coordinated expenditure occurs when someone

- spends money to influence the election of a City candidate **and**
- does so in cooperation, consultation or concert with the candidate's campaign.

For example, a coordinated expenditure occurs if the expenditure is made at the request or suggestion of the candidate's campaign. A coordinated expenditure also occurs if someone republishes materials created by a candidate's campaign.

Example: *Charlotte is running for City Council. Her best friend from college, Wilbur, texts her and says he is going to spend \$10,000 on flyers urging his neighbors to vote for her. Charlotte respond with a thumbs up emoji. Wilbur's payment for the flyers would be a coordinated expenditure and therefore an in-kind contribution that exceeds the City's limits by \$6,900.*

For more examples of how coordinated expenditures arise, check out [Subpart I of Regulation No. 1](#). For a discussion of [independent expenditures](#), click [here](#).

Coordinated expenditures are in-kind contributions

Coordinated expenditures are in-kind contributions from the person or committee who makes them to the candidate they benefit. Additionally, because coordinated expenditures are in-kind contributions, the amount spent is subject to the City's contribution limits.

Coordinated Expenditures (continued)

If I split costs with another candidate is that a coordinated expenditure?

Yes. If you share the costs for activities promoting your campaign and that of another candidate, the amount you spend is an in-kind contribution to the other candidate's campaign (and vice versa). This rule applies regardless of how many candidates share the costs.

Example: *Candidates Alvin and Simon each pay* a printer \$5,000 to produce 10,000 copies of a flyer that promotes both candidates. They then pay 50 people to distribute the flyers. Alvin's share of the distribution costs is \$3,750, while Simon pays \$1,250. Alvin has made in-kind contributions totaling \$8,750 (\$5,000 to the printer + \$3,750 for distribution) to Simon, while Simon has made in-kind contributions of \$6,250 (\$5,000 to the printer + \$1,250 for distribution) to Alvin.*

*This assumes that the expenses were properly paid for by candidate committees, making them subject to the **\$12,600 limit for political committees**.

Is paying to be on a sample ballot a coordinated expenditure?

No. So long as the you pay the usual and normal charge, payments to print and distribute sample ballots are not in-kind contributions or coordinated expenditures that count toward the City's contribution limits.

Example 1: *Piglet PAC spends \$50,000 to print and distribute 100,000 copies of a sample ballot promoting ten candidates in the May 2021 primary election. Each of the candidates pays Piglet PAC \$5,000 - \$7,500 to be on the ballot. Candidates who pay more have their names printed in red and in larger type. Because each candidate paid the usual and normal charge, the amount Piglet PAC paid to print and distribute the ballot is not an in-kind contribution subject to the contribution limits.*

Example 2: *Eeyore PAC spends \$50,000 to print and distribute 100,000 copies of a sample ballot promoting ten candidates in the May 2021 primary election. Eight of the candidates pay Eeyore PAC \$5,000 - \$7,500 to be on the ballot. Candidates Owl and Kanga do not make any payment to Eeyore PAC, but at their request Eeyore PAC leaves them on the ballot. Under these circumstances, Eeyore PAC has made two in-kind contributions of \$50,000 each to Owl and Kanga. For each candidate, the contribution exceeds the limits by \$37,400.*

Independent Expenditures

Identifying independent expenditures

An independent expenditure is any expenditure made to influence the outcome of a covered election that is

- made without the cooperation or consultation with any candidate's campaign **and**
- not made in concert with or at the request or suggestion of any candidate's campaign.

Essentially, an independent expenditure is the opposite of a **coordinated expenditure**.

Example 1: *Mayoral candidate Othello gives Shakespeare PAC a template for a door hanger. Shakespeare PAC spends \$5,000 to print door hangers based on the template and spends \$10,000 to distribute them a month before the Primary. Both the \$5,000 printing expenditure and the \$10,000 spent on distribution are coordinated expenditures and are therefore in-kind contributions to Othello subject to the contribution limits.*

Example 2: *Youse Can Fish (an independent expenditure committee supporting fishing piers) spends \$50,000 on radio ads in support of Council candidate Nemo. The candidate's campaign does not have any communication with the committee prior to the expenditure. The \$50,000 expenditure is an independent expenditure and is not subject to the contribution limits.*

For information on reporting independent expenditures, click [here](#).



Filing Campaign Finance Reports

The **Campaign Finance Law** requires those who participate in City elections to file campaign finance reports with the Board of Ethics at various points in the calendar year.

Filing Calendar

				Yes Maybe No		
Primary May 18, 2021 Municipal November 2, 2021				Filed by:		
Cycle	Report	Transactions Through	Filing Deadline	City Candidates	City Candidate Committees	
1	6th Tuesday Pre-Primary	Mar. 29, 2021	Apr. 6, 2021			
101*	4th Tuesday Pre-Primary	Apr. 18, 2021	Apr. 20, 2021			
2	2nd Friday Pre-Primary	May 3, 2021	May 7, 2021			
201*	Last Tuesday Pre-Primary	May 9, 2021	May 11, 2021			
202*	Last Friday Pre-Primary	May 12, 2021	May 14, 2021			
10	24 Hour Pre-Primary	May 4-18, 2021				
3	30 Days Post-Primary	June 7, 2021	June 17, 2021			
4	6th Tuesday Pre-General	Sept. 13, 2021	Sept. 21, 2021			
401*	4th Tuesday Pre-General	Oct. 3, 2021	Oct. 5, 2021			
5	2nd Friday Pre-General	Oct. 18, 2021	Oct. 22, 2021			
501*	Last Tuesday Pre-General	Oct. 24, 2021	Oct. 26, 2021			
502*	Last Friday Pre-General	Oct. 27, 2021	Oct. 29, 2021			
11	24 Hour Pre-General	Oct. 19-Nov. 2, 2021				
6	30 Days Post-General	Nov. 22, 2021	Dec. 2, 2021			
7	2021 Annual	Dec. 31, 2021	Jan. 31, 2022			

*Reporting for electioneering communications expenditures of \$5,000 or more.

24 hour reporting (Cycles 10 & 11)

Candidates/ Candidate Committees must file within 24 hours of receiving contributions/pledges of \$500 or more.

Political Committees & Other Groups/ Individuals must file within 24 hours of making or incurring debt for independent expenditures of \$500 or more.

Political Committees must file for any reporting period in which they:

- Spend any amount to influence a City election (includes contributions to City candidates)
- Donate to a Litigation Fund or Transition/Inauguration Committee
- Spend (or promise to spend) \$5,000 or more on electioneering communications to be published within 50 days of a City election

Other Groups/ Individuals must file for any reporting period in which they:

- Make independent expenditures of \$100 or more to influence a City election
- Spend (or promise to spend) \$5,000 or more on electioneering communications to be published within 50 days of a City election (except Cycle 7)

See our online [Campaign Finance Resource Guide](#) or [Regulation No. 1, Subpart E](#) for more details on filing.

What gets reported?

Contributions

You must report all **contributions** received.

\$50 or less

May be disclosed as a lump sum, rather than itemized.

Over \$50

Must provide the contributor's full name and mailing address.

Over \$250

Must also provide the contributor's occupation & employer, if any, or principal place of business, if self-employed.

Note: When determining a donor's contribution amount, the filer must aggregate all of the donor's contributions during the reporting period.

Expenditures

You must disclose each and every expenditure made during the reporting period and provide the date it was made, the full name and address of the person to whom it was made, and the purpose of the expenditure.

If you used a credit or charge card to make expenditures, you must disclose and itemize each purchase made with that card, not merely a lump sum payment to the card.

Unpaid debts

You must disclose the nature and amount of the debt, the date incurred, and the full name and address of the person to whom the debt is owed.

What gets reported? (continued)

Electioneering communications

An electioneering communication is any publicly distributed* broadcast, cable, radio, print, Internet, or satellite communication that

- promotes, attacks, supports, or opposes a candidate, **or**
- within 50 days of a covered election names, refers to, includes, or depicts a candidate in that election.

**A publicly distributed communication does not include a communication made solely to the members of a union, association, or corporation.*

Do I have to report expenditures for electioneering communications?

A **PAC** must file a report for Cycles 1, 2, 3, 4, 5, 6, or 7 if it spends any amount on electioneering communications in that reporting cycle. A PAC must file for Cycles 101, 201, 202, 401, 501, or 502 if it spends \$5,000 or more on electioneering communications. For each filing, a PAC must disclose all transactions during that reporting period.

An **individual or non-PAC entity** must file a report for any reporting cycle other than Cycle 7 in which they spend \$5,000 or more on electioneering communications that are published within 50 days of a covered election.

Special disclosure rules for organizations

If an organization (other than a PAC) spends \$5,000 or more on electioneering communications within 50 days of a covered election, it must file a full Campaign Finance Report with the Board of Ethics that discloses:

- all expenditures for electioneering communications or any other campaign related spending;
- any contributions as defined by the [State Election Code](#); **and**
- all donations of \$5,000 or more received during the reporting period regardless of whether they are designated for a political purpose **unless** the organization uses a segregated account for political spending. If the organization uses a segregated account for amounts used for political purposes, it need only disclose contributions deposited into that account.

Example: *Nonprofit Sanctuary for Seals receives two checks. One is a \$2,000 contribution to support the Sanctuary's electioneering communications in support of a candidate for Controller. The other is a general \$3,000 donation to the Sanctuary. Both checks are deposited into the Sanctuary's general account. The Sanctuary must file a Campaign Finance Report to disclose the \$2,000 contribution. The Sanctuary need not disclose the \$3,000 donation because it falls below the \$5,000 threshold for non-political donations.*

Special disclosure rules for individuals

An individual required to file a report regarding electioneering communications is only required to disclose contributions that they received or solicited in order to fund the expenditures disclosed in the report.

What gets reported? (continued)

Reporting independent expenditures: PACs

PAC refers to political committees other than the candidate committee of a current candidate for City elective office. PACs generally must file for any reporting period in which they spend any amount of money to influence a City election (including contributions to City candidates).

Independent Expenditure Reporting (for PACs)		Requires reporting in:		
		Full Report (Cycles 1, 2, 3, 4, 5, 6, 7)	24 hour IE report (Cycles 10, 11)	Full Report (Cycles 101, 201, 202, 401, 501, 502)
Amount:	\$0-\$499	Yes	No	No
	\$500 to \$4,999	Yes	Yes if spent during 24 hr reporting period	No
	\$5,000 or more	Yes	Yes if spent during 24 hr reporting period	Yes if spent on electioneering communications

Reporting independent expenditures: Individuals & non-PAC entities

Reporting of an independent expenditure depends on

- when it was made,
- how much was spent, and
- whether it was for electioneering communications.

State law requires that you report each independent expenditure of \$100 or more. This requirement applies even if the expenditure is for electioneering communications.

Independent Expenditure Reporting (individuals & non-PAC entities)		Requires reporting in:		
		IE Report (Cycles 1, 2, 3, 4, 5, 6, 7)	24 hour IE report (Cycles 10, 11)	Full Report (Cycles 101, 201, 202, 401, 501, 502)
Amount:	Under \$100	No	No	No
	\$100 to \$499	Yes	No	No
	\$500 to \$4,999	Yes	Yes if spent during 24 hr reporting period	No
	\$5,000 or more	Yes	Yes if spent during 24 hr reporting period	Yes if spent on electioneering communications

If the independent expenditure was for \$500 or more and was made during the 24 hour reporting period, you will also need to file a 24 hour independent expenditure report.

If the expenditure is for electioneering communications and is for \$5,000 or more you will also need to file a full campaign finance report for that cycle.

What gets reported? (continued)

24 hour reporting

From the close of the pre-election report (Cycle 2 or 5) through the election, a candidate must disclose any contribution or pledge of \$500 or more received. Any other filer must disclose any independent expenditure of \$500 or more that was made or for which debt was incurred.

- All reports are due within 24 hours of receipt or expenditure.
- A candidate filing a 24 hour report should only disclose contributions that total \$500 or more from a single source. The report should **not** include expenditures or debts.
- A political committee or other person filing a 24 hour report should only disclose independent expenditures that total \$500 or more, or debts incurred for such expenditures. The report should **not** include contributions received by the committee or person.

If I disclose an independent expenditure in a 24-Hour Report do I still need to report it in other cycles?

Yes. A PAC that files a 24 hour report disclosing expenditure must also disclose that independent expenditure in their post-election (Cycle 3 or 6) report..

Example: *Two days before the General Election, Friends United for Spectacular Sandwiches (an independent expenditure committee) makes an \$800 contribution to Dagwood 4 Council. That contribution must be disclosed in **both** a 24 hour (Cycle 11) Report and the 30-Day Post Election (Cycle 6) Report.*

Statements in lieu of reports

If you are required to file, but had **less than \$250 in activity** during the reporting period (i.e., accepted contributions, made expenditures, or incurred debt of less than \$250), you may file a shorter campaign finance statement rather than a full campaign finance report. The **Campaign Finance Filing System** will give you the option to select a statement.

Electronic Filing

All campaign finance reports filed with the Board of Ethics must be submitted electronically through the City's **Campaign Finance Filing System**. Campaign finance data is publicly available and **searchable online**.

How to file

Before you can file, you must **create an account** with the City's electronic Campaign Finance Filing System. This **video** provides step-by-step instructions for creating a filing account.

Create an Account

Each candidate and committee must create a separate account. If you use a committee you set up for a previous election, you do not need to create a new account.

You can use the Board's electronic system to simultaneously file documents with the Board and the City Commissioners. If you also need to file with the PA Department of State, you must either print out a paper copy of the report or export the report into text files for electronic submission.

NOTE: Filing a campaign finance report with only the Board of Ethics does not satisfy the requirement under the Pennsylvania Election Code to file reports with the City Commissioners or the Pennsylvania Department of State. For questions about the State Election Code, please call either the City Commissioners at 215-686-3469 or the Department of State at 717-787-1512.

Filing Assistance

You can always contact the Board of Ethics for filing assistance at **campaign.finance@phila.gov**. Please include your name, preferred contact information, and the type of assistance you need. You can also leave a message at 215-686-9450 and a staff member will return your call.

Please note that the filing center is closed until further notice due to the pandemic.

Post-candidacy

When do I become a former candidate?

If you were a candidate for City office, when you become a "former candidate" depends on circumstances surrounding the election.

If you are a former candidate	you concede a primary election	you are unopposed in a general election	you are opposed in a general election	an election is contested
	the day after the primary election	the day after the general election	when your opponent concedes	when all contests are resolved

Do the City contribution limits apply once I become a former candidate?

Yes, if your candidate committee has outstanding debts as a result of the campaign. In addition, the limits apply to money raised to pay for transition & inauguration to office. For more information about Transition & Inauguration Committees click [here](#).

Example: *In April 2021, Baggins gives Friends of Took \$2,000. Took loses in the May primary election. In July of 2021, Baggins offers to make another contribution. As of July, Took's candidate committee is carrying debt from the campaign. Under these circumstances, for the remainder of 2021, Baggins may give Took a total of \$1,100. (\$3,100 contribution limit - \$2,000 previous donation = \$1,100 remaining possible donations).*

Do I have to keep filing campaign finance reports once I am a former candidate?

Yes, if your campaign committee:

- has outstanding debts from a prior City election;
- raised money to pay off debts from a prior City election; **OR**
- spent money to pay off debts from a prior City election.

In addition, you would need to file for any [Transition & Inauguration Fund](#) or [Litigation Fund Committee](#). For more information about filing campaign finance reports, click [here](#).

Are there restrictions on paying off campaign debt?

Yes. All payments to retire (pay off) campaign debt must be made by your candidate committee. You cannot pay campaign debt out of a special use committee or out of your personal bank account.

What if someone forgives a debt?

Forgiveness of debt is an in-kind contribution and is subject to the [contribution limits](#).

Resources

More online resources

City Resources

Filing System

bit.ly/CFFiling

Regulation No. 1

bit.ly/2020Reg1

Online Resource Guide

bit.ly/PHLCampaignFinance

Training Registration

bit.ly/3sN1Jvi

Video Library

bit.ly/CFVideoLibrary

PA Resources

PA Campaign Finance Law

bit.ly/2O16XPc

PA Campaign Finance FAQs

bit.ly/3c6jIVM

PA Campaign Finance Page

bit.ly/2OlxKe3

PA Key Election Dates

bit.ly/3qYrNRZ

PDF Versions

Filing Calendar

bit.ly/2021CFDates

FAQs

bit.ly/PHLCFFAQs

Stay connected

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Official Board Twitter feed with updates on deadlines, advisory opinions, & meetings.

@EthicsSeal

The Board's semi-official mascot, Ethel the Ethics Seal, offers an informal and enthusiastic take on ethics law and more. She loves making new friends!

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BOEGCStaff@phila.gov

Lobbying

Bryan.McHale@phila.gov

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Contact Us

City Campaign Finance Law, Lobbying Law & Ethics Laws

Board of Ethics

Questions about the City's Campaign Finance Law (including filing system issues):

campaign.finance@phila.gov

Questions about other City ethics laws:

BOEGCStaff@phila.gov

Follow us on Twitter:

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[@EthicsSeal](https://twitter.com/EthicsSeal)

Join the [Campaign Finance mailing list](#).

Main Website:

www.phila.gov/ethicsboard

Office Hours:

The Board's physical office remains closed, but staff is working remotely. You can leave a message on the main office voicemail, but the best way to reach Board staff is via email. If you would like to reach a specific staff member, please use the [Staff Directory](#).

Monday - Friday
9:00 A.M. to 5:00 P.M.

Telephone:

215-686-9450

Mailing Address:

One Parkway Building, 18th Floor
1515 Arch Street
Philadelphia, PA 19102

State Campaign Finance Law & State Election Code

Office of the City Commissioners

Mailing Address:

City Hall, Room 142
1400 John F. Kennedy Blvd
Philadelphia, PA 19107

Telephone:

215-686-3469

Website:

www.phillyvotes.com

PA Department of State

Mailing Address:

210 North Office Building
401 North Street
Harrisburg, PA 17120

Telephone:

717-787-5280

Website:

Main: www.dos.pa.gov

Campaign Finance: bit.ly/20lxKe3