



**Michigan Department of State
Bureau of Elections**

**Campaign Finance
Ballot Question Committee Training**

2025

Topics

- What is a committee?
- MCFA Committee Types
- Where to Start?
- Statement of Organization Due Dates and Late Fees
- Reporting Waivers
- Losing and Regaining the Reporting Waiver
- Electronic Filing Requirement
- Ballot Question Filing Schedule
- Cover Page
- Receipts Direct and In-Kind
- Prohibited Contributions
- Contributions Exemptions
- Loans & Other Receipts
- What Information Do I Gather?
- What is an Election Cycle?
- What is a Campaign?
- Expenditures – Direct, In-Kind and Independent
- Limitations on Expenditures
- What Information Do I Gather?
- Fundraisers
- Late Filing Fees
- Late Contribution Reports
- Late Contribution Examples
- Fees for Late Contribution Reports
- Dissolving a Committee
- Identification Requirements
- Notices, Fees and Referrals
- Good Cause Waivers
- Campaign Finance Complaints
- Declaratory Rulings & Interpretive Statements
- Treasurers Responsibilities
- Selecting a Treasurer
- Tips for Successful Reporting

Introduction

The [Michigan Campaign Finance Act](#) (MCFA) provides for public disclosure of the funds spent and received to support or oppose candidates and ballot issues

Candidate and other committee types are required to register and file campaign statements with the appropriate filing official

This session will introduce you to the disclosure requirements for Political Party committees

What is a Committee?

Committees are “persons” or groups that:

- Receive contributions or make expenditures to influence voters for the qualification, passage or defeat of a ballot question
- Make independent expenditures to influence voters

When Should they Register?

- As soon as a group receives or spends \$500 or more in a calendar year to **support or oppose a ballot issue**, MCFA requires the group to form and register the committee.

MCFA Committee Types – [Appendix H](#)

- Ballot Question Committees
- Candidate Committees
- Political Action Committees (PACs)
 - PACs
 - Independent PACs
 - Caucus
 - Super PACs
- Political Party Committees

Where to Start?

- Review the [Ballot Question Committee](#) webpage
- Statement of Organization filed through MiTN
- Read the [Ballot Question Committee Manual](#) and [Appendices](#)
- Get to know:
 - [Dates and Deadlines](#)
 - [Contribution Limits](#)
 - [Election Cycle](#)
- Familiarize yourself with MiTN well before filing deadlines

Statement of Organization (SofO) Due Dates and Late Fees – MCL 169.224

Due Dates and Late Fees

- The SofO is due within 10 days after meeting the definition of a committee
- The fees are assessed based on the formation date supplied by the committee on their SofO
- The fees accrue at \$10 per business day to a maximum of \$300.00

Electronic filers will use MiTN – state level

Reporting Waiver - [MCL 169.224 \(5, 6\)](#)

The current reporting waiver threshold is **\$1,000.00 per calendar year**

Requesting the Reporting Waiver exempts committees who do not anticipate spending/receiving over the threshold from filing campaign statements

- Financial Activity must still be recorded and tracked
- You must answer YES in the Reporting Waiver section of the SofO to request the waiver
 - Selecting No will require campaign statements to be filed regardless of the committee's financial activity
 - Committees who have failed to file cannot retroactively request the waiver after the filing deadline

The waiver does not exempt committees from filing: An original or amended SofO or any Late Contribution Reports

Losing & Regaining the Reporting Waiver

When the Reporting Waiver is Lost

- Once a committee spends/receives over \$1,000 the next campaign statement is due
- The \$1,000 threshold includes debts owed, balances from previous elections and all contributions both direct and in-kind
- Candidate contributions (direct and in-kind) apply to the \$1,000 threshold

How to regain the Report Waiver

- The reporting waiver may be obtained again if the committee requests on an amended SofO
- The committee must:
 - Submit an amended SofO with the waiver box checked
 - Amended SofO must have appropriate signatures
 - Committees ending balance must be less than \$1,000
 - Committee debts and obligations must be under \$1,000

Electronic Filing Requirement [MCL 169.218](#) & [Appendix D](#)

- Any State level committee can file electronically, however, if the committee spends or receives \$5,000.00 or more in a calendar year MCFA requires electronic filing
- To file campaign statements electronically the committee must use the Michigan Transparency Network (MiTN)
- For more information on MiTN please visit our [Campaign Finance Disclosure](#) home page.

Ballot Question Filing Schedule

A ballot question committees without an active reporting waiver are required to file the following campaign statements:

Statement	Close of Books	Statement Due
January	December 31	January 31
April	April 20	April 25
July	July 20	July 25
October	October 20	October 25
Pre-Election	16 days before election	11 days before election
Post-Election	20 days after election	30 days after election
48 Hour/LCR	NA	Within 48 hours of Receipt
Petition Proposal Statements (state)	28 days after filing	35 days after filing

Campaign Statements

Committees disclose its campaign finance activity on campaign statements.

Campaign statements consist of the follow:

- Cover Page
- Summary Page
- Receipts Schedule
- Expense Schedule
- Debts/Obligations
- Fundraisers

Cover & Summary Pages

The Cover Page provides information about the committee including:

- The committee's name
- The committee's ID number
- The committee's address
- Coverage period
- Type of statement, and
- Treasurer information

The Summary Page provides a snapshot of the entire statement including:

- Total contributions and expenditures (calendar year)
- Total cumulative contributions and expenditures (calendar year)
- Balance statement

Receipts Direct and In-Kind

Direct

Money contributed to the campaign by cash or written instrument

- All contributions over \$20.00 must be by written instrument (check, money order, debit, credit)

In-Kind

In-kind contributions are goods, services and facilities donated or loaned to the committee at no cost or at a discount. An in-kind contribution could be a donation of postage stamps, paying off a debt incurred by the committee or donating professional services to the committee.

Prohibited Contributions [MCL 169.254](#) & [Appendix O](#)

MCFA prohibits political party committees from receiving contributions from the following :

- Anonymous
- Cash over \$20.00
- Earmarked
- Foreign Nationals
- Public Body Funds or use of Public Facilities ([Section 57](#))

NOTE – Ballot question committees may not contribute to other committee types **except** Super PACs

Contribution Exemptions [MCL 169.204\(3\)](#)

Committees should track, but do not have to report the following:

- A volunteer's personal services that aren't reimbursed
- A volunteer's travel and lodging up to \$500.00/year
- An individual's donation of food and beverages up to \$1,000.00/year
- A contribution that is returned to the contributor within 30 days.

Loans & Other Receipts

Contribution as a Loan

- A committee may accept loans from legal sources
- They must be reported on the Debts and Obligations schedule

Required Information:

- Date debt was incurred and original amount
- Name and address of person debt is owed to

Other Receipts

Money received by the committee NOT intended to further the nomination or election of the candidate including:

- Bank interest
- Refunds
- Rebates

What Information do I Gather from Contributors?

Required information:

- Name
- Address
- Amount
- Date of receipt

Is the contribution over \$100.00 or the cumulative for that contributor over \$100.00?

If the answer is **YES**, then request the contributor's occupation, employer name and the address of their place of business

What is an Election Cycle? [MCL 169.205](#)

General Election:

Election cycle begins the day following the last general election in which the office appeared on the ballot and ends on the day of the next general election in which the office appears on the ballot

Special Election:

Election cycle begins the day the special general election is called or the date the office becomes vacant (which ever is earlier) and ends on the day of the special general election

Campaign Finance Election Cycle Dates

What is a Campaign?

A campaign gives details about the candidate or issue the committee contributes to

When supporting a candidate the campaign will include:

- Campaign Type
- Office Sought
- Name of the Office
- Name of the Candidate Committee
- Support/Oppose
- District/Jurisdiction # & County
- Population (for local offices)
- Election date
- Election Cycle

When supporting/opposing a ballot issue the campaign will include:

- Ballot proposal name
- County
- Support or oppose

Expenditures – Direct, In-Kind and Independent

Direct Expenditures

- Money spent from the committee account for good and services that tangibly further the nomination or election of the candidate
- Written instrument is required for expenditures over \$50.00
- Receipts must be obtained for each expenditure

In-Kind Expenditures

- Donation of good or services to other committees or charitable organizations
- Items purchases on behalf of another committee (not candidate)

Independent Expenditures

- Made on behalf of a candidate or ballot question
- Made in any amount and do not count towards the contribution limit for candidates

Prohibited Expenditures

- A committee may not make a single expenditure from petty cash that exceeds \$50
- A committee may not make a cash expenditure that exceeds \$50
- A ballot question committee may not make expenditures to, in support of, or in opposition to any of the following:
 - Candidate Committee
 - Political Party Committee
 - Political Committee
 - Independent Committee
 - Or any committee that supports or opposes candidates

What Information do I Gather for Expenses?

Required Information

- Name of payee
- Amount of payment
- Address of payee
- Date of payment
- Purpose (be specific)

Fundraisers

A fundraiser is an event such as a dinner, reception, auction or similar event where contributions are solicited by the purchase of a ticket, donation or purchase of goods or services

- All contributions and expenditures for a fundraising event must be reported in detail on the appropriate schedules
- Joint fundraisers have specific rules that are outlined in [Appendix F](#) of the candidate manual
- Gambling or other activities that require licensing are prohibited at fundraisers

Memo Itemization of Expenditures

A committee that contracts with an agent or an independent contractor to make expenditures on its behalf must disclose the expenditure made to and by the agent or independent contractor – Memo Itemization

- Vendors, consultants, campaign workers
- Credit card payments
- Reimbursements
- Independent Contractors (Appendix L)

Late Filing Fees for Campaign Statements – [Appendix E](#)

January, April, July, and October Statements:

- Late fee of \$25.00/business day – Maximum \$500.00

Pre and Post Election Statements:

- Committees with financial activity **less than** 10k in last 2 years:
 - \$25.00/business day
 - Maximum: \$500.00
- Committees with financial activity **more than** 10k in last 2 years:
 - Days 1-3: \$25.00/business day
 - Days 4-16: \$50.00/business day
 - Maximum: \$1000.00

Late Contribution Reports

A late contribution is a contribution from the same contributor (both Direct and In-Kind) with a cumulative of \$2,500 or more between the 15th and 3rd day before an election. It begins the day after the close of books for the Pre-Election reporting period.

Section 32 of the MCFA requires that late contributions be reported within 48 hours of the date the contribution was received. The contribution is also reported on the Post-Election Statement.

It is very important that contributions both Direct and In-Kind are accurately reported on the Post-Election Statement. If a mistake is made with the date and it appears that it is an unreported Late Contribution, a Late Filing Fee will be assessed. To get the fee waived, proof will have to be shown that the contribution was not received during the Late Contribution Reporting period otherwise the fee will remain owed.

These filings will also be done using MiTN.

Late Contribution Reports Examples

Example 1: A Political Party Committee **does not participate** in an election between 10/20 and 11/1 by making **no** expenditures to support or oppose a candidate or ballot question on the ballot.

- Contributor A gives \$2,000.00 on 10/20: No report is required
- Contributor A gives \$500.00 on 10/21, with a cumulative of \$2,500.00: No report is required
- Contributor A gives \$1,000.00 on 10/22, with a cumulative of \$3,500.00: No report is required

Example 2: A Political Party Committee **participates** in an election between 10/20 – 11/1 by making an expenditure to support or oppose a candidate or ballot question on the ballot.

- Contributor B gives \$2,000.00 on 10/23: No report is required
- Contributor B gives \$500.00 on 10/24, with a cumulative of \$2,500.00: A report is required within 48 hours

Fees for Late Contribution Reports

Late filing fees shall not exceed the lesser of the following:

The Total amount of omitted contributions or \$2,000.00 to be assessed as follows:

- \$25.00/business days 1-3
- \$50.00/business days 3-10
- \$100.00/business days 11-26

Dissolving a Committee MCL 169.224

Committees with an active reporting waiver may file for dissolution using the Single Page Dissolution Statement

Committees without a reporting waiver must file a Dissolution Statement

To be eligible for dissolution a committee must:

- Have no assets
- No outstanding debt
- No outstanding fees or filings owed to the filing official

APPENDIX W Covers dissolution and disposition of unexpended funds

Identification Requirements [MCL 169.247](#) and [Appendix J](#)

- Section 47 of the MCFA requires that all printed matter, radio or television paid advertisement that refers to an election, candidate or ballot question have an identification statement
- Printed matter: “Paid for by (committee name, address)”
- Robo calls: prerecorded messages shall contain name, phone number, address or other contact for person paying for the message
- Mass mailings: Any mailing by U.S. mail or facsimile of 500 or more pieces of identical or similar nature within any 30-day period
- Radio or television: Must identify person sponsoring the ad; as required by the FCC

**EXAMPLE: Paid for by The Committee to Elect Barry Smith, 123 Main St.
Lansing, MI 48918**

Aerial Banners	Ashtrays	Badges & Badge Holders	Balloons
Bingo Chips	Brushes	Bumper Stickers (4"x15" or smaller)	Buttons
Campaign Stickers (3"x1 ½" or smaller)	Candy Wrappers (1 ½"x2 ½" or smaller)	Cigarette Lighters	Cloth Potholders
Clothes Pins	Clothing	Coasters	Combs
Cups	Drinking Glasses	Earrings	Emery Boards
Envelopes	Erasers	Fortune Cookie Messages (1/2"x 2" or smaller)	Frisbees
Glasses	Golf Balls	Golf Tees	Hats
Horns	Ice Scrapers	Jar Lid Grippers (5" or smaller)	Key Rings
Knives	Labels	Lapel Pins/Stickers	Magnifying Glasses
Matchbooks	Nail Clippers	Nail Files	Noisemakers
Paper & Plastic Cups	Paper & Plastic Plates	Paper Weights	Pencils
Pendants	Pennants	Pens	Pinwheels
Plastic Tableware	Pocket Protectors	Potholders	Refrigerator Magnets
Ribbons	Shoehorns	Staple Removers	Sunglasses
Sun Visors	Sweatshirts	Swizzle Sticks	T-shirts
TV Scroll Advertisements	Whistles	Wooden Nickels (Approx size of a 5cent coin)	Wooden Ruler (12" or smaller)
Yo-Yo's			

Notices, Fees and Referrals

Failure to File –

Committees are notified within 4 business days when required filings are not submitted. The Failure to file is referred to AG between the 9th and 12th Business Day following the deadline

Late Fees –

Notify committees when a statement is not filed on time based on the schedules provided under MCFA

- Unpaid fees are referred to the State/County Treasurer for collection
- Fees may be appealed for “good cause”

Error or Omission –

Committees are notified when clarifications or corrections are needed to a Statement. The committee’s lack of response to an Error or Omission is referred to the Attorney General between the 9th and 12th business day following the due date.

Good Cause Waivers [MCL 169.215\(f\)](#)

A person may request a waiver of late filing fees for “Good Cause” as defined below:

- An incapacitating physical illness, hospitalization, accident involvement, death, or incapacitation for medical reasons of a person required to file, a person whose participation is essential to the preparation of the statement or report, or a member of the immediate family of these persons.
- Other unique, unintentional factors beyond the filer's control not stemming from a negligent or a non-action so that a reasonably prudent person would excuse the filing on a temporary basis. These factors include the loss or unavailability of records due to a fire, flood, theft, or similar reason and difficulties related to the transmission of the filing to the filing official, such as exceptionally bad weather or strikes involving transportation systems.

Campaign Finance Complaints [MCL 169.215\(5\)](#)

- **All** complaints alleging violations of MCFA are filed with the SOS
- All complaints **MUST** be submitted using the complaint form available on our website
- Anonymous complaints are not accepted
- All parties will be given written notification regarding the disposition of the complaint
- Questions regarding the complaint process will be directed to the Regulatory section of the Bureau

Declaratory Rulings & Interpretive Statements

Interested parties may request clarification of MCFA by requesting a Declaratory Ruling. The Department would issue a ruling only if the person provided actual statements of fact.

Declaratory rulings are binding on all parties and carry the force of law

If the Department declines to issue a declaratory ruling, they will issue an Interpretive Statement.

The Regulatory section provides responses to requests. Time frames are outlined in any committee manual.

Previous Rulings to date are available on our [web site](#)

Treasurer Responsibilities

As outlined in [MCL 169.222](#):

- The treasurer assumes legal responsibility for the committee
- The treasurer is responsible for keeping accounts, records, bills, receipts and electronic files for 5 years
- Gathering the information for the contribution and authorizing expenditures
- Timely filing
- Responds to Notices of Error or Omission and Late Filing Fee notices

A treasurer or other individual designated as responsible for the committee's record keeping, report preparation, or report filing who knowingly violates this section is subject to a civil fine of not more than \$1,000.00.

Selecting a Treasurer

Important things to consider:

- Availability to perform duties in a timely fashion
- Experience
- Knowledge of MCFA or a willingness to become familiar with the law
- Proficient at recording and tracking financial activity and balancing accounts
- Technical skills: should be able to navigate the internet and have basic knowledge of computer software

Tips for Successful Reporting

- Read the [Ballot Question Committee Manual](#)
- Record and track **ALL** financial activity of the committee, even if the committee has a Reporting Waiver. The law requires you to report the date of receipt. That date is when the treasurer or committee designee receives the contribution.
- Become familiar with [filing materials](#) on our web site
- File on time! Mark your calendars with important dates to remember ([filing deadlines](#)). You can avoid fees by using certified mail when filing on paper.
- Understand Late Contribution Reporting and the penalties for not filing them – [Appendix G](#)
- Keep your SofO information up to date. We send mail and e-mail to the addresses we have on file.
- Candidate/treasurer communication must be optimum to avoid mistakes. Consider entering into a written agreement so that there is a clear understanding of each person's responsibility.
- Pick your committee members (treasurer, record keeper) carefully

Thank you!

MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

Email: CampaignFinance@Michigan.gov

Web Site: www.Michigan.gov/sos/elections/Disclosure/cfr