

To: State Chapter Presidents and Executives, State IFAPAC Chairs and Treasurers, State Government Relations Chairs, State Chapter Lobbyists  
Re: Important Reminders for Filing State IFAPAC Campaign Finance Reports

Dear NAIFA State Chapter Leaders:

NAIFA's state chapter political action committees are a critical part of NAIFA's advocacy program and our PACs' success depends on their proper administration. One key component of PAC administration is the common requirement that state chapters file periodic disclosure reports with the appropriate governmental authority in their state. This message contains important reminders about the filing of such state IFAPAC election/ethics/campaign finance reports.

As you prepare to file your state chapter's IFAPAC election/ethics/campaign finance reports, please remember that the following groups -- NAIFA, IFAPAC, State Share, and NAIFAPAC (national's federal political action committee) -- do not make any contributions to any state's IFAPAC or to any state's administrative fund.

IFAPAC serves only as a "collecting agent" for the purpose of joint fundraising for our federal and state chapter PACs. Contributions to your state chapter's IFAPAC and administrative fund are made only by individual NAIFA members and state or local chapters -- not by IFAPAC, NAIFA or NAIFAPAC or any variation of NAIFA or NAIFAPAC.

Accordingly, the state election/ethics/campaign finance reports you file for your state chapter's IFAPAC should list each contributor's name and the amount contributed by each individual, as well any contribution made by a state or local chapter, if your state requires such disclosure.

Importantly, your state election/ethics/campaign finance reports should not include the total amount of the monthly state share payments sent from NAIFA headquarters to your state chapter because those aggregate amounts are not the required information concerning individual contributors and their individual contributions.

Other reminders and suggestions for the preparation of state IFAPAC election/ethics/campaign finance reports are as follows:

- Do not cite "NAIFA" or "NAIFAPAC" or "NAIFA State Share Fund" or "IFAPAC" as a contributor of either political or administrative dollars on your state reports. As explained above, only list the individual contributors and their individual contributions, as well as any contributions from state or local chapters, if your state requires such disclosure.
- Check with your state's election/ethics committee/bureau for a list of all information required to be reported for each individual contributor and his/her contribution. (You can connect with your state's election agency through the FEC website at <http://www.fec.gov/pubrec/cfsdd/cfsdd.shtml>) or contact IFAPAC staff at [ifapac@naifa.org](mailto:ifapac@naifa.org)
- Check with your state's election/ethics committee/bureau to see if your state PAC is required to register annually or periodically.

- Check with your state's election/ethics committee/bureau to see if your state PAC is required to disclose administrative/corporate funds.
- Check with your state's election/ethics committee/bureau regarding the threshold for reporting itemized and non-itemized receipts.
- Check with your state's election/ethics committee/bureau regarding aggregate totals and contribution limits.
- Consider filing electronic reports, not paper reports, even if paper reports are an option, because electronic filing can be simpler and more efficient.
- NAIFA recommends that you maintain separate bank accounts for administrative and political funds.
- Determine whether or not your state chapter IFAPAC must also file IRS Form 1120-POL (the federal annual income tax return for political organizations), by reviewing the information at <https://www.irs.gov/charities-non-profits/political-organizations>.

If your state chapter needs a complete breakdown of your contributors and their state share amounts, please contact IFAPAC staff at [ifapac@naifa.org](mailto:ifapac@naifa.org) or 703-770-8162. ***Please provide the date range that your report covers, and whether or not you need a listing of both political and administrative amounts.***

Please note that NAIFA cannot give legal advice with regard to state-specific filing requirements, but the general information in this message should be helpful to the preparation of state IFAPAC filings.

Thank you for your attention to this important topic and for your leadership in helping to manage NAIFA's essential IFAPAC program. Best regards, Michael

**Michael E. Gerber**  
*Chief Operating Officer & General Counsel*