

Supporting Candidates at the Office

Looking to host a candidate event this year? There are a few rules you should know about who can be in the room, what they can say and who can pay for what.

There are two main types of fundraising events you can host at your organization's offices: internal events and external events.

Internal events are fundraisers for candidates to which only an organization's solicitable class (i.e., those eligible to give to the PAC) may be invited. These events fall under the internal communications standard. As long as only PAC eligibles are at the event, your company can pay for the costs of the event, which will likely include:

- The cost of the space the event is being held in
- Any cost associated with invitations to the event
- The costs incurred for administrative support to prepare for the event (e.g., setting up the food)
- The price for a *modest* amount of food

In holding these events, there are a few items to consider. First, candidates should attend the event at their own expense. Additionally, the hosting organization should not collect or bundle any of the contributions to the candidate. And all contributions should be given directly to the candidate or their representative, whether before or at the event.

Many candidate fundraising events do not meet the internal communications standard and are considered **external events**. External events are those at which individuals outside of the solicitable class (e.g., other industry PACs and lobbyists) may be invited to attend. In this circumstance, all costs for the event — space, food, administrative support time, invitations and the use of office equipment — must be paid for by a permissible source. Permissible sources include:

- A political action committee, up to its per election limit
The PAC must alert the campaign of the amount of its in-kind contribution for reporting purposes. This in-kind contribution goes against the PAC's per election limit for the candidate. The PAC must also report this in-kind contribution on its own reports.
- Individual(s), up to the individual's per election limit
An individual making an in-kind contribution must alert the campaign of the amount for reporting purposes. This in-kind contribution goes against the individual's per election limit for the candidate.
- A campaign committee

Should the organization pay for any initial expenses, the organization should be reimbursed by one of the above sources in advance of the event.

Not all events with candidates are fundraisers. Organizations are always encouraged to invite legislators to their facilities to meet their employees and show them what they do. Plant tours and site visits are considered constituent, rather than campaign, events, provided there is no discussion of fundraising or political activity. Generally, nonincumbents will not be doing a nonpolitical event so will not fall into this category. If any candidate speaks to your employees about their campaign, any opponents must be granted equal time upon request.

In an effort to always make sure our members are compliant, here are a few **key items to remember**:

- Always avoid the appearance of impropriety and do not host fundraising events — or make PAC contributions — close to votes on legislation important to your organization.
- You cannot coerce or appear to coerce any individuals to support a candidate as a condition of employment.
- Do not put detailed justifications for contributions or events in writing, including email.
- Always seek the opinion of general counsel before hosting any candidate event.

For questions on how to engage with candidates at your facilities this election season, contact Hannah Wesolowski, associate director, political engagement, at 202.787.5969 or hwesolowski@pac.org.