

Including a Notification Letter with the Form 1 - Statement of Organization:

According to the FEC, Political Committees already registered with the FEC must inform their Reports Analysis Division (RAD) analyst(s) their intent to form a separate Non-Contribution Account. If the Political Committee isn't yet registered with the FEC, they must include the notification letter with their reported Form 1 – Statement of Organization.

The notification letter must include the following:

“Consistent with the stipulated judgment in *Carey v. FEC*, this committee intends to establish a separate bank account to deposit and withdraw funds raised in unlimited amounts from individuals, corporations, labor organizations, and/or other political committees. The funds maintained in this separate account will not be used to make contributions, whether direct, in-kind, or via coordinated communications, or coordinated expenditures, to federal candidates or committees.”

Clients can include the notification letter language on the FEC Miscellaneous **Text** section of their **Form 1** or submit a **Form 99** referencing their Form 1 with the appropriate language.

Non-Contribution Account (Carey Committee) Receipts:

According to the FEC, all receipts deposited to the Non-Contribution Account must be reported on **Line 17 – Other Receipts (Form 3X)**.

When regular contribution receipts are assigned to a Non-Contribution Account fund code (Fund Type “U”), Crimson will automatically assign those receipts to **Line SA17** instead of the normal Schedule A lines of **Line SA11(a)**, **SA11(b)**, and **SA11(c)** as well as include the **Memo Text** “Non Contribution Account” for those transactions. In-kinds receipts assigned to a Non Contribution Account Fund Code will still automatically create a corresponding expenditure, but they will be assigned to **Line SB24**.

For questions regarding your Fund Code setup, please email CrimsonSupport@cmdi.com.

Non-Contribution Account (Carey Committee) Disbursements:

According to the FEC, all Independent Expenditures paid from the Non-Contribution Account must be reported on **Line SB24** while all other disbursements paid from the Non-Contribution Account must be reported on **Line SB29 – Other Disbursements (Form 3X)**.

Also, itemized disbursements paid from the Non-Contribution Account should be identified by including the language “Non Contribution Account” in the **FEC Memo Text** and/or **FEC Description** fields. Please note, if you choose to report this language in the Description field, you must still include the required purpose of the disbursement too.

Crimson does not automatically assign the **FEC line number** or include the “Non Contribution Account” language for any disbursements paid from the Non-Contribution Account. Clients must select the correct line numbers as well as enter the **FEC Memo Text** and/or **FEC Description** themselves within the disbursement records in Crimson.