



IBAT
PAC

PAC Procedures Frequently Asked Questions



IBAT
FedPAC

How many PACs does IBAT have?

There are **two** PACs:

IBAT PAC which collects funds for campaign contributions to state candidates for office.

IBAT FedPAC which collects funds for campaign contributions to federal candidates for office. If you or your company provide investment or securities products or services and you or your company are registered with FINRA, the SEC or the Texas State Securities Board as an investment advisor according to [SEC Rule 206\(4\)-5](#), and [FINRA Rule 2030](#) (the "Pay-to-Play Rules") you may only contribute personal funds to the IBAT FedPAC, and other restrictions may apply.

How are funds collected for these two PACs?

Funds for the **IBAT PAC** will be collected through the *Annual PAC Auction, Dream Vacation, Leadership Division Regional Events, and direct contributions*.

Funds for the **IBAT FedPAC** will be collected through *direct mail solicitations and voluntary contributions*.

May I use a corporate check when giving to either of the PACs?

NO!

If I am a sole proprietor, may I use a business check?

YES!

Can my bank or another corporation contribute an item to the PAC Auction?

This can get tricky. Yes, **ONLY** if the auction raises two times the cost of all the items contributed. For example, we have an auction with 5 items and all 5 of those items have been contributed by 5 banks at a total cost of \$1,000. Then the auction has to raise \$3,000 to offset the corporate donations. Otherwise, the PAC has to make up the difference. We try to discourage this practice because we cannot always depend on items going for their list price or higher. However, a bank may contribute funds to offset the cost of the auction itself: food, drink, etc.

Can my bank give directly to the candidates?

NO, unless your bank has its own PAC.

Is there a limit to what I can give to the PACs?

IBAT PAC: NO

IBAT FedPAC: [YES](#). An individual may contribute up to \$5,000 to any one federal trade association PAC per calendar year, \$2,800 per election to a candidate committee, \$10,000 per year in aggregate to state/district/local party committee, \$35,500 per year to a national party committee, and \$106,500 per account per year to additional national party committee accounts.



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Can two or more banks go together and split the cost of an ad on an issue or proposition?

ONLY if the banks register as a PAC.

Why is it important that I sign an Authorization Form for the FedPAC?

[Federal election regulations](#) require that a federal trade association PAC (such as IBAT FedPAC) obtain written approval from its member corporations before solicitation of individuals affiliated with those entities can take place for each year.

Since IBAT is affiliated with the national organization, ICBA, individuals may contribute to both federal PACs subject to limits referenced above.

What activities are associated with “solicitation”?

Solicitation includes communication to the membership through IBAT FedPAC articles in association publications, IBAT FedPAC functions at association and state meetings and direct initiatives.

Does signing a solicitation authorization form commit anyone to contribute?

NO, it simply permits IBAT FedPAC to solicit your employees.

Who has the authority to sign the authorization form?

Federal election regulations require that the request for solicitation authorization be signed by a representative of the bank/company or state affiliate with whom the trade association (IBAT) normally conducts activities. This can be the bank president, office manager, etc.

What if I decide to rescind this authorization in the future?

Simply write a letter stating your decision and we will discontinue solicitation.