



# Solicitation Guidelines & FAQs

## **Thank You for Implementing a Maryland BankPAC Solicitation Campaign!**

The Maryland Bankers Association, founded in 1896, serves as the voice of the Maryland banking industry at the federal, state, and local levels of government. Maryland BankPAC, the Association's political action committee, supports elected officials and candidates whose views and policy goals align with the Maryland banking industry and meets the needs of the customers and communities they serve. Contributions from banks, bank leadership, and eligible bank employees allows Maryland BankPAC to support these lawmakers.

This packet consists of all the information you need to conduct a successful Maryland BankPAC solicitation campaign, including solicitation guidelines and common FAQs. If you have any questions or concerns while implementing a campaign, please reach out to Maryland BankPAC Treasurer [Ann DeVilbiss](#).

### **Prior Authorization Form – Please Complete and Return!**

The Federal Election Commission (FEC) requires the federal PAC of a trade association with corporate members to receive permission from member organizations before their employees are communicated with and solicited for Maryland BankPAC. A senior executive at the bank (who is a main contact between the company and the trade association) must sign the authorization form on behalf of the company. A company may only provide such authorization to one trade association per calendar year. Granting prior authorization to Maryland BankPAC does not preclude employees of the company from contributing to other PACs. The authorization does not obligate you or anyone in your company to contribute and permission may be withdrawn at any time.

*NOTE: If you do not return the Prior Authorization Form, all personal contributions from your bank will go into the Maryland BankPAC state PAC account.*

## Ways to Contribute

Your bank can contribute to Maryland BankPAC in several different ways! Here's each way your bank can contribute:

**Corporate Contributions:** State-chartered commercial banks and state-chartered mutual savings banks, including those not headquartered in Maryland, can make direct corporate contributions to the Maryland BankPAC state PAC account. In the current state election cycle, January 1, 2023 to December 31, 2026, state-chartered banks may make an aggregate corporate contribution of up to \$6,000 (either a one-time contribution or, for example, \$1,500/year each of the four years in this election cycle.) In addition, bank holding companies can also make corporate contributions, provided that the contribution is made from funds other than those resulting from the operation of the bank.

*NOTE: Federally-chartered financial institutions, including national banks and federally chartered thrifts, are prohibited from making corporate contributions to political action committees and to candidates for public office in connection with any U.S. election - federal, state or local.*

**PAC to PAC Contribution:** If your bank already has an established PAC, you can contribute from your PAC to Maryland BankPAC. Please keep in mind that Maryland BankPAC is affiliated with ABA BankPAC, meaning that you can contribute up to \$5,000 in any election cycle. Please reach out to Maryland BankPAC Treasurer [Ann DeVilbiss](#) for additional information.

**Personal Contributions & Payroll Deductions:** Eligible bank employees can contribute to Maryland BankPAC via personal contributions and payroll deductions. Maryland BankPAC's Solicitation Guidelines below walk you through what you need to know about raising money from your employees to support Maryland's banking industry.

## Maryland BankPAC Solicitation Guidelines

Please read over these guidelines carefully before beginning your solicitation campaign. If you have chosen a group or department volunteers to assist with the campaign, please be sure they understand these rules before beginning solicitations. As a reminder, all contributions to Maryland BankPAC are **VOLUNTARY**. No form of coercion should be used to obtain a contribution.

**Solicitable Class:** You may solicit Maryland BankPAC contributions from the following classes of bank employees:

- exempt executive and administrative personnel, paid on a salary, who have policy-making, managerial, professional, or supervisory responsibilities;

- board Members and stockholders if they have a vested beneficial interest in the stock, power to direct how the stock will be voted (if a voting stock), and the right to receive dividends
- in limited cases – other employees if they 1) participate in the corporation's employee stock ownership plan, 2) have a vested beneficial interest in the stock, 3) have the power to direct how the stock will be voted (if it is a voting stock) and 4) have the right to receive dividends; and
- family members of the above.

**Non-Solicitable Class:** You may NOT solicit Maryland BankPAC contributions from the following classes of bank employees:

- Hourly wage employees;
- Professionals represented by labor organizations;
- Salaried foremen and others who supervise hourly employees; and
- Former or retired personnel who are not stockholders.

Here are some additional guidelines to consider:

- 1) The bank or corporation is not allowed to reimburse employees for their contributions.
- 2) Maryland BankPAC contribution guidelines are for suggestion purposes only. Individuals are free to contribute more or less than the suggested amounts.
- 3) Campaign contributions are **NOT** tax deductible.
- 4) The purpose of Maryland BankPAC is to use contributions in connection with federal, state and local elections. Contributions are subject to the prohibitions and limitations of the Federal Election Act and the State of Maryland Candidacy & Campaign Finance Laws. Contributions will be used to support federal, state and local candidates.
- 5) Federal and State laws require Maryland BankPAC to use its best efforts to collect and report the name, mailing address, occupation and employer of individuals whose federal contributions exceed \$200 in a calendar year and state contributions of any amount.

## **Maryland BankPAC Campaign Kickoff Tips**

The following are a few examples of how you can kick off a fundraising campaign within your organization. Certainly, there are other ideas that you may have to enhance the effectiveness of your kickoff, so please feel free to be creative. If you have any ideas that your institution does that are creative and effective, please contact the MBA's Lynn Mitchell to have your idea included in next year's Campaign Kickoff Tips.

### **❖ ASK!**

The number one reason people say they have not contributed is that they have not been asked to do so! One of the easiest ways to get the word out is to send an email to eligible employees.

### **❖ HOST A KICKOFF EVENT**

Host a continental breakfast or lunch event – give background about the importance of Maryland BankPAC and what its role is. MBA is happy to join these events and talk about the importance of contributing.

### **❖ OUTLINE THE CAMPAIGN**

Set a time frame to run the campaign. For example, have the campaign run for three weeks and have a weekly goal to accomplish. Publicize the status to your employees.

### **❖ HAVE KEY STAFF ATTEND THE EVENT**

Be sure to have members of the senior staff attend the event and make comments if appropriate. Usually just their attendance sends an important signal to other employees about the importance of Maryland BankPAC and the staff drive.

### **❖ ASSIGN CAPTAINS FOR THE CAMPAIGN**

Assign team captains for each area who will be responsible for collecting the contributions and sending them to you. It is also important to meet with these captains prior to the kickoff to let them know their role. You will have to provide them with a list of the employees that they can collect from. This also enables you to track the contributions as they come in. At the conclusion of the campaign, be sure to thank them for their efforts and possibly host a thank you luncheon for the captains.

# **Maryland BankPAC FAQs**

Here are responses to some frequently asked questions that will help you run an effective Maryland BankPAC solicitation campaign:

## **How much should an individual give to Maryland BankPAC?**

Suggested contribution levels have been established based on annual income:

<b><u>Annual Salary</u></b>	<b><u>Suggested Yearly Maryland BankPAC Contribution</u></b>
\$20,000 - \$40,000	\$50
\$40,000 - \$60,000	\$75
\$60,000 - \$80,000	\$100
\$80,000 - \$100,000	\$150
\$100,000+	\$250
Board of Directors & Bank Leadership	\$250 or more

Contribution guidelines are only suggestions. Individuals are free to give more or less than the suggested amounts and will not be favored or disadvantaged based on the amount of their contribution or decision not to contribute.

## **Are political contributions tax deductible?**

No. Contributions to MD BankPAC are not tax deductible.

## **How does Maryland BankPAC's affiliation with ABA BankPAC work?**

Maryland BankPAC and ABA BankPAC are "linked" by the Federal Election Commission, meaning both are subject to the campaign limits for any one PAC. We coordinate closely with ABA and provide input on how contributions are used to support members of the Maryland congressional delegation.

Every federal election cycle, ABA develops a "Fair Share" goal for every state. This goal is based on level of engagement, leadership position, and feedback from MBA. Funds put into the Maryland BankPAC federal PAC account are transferred to ABA BankPAC, and they contribute directly to members of Congress.

### **How does Maryland BankPAC select contribution recipients?**

Elected officials and candidates receive contributions from Maryland BankPAC based on leadership position, committee assignment, and influence on banking-related legislation. The President & CEO must approve these recommendations for checks to be sent.

### **Why should bankers give to Maryland BankPAC when they can contribute directly to elected officials and candidates?**

Engagement in the political process and supporting an individual's preferred elected official or candidate is encouraged. However, Maryland BankPAC has the impact of representing the entire industry. Support from Maryland BankPAC displays a unified voice, the same as with other aspects of our advocacy efforts. By combining resources, we can better influence policy outcomes.