

CAMPAIGN FINANCE HANDBOOK

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OFFICE OF THE CLERK AND RECORDER | HON. PAUL D. LÓPEZ
CITY AND COUNTY OF DENVER

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Office of the Clerk and Recorder

City and County of Denver

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Chapter 1: Introduction

What is the Office of the Clerk and Recorder and what is its function?

The elected clerk and recorder is a nonpartisan elected position established by the charter of the City and County of Denver. The clerk and recorder serves a four-year term and is responsible for the oversight of the Office of the Clerk and Recorder, an independent agency within the City and County of Denver.

In this role, the clerk and recorder oversees the Denver Elections Division. The Denver Elections Division administers all Denver elections and voter registration. The Office of the Clerk and Recorder also compiles campaign finance reports for municipal elections, lobbying reports, and gift disclosures for Denver's elected officials.

In addition to administering elections, the Office of the Clerk and Recorder issues marriage licenses, records land transactions, administers foreclosures, and maintains public records.

Who is this guide for and how can I use it?

This guide is intended for use by candidates, committee chairs, committee treasurers, campaign managers, compliance staff, and others involved in Denver municipal elections. This guide covers running for the offices of mayor, clerk and recorder, auditor, city council at-large, and city council district. The handbook provides answers to common questions and provides information on Denver's campaign finance ordinances.

This guide is not a substitute for legal advice and cannot cover every aspect of Denver's Elections Rules or the Denver Municipal Code.

Committees should review [Denver Municipal Code, Chapter 15](#) and the Office of the Clerk and Recorder [Election Rules](#) in their entirety.

Committees with questions are encouraged to contact the Office of the Clerk and Recorder. Campaign finance trainings are available for committee staff and treasurers. These trainings will be provided during set times in person or online to suit the needs of each committee.

I want to run for the Denver Board of Education. Can I use this guide?

No. Candidates for the Denver Board of Education are subject to regulation by the Colorado Secretary of State. Candidates interested in running for Board of Education or state office should consult the [Colorado Secretary of State](#) to learn about applicable campaign finance laws.

What is SearchLight Denver?

The Office of the Clerk and Recorder maintains the SearchLight Denver campaign finance database as a part of its role in elections administration. [SearchLight Denver](#) is a key component of the Office of the Clerk and Recorder's effort to promote accountable, transparent, and ethical government. Using this tool, the public can easily understand how campaign dollars are raised and spent. Any member of the public may search campaign finance reports. A user guide to SearchLight Denver is found on the Office of the Clerk and Recorder [campaign finance webpage](#).

SearchLight Denver was launched in 2022 to support the requirements of the voter-approved Fair Elections Fund. The system promotes greater public transparency by helping the public easily understand who is donating and receiving money on behalf of all types of political campaigns.

How will I use SearchLight Denver?

For candidates and committees, SearchLight Denver serves as the portal through which all campaign finance reports are filed. All candidate committees, issue committees, political action committees, small donor committees, and independent expenditures participating in Denver municipal elections are required to file information with the Denver Elections Division and open an account with SearchLight Denver. Once a committee is formed, the committee must electronically file regularly scheduled campaign finance reports documenting contributions made to the committee and expenditures spent by the committee.

SearchLight Denver serves as the online portal for the submission of all required campaign finance reports. **All reporting must be done electronically, and no paper filings will be accepted.** Once filed, campaign finance reports are automatically posted for public view online. Committees are responsible for providing accurate and complete information to the office.

What is an election cycle?

For candidate committees, an election cycle represents the time between when a candidate may create a candidate committee until the end of the year in which an election is held. For example, the election cycle for the Denver municipal elections scheduled for 2027 began January 1, 2024, when candidates could file for election. The election cycle will end December 31, 2027.

For issue committees, the election cycle is the calendar year in which the issue or question is on the ballot. For example, the election cycle for ballot propositions that Denver residents will consider in November 2025 started January 1, 2025, and will conclude December 31, 2025.

Election Cycle	Start Date	Ending Date	Election Date
2025 General Election <i>Includes local and state ballot issues and school board candidates</i>	<i>January 1, 2025</i>	<i>December 31, 2025</i>	<i>November 4, 2025</i>
2027 Municipal Election <i>Includes for Mayor, Auditor, Clerk and Recorder, City Council At-Large, City Council District, and local ballot issues</i>	<i>January 1, 2024</i>	<i>December 31, 2027</i>	<i>April 6, 2027 Runoff Election (if needed) June 1, 2027</i>

What is the Denver Fair Elections Fund?

Denver voters approved the Fair Elections Fund Act in November 2018. The act established the Fair Elections Fund to empower small donors and limit the influence of large campaign contributors on municipal elections.

Candidates who choose to participate in the Fair Elections Fund must abide by a lower maximum contribution limit and are prohibited from accepting contributions from political action committees. They may only accept contributions from individuals and small donor committees.

After a candidate qualifies for funding from the Fair Elections Fund, the fund will match donations from Denver residents nine to one (9:1) up to \$50 per donor. If a Denver resident donates the full \$50 to a qualified candidate, the campaign will receive \$450 in matching funds for the donation.

The Fair Elections Fund is funded by an annual transfer from the City and County General Fund of \$3.43 for each Denver resident. The fund balance may not exceed \$9.5 million dollars.

I want to run as a Fair Elections Fund candidate. What do I need to know before I begin?

Candidates may voluntarily choose to participate in the Fair Elections Fund when running for office. Issue committees, political action committees, small donor committees, and independent expenditure filers may not participate in the Fair Elections Fund.

Before choosing to participate in the Fair Elections Fund, candidates should understand the requirements of the program, outlined in detail in [Chapter 6](#). Candidates who participate must undergo more stringent compliance requirements in the Campaign Finance Database, including an audit of all expenditures made using taxpayer funds.

In choosing to accept public money, a candidate must accept a lower contribution limit and must abide by the rules of the Fair Elections Fund program, as outlined in [Chapter 6](#). Candidates who violate the rules of the Fair Elections Fund risk expulsion from the program and civil penalties and may be required to repay any funds received.

Hiring a bookkeeper, accountant, or a professional compliance firm is strongly recommended for participating candidates to ensure compliance with program requirements.

Do I have to participate in the Denver Fair Elections Fund?

No, participation in the Fair Elections Fund is optional. Candidates who choose not to participate in the fund have higher contribution limits, outlined in [Chapter 4](#).

I have additional questions on campaign finance issues. Who do I contact?

The Office of the Clerk and Recorder's campaign finance unit is available to assist candidates and committees during normal city business hours from 8 a.m. to 5 p.m., Monday through Friday. The campaign finance unit is not available outside of business hours or on city holidays. The campaign finance unit can be reached at campaignfinance@denvergov.org.

The Office of the Clerk and Recorder cannot and will not provide legal advice.

In addition to fielding inquiries, the campaign finance unit offers training to committees. For Fair Elections Fund Candidates, attendance is required. For non-Fair Elections Fund candidates and non-candidate committees, trainings are optional but strongly encouraged. Please contact campaignfinance@denvergov.org for information on upcoming trainings.

Chapter 2: Candidate Committees

Becoming a Candidate for Municipal Office in Denver

Qualifications and Residency Requirements

Before opening a committee, candidates for office in the City and County of Denver must ensure they meet the qualifications and residency requirements to run for municipal office. Requirements to run can be found online at the [Elections Division's Ballot Access site](#).

For all municipal offices, candidates must be citizens of the United States and qualified electors in the City and County of Denver. Candidates for the office of mayor must be at least 30 years old on the date of the election, and candidates for all other offices must be at least 25 years old.

A candidate must be a resident of the City and County of Denver for the two years immediately before the election. Candidates running in a district city council seat must reside in the district they seek to represent in the year preceding the election.

For the 2027 municipal election, candidates must establish residency in Denver no later than April 6, 2025, and candidates for a city council district must reside in the district they seek to represent no later than by April 6, 2026.

Becoming a Candidate for Municipal Office in Denver

According to [Denver Municipal Code](#), a person becomes a candidate when one of the following occurs:

- A person publicly announces that they will seek office or seek reelection to their current office and the person has received contributions, in-kind contributions, or made campaign expenditures that aggregate to \$500 or more in the current election cycle.
- The person files nominating petitions.

Contributions and in-kind contributions received, and expenditures made prior to becoming a candidate must be reported on the first campaign finance report filed by the candidate.

Within 10 days of fulfilling one of those requirements and becoming a candidate, a candidate must file the following documentation with the Office of the Clerk and Recorder:

1. Candidate Affidavit
2. Treasurer Affidavit

3. Financial Disclosure Statement
4. Statement of Committee Organization (filed by SearchLight Registration)

Fillable PDFs of the candidate affidavit, treasurer affidavit, and financial disclosure statement can be found online at the [Ballot Access](#) site. The affidavits must be signed (with a wet signature). The documents can be emailed to campaignfinance@denvergov.org or delivered to the Denver Elections Division at 200 W. 14th Ave. Once received, candidate documents will be posted online at the Denver Election Division [candidate tracker](#).

Candidate Affidavit

Within 10 days of becoming a candidate, a candidate must file a candidate affidavit. A candidate must list the office sought and affirm that they are familiar with Denver Campaign Finance Code.

A candidate must affirm that they understand committees must file regular campaign finance reports, that committees who fail to file timely reports will be fined up to \$500 per violation, and that the committee must continue to file campaign finance reports until all funds are expended and no debt remains.

On the affidavit, the candidate must provide their residential address, a phone number, and an email address. The affidavit must be signed by the candidate, but there is no longer a notary requirement.

If a candidate wishes to change the office they are seeking, moves during the course of an election, or wishes to provide an updated affidavit with new contact information, they may submit a new affidavit at any time.

Treasurer Affidavit

Within 10 days of a becoming a candidate, the committee must a treasurer affidavit.

The treasurer affidavit must be filed even if the candidate is serving as treasurer of his or her own committee.

The treasurer must affirm that they understand committees must file regular campaign finance reports, that committees who fail to file timely reports will be fined up to \$500 per violation, and that the committee must continue to file campaign finance reports until all funds are expended and no debt remains.

On the affidavit, the treasurer must provide a mailing address, a phone number, and an email address. The affidavit must be signed by the treasurer, but there is no longer a notary requirement.

There is no residency requirement for a treasurer. A treasurer for a Denver committee may live outside the City and County or outside the state as long as they are able to fulfill the obligations of a committee treasurer.

If a committee treasurer resigns or a new treasurer is appointed, a new treasurer affidavit must be filed within 10 days.

Finance Disclosure Statement

All candidates, including incumbents seeking reelection, must file a financial disclosure statement within 10 days of becoming a candidate.

The requirements for the financial disclosure form are found in D.R.M.C. 2-52, 2-71, 2-72, 15-32, and 15-33. Candidates must disclose the required information, including employer, creditors owed more than \$5,000, and other information listed on the financial disclosure form. required by code business ownership, security interest, sources of income, employers,

The reporting year is the year immediately prior to the form's submission. No actual dollar amounts need to be listed. All real estate property must be listed, with an exception for home addresses. All fields should be filled in; a candidate may answer "None" where appropriate.

Candidates must also disclose the information below for any financial interest of an immediate family member which is held jointly, derived from the income or assets of the candidate, or may be materially affected by direct official action by the candidate as defined in section D.R.M.C. 2-52 (b). Candidates must list the name(s) of the person(s) holding the financial interest. Immediate family member is defined in D.R.M.C. Article 4, Section 2-52 (c).

Statement of Organization and SearchLight Denver Registration


Within 10 days of becoming a candidate, the committee must file a statement of organization, which is completed by registering the committee in SearchLight Denver. Navigate to <https://denver.maplight.com/public> and click the "Log in" button, which will bring down the "Register" button.

In the SearchLight Denver registration, the committee provides the name and address of the committee and the name of the candidate. It must also provide the name, address, and phone number of the committee treasurer. If the committee has not appointed a treasurer, then the candidate serves as the treasurer for the committee.

The registration asks for the committee’s website and an alternate contact email. If no website or alternate email exists, those fields may be left blank. If the committee has opened a bank account, the financial institution where the account is held must be listed on the SearchLight registration. If a committee files paperwork before opening a bank account, this may be left blank. When a bank account is opened, the committee must update its registration with the name of the financial institution.

Upon submission of the SearchLight registration, the committee meets the requirements of the statement of organization.

A candidate committee is authorized to collect contributions, receive contributions in-kind, and make expenditures on behalf of a candidate. A candidate may only have one candidate committee and is prohibited from having more than one candidate committee.



Candidate Checklist

- Meet qualification and residency requirements
- File candidate affidavit
- File treasurer affidavit
- File financial disclosure statement
- Register the committee in SearchLight Denver (fulfills the statement of organization requirement)
- If participating in the Fair Elections Fund, submit the intent to qualify (more information in [Chapter 6](#))
- Contact Elections Division for information on petition collection

Candidate Committee Reporting Requirements

Candidate committees must report contributions received and expenditures made. More detail on contributions and expenditures are found in [Chapter 4](#) and [Chapter 5](#).

All campaign finance reports must be filed online through [SearchLight Denver](#), where the reporting calendar is also posted. A PDF version is available under '[User Resources](#)' on the Clerk and Recorder's website.

For the first two years of the election cycle, 2024 and 2025, candidates file semiannual reports. In 2026 candidate file quarterly reports. In the election year 2027, more frequent reporting is required. Refer to the posted calendar for the most up-to-date information.

If a campaign finance deadline falls on a weekend or city holiday, then the deadline is moved to the next business day. In the case of any technical problem or system outage, the campaign finance deadline will be extended.

Major Contribution Reports

In addition to the scheduled campaign finance report deadlines, candidate committees must report any contribution of \$1,000 or more received in the days leading up to the election. Starting the Thursday before the election through the Monday before the election, all major contributions of \$1,000 or more must be reported with 24 hours of receipt. These reports must be filed within 24 hours regardless of whether the deadline falls on a weekend or city holiday.

If a committee receives a contribution of \$1,000 on the Monday before the election, it must be submitted by the end of Election Day. Any contributions received on Election Day or after the election will be reported on the post-election report, and no major contribution report needs to be filed.

Closing Your Committee

After an election, a candidate may choose to close his or her committee or leave it open. If the candidate wins their election, they may use the existing committee for a re-election campaign.

Candidate committees must expend all unexpended campaign contributions no later than four years after the election for a candidate or four years after the end of the term of office if the candidate is elected to public office, whichever is later.

To close a committee, the committee must report a zero-dollar balance and no outstanding debt. After a zero-dollar balance is reported, committees can be terminated through SearchLight Denver.

Unspent Campaign Funds

Before a committee can close and end its reporting requirements, all loans or unpaid obligations must be paid or forgiven. Any remaining funds must then be expended according to limitations set in [Denver Municipal Code](#). Candidate committees have several choices for how to spend unused campaign funds, and candidates who are elected to public office are given additional options.

Permitted Uses for Unexpended Campaign Funds: Candidate Committees

- Returned to the contributors
- Donated to a 501(c)(3) charitable organization recognized by the Internal Revenue Service
- Contributed to a candidate committee for another candidate for elected office in the city (up to the individual limit for the elected office), who is not participating in the Fair Elections Fund
- Contributed to any issue committee organized to support or oppose any city or state ballot question or ballot issue, or any ballot issue or ballot question proposed by any other local government that includes territory within the city
- Retained by the committee for use by the candidate in a subsequent campaign for elected office in the city up to four years

Additional Permitted Uses for Unexpended Campaign Funds for Officeholders

Candidates who are elected to a public office are given additional options for spending unused campaign funds. These options allow officeholders to spend money on constituent communication, official travel, and other options:

- Voter Registration
- Political education, which includes obtaining information from or providing information to the electorate
- To defray reasonable and necessary expenses related to mailings and similar communications to constituents
- Any expenses that are directly related to the person's official duties as an elected official, including, but not limited to:
 - Expenses for the purchase or lease of office equipment and supplies,
 - Room rental for public meetings
 - Necessary travel and lodging expenses for legislative education such as seminars, conferences, and meetings on legislative issues
 - Telecommunication expenses

Unused campaign funds may not be spent on personal expenses not reasonably related to influencing an election. Candidate committee funds may not be used on any expenditures unrelated to supporting the election of the candidate who designated the committee, except for those outlined above.



Important:

Candidates who participate in the Fair Elections Fund have limitations on unspent FEF funds, as outlined in [Chapter 6](#).

Once all unspent funds have been legally expended, committees can close through SearchLight Denver. Committees with concerns or questions about expending unused funds or closing should reach out to campaignfinance@denvergov.org.

In addition to the options named here for expending unspent funds, a candidate may transfer funds between committees if the candidate decides to run for a different elected office. For more information on committee transfers, see [Transferring Money Between Committees](#).

Chapter 3: Non-Candidate Committees

There are three types of non-candidate committees in Denver: political action committees, small donor committees, and issue committees. Each committee has its own purpose and compliance rules.

Which type of committee should I open?

The below table provides an overview of the purpose of each committee.

Committee Type	Purpose
Political Action Committee (PAC)	Collect donations for the purpose of making contributions to candidate, issue, and political action committees. May not contribute to Fair Elections Fund candidates
Small Donor Committee (SDC)	Collect donations of up to \$50 from individuals for the purpose of making contributions to issue committees and candidates, including Fair Elections Fund candidates
Issue Committees	Advocate for or against the passage of a ballot measure, or fund signature gathering efforts to put a measure on the ballot

For questions about what committee type is appropriate for a given situation, contact the Office of the Clerk and Recorder at campaignfinance@denvergov.org. If legal guidance is needed, contact a private attorney.

Opening and Closing a Non-Candidate Committee

All non-candidate committees require the same documentation to open a committee: a treasurer affidavit and registration in SearchLight Denver, which fulfill the statement or organization requirement.

Treasurer Affidavit

The treasurer must affirm that they understand committees must file regular campaign finance reports, that committees who fail to file timely reports will be fined up to \$500 per violation, and that the committee must continue to file campaign finance reports until all funds are expended and no debt remains.

On the affidavit, the treasurer must provide a mailing address, a phone number, and an email address. The affidavit must be signed by the treasurer, but there is no longer a notary requirement.

There is no residency requirement for a treasurer. A treasurer for a Denver committee may live outside the City and County or outside the state as long as they are able to fulfill the obligations of a committee treasurer.

If a committee treasurer resigns or a new treasurer is appointed, a new treasurer affidavit must be filed within 10 days.

Statement of Organization and SearchLight Denver Registration

Within 10 days of becoming a candidate, the committee must file a statement of organization, which is completed by registering the committee in SearchLight Denver. Navigate to <https://denver.maplight.com/public> and click the “Log in” button, which will bring down the “Register” button.

In the SearchLight Denver registration, the committee will provide the name and address of the committee. It must also include the name, address, and phone number of the committee treasurer. The registration will also ask for the committee’s website and an alternate contact email. If no website or alternate email exist, those items may be left blank. If the committee has opened a bank account, the financial institution where the account is held must be listed on the SearchLight registration. If a committee files paperwork before opening a bank account, this may be left blank. When a bank account is opened, the committee must update its registration with the name of the financial institution.

Any new committee must open a separate bank account for the committee’s business to ensure proper segregation of funds and proper documentation of committee contributions and expenditures. The bank account name should include the name of the committee. It must not be comingled with any personal funds or used by any entity other than the committee.

Upon submission of the SearchLight registration, the committee will meet the requirements of the statement of organization.

Closing a Non-Candidate Committee

To close a non-candidate committee, the committee must report a zero-dollar balance. All loans or unpaid obligations must be paid or forgiven. After a zero-dollar balance is reported, committees can terminate online through SearchLight Denver. Legal methods of dispensing unspent campaign funds for issues committees can be found in the [Issue Committee Unspent Campaign Funds](#) section.

Small donor committees and political action committees may stay open in perpetuity. However, as long as they are open, they must file all legally required campaign finance reports.

Campaigns with concerns or questions about expending unused funds or closing committees should reach out to campaignfinance@denvergov.org for support.

Political Action Committees (PACs)

A PAC is a committee, club, association, local political party, or other group of persons not authorized by a candidate and formed for the major purpose of making contributions to candidate, issue, or political committees. If the committee raises \$500 or more during an election cycle or makes expenditures totaling \$500 or more, it must register with the Office of the Clerk and Recorder.

A committee that solicits contributions, deposits the contributions into their own bank account, and then distributes the contributions to candidate, issue or political committees must register as a PAC.

However, PACs do not include groups that solicit individual donations directly for a candidate without depositing the contributions in their own bank account.

How PACs can Raise and Spend Money

PACs have no restriction on who may give or how much they can accept. Individuals, LLCs, labor organizations, business associations, and other organizations may give contributions without restriction.

PACs may contribute directly to non-Fair Elections Fund candidates if they do not exceed the contribution limit for the candidate.

PACs are prohibited from contributing to a Fair Elections Fund candidate.

PACs are also prohibited from making any expenditure for private purposes not reasonably related to influencing an election.

Example 1:

Neighborhoods for Denver is a group of likeminded Denver residents. They invite John Denver for Mayor to attend one of their meetings. At the meeting, the President of Neighborhoods for Denver asks every member in attendance to contribute to the John Denver for Mayor candidate committee. Many members write checks and contribute online to John Denver for Mayor at the meeting.

Neighborhoods for Denver does not have to register as a political action committee because they do not deposit the contributions in their own account. They may ask their members to contribute freely if they do not deposit the contributions into their own account.

Example 2:

Denverites for Clean Water is a group of likeminded Denver residents. They decide as a group to support John Denver for Mayor. 50 members of the group each contribute \$10 to Denverites to Clean Water. Then, Denverites for Clean Water writes a \$500 to John Denver for Mayor.

Denverites for Clean Water must register as a political action committee. They have made an expenditure of \$500 in an election cycle and collected money directly from members into their bank account.

PAC Reporting Requirements

Political action committees must file campaign finance reports on the same schedule as candidates. All campaign finance reports are filed online using SearchLight Denver. The calendar for campaign finance reports is posted on [SearchLight Denver](#). In addition, a PDF version of the calendar is available on the Office of the Clerk and Recorder [campaign finance webpage](#) under “User Resources.”

In addition to the scheduled campaign finance report deadlines, PACs must report any contribution of \$1,000 or more received in the days leading up to the election. Starting the Thursday before the election through the Monday before the election, all major contributions of \$1,000 or more must be reported with 24 hours of receipt. These reports must be filed within 24 hours regardless of whether the deadline falls on a weekend or city holiday.

If a committee receives a contribution of \$1,000 on the Monday before the election, it must be submitted by the end of Election Day. Any contributions received on Election Day or after the election will be reported on the post-election report, and no major contribution report needs to be filed.

Small Donor Committees (SDCs)

SDCs serve a similar function to PACs with additional restrictions. SDCs may collect contributions from individuals **only**, and may only accept up to \$50 per year, per individual.

SDCs are prohibited from taking money from non-individuals, including LLCs and other political committees. They are prohibited from accepting any donation larger than \$50 or collecting more than \$50 for any one individual in a calendar year.

Corporations and labor organizations may establish SDCs, and their members can contribute. However, corporations and labor organizations cannot directly contribute to SDCs and money contributed to an SDC cannot be given back to a corporation or labor organization for general use.

SDCs established by substantially the same group of individuals will be treated as a single committee subject to contribution limits.

Unlike PACs, SDCs may contribute to Fair Elections Fund candidates. A Fair Elections Fund candidate can accept a contribution from an SDC up to 10 times the amount of the individual donation limit. SDCs have no limits on contributions to non-FEF candidates.

Office Sought	Individual Contribution Limit for FEF Candidates	SDC Contribution Limit for FEF Candidates	Individual Contribution Limit for Non-FEF Candidates	SDC Contribution Limit for Non-FEF Candidates
Mayor	\$595	\$5,950	\$1,190	\$11,900
City Council At-Large, Auditor, Clerk and Recorder	\$415	\$4,150	\$835	\$8,350
City Council District	\$235	\$2,350	\$475	\$4,750t

SDC Reporting Requirements

Small donor committees must file campaign finance reports on the same schedule as candidates and political action committees. All campaign finance reports are filed online using SearchLight Denver. The calendar for campaign finance reports is also posted on [SearchLight Denver](#). In addition, a PDF version of the calendar is available on the Office of the Clerk and Recorder [campaign finance webpage](#) under “User Resources.”

Issue Committees

Issue committees are formed for the purpose of supporting or opposing a ballot issue or ballot questions. Any committee, club, association, corporation, or other group of persons that receives contributions or contributions in-kind aggregating \$500 or more during an election cycle and makes expenditures aggregating \$500 or more during an election cycle for the purpose of supporting or opposing a ballot issue or question must register with the Office of the Clerk and Recorder.

Proponents of an initiative, referendum, or recall petition must register as an issue committee within ten calendar days of their petition's approval. An issue committee may advocate for or against one or more ballot issues or committees. Issue committees do not include political parties, political committees, or candidate committees as otherwise defined in this manual.

How Issue Committees Can Raise and Spend Money

Issue committees have no restriction on who may give or how much they may give. Individuals, LLCs, labor organizations, business associations, and other organizations may give contributions without restriction.

Issue committees may make expenditures to support or oppose ballot measures or ballot questions. They may choose to support or oppose multiple measures or questions. They are prohibited from using any contribution for private purposes not reasonably related to influencing an election.

Issue Committee Reporting Requirements

Once an issue committee is created, it must file monthly reports until the issue is voted on. In addition, an issue committee must file a pre-election report, a post-election report, and a year-end report.

All campaign finance reports are filed online using SearchLight Denver. The calendar for campaign finance reports is also posted on [SearchLight Denver](#). In addition, a PDF version of the calendar is available on the Office of the Clerk and Recorder [campaign finance webpage](#) under "User Resources."

In addition to the scheduled campaign finance report deadlines, issue committees must report any contribution of \$1,000 or more received in the days leading up to the election. Starting the Thursday before the election through the Monday before the election, all major contributions of \$1,000 or more must be reported with 24 hours of receipt. These reports must be filed within 24 hours regardless of whether the deadline falls on a weekend or city holiday.

If a committee receives a contribution of \$1,000 on the Monday before the election, it must be submitted by the end of Election Day. Any contributions received on Election Day or after the election will be reported on the post-election report, and no major contribution report needs to be filed.

If an issue committee fails to collect enough signatures to put an issue on the ballot, it must file all required reports until it is closed. After an election, an issue committee may also stay open and rededicate itself to advocate for or against another ballot issue or ballot question.

Issue committees that do not rededicate themselves to another ballot issue or question should close their committees by the end of an election cycle pursuant Election Rule 3.2.5. As with all committees, an issue committee must report no debt and a zero-dollar balance before closing.

Issue Committee Unspent Campaign Funds

Any remaining funds held by an issue committee after an election must then be expended according to limitations set in [Denver Municipal Code](#). Issue committees may return unspent campaign funds to contributors or donate the funds to any 501(c)(3) charitable organization recognized by the I.R.S.

Chapter 4: Raising Money

Contribution Basics

Candidates and committees may accept contributions by check, online credit card payment, money order, or cash. Cash donations of over \$50 may not be accepted. If a cash donation of over \$50 is received, the amount over \$50 must be remitted to the Office of the Clerk and Recorder within 72 hours. Contributions in cryptocurrency are prohibited and may not be accepted.



Important:

Donations to Fair Elections Fund candidates are subject to additional information requirements as outlined in [Chapter 6](#).

When a committee solicits or accepts contributions, it must collect the name and address of each contributor. For contributors who make an aggregate of \$50 or more in donations over the course of a calendar year, the occupation and employer of the contributor must be collected and reported.

It is strongly recommended that committees use a donation form to collect this information at the time of the contribution. The form may be a physical form or information collected during an online donation. A committee should only use an online donation platform that allows candidates to collect the required information. A sample donation form is found below.

Sample Donation Form for Non-Fair Elections Fund Candidate

Full Name:	_____	Date:	_____
Amount of Donation:	_____		
Home Address:	_____		
City:	_____	State:	_____
	_____	Zip:	_____
Telephone:	_____		
Occupation:	_____	Employer:	_____

Paid for by [Committee Name]

Although contributors who donate less than \$50 in a year are not required to disclose their employer and occupation, the Office of the Clerk and Recorder recommends that all committees collect and disclose this information. That way, if a donor makes an additional contribution that puts him or her over the \$50 aggregate limit, the campaign has all the information necessary to file their legally required reports.

Candidate Contribution Limits

Candidates running for Denver office must abide by contribution limits. Candidates who choose to participate in the Fair Elections Fund have lower limits than candidates who do not participate. More detail on the Fair Elections Fund is found in [Chapter 6](#).

Office Sought	Contribution Limit	Participating in Fair Elections Fund Limit
Mayor	\$1,190	\$595
City Council At-Large	\$835	\$415
Clerk and Recorder	\$835	\$415
Auditor	\$835	\$415
City Council District	\$475	\$235

In-Kind Contributions

Contributions may be made in one of two ways: as a monetary contribution or an in-kind contribution. An in-kind contribution is any non-monetary donation made to a committee for the purpose of influencing an election.

For example, if a supporter of a candidate donates a computer to the candidate for use by the campaign, that is an in-kind contribution that must be reported. When reporting an in-kind contribution, a reasonable estimate of fair market value must be used. In-kind contributions are subject to the same value limits as monetary contributions. A candidate may not accept in-kind donations with a fair market value over the contribution limit. The contribution limit for monetary and in-kind donations aggregate, meaning together they may not exceed the contribution limit.

Example:

Molly Brown, the owner of a bakery, supports the John Denver for Mayor committee. For a campaign event, she donates \$500 worth of cake to the committee. After the event, she makes a \$690 contribution by check to the committee. She has now hit the contribution limit of \$1,190 for a non-Fair Elections Fund candidate and **is prohibited from donating additional money or goods to the committee.**

An item that is loaned to a committee for its use must be reported as an in-kind contribution in the same manner as an item that is given to the committee.

For the purposes of campaign finance reporting, the same information must be collected and reported for monetary and in-kind contributions. Volunteer time is not considered an in-kind donation and does not have to be reported.

Who Can Contribute?

Candidates who are not participating Fair Elections Fund candidates may accept donations from individuals, small donor committees, political action committees, and other candidate committees. Candidates who are participating in the Fair Elections Fund may only accept contributions from individuals and small donor committees.



Important:

No candidate may accept contributions from corporations, LLCs, partnerships, labor unions, or unincorporated associations.

Candidate Personal Funds

For candidates who are not participating in the Fair Elections Fund, candidate contribution limits do not apply to personal funds donated by a candidate to his or her own committee. A non-Fair Elections Fund candidate may donate any amount of money to his or her campaign.

For Fair Elections Funds candidates, see [Chapter 6](#) for more information on candidate personal funds.

Anonymous Contributions

Anonymous contributions are prohibited. If a committee receives an anonymous contribution or contribution in-kind of any size, the contribution may not be retained or expended by the committee. The contribution must be remitted to the Office of the Clerk and Recorder within 72 hours of receipt.

The anonymous contribution must be reported in the next filing deadline, along with an expenditure transaction noting that the full amount of the anonymous donation was remitted to the Office of the Denver Clerk and Recorder

Age and Citizenship Requirements for Donors

All contributors must be 18 years or older on the date the donation is made. Contributors do not have to be citizens of the United States to donate to campaigns if they are legal permanent residents, including green card holders.

Refunds and Bounced Checks

Committees are required to issue refunds to any contributor who contributes more than the contribution limit, or from any prohibited contribution source.

If a committee receives an over-the-limit contribution, it must refund the portion of the contribution that is over the aggregate contribution limit within 72 hours of receipt. Both the contribution and the refund must be reported on the subsequent campaign finance report.

If a committee receives a prohibited contribution, such as a candidate who receives a check from an LLC, must refund the whole portion of the contribution within 72 hours of receipt. Both the contribution and the refund must be reported on the subsequent campaign finance report.

If the committee is unable to return the contribution to the donor after reasonable effort, the committee may remit the funds to the Office of the Denver Clerk and Recorder. Under no circumstance may a committee expend prohibited or over-the-limit contributions on campaign expenditures.

Bounced checks must be reported as a contribution that has been refunded. If a contributor requests a refund, the committee may also choose to issue a refund at their discretion.

How can I raise money?

Committees may raise money in many ways. For example, they may host events, send solicitations by email or mail, and raise money over the phone.

Committees are prohibited from “pass the hat” fundraising in which money is raised anonymously. Additionally, committees are prohibited from selling raffle tickets to raise money.

Goods, like candidate-branded t-shirts and mugs, may be sold but they must be reported as contributions and count toward the individual’s contribution limit.

Example:

A non-Fair Elections Fund candidate for district council sells sweaters for \$50 to raise money for their campaign. Molly Brown purchases two sweaters for \$100. She may donate up to \$300 more to the candidate committee before she hits her \$400 contribution limit.

Committees may raise money through an auction. However, all items auctioned must be documented as goods purchased or in-kind contributions received.

Loans

There are three types of loans that a committee may solicit: commercial loans, individual loans, and candidate loans.

According to the Denver Municipal Code and Elections Rules, a loan is a type of contribution. This means that loans made to candidates must adhere to the individual contribution limits for candidates.

Commercial Loans

Committees may seek financing from commercial lenders. If a committee accepts a commercial loan, it must not receive special treatment compared to other banking customers. The loan must be made in writing with a due date or amortization schedule and an interest rate typical of the lending institution.

On the next campaign finance report, the committee accepting the commercial loan must report the loan. They must include the identification of the lender, the amount, the method of disposition, the balance due on the loan, and the terms of interest.



Important:

Fair Elections Fund candidates may not accept commercial loans or loans from other individuals. For more information on Fair Elections Fund candidate loans, see [Chapter 6](#).

Individual Loans

Committees may accept loans from individuals up to the contribution limit for their committee type or office. For example, a non-Fair Elections Fund candidate for mayor may accept a \$1,000 loan from an individual.

An unsecured loan will be reported as a contribution from the lender. A secured or guaranteed loan must be reported as a contribution from the guarantor or person whose property secures the loan.

An individual may forgive their loan at any point. The balance of a forgiven loan counts toward the individual contribution limit.

Candidate Loans

A non-Fair Elections Fund candidate may loan their committee any amount of money. This may be forgiven or paid back with money raised from the committee.

Chapter 5: Spending Money

When committees spend money, it is called an expenditure. While committees have flexibility to make expenditures, there are legal limitations on this spending.

What is an Expenditure?

An expenditure means the purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made by any person for the purpose of influencing an election. Expenditures include transfers of money between committees, covered later in this chapter.

An expenditure occurs when the actual payment is made, not when the goods or services are rendered.

Example:

The John Denver for Mayor committee orders \$1,000 worth of campaign signs from Colorado Sign Company. On September 1, Colorado Sign Company sends an invoice to the committee for payment. **If the John Denver for Mayor committee pays the invoice on September 5, then the expenditure is reordered as occurring occurred on September 5.**

Documenting and Reporting Expenditures

All expenditures made by a committee must be reported using SearchLight Denver. Records and receipts may be requested by the Office of the Clerk and Recorder at any time.

A committee treasurer or their designee must preserve all records required by Denver code for five years after a report is filed. If a committee is subject to any complaint or ongoing litigation, records must be maintained until the final disposition of the complaint or litigation or five years after the report is filed, whichever is later.

When a committee files a campaign finance report, the following information is required for all expenditures:

- Name of person or vendor paid
- Address of person or vendor
- Date of expenditure

- Amount of expenditure
- Type of goods or services purchased



Important:

Fair Elections Fund candidates are subject to additional regulation of public campaign funds. See [Chapter 6](#) for more information.

What is an Acceptable Expenditure?

Committees are limited to spending campaign funds for purposes that are reasonably related to influencing an election. Candidate committee expenditures must be directly related to supporting the election of the candidate who designated the committee.

Committees who are unsure if an expenditure is an acceptable use of campaign funds are encouraged to contact the Office of the Clerk and Recorder for clarity before making the expenditure.

Examples of <i>Acceptable</i> Expenditures:	Examples of <i>Unacceptable</i> Expenditures:
<ul style="list-style-type: none"> • Staff salaries • Voter contact by mail, radio, TV, social media, and other mediums • Signs, pamphlets, leaflets • Food and drink for purposes related to the campaign • Consulting, polling, and other campaign support services 	<ul style="list-style-type: none"> • Mortgage or car payments • Travel unrelated to campaign • Food and drink for purposes unrelated to campaign • School tuition or fees • County club memberships or dues • Personal expenditures unrelated to the campaign

In addition to reporting required by Denver campaign finance law, campaigns must follow all applicable local, state, and federal laws. For example, campaigns must pay applicable taxes on goods and applicable payroll taxes.

Unpaid Obligations

An unpaid obligation is the promise or agreement to make an expenditure that is more than 30 days overdue. If an unpaid obligation is greater than \$500 or more than thirty days overdue, it must be reported on the next campaign finance reporting period.

Example:

The John Denver for Mayor committee orders \$1,000 worth of campaign signs from Colorado Sign Company. On September 1, Colorado Sign Company sends an invoice to the committee for payment. If the John Denver for Mayor committee does not pay the invoice by October 1, it must be filed and on the next campaign finance report as **an unpaid obligation because it is over \$500.**

Unpaid obligations are reported with similar information as expenditures. The committee must list the name and address of the person or vendor, the due date of the obligation, the purpose of the obligation, and the past due amount of the obligation.



Important:

All committees are required to obtain and keep receipts for all expenditures through the course of the election cycle. It is also strongly encouraged that all committees make expenditures by check or debit card to keep a clear record of where money is spent. **Making expenditures in cash is strongly discouraged.**

Transferring Money Between Committees

Transfers to Candidate, Issue, and Political Action Committees

A transfer of money from one candidate or political committee to another is considered a contribution to the committee receiving the transfer. These transfers are subject to the campaign finance limit of the receiving committee.

Transfers between Candidate Committees for Different Offices

When transferring money between candidate committees authorized by the same candidate, any amount of campaign funds may be transferred, so long as the committee sending the money is closed within 10 days of the contribution.

For example, if a candidate for district council opens a new committee for the purpose of running for auditor, the candidate may contribute the entire balance of the district council committee to the new committee, regardless of the amount contributed. After the transfer is made the older committee must terminate within 10 days.

Transferring Money to Committees outside Denver

Transferring money to committees running for office in other jurisdictions is prohibited. This includes state legislative, federal, and municipal committees outside of Denver. The only exception is state ballot questions. Any committee besides a Fair Elections Fund candidate's committee may transfer unexpended funds from a municipal committee to a committee organized to support or oppose a state ballot question.

Chapter 6: Fair Elections Fund

Candidates

Introduction to Fair Elections Fund

Background

Denver voters passed the Fair Elections Fund Act in November 2018. The goal of the fund is to limit the influence of large campaign contributors and empower small dollar donors. It accomplishes this by lowering the campaign contribution limit and matching donations of up to \$50 nine-to-one.

For the 2027 municipal election, candidates for mayor may receive up to \$895,095 from the fund. Candidates for city council at-large, clerk and recorder, and auditor may receive up to \$298,365. Candidates for city council district may receive up to \$149,180.

The Fair Elections Fund is funded by an annual transfer from the City and County General Fund of \$3.43 for each Denver resident. The fund balance may not exceed \$9.5 million dollars and the city council may withdraw money from the account in the case of a fiscal emergency. These numbers are adjusted after each four-year election cycle.

The complete rules and regulations regarding participation in the Fair Elections Fund are found in the [Denver Fair Elections Fund Act](#) and the [Election Rules](#).

Who may participate?

Candidates running for the office of mayor, city council, clerk and recorder, and auditor are eligible to participate in the Fair Elections Fund.

Ballot measure committees, issue committees, and small donor committees may not participate and are not subject to the additional regulations put forward by the Fair Elections Fund Act or Election Rules regulating the implementation of the Fund.

Qualifying Period for the Fair Elections Fund

The qualifying period for Fair Elections Fund candidates starts on the same day of the elections cycle, which is January 1 immediately following the last election for the position. For the 2027 municipal elections, the qualifying period began January 1, 2024. The qualifying period ends 75 days before the election date. For the 2027 election, the last day to apply for FEF funding is January 21, 2027.

For special or vacancy elections, the qualifying period starts the day the notice of election is made and ends on the date of certification or 50 days before the election date.

Candidate Personal Funds and Seed Money

For candidates participating in the Fair Elections Fund, candidates may not donate more than the individual contribution limit to their campaign. However, a candidate may personally loan up to \$5,000 to his or her campaign as seed money. The loan must be repaid with campaign funds before the committee can receive any public matching funds. Using FEF funds to pay back a candidate personal loan is not permitted. Up to the individual contribution limit may be forgiven as a candidate contribution, but the rest of the loan must be repaid.

Example:

Miles Bronco is a new Fair Elections Fund candidate for mayor. He decides to loan his campaign \$2,500 in seed money. He must repay the loan using non-Fair Elections Fund money.

After raising money from donors, he forgives \$595 of the loan balance as a contribution to himself. He pays back the remaining \$1,905 using donor funds. He has hit the contribution limit and may not contribute any more funds to his campaign.

How do I qualify for Fair Elections Funding?

Candidates seeking matching funds from the Fair Elections Fund must fulfill the following requirements during the qualifying period:

1. File an Intent to Seek Certification.

Candidates must file an intent to seek certification before soliciting or collecting qualifying contributions. **Any contribution made before the candidate files his or her intent is not a qualifying contribution and will not be matched.**

The intent to seek certification may be made after the beginning of the qualifying period. Candidates fill out their intent to seek certification through their SearchLight Denver account.

2. Complete Required Fair Elections Funds Training

In order to comply with Denver Election Rules, candidates seeking certification to participate in the Fair Elections Fund are required to complete a training from the staff of the Office of the Clerk and Recorder within 20 days of filing their intent to seek certification. If the candidates fail to attend a training, the clerk will not consider a reduction or waiver to any fine assessed for violation of Denver Municipal Code and/or the Election Rules.

Trainings are offered in-person and online. While the candidate and treasurer are required to attend, it is strongly recommended that any campaign volunteers or staff who will be involved in fundraising or bookkeeping attend. Additional trainings can be requested at any time by a committee.

To schedule a training, contact the Office of the Clerk and Recorder campaign finance unit at campaignfinance@denvergov.org.

3. Collect Qualifying Contributions

Once the intent to seek certification has been submitted with the Office of the Clerk and Recorder, a candidate may begin soliciting and accepting qualifying contributions. To participate in the program, candidates for mayor must collect 250 qualifying contributions and candidates for all other offices must collect 100 contributions.

For a contribution to be classified as a qualifying contribution, it must be made during the qualifying period by a Denver resident in an amount between \$5 and the campaign contribution limit for the office. For more limits on campaign contributions, see the table below.

Contributions from donors outside Denver city limits are not considered qualifying contributions. Contributions made before a candidate files an intent to seek certification are not considered qualifying contributions.

Office Sought	Number of Qualifying Contributions Needed	Maximum Donation that may be Accepted
Mayor	250	\$595
City Council At-Large, Auditor, or Clerk and Recorder	100	\$415
City Council District	100	\$235

Contributors who make qualifying contributions must receive a receipt that includes the contributor's name, home addresses, telephone number and name of the candidate receiving the contribution.



Important:

A copy of completed receipts for all qualifying contributions must be submitted with the application for certification as a participating candidate, and any contribution for which a candidate has not obtained a fully completed receipt shall not be counted as a qualified contribution.

The receipt must also indicate that the contributor understands that the purpose of the contribution is to help the candidate qualify for campaign funding from the Fair Elections Fund, that the contribution up to \$50 will be matched by the Fund by 900%, and that the contribution is made without coercion or reimbursement. The receipt must be given to the contributor and a copy of the receipt retained by the committee.

The Office of the Clerk and Recorder strongly encourages candidates to pre-clear their receipt format before collecting contributions.

Sample Donation Form and Receipt for a Contribution to a Fair Elections Fund Candidate by Check or Electronic Contribution

Full Name: _____ Date: _____

Amount of Donation: _____ Home Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____

Occupation: _____ Employer: _____

I understand that the purpose of the contribution is to help CANDIDATE NAME qualify for campaign funding from the Fair Elections Fund. I understand that up to \$50 of my contribution will be matched by the Fund by 900% percentage. This contribution is made without coercion or reimbursement.

Paid for by [Committee Name]

Sample Donation Form and Receipt for a Contribution to a Fair Elections Fund Candidate in Cash

Contributions made in cash require a signed and dated receipt to be considered a qualifying contribution.

Full Name: _____	Date: _____	
Amount of Donation: _____	Home Address: _____	
City: _____	State: _____ Zip: _____	
Telephone: _____		
Occupation: _____	Employer: _____	
I, the undersigned, understand that the purpose of the contribution is to help CANDIDATE NAME qualify for campaign funding from the Fair Elections Fund. I understand that up to \$50 of my contribution will be matched by the Fund by 900% percentage. This contribution is made without coercion or reimbursement.		
Signature: _____		
<table border="1"><tr><td>Paid for by [Committee Name]</td></tr></table>		Paid for by [Committee Name]
Paid for by [Committee Name]		

If a credit card processor or other third-party vendor is unable to meet the parameters of this rule, committees may email each contributor a receipt containing this information to comply with Fair Elections Fund regulations. Copies of each receipt must be retained by the candidate for two years after the election in which he or she is a candidate.

4. Gather Supporting Material for Qualifying Contributions

To comply with Denver Election Rules, candidates must maintain supporting material for all qualifying contributions. They must continue to do so with all match eligible contributions after certification. The supporting material must include:

- A copy of the deposit slip and deposit receipt for each qualifying or matching contribution.
- Documentation showing that a contribution was made, such as:
 - For contributions made by check, a copy of the check itself;

- For contributions made by credit card or a payment intermediary, a receipt showing the accountholder's name, the accountholder's billing address, the date the transaction was initiated, and the amount of the contribution; or
- For cash contributions, a signed and dated receipt that includes the committee's name, the amount of the contribution, and the contributor's name and home address in Denver.

5. File Disclosure Reports While Qualifying

Candidates seeking certification for Fair Elections Funds are required to file campaign finance reports on the same schedule as all other candidates.

While seeking certification, all reports filed must include a copies of qualifying contribution receipts received thus far.

If the candidate receives any contributions over the contribution limit established for the office, the amount above the limit must be returned before applying for certification.

6. Open a Separate Bank Account

A candidate who seeks certification must open a separate bank account before receiving funding from the Fair Elections Fund. The separate bank account may be at the same or a different financial institution.

All money received from the Fair Elections Fund must be segregated and not commingled with any other funds, including other campaign funds.

7. File an Application for Certification as a Participating Candidate

Once a candidate has collected more than the minimum number of qualifying contributions, the candidate may file an application for certification as a participating candidate. It is recommended that candidates submit more than the minimum number of qualifying contributions to ensure that the campaign may qualify as a participating candidate if some submitted qualifying contributions are rejected.

The application for certification is submitted through a committee's SearchLight Denver account. The application for certification requires that candidate certify that, under penalty of perjury, the candidate has complied with campaign finance regulations to date, filed all required reports accurately to date, and will comply with the Fair Elections Fund requirements for participating candidates.

Once an application for certification has been submitted, the Office of the Clerk and Recorder will determine eligibility and notify the candidate within 10 business. The Office of the Clerk and Recorder has the authority to request additional documentation from candidates seeking certification in accordance with.

If the Office of the Clerk and Recorder determines that a candidate is not certified, the candidate must inform the office whether the candidate will attempt to re-apply for certification by providing additional qualifying contributions and/or additional documentation on previous qualifying contributions that have been deemed insufficient. A candidate who will re-apply must continue to comply with the requirements of Fair Elections Fund participating. A candidate may re-apply until the close of the qualifying period.

If the candidate informs the Office of the Clerk and Recorder that they do not intend to re-apply for certification, they are not required to comply with the provisions of the Fair Elections Fund that govern certified candidates, such as the lower donation limits. After notifying the Office of the Clerk and Recorder that the candidate does not intend to re-apply, the candidate may not seek certification again during the same election cycle.

I've Been Certified as a Fair Elections Participating Candidate. Now What?

After becoming a certified participating candidate, the Fair Elections Fund matches donations up to \$50 from Denver residents at a rate of 900%, including all qualifying donations collected during the qualifying process. The campaign must continue to abide by the rules of the Fair Elections Fund and only accept contributions from individuals or small donor committees. Additionally, candidates must continue to collect the required donor information and submit a valid receipt for each donation submitting for matching.

Even after being certified as a participating candidate, the Office of the Clerk and Recorder may request any information or documentation related to campaign expenditures and contributions. Candidates must comply with those requests.

Submit Required Department of Finance Paperwork

After a candidate is certified to receiving matching funds, the committee will receive a blank W2 form and other paperwork to submit at the request of the Department of Finance.

That paperwork must be sent back prior to any disbursement occurring. The committee will also choose between receiving payments via electronic bank transfer or check. A committee may receive their first payment by check, use the check to open the required second FEF bank account, and subsequently resubmit their Department of Finance paperwork to receive future disbursements electronically to that account.



Important:

All Fair Elections Fund payments will be made by check or electronic transfer to a bank account designated to receive Fair Elections Fund payments only. These funds may not be comingled with other campaign funds for any reason.

Fair Elections Fund Disbursement Schedule

The first payment to participating Fair Elections Fund candidates will be made on August 15, 2026. The first payment will match all approved contributions received through June 30 and filed on the campaign report due July 31. After the initial payment, future payments will be authorized after campaign finance report filing deadlines for the following campaign finance reports: the 2026 Quarter 3 and Quarter 4 reports, and the 2027 January and February reports.

The last day to collect match-eligible contributions is February 28, 2027. No donations collected after that date will be matched. The last disbursement will be made no later than March 23, 2027, 14 days before the election.

A certified candidate may submit donations to be matched through any of their campaign finance reports and will receive funding for each payment in which they submit match-eligible contributions.

Candidates in the qualifying process who have not been certified are not eligible for payments. However, upon their certification as a participating candidate, they will receive a match for all eligible donations in the next payment according to the payment schedule.

Payments are not instantaneous – each payment must be approved by the Clerk’s Office and processed by the Department of Finance. Plan accordingly and consider signing up for ACH transfers in lieu of checks.

Example 1:

Miles Bronco is a candidate for mayor. He submits 500 qualifying contributions to the Office of the Clerk and Recorder in April 2026, more than the 250 he needs to qualify to be a certified participating candidate. The office confirms that Miles Bronco has submitted enough contributions and certifies him as a participating candidate.

Although he is now a participating candidate, he will not receive his first payment until August 15, 2026. The payment will provide a match for all contributions received through July 31, including the qualifying contributions he submitted in April.

Example 2:

Rocky the Mountain Lion is a candidate for district city council. He submits more than 100 qualifying contributions on November 1, 2026, and is certified by the office. He has not received a Fair Elections Fund payment because he was not a certified candidate when the Quarter 3 disbursement was made. Rocky will receive his first disbursement after he submits the Quarter 4 campaign finance report in January, which will include match for all qualifying contributions received through Quarter 4.

Fair Elections Fund Payment Limits

Participating candidates receive payments on all match eligible contributions until they reach the maximum aggregate payment.

Office Sought	Maximum Aggregate Fair Elections Fund Payment
Mayor	\$895,095
City Council At-Large, Clerk and Recorder, and Auditor	\$298,365
City Council District	\$149,180

A candidate may continue to raise money in accordance with the Fair Elections Funds contribution limits after receiving the aggregate maximum payment from the Fair Elections Fund. However, those contributions exceeding the limit will not be matched.

Run-Off Election Disbursement

If any election for municipal office goes to a run-off election, participating Fair Elections Fund candidates in good standing with the program will receive a one-time payment equal to 25% of their total Fair Elections Fund payments to date. The payment will be made promptly after the election is certified.

Run-off payments are exempt from the aggregate Fair Elections Fund limit.

Example:

Chip the Buffalo is a participating Fair Elections Fund candidate for auditor. Chip receives \$225,000 from the Fair Elections Fund before the election. Chip is the second highest vote getter, but no candidate receives 50% of the vote, so a runoff is held.

Chip will receive 25% of the amount of the funds he previously received for the runoff. Therefore, Chip will receive \$56,250 from the fund.

Spending Fair Elections Fund Dollars

Candidates are prohibited from spending Fair Elections Fund dollars on any expenditure not reasonably related to supporting the candidate's election. However, Fair Elections Fund dollars have additional restrictions that must be followed. Spending Fair Elections Fund dollars on prohibited expenditures or failure to properly document how FEF funds are spent may result in enforcement action, including withholding future FEF payments, expulsion from the FEF program, and requiring Fair Elections Fund dollars disbursed to the candidate to be repaid.

This section discusses items that may not be purchased with Fair Elections Fund dollars, additional documentation required for certain expenditures, the process of decertification from the Fair Elections Fund, and returning funds after a candidate is decertified.

Expenditure Prohibitions

Candidates may not use Fair Elections Fund dollars on the following expenditures, regardless of whether the expenditure is related to their candidacy:

1. Alcoholic beverages
2. Marijuana products
3. Tobacco products
4. Gifts valued over \$50 per gift
5. Payment of any fine, fee, or penalty assessed by the City and County of Denver

6. Prepaid credit or gift cards
7. Reimbursing contributors for their contributions
8. Spending any Fair Elections Fund dollars after a candidate has been decertified, except to satisfy obligations made prior to decertification
9. Expending any Fair Elections Fund dollars 60 days after a candidate is decertified, regardless of when the expenditure was obligated

Fair Elections Fund candidates are not prohibited from using donor funds on the above expenditures, provided that the expenditures must still be campaign-related and not for private purposes. For example, a candidate may host an election night gathering with their supporters and use FEF funds to pay for food and event space but must use the bank account containing donor funds to pay for any alcohol at the event.

If any Fair Elections Fund dollars are spent on prohibited items, the candidate must reimburse the Fair Elections Fund for the full value of any prohibited expenditures.

Additional Reporting for Food, Beverage, and Travel

Participating candidates must keep a record for all food, beverage, and travel-related expenditures paid for by money received from the Fair Elections Fund.

For any food and beverage expenditure over \$50 paid for by Fair Elections Fund dollars, a candidate must keep an itemized receipt of the expenditure. That receipt must be uploaded into SearchLight Denver and reported on the next campaign filing deadline. The campaign must also provide a specific campaign-related purpose for the food and beverage purchase.

For any travel related expenditures paid for by Fair Elections Fund dollars, a candidate must report the travel on SearchLight Denver on the next campaign filing deadline. The candidate must provide a specific campaign-related purpose for the travel.

Candidates may reimburse themselves for vehicle miles traveled, but a record must be maintained showing the dates of travel, the number of miles traveled, purpose of travel, and total amount claimed for reimbursement.

Fair Elections Fund Decertification

A candidate may be decertified as a participating candidate because they are no longer in a contested election. A candidate may also be decertified if the Office of the Clerk and Recorder find that the candidate has failed to comply with Fair Elections Fund regulations or submitted fraudulent or false information in their application for certification.

Withholding Payments Pending Decertification

The Office of the Clerk and Recorder may withhold payment if it determines that a candidate is not adhering to the rules and regulations of the Fair Elections Fund, or if the candidate's application for funding contains fraudulent or false information.

If the office has a reasonable belief that the candidate has failed to comply, the office may withhold payments from the Fair Elections Fund. In that case, the office will provide the participating candidate with a written determination specifying the basis for non-payment of funds.

A candidate who receives a determination from the Office of the Clerk and Recorder may petition for reconsideration of payment in writing to the office. The petition for reconsideration may include any supporting information that addresses issues raised in the determination. The Office of the Clerk and Recorder will issue a response within five days of receiving the petition. All payments will be withheld until any investigation is complete.

If a payment is withheld for 30 days and violations are not corrected, the office will decertify the candidate, rendering them ineligible for additional Fair Elections Fund payments during the election cycle. A candidate who is decertified for noncompliance must cease obligating new expenditures and return unspent funds as described below.

Uncontested Elections – Ministerial Decertification

After the ballot has been certified, a candidate must be in a contested election to receive Fair Elections Fund payments. Upon the first of the following to occur, a candidate is decertified:

- The candidate does not qualify for the ballot
- The candidate qualifies for the ballot but is uncontested after ballot certification
- After ballot certification, the candidate dies, is disqualified, or withdraws
- After ballot certification, the candidate's opponents for the office die, are disqualified, or withdraw, leaving the race uncontested
- The candidate fails to qualify for a run-off ballot
- The candidate wins the general election outright and no run-off election is held
- The run-off election results are certified, regardless of whether the candidate won or lost the election

Spending Fair Elections Funds after Decertification

As soon as the candidate is no longer in a contested election due to one of the circumstances above, they may not spend or commit to spend any money received from the Fair Elections Fund.

In the 60 days following decertification, a candidate may spend funds they have previously committed. For example, a candidate may spend FEF funds to pay for contracts entered with staff members or pay invoices received from vendors for work agreed to prior to the decertifying event.

A candidate must return any unspent Fair Elections Fund dollars within 60 days of decertification. After 60 days of the decertifying event, no Fair Elections Fund may be spent for any expenditure. A decertified candidate may continue to raise and spend funds from donors.

Property Purchased with Fair Elections Fund

Except for de minimis purchases under \$50, property that has been purchased with Fair Elections Fund dollars may not be retained. Property valued at \$50 or greater must be liquidated at fair market value and the proceeds returned to the Fair Elections Fund with any other funds returned after decertification.

Within 60 days of decertification, the property must be liquidated, and the proceeds returned to the Fair Elections Fund. De minimis items such as flyers, signs, and other campaign-branded materials with no resale value need not be liquidated.

Insufficient Program Funds

If the Office of the Clerk and Recorder determines that there are insufficient funds in the Fair Elections Fund to adequately fund all participating candidates, the clerk and recorder will notify participating candidates.

If the clerk and recorder is unable to make a full payment, candidates will have their contribution limits raised to the limit for non-Fair Elections Fund and are no longer subject to the requirements of the Fair Elections Fund Act.

Debates

Participating candidates must agree to participate in at least one public debates with opponents in the general election and at least one public debate with the opponent in a run-off election if offered. If the candidate is running in an uncontested election, the debate requirement is waived.

The Office of the Clerk and Recorder will select a community sponsor or sponsors to host the debates, which are required to be at least one hour long. The community sponsors may not be affiliated with a political party, a candidate, or an officeholder. The community sponsor may also not have endorsed any candidate in the race to be eligible to host the debate.

The Office of the Clerk and Recorder will promulgate rules for community sponsors before the 2027 municipal election. Interested sponsors may contact campaignfinance@denvergov.org for details.

Post-Election Audit

The Office of the Clerk and Recorder will audit all expenditures made using Fair Elections Fund dollars. Committees must provide bank statements for their FEF bank account, as well as provide receipts, invoices, and documentation for expenditures made with FEF funds.

Chapter 7: Independent Expenditures and Electioneering Communications

Independent expenditures and electioneering communications are reported differently than other political spending. This section describes the reporting process for independent expenditure and electioneering communications made outside of a registered candidate, issue, or political committee.

Independent Expenditures

Independent expenditures are expenditures made by any person for the purpose of expressly advocating the election or defeat of a candidate or supporting or opposing a ballot issue or ballot question that is not controlled by, or coordinated with, any candidate or issue committee or agent of a candidate or issue committee.

Independent expenditures do not include news articles, opinion writing, editorial endorsements, or communications made in the regular course of business by a membership organization solely to members of the organization.

An expenditure that is controlled by or coordinated with a candidate or issue committee is not an independent expenditure and should instead be reported as a contribution or expenditure by the candidate or issue committee.

Electioneering Communications

Electioneering communications are any communication broadcasted by television or radio, printed in a newspaper or on a billboard, directly mailed or delivered by hand to personal residences, placed on a website, streaming media service, or online forum for a fee, or a pre-recorded audio message delivered by telephone, that refer to a candidate, ballot issue or ballot questions and distributed within 60 days before a general election until after a run-off election.

Electioneering communications do not include news articles, opinion writing, editorial endorsements or communications made in the regular course of business by a membership organization solely to members of the organization.

Electioneering communications by candidate committees, political action committees, and issue committees are reported through the regular campaign finance reports outlined in [Chapter 2](#) and [Chapter 3](#). **No additional reporting is required for electioneering communications made by these committees.**

Independent Expenditures and Electioneering Communications Raising and Spending Money

Independent expenditures and electioneering communications made by groups other than registered committees differ significantly from spending directly by committees. Unlike all other committee types, individuals or groups making independent expenditures or electioneering communications are prohibited from coordinating with issue and candidate committees. They must make all expenditure decisions without coordination with any issue or candidate committee or their agents. That includes members of the committee, employees of the committee, or any other person acting on behalf of an issue or candidate committee.

Independent expenditures and electioneering communications have no restriction on who may give or how much they may accept. Individuals, LLCs, labor organizations, business associations, and other organizations may make contributions without restriction.

Independent expenditures and electioneering communications may not contribute to any other committee. Independent expenditures and electioneering communications may make any expenditure in support or opposition of a candidate, ballot issue, or ballot question.

Independent Expenditures and Electioneering Communications Reporting Requirements

Independent expenditures and electioneering communications reporting requirements are more stringent than all other committees. Once a person or group makes independent expenditures or electioneering communications aggregating more than \$1,000, it must file a campaign finance report with the Office of the Clerk and Recorder within 48 hours.

Once the \$1,000 threshold is met, an independent expenditures and electioneering communications must file a campaign finance report for every additional independent expenditure or electioneering communication, regardless of the amount, within 48 hours. An independent expenditure is made when money is spent or when there is a contract to spend a fixed amount of money.

Example:

The Independent Expenditure Denver for Good Government signs a contract with a local TV station for \$20,000 to air television ads in support of a candidate for mayor on January 15. The committee mails a check the following day and the television ads start the following week. Regardless of when the check is mailed and the ads start, **the expenditure must be reported within 48 hours** on January 17 because the contract was finalized on January 15.

Unlike the deadline for other committees, IE committees must file their 48-hour reports regardless of whether the deadline falls on a weekend or city holiday. For example, an independent expenditure made on a Friday at noon must be reported by Sunday at noon.

A filer reporting an independent expenditure or electioneering communication must create a SearchLight Denver account. All required reports for independent expenditure and electioneering communications will be filed through SearchLight Denver.

An independent expenditure or electioneering communication filer may register their filing entity in SearchLight prior to making any expenditures. If an entity is planning on making independent expenditures or electioneering communications in an upcoming election, we strongly encourage the entity to reach out to campaignfinance@denvergov.org and request a SearchLight Denver training.

When an independent expenditure or electioneering communication filer registers in SearchLight Denver, they must provide:

If the independent expenditure or electioneering communication is made by a natural person, the person must provide their full name, mailing address, telephone number, email address, employer, and occupation.

If the communication is made by a covered entity or organization, the following must be provided:

- The individual responsible for filing reports on behalf of the entity must provide their full name, mailing address, telephone number, email address,
- The URL for the website of the entity, if any.
- The full name of each principal owner of the entity, if any.
- The business or purpose of the entity, including its tax-exempt status, if applicable.
- The street address of the entity's principal place of operations, if different from the mailing address for the individual responsible for filing reports.

The above information is submitted through the filer's initial registration in SearchLight Denver. The registration may be amended at any time. Once the filer is registered in SearchLight Denver, they file the initial IE spending report once the initial \$1,000 in spending occurs. Subsequent reports are filed for each additional expenditure. All reports require the same information:

- Whether the communication is an independent expenditure or an electioneering communication
- The date of communication
- The method of communication
- The candidates, ballot initiatives, or ballot questions referred to in the communication,
- If the communication is supporting or opposing the named candidates, ballot initiatives, or ballot questions
- The amount spent on the communication
- How the communication was funded

Independent Expenditures and Electioneering Communications Filer Affidavit

Within 10 days of a filing the initial report, the individual responsible for filing reports shall affirm to the clerk and recorder that the person is familiar with the provisions of Denver code. The affidavit must be signed by the designated filer.

There is no residency requirement for a designated filer. A filer for an independent expenditure organization may live outside the City and County or outside the state as long as they ensure compliance with Denver code.

If a covered entity or other organization names a new individual responsible for filing on behalf of the entity, the new individual must file a new filer affidavit.

A fillable PDF of the filer affidavit can be found online at the Ballot Access site. The affidavit must be signed (with a wet signature). The document can be emailed to campaignfinance@denvergov.org or delivered to the Denver Elections Division at 200 W. 14th Ave.

Chapter 8: Enforcement and Complaints

The Office of the Clerk and Recorder oversees enforcement of campaign finance regulations, including issuing fines for late and incomplete reports, and investigating complaints for ballot issues, ballot questions, and candidates for municipal office.

This section discusses the complaint process and a committee's options to respond to complaints. In addition to the process outlined in this section, the Office of the Clerk and Recorder retains the ability to initiate complaints against committees who are in violation of campaign finance law or rules.

Fines for Late Reporting

Any filer who fails to file a timely report is subject to a fine of \$50 per day the report is late, up to \$500 per violation. This includes all committee types and independent expenditure and electioneering communication filers.

For independent expenditure and electioneering communication filers, each failure to file a 48-hour report constitutes a separate violation that may result in a \$500 fine.

A fined party may request a waiver or reduction of the fine within ten (10) calendar days of the fine's final accrual. The request must include the following information:

- The reason for the delinquency, including all relevant factors related to it;
- Remedial actions the filer has taken to avoid future delinquencies; and
- Any other information the requestor deems relevant to the request.

Incomplete Filings

If the Office of the Clerk and Recorder deems any report to be incomplete, the office will accept the report on a conditional basis and notify the committee. If the office identifies curable deficiencies, the notice shall include a description of each deficiency and instructions on how the committee may cure the deficiency.

If the committee does not cure a deficiency within ten days of notice of the deficiency, the office will assess a late fine of \$50 per day up to \$500 beginning on the 11th day after the notice is sent. The fined party may request a waiver once the deficiency is cured using the same waiver process as late fines above.

Citizen-Initiated Complaints

Residents of Denver who believe a violation of campaign finance law has occurred may file a complaint. Complaints must be received within 60 days after the date on which the complainant knew or should have known, by the exercise of reasonable diligence, of the violation.

Complaints may be filed [using an online form](#). Complaints must include the name of the complainant, his or her residential address, contact information, the relevant section of code that was violated, and a description of the violation.

Complaints from individuals who reside outside Denver city limits will not be accepted. Complaints that are not filed timely will not be accepted. Complaints filed late or by individuals outside of Denver will be dismissed by the Office of the Clerk and Recorder and no notice to the committee allegedly in violation given.

Complaint Process

After a complaint is received and the Office of the Clerk and Recorder has determined that the complaint was filed timely by a Denver resident, the office will send notice to the committee allegedly in violation.

After notice of a complaint is given, the committee has 30 days from date of receipt of notice to respond to the complaint. The committee may respond by curing the alleged violation or by requesting the complaint be dismissed.

If, after reviewing the response, the clerk and recorder determines that the respondent has either cured the alleged violations in the complaint or provided sufficient information for the clerk and recorder to determine that no violation occurred, the clerk and recorder may dismiss the complaint.

If the respondent fails to provide sufficient information to allow the clerk and recorder to dismiss the complaint, the clerk and recorder must either request additional specific information from the respondent or appoint a hearing officer to resolve the complaint.

Role of Hearing Officers

If the committee does not cure the violation or request that the complaint be dismissed, the clerk and recorder will appoint a hearing officer. The hearing officer is not an employee of the city and acts as an impartial arbiter of the complaint.

The hearing officer may dismiss the violation if he or she believes the complaint does not assert the facts necessary to support the alleged violation. The hearing officer may also issue subpoenas. Any subpoena is enforceable in county court. The hearing officer will determine if a violation has been committed and, if so, will enter a decision and order any necessary relief, if applicable. The decision of the hearing officer is final and subject to review by the district court.

Notice of Apparent Violation

The Office of the Clerk and Recorder has the authority to open investigations and audit filings without receiving a citizen-initiated complaint. If the office determines a violation has occurred, the office will notify the committee or person of the apparent violation.

The receiving committee or person will have ten (10) days from the date of notice of an apparent violation to correct any violation of this article. If the violation is not corrected, the office will file a complaint with a hearing officer who shall resolve the complaint as outlined above

Chapter 9: Best Practices for Campaigns



Internal Controls

- Hire a bookkeeper, accountant, or compliance consultant, *especially* for candidates participating in the Fair Elections Fund
- Utilize accounting or campaign finance software
- Use a compliant online payment portal
- Store receipts and campaign finance documents in a safe and secure place
- Ensure only authorized individuals have access to documents
- Have all campaign finance staff and volunteers attend a training by the Campaign Finance Unit and regularly consult the Campaign Finance Handbook
- If necessary, consult a private attorney for unanswered questions.

Appendix: Disclaimer Rules

Committees are responsible for disclosing who paid for all campaign communication that advocates or opposes a candidate or issue, solicits contributions, or solicits in-kind contributions.

Disclaimer Basics

Campaign “paid for by” disclaimers are detailed in D.R.M.C. 15-40. All political advertising is covered by the code. This includes communication by television, newspaper, outdoor advertising facility, billboard, direct mailing, digital advertising, campaign signage, or any other type of public political advertising. All campaign material, including fundraising communications, that advocates or opposes a candidate or issue should include a disclosure. When in doubt, committees should err on the side of including a disclosure.

A disclosure template is below. For audiovisual communications, the disclosure should be spoken. If the communication is made in a language other than English, the disclaimer should be made in the language of the rest of the communication.

Paid for by [Name Candidate or Committee].

Disclaimers for Expenditures Paid for by Persons Other than a Committee

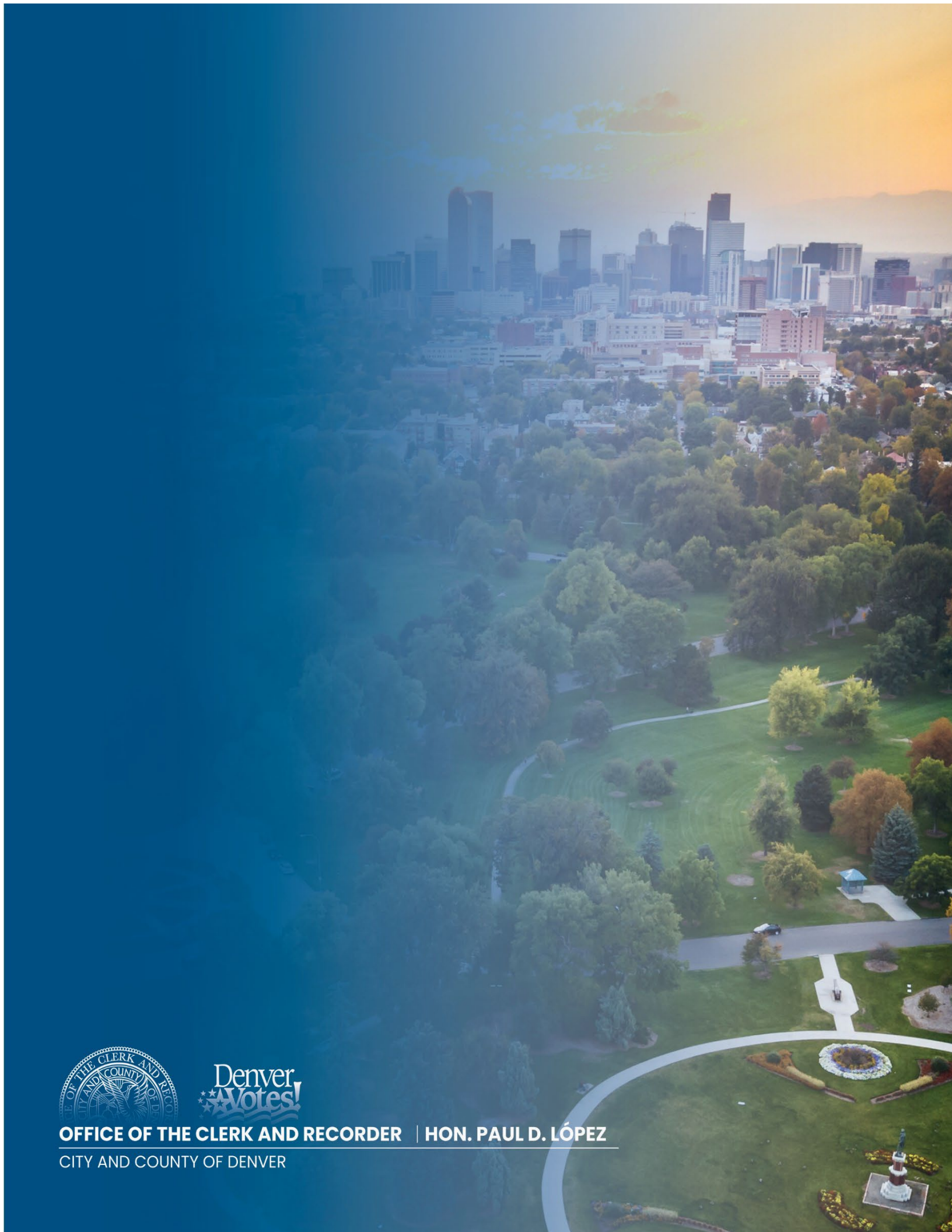
If paid for by other persons but authorized by a candidate, a candidate committee, issue committee, political committee, or their agents, shall clearly state that the communication is paid for by such other persons and authorized by the candidate, candidate committee, issue committee, or political committee; or:

Paid for by [Name of Person, Persons, or Entity Paying for the Communication]. Authorized by [Name of Candidate or Committee Authorizing Spending].

Disclaimers for Independent Expenditure and Electioneering Communications

All independent expenditures and electioneering communications must state the name of the person or committee making the expenditure. It must also include the statement This [advertisement or material] is not authorized by the any candidate, candidate committee, issue committee, or political committee”.

Paid for by [Full Name of Person or Entity Making the Expenditure]. Not authorized by any candidate, candidate committee, issue committee, or political committee.



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CITY AND COUNTY OF DENVER