



# INVALID MATCHING CLAIMS (IMC) CODES

*All contributions claimed for match must be documented and reported properly in order to be matchable under the Campaign Finance Program. An invalid matching claim (IMC) is a contribution that you have claimed for match but that has been deemed invalid upon review by CFB staff. Most invalid matching claims can be resolved and made valid for match.*

The statement reviews you receive after each disclosure statement you file could include an invalid matching claims (IMC) report. (For more information on statement reviews and other pre-election audit reviews, see Chapter 5 of the [Handbook](#)). The IMC report will list contributions you claimed for match that have been preliminarily deemed invalid. Each invalid matching claim in the report will be labeled with a code and short description to specify the reason(s) why the contribution is invalid for match. This guide provides a description of each of the codes and explains how to respond to them.

## HOW TO RESPOND TO THE IMC REPORT

The IMC report is separated by disclosure statement and includes invalid matching claims from the most recent disclosure statement, as well as any unresolved invalid matching claims from previous disclosure statements.

To respond to an invalid matching claim:

- Check the applicable boxes** to indicate the action(s) you have taken. You can also write an explanation in the space provided.
- Upload all applicable documentation** (contribution cards, checks, affirmation letters, etc.) to the corresponding transaction in C-SMART.
- Submit applicable amendments to your disclosure statements** if you uploaded documentation to C-SMART to previously reported transactions or modified a transaction (including deleting it or withdrawing a matching claim).
- Use the Contribution Refund Documentation Submission feature** in C-SMART to submit documentation for newly entered refunds, as these transactions will not be reported until you file your next [disclosure statement](#).
- Submit the completed IMC report** as part of your response to the statement review.

You must submit amendments in order to update your reporting and submit your uploaded documentation to the CFB. You should submit amendments in C-SMART only after you have made all modifications and uploaded all documentation necessary to respond to the IMC report and the rest of the statement review.

Refer to [C-SMART Help](#) for assistance with modifying transactions, uploading documentation, and submitting amendments, and contact your Candidate Services liaison for more information on how to respond to the statement review.

### SAMPLE INVALID MATCHING CLAIM

<b>Transaction ID:</b> R0008897 <b>Contributor:</b> Sampson, Winifred <b>Address:</b> 73-06 Woodside Avenue <b>Occupation:</b> Teacher <b>Employer:</b> NYC DOE <b>Employer Address:</b> 35-01 Union Street	<b>Type:</b> Credit Card <b>Amount:</b> \$175.00 <b>Match Amt:</b> \$175 <b>Rcvd Date:</b> 4/15/2021	<b>Campaign Response</b> <b>Check Appropriate Box(es)</b> Documentation Submitted <input type="checkbox"/> Transaction Modified <input type="checkbox"/> Matching Claim Withdrawn <input type="checkbox"/> Transaction Deleted <input type="checkbox"/> New Transaction ID: _____ Other Response/Explanation:
<b>Invalid Codes</b> SRC-9 - Address Verification (AVS) Failed or AVS Not Performed		<b>Response Inadequate</b> <input type="checkbox"/>

To address this contribution, check the box(es) that describe the action(s) taken to respond.

Provides the reason why a transaction was invalidated.

Record any written response or explanation in this space.

Box will be checked in cases where a response has been submitted, but more information or documentation is needed.

To make a contribution eligible for match, you must address every invalid code for that contribution. Any unresolved invalid claims will appear again in the next statement review.

Some invalid matching claims cannot be resolved due to the nature of the contribution. For example, a contribution from a contributor who lives outside of New York City will never be matched because only contributions from New York City residents are eligible to be matched. If you agree that a claim does not meet the requirements to be matchable, withdraw the matching claim for the contribution in C-SMART.

Once you withdraw a matching claim on a contribution, that contribution can never be matched in the future.

## WHAT ARE THE INVALID MATCHING CLAIMS (IMC) CODES?

The invalid matching claims codes are organized into five categories—[contribution source \(SRC\)](#), [contribution documentation \(DOC\)](#), [contribution reporting \(RPT\)](#), [contribution limit \(LMT\)](#), and [other \(OTH\)](#). In the IMC report, you will see the codes listed as the three-letter abbreviation followed by a number with a short description of the code.

## CONTRIBUTION SOURCE (SRC)

The codes found in the Contribution Source series relate to contributions from a non-matchable or prohibited source.

### **SRC-1: Refunded, Check Did Not Clear, or Credit Card Declined**

The SRC-1 code indicates one of three issues: the campaign has claimed matching funds for a contribution it refunded, the contributor's check did not clear, or the contributor's credit card was declined.

#### **To respond to this code:**

- ◆ If the contribution was refunded, the check did not clear, or the credit card was declined, withdraw the matching claim, enter the refund, and upload documentation to the refund transaction in C-SMART.
- ◆ If the bounced check was re-deposited successfully, submit documentation demonstrating that the deposit occurred.
- ◆ If the credit card contribution was settled successfully, submit proof of the settlement.

### **SRC-2: Contribution Drawn on Business Account**

The SRC-2 code is assigned when a contribution appears to be drawn from a business account (including sole proprietorships).

#### **To respond to this code:**

- ◆ If the contribution was drawn on a personal account or if the contribution was drawn on an account that is used for both a sole proprietorship and personal purposes, submit a [Contribution Drawn on Business Account](#) affirmation letter signed by the contributor.
- ◆ If the contribution is drawn on an unincorporated sole proprietor's business account, withdraw the matching claim in C-SMART.

### **SRC-3: Contribution Drawn on Corporate Account**

The SRC-3 code is assigned to contributions from corporations, partnerships, and limited liability companies, which are not only ineligible for matching funds but also entirely prohibited.

#### **To respond to this code:**

- ◆ Refund the prohibited contribution using a bank or certified check drawn from your committee's bank account. Withdraw the matching claim, enter the refund, and upload a copy of the bank or certified check in C-SMART. Change the contributor's name code to reflect that it is a corporation or partnership.

#### **SRC-4: Contribution Drawn on Political Committee Account**

The SRC-4 code indicates that the contribution is drawn from a political committee's bank account, and is not eligible to be matched. (Note: Make sure the political committee is registered with the CFB to avoid a violation.)

##### **To respond to this code:**

- ◆ Withdraw the matching claim in C-SMART and change the contributor's name code to reflect that it is a political committee.

#### **SRC-5: Money Order Contributions with Sequential Serial Numbers**

The SRC-5 code indicates that the contribution is a part of a series of money order contributions with sequential serial numbers.

##### **To respond to this code:**

- ◆ Submit a written, signed narrative from each contributor who made a contribution using the money orders in sequence; the narratives must fully explain the circumstances surrounding the purchase of the money orders and confirm the reported contributor as the source of the contribution. (Note: providing these statements does not guarantee that the invalid code will be removed.)
- ◆ Or, if you are not disputing the invalid claim, withdraw the matching claim in C-SMART.

#### **SRC-6: Contributor is Under Eighteen Years of Age**

The SRC-6 code is assigned if the contributor appears to be a minor. Contributions from minors are never eligible to be matched with public funds.

##### **To respond to this code:**

- ◆ If the contributor is 18 years old or over, submit a signed [Contributor Under Eighteen Years of Age](#) affirmation letter from the contributor confirming that the contributor was over the age of 18 at the time of the contribution and that the contribution was made from the contributor's personal funds.
- ◆ If the contributor is a minor, withdraw the matching claim in C-SMART.

## **SRC-7: Contributor is Not an Individual**

The SRC-7 code is applied when you have claimed matching funds for a contribution from a contributor who is not an individual, or when a single transaction is reported and/or documented as being from more than one contributor—such as when both spouses' names are reported for a single check/credit card contribution drawn on a joint account.

### **To respond to this code:**

- ◆ Review the contribution backup documentation to determine which situation below applies.
- ◆ If the contribution is from an entity and is not from an individual, withdraw the matching claim in C-SMART.
- ◆ If the name or source of the contribution was entered incorrectly, delete the transaction, create a new name record with the correct name, and re-enter the transaction.
- ◆ If the contribution is reported as coming from more than one individual and is to be equally divided between joint accountholders, submit a [Contributor is Not an Individual](#) affirmation letter signed by the joint accountholders. In C-SMART, edit the transaction to be reported from one of the individuals for half of the joint contribution amount, and enter a second contribution for the same amount from the other contributor.
- ◆ If the name of both contributors is on the backup documentation and/or both contributors signed the backup documentation, update the reporting to report two transactions with half the contribution coming from each contributor. An affirmation letter is not required in this instance.
- ◆ On the copy of the IMC report you submit with your response, describe the actions taken and include the new transaction ID. (Note: This newly entered transaction will appear in your next disclosure statement filing with the CFB.)

## **SRC-8: Contributor has a Non-New York City Address**

The SRC-8 code indicates that you have claimed a contribution from a non-New York City resident for match.

### **To respond to this code:**

- ◆ If the contributor is not a New York City resident, withdraw the matching claim in C-SMART.
- ◆ If the address was entered incorrectly, modify the contributor's information in C-SMART.

## **SRC-9: Address Verification (AVS) Failed or AVS Not Performed**

The SRC-9 code is assigned in instances where backup documentation for credit card contributions indicates that the Address Verification System (AVS) check failed or was not performed.

### **To respond to this code:**

- ◆ Submit an [Address Verification](#) affirmation letter signed by the contributor.

### **SRC-10: Contributor Has a Non-Residential Address**

The SRC-10 code indicates that the contributor's address is non-residential, which indicates the contributor may not be an individual New York City resident. The CFB uses a database maintained and regularly updated by the city to identify non-residential addresses.

#### **To respond to this code:**

- ◆ Make sure you entered the contributor's address correctly.
- ◆ If the contributor's address was entered incorrectly, modify the contributor's address information in C-SMART.
- ◆ If you entered the address correctly and believe that the code is erroneous, submit documentation showing that the address is residential—such as a listing from the White Pages, a real estate advertisement for the building, or a signed [Missing/Incomplete Residential Information](#) affirmation letter—and submit it with your response.

### **SRC-11: Reported Address Not Billing Address on Credit Card Document**

The SRC-11 code indicates that the contributor's billing address on the credit card processing documentation is different from the reported contributor address, which could indicate that the contributor is not a New York City resident or that the contribution did not come from personal funds.

#### **To respond to this code:**

- ◆ If the contributor's address was entered correctly, submit a [Billing Address Verification](#) affirmation letter signed by the contributor.
- ◆ If the contributor's address was entered incorrectly, modify the contributor's information in C-SMART.

### **SRC-12: Contributor is a Vendor to the Campaign**

The SRC-12 code indicates that the contribution is from a campaign vendor, which is not eligible for match. (This restriction applies to consultants and one-time payees, but does not include regular salaried campaign employees, whose contributions may be matchable.)

#### **To respond to this code:**

- ◆ If this contribution is from a campaign vendor or one-time payee, withdraw the matching claim in C-SMART.
- ◆ If the contribution is not from a campaign vendor or one-time payee, submit documentation with your response (such as employment contracts and/or timesheets) to substantiate the individual's employment status.

### **SRC-13: Contributor is in the NYC Doing Business Database**

The SRC-13 code is assigned to contributors who were listed in the New York City [Doing Business Database](#) (DBDB) at the time of their contribution. Contributions from people in the DBDB are not matchable. The DBDB includes the principal owners, principal officers, and senior managers of organizations that have financial dealings with the city; it also includes lobbyists. For more information, see the [Doing Business Frequently Asked Questions](#).

#### **To respond to this code:**

- ◆ Unless you can demonstrate that the contributor was listed in the DBDB in error, or that the contributor is not the individual who is listed in the DBDB, you should withdraw the matching claim. Contributors should contact the Doing Business Accountability Project of the Mayor's Office of Contract Services at (212) 298-0600 or [DoingBusiness@mocs.nyc.gov](mailto:DoingBusiness@mocs.nyc.gov) if they believe they should not be listed in the DBDB.

### **SRC-14: Contributor is Listed on a Lobbyist Registration**

This code is assigned to contributors who are listed on a lobbyist registration but are not lobbyists and are therefore not in the New York City [Doing Business Database](#) (DBDB). This includes spouses, domestic partners, and unemancipated children of registered lobbyists, as well as non-lobbying employees of lobbyists. Contributions from people listed on a lobbyist registration are not matchable.

#### **To respond to this code:**

- ◆ Unless you can demonstrate that the contributor was listed on a lobbyist registration in error, you should withdraw the matching claim. Contact the Office of the City Clerk at (212) 699-8171 for more information about lobbyist registration.

### **SRC-15: Intermediated by Individual in the Doing Business Database**

The SRC-15 code is assigned to any contributions that were intermediated by an individual in the New York City [Doing Business Database](#) (DBDB) at the time the contribution was made. Contributions intermediated by an individual in the DBDB are not matchable. The DBDB includes the principal owners, principal officers, and senior managers of organizations that have financial dealings with the city; it also includes lobbyists. For more information, see the [Doing Business Frequently Asked Questions](#).

#### **To respond to this code:**

- ◆ If you are not disputing the invalid claim, withdraw the matching claim.
- ◆ If after reviewing the intermediary disclosed with the contribution you believe that the intermediary is listed in the DBDB in error or is not the individual who is listed, please submit an explanation. Intermediaries should contact the Doing Business Accountability Project of the Mayor's Office of Contract Services at (212) 298-0600 or [DoingBusiness@mocs.nyc.gov](mailto:DoingBusiness@mocs.nyc.gov) if they believe they should not be listed in the DBDB.
- ◆ If the campaign did not report an intermediary, contact your campaign's assigned auditor.

## **SRC-16: Backup Indicates Another Contributor**

The SRC-16 code is applied when there is an indication on the backup documentation that suggests the contribution may be, in part or in whole, from another contributor—such as the name of another person or entity in the memo line of a check or a reference to an organization on a contribution card.

### **To respond to this code:**

- ◆ If the contributor is an individual and the name of the contributor was entered correctly, submit a [Reported Contributor Does Not Match Backup Documentation](#) affirmation letter signed by the contributor.
- ◆ If the contributor is not an individual, refer to the additional SRC code associated with this transaction.
- ◆ If the name or source of the contribution was entered incorrectly, delete the transaction, create a new name record with the correct name, and if claiming the contribution for match, provide the associated backup documentation with your statement review response. On the copy of the IMC report you return with your response, describe the actions taken and include the new transaction ID. (Note: This newly entered transaction will only appear in your next disclosure statement filing with the CFB.)

## **CONTRIBUTION DOCUMENTATION (DOC)**

The codes found in the Contribution Documentation series relate to contributions for which the campaign has not provided backup documentation and/or the backup documentation provided is incomplete and/or has one or more elements that are unclear (i.e. the contributor's name, contribution date, amount, and/or instrument).

### **DOC-1: No Backup Documentation Supplied for Match Claim**

All contributions claimed for match must be accompanied by backup documentation. This code is assigned when documentation has not been submitted for the reported matching claim.

#### **To respond to this code:**

- ◆ Upload the missing documentation to the transaction in C-SMART.

### **DOC-2: Contribution Card Not Supplied**

The DOC-2 code is assigned if a contribution card required for the matching claim has not been submitted.

#### **To respond to this code:**

- ◆ Upload a copy of the contribution card to the transaction in C-SMART.



### **DOC-3: Copy of Money Order Not Supplied**

This code is assigned for money order contributions when the campaign did not submit a copy of the money order.

#### **To respond to this code:**

- ◆ Upload a copy of the money order (a money order receipt is not sufficient documentation), to the transaction in C-SMART.

### **DOC-4: Copy of Credit Card Processing Documentation Not Supplied**

The DOC-4 code is assigned in instances where the campaign did not provide the processing documentation with its backup documentation, or it provided only part of the processing documentation.

#### **To respond to this code:**

- ◆ Upload a copy of the processing documentation from the credit card processor including all required elements to C-SMART. For more information, refer to the [Credit Card Contributions](#) guidance document.

### **DOC-5: Illegible Backup Documentation**

The DOC-5 code indicates that the documentation submitted for the contribution is illegible.

#### **To respond to this code:**

- ◆ If the original documentation was copied or scanned poorly, submit a legible copy of the documentation.
- ◆ If the original documentation contains illegible handwriting or other defects, submit a [Contribution Affirmation](#) letter signed by the contributor. (Note: For copies of checks or money orders, you must always obtain a clearer image of the original check or money order.)
- ◆ In the case of an illegible contribution card, you may submit a new contribution card from the contributor that indicates that it is a replacement.

### **DOC-6: Contributor Name Missing or Unclear on Backup Documentation**

The DOC-6 code is assigned when the contribution backup documentation is missing the contributor's name and/or the contributor's name is unclear (i.e., written in such a way that CFB staff cannot verify the contributor's name).

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.

### **DOC-7: Instrument Code Missing or Unclear on Contribution Card**

The DOC-7 code is assigned if the instrument code on the backup documentation is not indicated or is unclear (i.e., there are multiple instrument types checked on the contribution card).

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.

### **DOC-8: Contribution Amount is Missing or Unclear on Backup Document**

The DOC-8 code is assigned when the dollar amount on the contribution backup documentation is blank or unclear (i.e., is written in such a way that it is not possible to verify the contribution amount).

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.

### **DOC-9: Contribution Date Missing or Unclear on Backup Documentation**

The DOC-9 code is assigned when the backup documentation does not contain a contribution date or the date is unclear (i.e., is written in such a way that CFB staff cannot verify the contribution date).

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.

### **DOC-10: Required CFB Affirmation Statement Missing or Incorrect**

The DOC-10 code is assigned when the contribution card is missing the affirmation statement or when the affirmation statement on the contribution card deviates from the required language. This code is likely to appear on many transactions if the campaign has failed to include the correct affirmation statement on its contribution cards.

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.
- ◆ Print new [contribution cards](#) with the correct affirmation to avoid this problem going forward.

## **DOC-11: Not Properly Signed or Affirmation Not Required Online**

The DOC-11 code indicates that a contribution card or check was submitted to the CFB without the contributor's signature. It is also assigned when the website through which the campaign collects online contributions does not require contributors to electronically agree to the required affirmation statement prior to processing their credit card contribution.

### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.
- ◆ Or submit a new, signed contribution card with the correct information from the contributor that indicates that it is a replacement. (Never alter a contribution card.)
- ◆ If the contribution was by credit card, ensure that the website through which you are collecting credit card contributions requires contributors to electronically agree to the required affirmation statement. For more information, refer to the [Credit Card Contributions](#) guidance document.

## **DOC-12: Contribution Not Payable to Principal Committee or Campaign**

The DOC-12 code is assigned when (1) contributions appear to be intended for another committee authorized by the same candidate, e.g., a check made out to a committee used for a previous election; (2) it is not clear that the money was intended as a campaign contribution, e.g., a check is made out to the candidate personally or the payee line is left blank; or (3) the contribution card does not include the committee name.

### **To respond to this code:**

- ◆ If the contribution was intended as a contribution to the current committee, submit a [Contribution Affirmation](#) letter signed by the contributor. You may also submit a signed contribution card with the committee name listed on the card.
- ◆ If this transaction should not have been disclosed as a contribution to your current campaign but was deposited into your current campaign's bank account, refund the contribution via bank or certified check, enter the refund in C-SMART, and submit a copy of the refund check with your response.
- ◆ If this transaction should not have been disclosed as a contribution to your current campaign and was not deposited into your current campaign's bank account, delete the transaction in C-SMART. (If the contribution was deposited into the campaign's account, deleting the transaction will result in a variance in the campaign's bank reconciliation.)

### **DOC-13: Credit Card Transaction Pending or Approval Not Provided**

The DOC-13 code is assigned in instances where the credit card processing documentation provided does not show that the processor approved the transaction.

#### **To respond to this code:**

- ◆ Submit documentation from the credit card processor showing the transaction in question as approved. For more information, refer to the [Credit Card Contributions](#) guidance document.

### **DOC-14: Unique Merchant Account Not Linked to Campaign**

The DOC-14 code is assigned when the processing documentation for a credit card contribution does not contain information necessary to link the contribution to the campaign's merchant account or credit card processor.

#### **To respond to this code:**

- ◆ Submit documentation from the credit card processor showing that the unique merchant account name and/or account number on the backup documentation is associated with an account the campaign has disclosed to the CFB.
- ◆ Or, if you have not disclosed the merchant account used for collecting the credit card contribution, submit a completed [Change of Bank Account](#) form.

### **DOC-15: Last 4 Digits of Card Number Missing from Documentation**

The DOC-15 code is assigned when the processing documentation for a credit card contribution does not include the last four digits of the contributor's credit card number.

#### **To respond to this code:**

- ◆ Submit documentation from the credit card processor showing the last four digits of the contributor's credit card number.

### **DOC-16: Contribution Card Printed Without a Required Element**

The DOC-16 code is assigned when a contribution card does not include a required element (i.e., the contribution card has no place for the contributor's name, contribution date, amount, and/or instrument).

#### **To respond to this code:**

- ◆ Submit a [Contribution Affirmation](#) letter signed by the contributor.
- ◆ Print new [contribution cards](#) with all required elements to avoid this problem going forward.

## CONTRIBUTION REPORTING (RPT)

The codes found in the Contribution Reporting series relate to erroneous or incomplete reporting of contributions (e.g., when information reported to the CFB differs from the backup documentation). The campaign must file an amendment for the CFB to receive any corrections it makes to its reporting.

### **RPT-1: Full Contributor Name Not Reported**

The contributor's full name must be reported for any contribution claimed for matching funds. The RPT-1 code is assigned when a contributor's full name was not completely reported.

#### **To respond to this code:**

- ◆ If the name or source of the contribution was entered correctly, fix any partial reporting of names, use of initials, and misspellings.
- ◆ If the name or source of the contribution was entered incorrectly, delete the transaction, create a new name record with the correct name, and re-enter the transaction. On the copy of the IMC report you return with your response, describe the actions taken and include the new transaction ID. (Note: This newly entered transaction will only appear in your next disclosure statement filing with the CFB.)

### **RPT-2: Required Contributor Employment Information Not Reported**

The RPT-2 code indicates that the campaign is missing some or all employment information for a contributor whose aggregate contributions exceed \$99.

#### **To respond to this code:**

- ◆ Add the employment information to the contributor's name record in C-SMART. If the contributor is not employed, enter "Unemployed," "Retired," "Student," or "Homemaker" as the contributor's occupation, depending on what best describes the individual's employment. If the contributor is self-employed, enter "Self-employed" as the contributor's employer, followed by his or her occupation and employment address, even if it is the same as his or her residential address.
- ◆ You can obtain the contributor's employment information by collecting a [Missing/Incomplete Employment Information](#) letter, but this is not required.

### **RPT-3: Duplicate Matching Claims Reported for Same Contributor**

The RPT-3 code is assigned when a campaign has claimed matching funds for the same contribution more than once, e.g., by entering a duplicate contribution in C-SMART.

#### **To respond to this code:**

- ◆ If the campaign entered the same contribution twice, delete the duplicate transaction. (Note: The campaign may also need to review all C-SMART name records to determine if a contributor has a duplicate name record and [merge duplicate names](#).)
- ◆ If the contributions are not the same, submit documentation to substantiate that they are different contributions and ensure that they do not exceed the matchable limit.

### **RPT-4: Incomplete Address or P.O. Box Reported**

The campaign must report the contributor's full residential address for any contribution claimed for match. The RPT-4 code means that at least part of the contributor's address was not reported or the campaign did not report the contributor's full residential address (e.g., it is missing street information or lists a post office or mail drop box). However, this code is not assigned if only the ZIP code field is blank.

#### **To respond to this code:**

- ◆ If the contributor is a New York City resident, obtain the correct residential address from the contributor and enter it in C-SMART. You can obtain the contributor's residential address by collecting a [Missing/Incomplete Residential Information](#) letter, but this is not required.
- ◆ If the contributor is not a New York City resident, withdraw the matching claim.

### **RPT-5: Contribution Not Reported Timely**

The RPT-5 code is assigned for three different reasons. First, it is assigned when the backup documentation indicates the contribution was not reported and/or claimed for match in the appropriate reporting period. This may occur when the backup documentation lists a date from a previous disclosure period.

Second, it is assigned when the reported date for a contribution is outside of the reporting period in which you disclosed it. This can occur when you delete a transaction and add a new, replacement transaction. Whenever possible, you should modify transactions instead of deleting and re-entering them. If a deletion is absolutely necessary, you should explain that the new transaction was originally reported in the correct reporting period and provide the original transaction ID.

Third, it is assigned when a contribution is received after December 31 in the year of the election.

**To respond to this code:**

- ◆ If the date received was entered incorrectly in C-SMART, modify the transaction to add the correct date.
- ◆ If the date received was entered correctly in C-SMART, submit documentation (such as a postmarked envelope that contained the contribution) to demonstrate the transaction was received during the appropriate reporting period.
- ◆ For contributions reported after December 31 in the year of the election, if the date received was entered correctly, withdraw the matching claim in C-SMART.

**RPT-6: Reported Contributor Name Does Not Match Backup Document**

The RPT-6 code is assigned when the reported contributor does not appear to be the person on the submitted backup documentation.

**To respond to this code:**

- ◆ Make sure you entered the contributor information correctly.
- ◆ If the name or source of the contribution was entered incorrectly, delete the transaction, create a new name record with the correct name, and re-enter the transaction. On the copy of the IMC report you return with your response, describe the actions taken and include the new transaction ID. (Note: This newly entered transaction will only appear in your next disclosure statement filing with the CFB.)
- ◆ If the check was signed by someone other than the reported contributor (e.g., a business agent), submit a [Reported Contributor Name Does Not Match Backup Documentation](#) letter signed by the contributor.

**RPT-7: Reported Instrument Code Does Not Match Backup Documentation**

The RPT-7 code is assigned when the documentation indicates that the wrong instrument code for a contribution was reported; e.g., reporting a contribution was made by credit card when it was actually made by check.

**To respond to this code:**

- ◆ Modify the transaction in C-SMART to indicate the correct instrument code.

**RPT-8: Reported Contribution Amount Does Not Match Backup Document**

The RPT-8 code is assigned when the reported amount of the contribution does not match the amount on the backup documentation.

**To respond to this code:**

- ◆ Modify the transaction in C-SMART to report the correct amount.

## CONTRIBUTION LIMIT (LMT)

The codes found in the Contribution Limit series relate to contributions that exceed an applicable limit.

### **LMT-1: Aggregate Cash Contribution Exceeds \$100**

The LMT-1 code is assigned when the campaign has accepted cash contributions from a single contributor that exceed \$100 in aggregate, in violation of New York State law.

#### **To respond to this code:**

- ◆ Refund the amount in excess of \$100 using a bank or certified check drawn from the campaign's bank account, enter the refund in C-SMART, and upload a copy of the refund check to the transaction. (Note: The campaign may also need to review all C-SMART names records to determine if a contributor has a duplicate name record.)

### **LMT-2: Aggregate Matchable Amount Exceeds the Applicable Limit**

The LMT-2 code indicates that the campaign has claimed more than the [maximum matchable amount](#) for a single contributor.

#### **To respond to this code:**

- ◆ Amend the transaction(s) in C-SMART so that the total amount claimed for match for the contributor does not exceed the maximum matchable amount. (Note: The campaign may also need to review all C-SMART name records to determine if a contributor has a duplicate name record.)

### **LMT-3: Aggregate Contribution Exceeds Applicable Limit**

The LMT-3 code indicates that this contribution, alone or in combination with other contributions from the same contributor, exceeds the contribution limit. Over-the-limit contributions are not matchable and the campaign is subject to penalties for accepting them, even if the violation is corrected by issuing a refund. Issuing a refund for the amount over the limit may make the remaining portion of the contribution eligible for match if it meets all other criteria.

#### **To respond to this code:**

- ◆ Refund the amount in excess of the contribution limit using a bank or certified check drawn from the campaign's bank account, enter the refund in C-SMART, and upload a copy of the refund check to the transaction.



## **LMT-4: Aggregate Money Order Contribution(s) Exceed \$100**

The LMT-4 code indicates that the campaign has accepted one or more money order contributions from a single contributor that exceeds \$100 in aggregate, and claimed one or all of those money order contributions for match. While campaigns can accept money order contributions up to the contribution limit, if aggregate money order contribution(s) from a single contributor exceed \$100, no part of the money order contribution(s) will be matchable.

### **To respond to this code:**

- ◆ Withdraw the matching claim in C-SMART, OR
- ◆ If you would like to claim the money order contribution(s) for match, refund the amount in excess of \$100 using a bank or certified check drawn from the campaign's bank account, enter the refund in C-SMART, and upload a copy of the refund check to the transaction.

## **OTHER (OTH)**

The codes found in the Other series relate to contributions that are not valid for match, but do not fall within one of the other series.

### **OTH-1: Contribution Not Accepted by the Board**

The CFB staff will assign the OTH-1 code to any contribution that is considered invalid and for which there is no other code.

#### **To respond to this code:**

- ◆ Contact the CFB to determine why the transaction has been deemed invalid and submit documentation to explain why the matching claim should be considered valid. In certain circumstances, the campaign may be sent a separate notice describing the issue with the contribution.
- ◆ Or, if you are not disputing the invalid claim, withdraw the matching claim in C-SMART.

### **OTH-2: Ineligible for Match – Contribution Disclosed after Disclosure Statement Filing Deadline**

The OTH-2 code indicates that the campaign amended a previous disclosure statement to add a contribution and an associated matching claim after the relevant filing deadline. In order for a matching claim to be valid, the contribution must be disclosed by the filing deadline for the appropriate disclosure statement in which the contribution was received.

#### **To respond to this code:**

- ◆ Withdraw the matching claim in C-SMART.

3/21/2023