



NEW HAMPSHIRE SECRETARY OF STATE

David M. Scanlan

2025 Changes to Campaign Finance Reporting Law

On January 1, 2025, significant changes to the campaign finance laws take effect. House Bill 1091 (2024), laws of 2024 Chapter 365.

These changes include (this is NOT an exhaustive list of changes):

- Limits on contributions are now based on the two-year election cycle. Limits are no longer tied to the exploratory phase, primary, or general elections. Where limits exist, the two-year election cycle limit remains the same as the combined limits for the three phases recognized in prior law. See RSA 664:4.
- Candidates and political committees must use the online campaign finance system for filing all reports required under RSA 664:4 according to the following schedule:
 - November 27, 2024 — all political committees, other than political committees of candidates
 - November 27, 2024 — candidates and political committees of candidates for the election of governor, executive council, and state senator
 - November 25, 2026 — candidates and political committees of candidates for the election of state house of representatives, county commissioner, and all other offices voted on at a primary, general, or special election.
- The definition of a political committee now includes a candidate committee, political advocacy organization, political committee of a political party, and the committee of a segregated fund. All are required to register and report based on the same thresholds for receipts or expenditures and by mostly the same deadlines with several deadline exceptions for a political committee of a candidate who has not filed a declaration of candidacy or intent for the current election cycle.
- On January 2, 2025, all existing filers (committees or candidates) in the Campaign Finance System with either surplus or a debt will be automatically registered for the 2026 two-year “election cycle.”
 - Existing surplus or debt will be carried forward as the starting balance for the 2026 two-year election cycle.
 - Filers with a \$0 balance will expire. Those filers will need to register for a new account for the 2026 cycle if required by law.
 - In every future election cycle past the 2026 two-year cycle, the campaign finance system accounts for all filers with a balance of \$0 will expire 22 days after the general election. The accounts for all filers with either surplus or debt will automatically be renewed and registered for the corresponding two-year election cycle.

- Regardless of the amount of the receipt, data entry in the campaign finance system must include the full name and postal address for all donors. The online system reports will put donors in alphabetical order. If the donor's aggregate contributions during the two-year election cycle are \$50 or less, the name and address will not be available to the public through the online campaign finance system and are exempt from disclosure under the Right-to-Know law, RSA chapter 91-A. However, when the donor's aggregate contributions reach \$50.01 or more, their name and address will be publicly available and subject to Right-to-Know disclosure.

The past practice of entering/reporting amounts received under \$50.01 as unitemized receipts is no longer permitted. Receipts under \$50.01 must be entered individually and the report must include the donor's name and address.

RSA 664:4 has and, under the revised law, continues to prohibit a person from making a contribution "anonymously or under a name not that of the donor." Candidates and committees must obtain the name and address of the donor when receiving a contribution of any amount, including in-kind contributions.

- Transition timeline: November 6, 2024, to December 31, 2024. The changes to the campaign finance laws take effect on January 1, 2025. The online system for reporting is expected to be updated to reflect these changes to law on January 2, 2025.

A candidate or committee was required to report all receipts and expenditures occurring up to election day, November 5, 2024, by the Wednesday following the election, November 13, 2024. The law is silent, however, on filling the gap between November 6, 2024, after the final report date under the 2024 law, and December 31, 2024, the final day before House Bill 1091 goes into effect on January 1, 2025. Therefore, a candidate or committee that has receipts or expenditures has two options:

- 1.) Voluntarily file a Receipts and Expenditures Report covering the period by December 31, 2024, which reports all 2024 activity that was not previously reported. A voluntary report made in the campaign finance system under the 2024 law will satisfy the duty to report receipts and expenditures and allow the filer to start 2025 reporting following the new law. As noted above, the accounts of filers with either surplus or debt will be automatically renewed as a 2026 cycle account showing the surplus or debt as the starting balance.
- 2.) Report receipts and expenditures occurring between November 6, 2024, and December 31, 2024, in the first Receipts and Expenditures Report filed in 2025 for the 2026 cycle account.