

## Commercial Co-venturer (“CCV”) Registration and Reporting Requirements

The following registration/reporting requirements apply to companies conducting charitable sales promotions in which the company advertises that the purchase or use of certain goods or services will benefit a charitable organization or charitable purpose. Companies conducting such promotions are called “commercial co-venturers” under state charitable solicitation laws.

State	Registration & Contract Filing	Registration Expires	Campaign Reporting
Alabama	<u>Registration</u> : Required; \$100 filing fee; \$10,000 face value bond <u>Contract Filing</u> : A copy of each contract must be filed within ten (10) days after its execution, and at least 15 days prior to performance of the contract.	September 30	Due within 90 days after termination of the contract
California	<u>Registration</u> : Commercial co-venturers must either register or they may instead just comply with certain contract and related compliance requirements, including transfers of payments every 90 days. If registering, there is a \$500 filing fee; No bond required.  Note that, effective 1/1/24, any entity conducting online charitable sales promotions for 7 or more benefiting charities per calendar year must register as a “charitable fundraising platform” in California. <u>Contract filing</u> : Not required.	January 15	Due by January 30 for any promotion that was active during the preceding calendar year
Hawaii	<u>Registration</u> : Not required; No bond required <u>Contract filing</u> : A copy of each contract or a written consent must be filed not less than ten (10) days prior to the start of the promotion within the state.	n/a	Not required
Illinois*	<u>Registration</u> : The Illinois AG’s office has verbally taken the position that commercial co-venturers must register under the state’s charitable trust law, even though neither Illinois’ statutes nor its registration forms explicitly refer to commercial co-ventures or charitable sales promotions. \$15 filing fee; No bond required. <u>Contract filing</u> : A copy of each contract must be filed prior to the start of the promotion within the state.	6 months after the conclusion of the promotion	Due 6 months after the conclusion of the promotion
Massachusetts	<u>Registration</u> : Required; \$200 filing fee; \$25,000 face value bond <u>Contract Filing</u> : A copy of each contract and a solicitation notice form signed by both parties must be filed within ten (10) days after execution.	December 31	Due by February 28 for any promotion that was active during the preceding calendar year
Mississippi	<u>Registration</u> : Not required; No bond required. <u>Contract Filing</u> : A copy of each contract must be filed no later than seven (7) days prior to the start of the promotion within the state.	n/a	Due no later than 30 days after the conclusion of the promotion or within 30 days of the anniversary of the promotion start date (for multi-year contracts)
South Carolina	<u>Registration</u> : Required; \$50 filing fee; No bond required. <u>Contract Filing</u> : A copy of each contract and a solicitation notice form signed by both parties must be filed at least ten (10) days prior to the start of the promotion within the state.	Anniversary of initial registration	Due within 90 days after the conclusion of the promotion, or by the anniversary of the promotion start date (for multi-year contracts)

Please also note that several states require charities to file CCV contracts and campaign reports, or disclose the relationship in their annual registration forms. A chart of charity state registration and reporting requirements related to their CCV relationships is available here: <https://perlmanandperlman.com/wp-content/uploads/2024/03/Charity-Registration-and-CCV-Disclosures.pdf>.

***The information provided in this document does not constitute legal advice and is not intended to substitute for legal counsel.***