

## 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	<p><u>Registration</u>: Required; \$100 filing fee; \$10,000 face value bond</p> <p><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.</p>	September 30	Due within 90 days after termination of the contract
California	<p><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.</p> <p>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.</p> <p><u>Contract filing</u>: Not required.</p>	January 15	Due by January 30 for any promotion that was active during the preceding calendar year
Hawaii	<p><u>Registration</u>: Not required; No bond required</p> <p><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.</p>	n/a	Not required
Illinois*	<p><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.</p> <p><u>Contract filing</u>: A copy of each contract must be filed prior to the start of the promotion within the state.</p>	6 months after the conclusion of the promotion	Due 6 months after the conclusion of the promotion
Massachusetts	<p><u>Registration</u>: Required; \$200 filing fee; \$25,000 face value bond</p> <p><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.</p>	December 31	Due by February 28 for any promotion that was active during the preceding calendar year
Mississippi	<p><u>Registration</u>: Not required; No bond required.</p> <p><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.</p>	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	<p><u>Registration</u>: Required; \$50 filing fee; No bond required.</p> <p><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.</p>	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 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/charity-registration-and-ccv-disclosures-3/>

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