



# Public Disclosure of Bond Ballot Campaign Contributions

When state and local governments seek voter approval for specific municipal bond issues to finance public projects, they often use bond ballot campaigns. Contributions to these campaigns by municipal securities dealers that may seek to do business with the issuer of the bond can affect perceptions of municipal market integrity. To promote transparency, municipal securities dealers must publicly disclose detailed information about cash or in-kind contributions to bond ballot campaigns and any resulting municipal securities business. These disclosure requirements are described below to assist state and local governments in understanding the information that will be made public regarding contributions to bond ballot campaigns and voter-approved bond offerings.

*Dealers must report identifying information about certain political contributions and any related bond issues, on a quarterly basis, to EMMA.*

## About the Rule<sup>1</sup>

The Municipal Securities Rulemaking Board (MSRB), which regulates municipal securities dealers, addresses the perception of “pay-to-play” practices in the municipal market by, among other things, (1) prohibiting municipal securities dealers from engaging in certain municipal securities business for two years after making certain political contributions; and (2) collecting and making public certain information about contributions of dealers to political officials and ballot initiatives that are connected to municipal securities business. Dealers must report identifying information about certain political contributions and any related bond issues, on a quarterly basis, to the MSRB’s [Electronic Municipal Market Access \(EMMA®\) website](#).

## Public Disclosure Requirements

Dealers, certain of their employees and dealer-controlled political action committees must submit the below information to the EMMA website on a quarterly basis for contributions to a bond ballot campaign. Contributions are *de minimis*, and not required to be disclosed, if the contributor is entitled to vote in the campaign and the contributions do not exceed, in total, \$250 per ballot initiative.

- **Campaign Name and Jurisdiction** — Official name of the bond ballot campaign and the jurisdiction (including state, county, city or political subdivision) seeking voter approval to issue the bonds

<sup>1</sup> This document contains only a summary of the key provisions of MSRB Rule G-37 with respect to contributions to bond ballot campaigns as of the date of the publication of this document and should not be relied upon as a substitute for careful review of the rule itself. The complete text of the rule is available at <http://www.msrb.org/Rules-and-Interpretations/MSRB-Rules/General/Rule-G-37.aspx>.



**Subscribe to issuer education and EMMA email updates from the MSRB.**

*Contribution disclosures are made on a quarterly basis and reported in January, April, July and October.*

- **Contribution Amount** — Cash and in-kind contributions, including the value and nature of goods and services provided
- **Contribution Date** — Specific date the contribution was made
- **Reimbursements** — Amount and source of any third-party payments or reimbursements to dealers or their municipal finance professionals for their out-of-pocket contributions
- **Related Municipal Securities Business** — Identifying information about any municipal securities business including negotiated underwriting, private placement, or remarketing business resulting from a bond ballot campaign to which the dealer contributed. This includes:
  - Full issuer name
  - Full issue description
  - Date the issuer selected the dealer

## Viewing Disclosures on EMMA

The MSRB makes bond ballot contribution disclosures and other disclosures required under the MSRB's pay-to-play rule available to the public, free of charge, on the EMMA website at [emma.msrb.org](http://emma.msrb.org). Contribution disclosures are made on a quarterly basis and reported in January, April, July and October.



Subscribe to issuer education and EMMA email updates from the MSRB.