

NATIONAL RPAC FEDERAL DISBURSEMENTS TRUSTEE POLICIES

(Bylaws, Disbursements)
REALTORS® POLITICAL ACTION COMMITTEE
NATIONAL ASSOCIATION OF REALTORS®

BYLAWS AS APPROVED BY NAR BOARD OF DIRECTORS
NOVEMBER 1993, LAST UPDATED NOVEMBER 2012

AND POLICIES LAST AMENDED BY THE NATIONAL RPAC TRUSTEES ON MAY
2017

(Updated and Approved by the RPAC Federal Disbursements Trustees – December
2021)

RPAC FEDERAL DISBURSEMENTS COMMITTEE MISSION STATEMENT:
PURPOSE: To enhance the political effectiveness of the NATIONAL ASSOCIATION OF REALTORS® by making direct contributions for the purpose of assisting real estate-supported candidates win election to federal office; working collaboratively with state RPAC Trustees Committees to secure a request to mobilize REALTORS® in districts of RPAC-supported federal candidates; urging the general public through Independent Expenditures to support key federal legislators which is predicated upon first receiving a request to mobilize REALTORS® from respective state Trustees; and urging general public support for federal legislative and regulatory issues through public issue advocacy communications.

RPAC GOVERNANCE/BYLAWS – FEDERAL DISBURSEMENTS TRUSTEES

National RPAC Statement of Organization and Procedures

ARTICLE I

Name and Definition

The name of this committee is the REALTORS® Political Action Committee (or "RPAC") Federal Disbursements Trustees which is a committee of the NATIONAL ASSOCIATION OF REALTORS® (NAR).

ARTICLE II

PURPOSE: To enhance the political effectiveness of the NATIONAL ASSOCIATION OF REALTORS® by making direct contributions for the purpose of assisting real estate-supported candidates win election to federal office; working collaboratively with state RPAC Trustees Committees to secure a request to mobilize REALTORS® in districts of RPAC-supported federal candidates; urging the general public through Independent Expenditures to support key federal legislators which is predicated upon first receiving a request to mobilize REALTORS® from respective state Trustees; and urging general public support for federal legislative and regulatory issues through public issue advocacy communications.

ARTICLE III

Board of RPAC Trustees

Section 1. Composition

The Board of Trustees shall be composed of eighteen – twenty one voting Trustees, appointed by the President of NAR, as follows:

RPAC Chairman

RPAC Vice Chairman

Immediate Past RPAC Chairman

13 Regional Trustees (1 per region)

Disbursements Liaison, (non-voting member)

State Association Executive

State Government Affairs Director

Member State Representative (CA, TX, FL)

Vice President to Government Advocacy, (non-voting member) NAR Treasurer (also serves at RPAC Treasurer, (non-voting member)

Section 2. Terms

The length of terms of office for the RPAC Trustees shall be the following:

RPAC Chairman: 1 year;

RPAC Vice Chairman: 1 year;

Immediate Past RPAC Chairman: 1 year;

Regional Trustees, three year staggered term, eligible for reappointment to 2nd consecutive two year term after two-year wait period

State Association Executive, three-year staggered term

State Government Affairs Director, three-year staggered term

Member State Representative (CA, TX, FL), three year staggered term

(See Appendix A for Qualifications and Duties)

Section 3. Vacancies

In the event any appointed Trustee shall die, become disabled, be removed, resign, or become otherwise unable or unwilling to serve for any reason whatsoever, the President, with the advice of the Trustees, shall appoint a successor to serve for the un-expired term of such Trustee.

ARTICLE IV

Officers of RPAC

1. Officers. The officers of RPAC shall be the RPAC Chairman, RPAC Vice Chairman, Immediate Past Chairman, the Treasurer, the Disbursement Liaison, and one or more Assistant Treasurers, who shall be staff members of the NATIONAL ASSOCIATION OF REALTORS® designated by the Executive Vice President.

2. Duties. The Leadership Duties of the Chairman, Vice-Chairman and Treasurer are as follows:

a. RPAC Chairman

The Chairman shall preside at Trustee Committee meetings and perform all other duties usual and customary to that office. The Chairman shall be an ex-officio member of all RPAC subcommittees.

b. RPAC Vice Chairman

The Vice Chairman shall preside at meetings in the absence of the Chairman. The Vice Chairman shall succeed to the office of Chairman the following year. If the Chairman dies, resigns, or is otherwise unable or unwilling to serve, the Vice Chairman shall automatically serve as Chairman until the office is filled by the NAR President. Upon filling of such office, the Vice Chairman shall again assume the Vice

Chairmanship. If the NAR President appoints the Vice Chairman to become Chairman, the NAR President shall also appoint a new Vice Chairman.

c. Treasurer

The Treasurer shall be the custodian of funds for the Committee. He/She, with the assistance of the Assistant Treasurer, shall keep all funds of the Committee in accordance with the instructions of the Trustees, and shall keep full and accurate accounts, present financial statements, and prepare, sign and file all reports to the governmental authorities required by law or directed to be filed by the Trustees. The Treasurer and Assistant Treasurer shall give bond in such sum as may be fixed by the Trustees, the premium on such bond to be paid by the Association.

ARTICLE V

Meetings and Operations

1. Meetings of the Trustees shall be called by the Chairman, with concurrence of the NAR President, at such time and place as he may specify in writing or at any meeting of the Trustees.
2. Fifty percent plus one of the voting members of the Board of Trustees shall constitute a quorum. A simple majority of those present is necessary for approval of actions by the Board of Trustees, unless otherwise specifically noted.
3. The Treasurer of the Committee shall keep correct and complete books and records of account in accordance with applicable law and generally accepted accounting practices. The Committee's books of account should be audited by NAR Finance staff at least once a year.
4. The Fiscal Year of the Committee shall be from January 1 through December 31.
5. The Funds of the Committee shall be deposited to the credit of the Committee in such banks or other depositories as NAR may select. All such funds including corporate funds in the Political Advocacy Fund shall be placed in segregated accounts and shall not be combined with any other funds of the Association.

ARTICLE VI

Amendments

This Statement of Organization and Procedure may be amended by action of the NAR Board of Directors upon recommendation of the Board of Trustees. (August 24, 2001)

APPENDIX A

ROLES AND RESPONSIBILITIES OF TRUSTEES

Section 1. Qualifications as guidelines for appointing Trustees

- 1 2-year election cycle as a state or local RPAC trustee or RPAC Committee chair
- An appreciation for the importance of RPAC, as indicated, for example, by being a multi-year RPAC contributor.
- 2 years experience on an NAR political or legislative committee or as a Federal Political Coordinator (FPC)
- Volunteer experience in a political campaign

Section 2. Authority and Duties

The Board of Trustees shall have complete supervision and control over the affairs and funds of the Committee and shall establish and carry out all policies and activities of the Committee. The Board shall from time to time adopt policies and procedures or amend existing policies and procedures, to govern RPAC's fundraising efforts, the making of investments and other expenditures in furtherance of its purposes, and the duties and responsibilities of members of the Board of Trustees.

A. RPAC Disbursements Trustees Chair

The RPAC Chairman is responsible for overseeing the distribution of RPAC funds. The Chairman should provide leadership and inspiration to promote the REALTORS® Political Action Committee to the NAR Board of Directors, Committee leadership, state and local associations of REALTORS® RPAC Chairmen and Fundraisers. The Chairman is encouraged to demonstrate his or her leadership by making a major investment in RPAC. In addition, the Chairman should encourage the Board of Directors, state and local RPAC Chairmen to make a major investment to RPAC. The Chairman should be available to attend all RPAC events held in conjunction with NAR business meetings.

B. RPAC Disbursements Trustees Vice Chair and Immediate Past Chair

The Vice Chair and Immediate Past Chair are responsible for assisting the Chair in managing the Trustees as the Chair sees fit.

C. Role of National RPAC Disbursements Trustees (Regional) Disbursement Responsibilities

1. **Candidate Support Requests:** The core responsibility of the Trustees is to decide which candidates and political committees RPAC should support and at what financial level, in response to requests submitted by state Trustees.
2. **Presenting Candidate Requests:** Once a state request for an RPAC contribution has been received, it is the duty of the respective regional Trustees to make a motion in support of the state's request. The Trustee must perform the dual role of advocating for their state while also serving as an NAR RPAC Trustee.
3. **Evaluating Request:** NAR RPAC Trustees evaluate the merits of each requested contribution and may approve, amend, defer or deny the request. The Trustees are to consider states' rationales, and make a decision based on the overall objectives of a 'REALTOR® Party' disbursement strategy of supporting candidates who have been supportive of pro-real estate public policies regardless of political party affiliation.
4. **Explaining Decisions:** It is imperative that RPAC deliberations be kept confidential and that confidences are kept on such important and sensitive matters. However, it is equally important that Trustees communicate back to state trustees why the Board of Trustees made the decisions they did.
5. **Opportunity Race Execution:** Trustees are to support Steering Committees used to signal grassroots support for approved Opportunity Race.
6. **Independent Expenditures:** For RPAC Independent Expenditures, Trustees must work to secure strategic support from respective state trustees as well as serve as spokespersons to explain RPAC's Independent Expenditure decisions.
7. **Collection of President's Circle Pledges:** For candidate targets for President's Circle solicitations, Trustees work with Major Investor Council members to assist them in following-up with members to explain the rationale of the targets and secure a commitment from them to support target candidates. Trustees are to be familiar with the collection process and instruct members accordingly. The RPAC Trustees will be responsible for getting President's Circle Members to fulfill their pledge to the President's Circle in conjunction with the Major Investor Council Members from the states within their respective regions.
8. **Political Advocacy:** It is essential that Trustees utilize their travel allowance to visit their respective state Trustee Committees to educate them on NAR's issue advocacy. They should do so in coordination with their appropriate NAR Political Field Representative.

II. DISBURSEMENTS CRITERIA

RPAC INVESTMENTS

A. RPAC TRUSTEES CONFLICTS OF INTEREST POLICY

In order to avoid the potential for conflicts of interest between an RPAC Trustee's duty to act in the best interests of NAR, its members and the real estate industry when voting to provide direct financial or other forms of support by RPAC to candidates for Federal office, the following principles shall apply:

1. (a) An RPAC Trustee shall disclose to the other Trustees any direct family or business relationship with a candidate for Federal office for whom RPAC is considering making direct financial or other support, and shall not vote on nor remain present during discussion or consideration of such support.

(b) For purposes of the foregoing, an RPAC Trustee has a direct family or business relationship with any candidate for Federal office who is

- (i) the Trustee;
- (ii) the Trustee's spouse, parents, parents-in-law, or children or grandchildren or their spouses;
- (iii) any partner of a partnership in which the Trustee is a partner, or shareholder or corporate officer of a corporation of which the Trustee is a shareholder or corporate officer, but either shall be deemed a shareholder only if he or she owns in excess of 1% of the stock of the corporation.

Such disclosure shall occur at the earliest possible time after the Trustees begin consideration of support for such candidate.

2. An RPAC Trustee shall disclose to the other Trustees (a) any family relationship with a candidate for whom RPAC is considering making direct financial or other support other than the family relationship described in paragraph 1(b) above;
- (b) if he or she is a member of the campaign committee of such a candidate;

Such disclosure shall occur at the earliest possible time after the Trustees begin consideration of support for such candidate. The Trustee may participate in the discussion regarding the support for the candidate but must recuse him or

herself from voting.

Except as described in paragraphs 1 and 2 above, Trustees may participate in and vote, and are not required to make any disclosure of relationships with candidates, with respect to all other direct financial or other support for candidates for Federal office being considered.

B. IN-STATE RECEPTIONS

PURPOSE: To strengthen our grassroots capabilities by enhancing relationships between appointed Federal Political Coordinators and their respective U.S. Representative or Senator.

To strengthen that relationship as early in the election cycle as possible, In-State requests must be used in the first year of the two year election cycle for House members or in the first five years of the six year election cycle for Senators. In-State funds are not available once a state requests Special Recognition funding for the candidate.

ACTIVITY: The In-State Reception Program provides REALTOR® access to incumbent Members of Congress and Senators. An In-State contribution does not imply endorsement nor official support for the incumbent's re-election which is only secured through Special Recognition funding.

Incumbent House Members are eligible for up to \$1000 per two-year election cycle for In-State reception funds. All In-State requests should be for no less than \$500.

U.S. Senate candidates are eligible to receive up to \$2,000 of In-State reception funds to be used all at once or in increments anytime in the 6-year cycle up until the Primary.

Once a challenger or open seat candidate receives special recognition funding, the incumbent in that seat may not receive In-State Reception funds.

Incumbents may not receive In-State Reception funding after officially declaring their candidacy for another office. Incumbents may receive In-State funding for their current office when considering running for another office as long as not yet officially declared for the new office.

State associations and local boards that do not contribute hard dollars (which are preferred) or soft dollars to RPAC are not eligible to receive In-State Reception Funds, unless approved by a simple majority vote of the National RPAC Disbursement Trustees.

FPC - RPAC Contribution Policy

- When called upon to notify a candidate of a RPAC contribution, the FPC is to provide such notification timely. In no event may a contribution be provided to a candidate later than the day prior to the election for which the contribution is designated.
- All contributions approved within 30 days of the Primary and at the last Trustee Special meeting for General Elections must be sent directly to the candidate rather than to the state association, with exceptions to be approved by the RPAC Chair and Vice Chair.

FPC's Role in Contribution Presentation

- 1) The FPC should file comments on the contribution notification and those comments will be included in the FPC's annual review.
- 2) For In-State receptions, a request should be submitted by the AE/GAD with comments solicited from the FPC. NAR Lobbyists are automatically copied on state requests and states are copied on DC Reception requests by NAR Lobbyists to improve communication and teamwork by the respective parties.

APPROVAL PROCESS:

TYPE OF IN-STATE REQUEST	PROCESS
Incumbents \$1,000 for incumbents. prior	<ul style="list-style-type: none"> • No formal approval by the National RPAC Trustees is necessary for In-State reception requests within the House and \$2,000 Senate per cycle limit • A completed electronic RPAC "Candidate Contribution Request" for incumbent candidate receptions must be submitted to National RPAC staff at least two weeks to the date of the scheduled event. • The electronic RPAC "Candidate Contribution Request" form requires that the State RPAC Chairman has been

notified of the request for In-State funds by the FPC via the GAD.

C. D.C. RECEPTIONS

PURPOSE: To strengthen our ability to pass REALTOR® supported legislation on Capitol Hill by enhancing the relationships between the NAR legislative staff and Members of Congress. The D.C. Reception Program provides valuable opportunities for the NAR Government Affairs staff to develop working relationships with federal elected officials. The visibility and access NAR maintains by continuing this program is essential to conducting business in Washington, D.C.

ACTIVITY: The D.C. Reception Program provides the NAR legislative staff access to incumbent Members of Congress and Senators by allowing them to attend Washington, D.C. fundraising receptions.

Incumbent House Members are eligible to receive up to \$2,000 per two-year election cycle of D.C. Reception funds.

U.S. Senate candidates are eligible to receive up to \$3,000 of DC Reception funds, of which \$1,000 will be accessible each two years of the six-year term. Unused funds may be carried over to following years of the term. DC Reception funds may only be used in the Primary unless the incumbent has already received Special Recognition funding.

Once a challenger or open seat candidate receives special recognition funding, the incumbent in that seat may not receive DC Reception funds.

An incumbent may not receive DC Reception funding after he has officially declared for another office. An incumbent may receive DC funding for his current office when he is considering running for another office as long as he has not yet officially declared for the new office.

All D.C. Reception funds which have not been used 60 days prior to the general election will be rolled into the Special Recognition Fund.

In no event shall a contribution be delivered to a candidate later than the day prior to the election for which the contribution is designated.

After 45 days if the RPAC contribution is still not deposited, the recipient political committee is to be informed that they have two weeks to deposit the contribution or it will be voided..

APPROVAL PROCESS:

TYPE OF D.C. RECEPTION REQUEST	PROCESS
Incumbents v House and Senate	<ul style="list-style-type: none">• No formal approval by the National RPAC Trustees is necessary for D.C. reception requests (within the designated limits) for incumbent Members.• State GAD and FPC are automatically copied on DC Reception requests by NAR Lobbyists to improve communication and teamwork by the respective parties.

D. SPECIAL RECOGNITION FUND

PURPOSE: To provide higher levels of financial support for those Members of Congress who have been extraordinary supporters of the real estate industry and/or are involved in a very tough election campaign. In addition, this fund will assist challenger and open seat candidates who traditionally have a difficult time raising money.

ACTIVITY: The Special Recognition Fund will provide higher levels of support for incumbent Members of Congress who are champions of NAR's legislative agenda and/or are in a very tough reelection campaign. The fund will also be used for challengers, open seat candidates, and debt retirement for incumbents. Strict guidelines will be used when making decisions regarding Special Recognition Fund distributions.

It is the policy of NAR's RPAC Disbursement Trustees that a candidate questionnaire must be completed for all open seat and challenger candidates for the House and Senate. A candidate interview is highly encouraged to obtain the answers to the questionnaire in person. The candidate questionnaire should be used during the interview and must be sent to RPAC following completion of an online request for RPAC funds for the request to be considered.

All Special Recognition requests for challengers and open seat candidates must be accompanied by a candidate questionnaire or summary of a personal interview. The

National RPAC Disbursement Trustees will not consider requests until the candidate has officially declared for the office he/she is seeking and has filed the appropriate paperwork with the Federal Election Commission. National RPAC encourages the state interviewing committee to share the candidate questionnaire with the candidate prior to the interview so the candidate may have an opportunity to be familiar with NAR issues. The interviewing committee should obtain from NAR the official NAR answers to the questions, however the answers should not be shared with the candidate. A personal interview is encouraged, but is not necessary as long as the candidate completes the candidate questionnaire. Candidates are also encouraged to interview with NAR staff if they are in Washington, DC for other business as well. National RPAC Disbursement Trustee policy requires that NAR staff shall not interview federal challenger candidates until the year of the election so as not to send any possible mixed signals to incumbents with whom NAR is working on legislation.

Incumbents do not need to complete a questionnaire. However, if state RPAC is considering opposing the incumbent, the incumbent must be offered an interview to defend his record. If he/she chooses to accept, a completed incumbent questionnaire should be submitted with the request, whether the request is for the incumbent or the challenger. In Open Seat races, major candidates from both parties must be offered a questionnaire to complete before making a Primary or General Election request. All questionnaires collected should be submitted along with the request for whichever candidate the state recommends.

Incumbent House Members who are running for the Senate rather than for re-election to the House are not required to complete a questionnaire. When requesting debt relief, a candidate questionnaire is preferred but not required. If one was obtained during the election, it should be forwarded with the request, but the newly elected Member should not be asked to complete one.

NAR will provide at no charge a poll to state RPAC Trustees (not to be shared with any candidate which would be an illegal in-kind contribution) to help them assess the political climate of competitive open seat races. The RPAC Trustees Leadership will use the non-partisan Cook Political Report as a guide in determining whether a race merits a poll. The NAR Political Representative will work with the state GAD to determine if the state desires the poll and when would the poll needs to be conducted in regard to timing of the election (either Primary or General) and of the state Trustees meeting to review the poll before making their request for the recommended candidate.

NAR staff shall not interview federal challenger candidates until the year of the election so as not to send any possible mixed signals to incumbents with whom NAR is working on legislation. Once an incumbent has received Special Recognition support, NAR Staff shall not meet with their challenger.

Once Special Recognition funding is provided to a candidate, no other candidate for that seat may receive Special Recognition unless the initial candidate receiving funding loses in the Primary. If a state's request for Special Recognition for a candidate is denied by the National RPAC Disbursement Trustees, no other candidate may receive Special Recognition funding in the race unless the denied candidate loses the Primary.

One exception to the policy of providing Special Recognition to only one candidate is the REALTOR® Appreciation Funding policy. In the case where a REALTOR® is running against the RPAC-endorsed candidate, a State Trustees Committee may (but is not required to) request a \$1,000 contribution for the REALTOR® running for federal office in addition to requesting up to \$5,000 funding for the RPAC-endorsed candidate. The REALTOR® candidate is required to complete a Candidate Questionnaire and should include years active as a REALTOR® and history of RPAC support. The National RPAC Disbursement Trustees will then review the request and decide whether to provide the \$1,000 funding. If approved, a letter to the challenger shall accompany the check to clarify that the contribution is only a token of appreciation for their political activism and that RPAC has endorsed the other candidate.

Candidates shall not receive Special Recognition funds for the General Election before the state's Primary has occurred except in special circumstances. Trustee policy is to not begin approving Special Recognition funding until the first Annual Convention Meeting in the election cycle for states with early Primaries. States must submit requests for the Primary Election based on the election cycle calendar approved by the Trustees to ensure an orderly disbursement process. Early funding for a select number of "REALTOR® Champions" may occur at the discretion of the Trustees pending a request from the respective state trustees.

Special Recognition Fund expenditures may include direct contributions or in-kind research (benchmark polls, focus groups, demographic studies).

After a state RPAC committee initiates a federal candidate request for Special Recognition funds to the NAR RPAC Disbursement Trustees, that request should remain confidential until the NAR RPAC Disbursement Trustees have reviewed the request and made their decision. When the RPAC Disbursement Trustees provide maximum funding to a candidate (\$5,000 per election), the candidate may state that they have been endorsed by RPAC. Candidates receiving lesser amounts of Special Recognition funding would merely be supported by RPAC. Only once the NAR RPAC Disbursement Trustees have bestowed maximum funding and thus endorsed the candidate may the state and local associations also endorse the same candidate. Candidates only receiving DC or In-state Reception funds should not be considered as having the support of RPAC until Special Recognition funding is bestowed by the NAR RPAC Disbursement Trustees.

NATIONAL ASSOCIATION OF REALTORS® policy prohibits state or local associations/PACs from making direct or "indirect" contributions to federal candidates and that State associations and their associated PACs may not support federal candidates by advocating or otherwise supporting the election of federal candidates in other lawful ways, such as independent expenditures, advocacy communications directed to members, or public communications that identify federal candidates. This requirement is also embodied in the NAR/RPAC - State Association/State PAC Contribution Collection and Cooperation Agreement. If a state or local association or PAC wishes to supplement the efforts of National RPAC to assist a federal candidate, any proposed activities must first be approved by National RPAC.

A subset of Special Recognition is a Debt Relief contribution. This is a contribution made after the election. It may total \$5,000 per election, which includes any contribution made before the election. Candidate questionnaires are not required to submit a Debt Relief request.

All contributions for Special Recognition are wired to the respective campaign committees with the FPC and/or the state association's leadership (including respective National and State RPAC Trustees) being notified. In no event shall a contribution be made to a candidate later than the day prior to the election for which the contribution is designated.

APPROVAL PROCESS: STATE ORIGINATED REQUESTS

The National RPAC Trustees must approve all Special Recognition Fund requests by a 2/3 vote of the Trustees present.

All National RPAC Disbursement Trustee deliberations and materials are confidential. However, the respective Trustee should contact the state association prior to the National RPAC Disbursement Trustee Meeting to inform them that they have submitted a request that will be on the Discussion Agenda to solicit their rationale for the request.

The following RPAC forms must be submitted to the NAR staff by the requests cut-off date for the next scheduled National RPAC Disbursement Trustees meeting or conference call:

- A completed RPAC "Candidate Contribution Request" online form.
- A completed Candidate Questionnaire must also be submitted with all challenger and open seat requests for both the candidate being recommended as well as for the opponent.
- The RPAC "Candidate Contribution Request" form must be approved by the State RPAC Chairman and approved by the State RPAC Trustees committee.

RPAC Candidate Profile

NAR Staff must provide to state association staff a candidate profile of incumbents based on the REALTOR® Party Criteria (see below). State staff may then decide how best and in what format to share the information with their state Trustees per the custom in that state. The State is encouraged to invite their NAR Political Representative to attend the meeting to be able to provide any further information requested by the state Trustees on their delegation.

RPAC Decision Notification

A candidate should not be made aware of the state request before the National RPAC Disbursement Trustees have made a final funding decision. The State AE or GAD will be notified by NAR staff of the action taken by the National RPAC Disbursement Trustees within 72 hours of the vote.

NATIONAL ORIGINATED REQUESTS

- National RPAC encourages state and local RPAC Committees to make a recommendation in all Primary and General Elections in both incumbent and open seat races. RPAC does not support more than one candidate in a race so in the rare circumstances when the state RPAC Trustees are unable to generate a request, National RPAC will remain neutral in the race unless it chooses to generate a nationally originated request.
- The National RPAC Disbursement Trustees may originate a request for Special Recognition Funding for a U.S. House or Senate incumbent/open seat candidate if a state RPAC Trustee Committee has not made a request for funds within 60 days of the election.
- NAR staff must complete an RPAC "Candidate Contribution Request" form and a summary of the candidate interview (if open seat), and submit them to the National RPAC Disbursement Trustees by the requests cut-off date for the next scheduled meeting or conference call of the RPAC Trustees.
- National RPAC Disbursement Trustees must approve all Special Recognition Fund requests by a 2/3 vote of the Trustees present.
- When requests are initiated by the National RPAC Disbursement Trustees, the State RPAC Chairman will be asked for input prior to the vote.
- The state AE or GAD will be notified of the action taken by the National RPAC Disbursement Trustees within 72 hours of the vote.

REALTOR® Party RPAC Disbursement Criteria

RPAC policy is to support incumbents who have been supportive of NAR.

In order to gauge the deserved level of support, the following criteria will be used to build a candidate profile of incumbents to evaluate support for each election cycle's funding. The criteria are:

- Action taken to advance NAR legislation (Initiating Dear Colleague letters, supportive action during hearings, floor speeches, etc)
- Group action (Co-sponsorship of NAR legislation, co-signing of regulatory letters)
- Congressional Leadership Position
- Congressional Committee Assignments
- Congressional Voting Record
- DC Engagement
- In-state Accessibility
- Race Competitiveness

E. POLITICAL PARTY CONTRIBUTIONS

PURPOSE: To increase our political visibility in United States House and Senate races.

ACTIVITY: To contribute up to the maximum amount allowable by federal campaign finance law per year each to the National Republican Senatorial Committee, Democratic Senatorial Campaign Committee, National Republican Congressional Committee, Democratic Congressional Campaign Committee, Republican National Committee and Democratic National Committee.

APPROVAL PROCESS:

A simple majority vote of the National RPAC Trustees present is required to approve these contributions.

F. POLLING PROGRAM

PURPOSE: To provide a poll either as an in-kind contribution to a candidate, or to conduct a poll for internal use only to be shared with a state Trustees Committee to assist them in making a candidate funding recommendation.

ACTIVITY: To provide funding using Political Advocacy Fund (PAF) for internal polling or RPAC funds for polling to be shared with candidates.

APPROVAL PROCESS:

NAR staff or a state Trustees committee may request funds for an internal poll. State Trustees must request providing a poll as an in-kind contribution to a candidate. A simple majority vote of the National RPAC Disbursement Trustees present is required to approve either of these type of polling expenditures.

G. LEADERSHIP PAC CONTRIBUTIONS

PURPOSE: To ensure that funds are available to assist targeted Members of Congress with raising money for their Leadership PACs. They, in turn, use the funds to support other incumbent and non-incumbent candidates for Congress, thereby expanding NAR's and their influence in the federal electoral and legislative processes.

ACTIVITY: To set aside a specific amount of funding at the beginning of each election cycle for unanticipated election cycle needs. The Leadership Committees of the House Speaker, the House Majority Leader, the House Minority Leader, the Senate Majority Leader, The Senate Assistant Majority Leader and the Senate Minority Leader shall each automatically receive \$5,000 each year of the cycle. The remaining funds shall be used at the discretion of the trustees and staff in accordance with the approval process.

APPROVAL PROCESS:

For Leadership PACs other than those listed above, the NAR Sr. Vice President and RPAC Program Representative may approve to expend up to \$1,000 per calendar year

per Leadership PAC. The RPAC Disbursements Trustees Chairman, NAR Sr. Vice President and RPAC Program Representative may approve to expend up to \$2,500 per calendar year per Leadership PAC.

A two-thirds vote of the National RPAC Disbursement Trustees present is required to approve funding beyond \$2,500 and up to the \$5,000 per calendar year limit.

H. DC IN-KIND FUNDRAISERS

PURPOSE: This program enables National RPAC Disbursement Trustees to provide our valued federal candidates with additional dollars from individuals and PACs outside of the REALTOR association.

ACTIVITY: To generate financial support for federal candidates. Fundraisers in Washington, D.C. will be organized by NAR's RPAC staff and Legislative Representatives targeting other D.C. based PACs. National RPAC Disbursement Trustees will provide the organizational support for the approved fundraisers, thus generating an "in-kind contribution" to the campaign.

In compliance with Federal Election Commission law, in-kind contributions combined with any direct contributions may not exceed the allowable limits of \$5,000 for a primary or a general election campaign.

APPROVAL PROCESS:

The RPAC Trustees must approve. Targets are generally also President's Circle recipients.

I. DC MEET & GREETINGS

PURPOSE: This program enables the REALTORS® Association to provide our valued federal candidates an opportunity to meet with NAR Lobbyists and other lobbyists from other lobbying groups to discuss public policy issues, but not campaign-related topics.

ACTIVITY: RPAC Disbursement Trustees will fund up to \$500 for NAR to host a Meet and Greet event for a Member of Congress. Since it is only a policy-based discussion, the cost does not count against the candidate's contribution limit as an in-kind contribution.

APPROVAL PROCESS:

The RPAC Disbursement Trustees must approve the candidate for NAR to host the event.

J. IN-STATE MEET & GREETINGS

PURPOSE: This program enables the REALTORS® Association to provide our valued federal candidates an opportunity to meet with REALTORS® to discuss public policy issues, but not campaign-related topics.

ACTIVITY: RPAC Disbursement Trustees will fund up to \$1000 for a state or local association to host a Meet and Greet event for a Member of Congress. Since it is only a policy-based discussion, the cost does not count against the candidate's contribution limit as an in-kind contribution.

APPROVAL PROCESS:

The RPAC Disbursement Trustees must approve the candidate for the association to receive funding. There is no formal approval process, but states interested should contact their NAR Political Representative.

K. IN-STATE IN-KIND FUNDRAISERS

PURPOSE: This program enables the REALTORS® Association to provide our valued federal candidates with additional dollars from individuals and PACs outside of the REALTOR association.

ACTIVITY: State and local associations are generally discouraged from conducting In-Kind fundraisers due to the complicated reporting requirements specified by federal election law. Instead, they are encouraged to take advantage of the In-Home Political Events program.

In compliance with Federal Election Commission law, the in-kind contributions, combined with any direct contributions, may not exceed the allowable limits of \$5000 for a primary or \$5000 for a general election campaign.

APPROVAL PROCESS:

Due to the potential legal liabilities for National RPAC, instate In-Kind Fundraiser requests must be approved in advance by the National RPAC Trustees. The state GAD or AE should contact NAR staff and then the GAD or EO will be subsequently notified by NAR staff if approval is granted.

L. IN-HOME POLITICAL EVENTS PROGRAM

PURPOSE: Unlike the district-based Meet & Greet program which is a strictly public policy-only event, the In-Home Political Events program allows FPCs to add a political component to the event per the following guidelines.

ACTIVITY: RPAC Disbursement Trustees will fund via the Political Advocacy Fund the cost of hosting a “Political” Meet and Greet whereby an incumbent candidate may also fundraise from REALTORS® in attendance, though they are not required to contribute in order to attend.

APPROVAL PROCESS:

The RPAC Trustees must approve. Targets are generally also Level 1 Opportunity Race recipients.

I. Background

In January 2005, the RPAC Trustees approved funding to create an In-Home Political Event (IHPE) program, which would encourage Federal Political Coordinators (FPCs) to host REALTOR® political events -- ideally in their home for their assigned Member. The objective was to help FPCs build relationships with their respective Member of Congress (MOC) and foster better and more frequent dialogues between MOCs and REALTORS® on the grassroots level. The program utilizes RPAC Political Advocacy Funds (PAF) to help underwrite costs up to \$1,000 per event (i.e. for food and beverage).

II. Program Goals and Objectives

The program was created to enhance the relationship between REALTORS® and their federally elected officials by exchanging views on legislative topics as well as engaging REALTORS® in the candidate’s election campaign. The program has a grassroots focus with a two-part goal:

- First, to provide a comfortable, informal setting in the FPC’s home to cement the FPC/Congressman’s relationship as well as for other attending REALTORS® to meet their Member of Congress, ask questions, and discuss issues of importance to NAR members and the real estate profession in general;
- Second, to encourage REALTORS® who are supportive of the Member of Congress to take an active role in Member’s re-election effort. To that end, attending REALTORS® may be asked to make a low to mid-level contribution (\$25 to \$250) to the candidate’s campaign, or simply volunteer in a related capacity.

The goal of the In-Home Political Event program is not to raise large sums of individual/personal REALTOR® funds for a targeted candidate. That is the objective of NAR's Presidents Circle. Instead, the goal is to strengthen the FPC/Congressman's relationship by achieving a large attendance of REALTORS® to underscore the political clout of the FPC and their association to the Member of Congress and his/her campaign. (*Note - this should be made clear to the campaign in advance of confirming the event).

III. Program Targets

In Home Political Event congressional targets are selected based on the following factors:

- The MOC's importance to NAR's legislative agenda,
- The experience/ability of the MOC's FPC to successfully host the event.
- The record of legislative support of NAR issues by the MOC, or the need to educate the MOC on a critical REALTOR® issue.

The likelihood of success appears to be predicated on these factors:

- The involvement of a motivated and organized FPC
- The existence of legitimate grassroots REALTOR® support for the Member within the state/district
- The active involvement of the NAR Field Staff (and occasionally the state/local association staff) that were instrumental in assisting and organizing the events.

Staff also recommends a two-track approach to the program:

- Election-year targets would be Members of Congress facing competitive elections who will also be receiving Opportunity Races.
- Off-election year targets would focus on freshman/junior members who don't necessarily have competitive races but who have been supportive of NAR and would appreciate the attention by NAR.

IV. Program Criteria

Criteria for selection of a MOC for an IHPE include the following:

Election year criteria

- Support by the MOC for NAR legislative priorities
- MOC faces a competitive race in either the congressional primary or general election.
- Recommendation and approval of an Opportunity Race for the MOC in a congressional election year
- Agreement by the FPC to host the event
- Availability of NAR Field Staff to assist with event organization/execution

Off Election year criteria

- Freshman or junior MOC who was supported by RPAC in the past election
- Initial record of support by the MOC for NAR legislative priorities
- Holds a committee assignment of strategic importance to REALTOR® interests
- Agreement by the FPC to host the event
- Availability of NAR Field Staff to assist with event organization/execution

V. Legal Considerations

In order for NAR to use treasury funds (“soft dollars”) to pay the costs of the event, three requirements must be met:

- 1) Only REALTORS® may be invited and attend the event;
- 2) A suggested contribution may be included on the invitation and may be solicited at the event by the FPC, but REALTORS® must be allowed to attend at no cost if they wish;
- 3) No REALTOR® volunteer or association staff may handle collecting the funds; the candidate or his campaign staff must do so. The rule is you may solicit, but not facilitate contributions to the candidate.

In addition, the costs incurred by NAR in connection with the event must be reported to the Federal Election Commission, although there is no limit on such costs.

VI. Program Approval Process

- Any FPC may submit their Member of Congress as a possible target to receive support via this program;
- Field Staff reviews the target in regard to above criteria, especially electoral competitiveness and REALTOR® support of candidate;
- Lobbyist reviews the target in regard to above criteria, especially support for NAR legislative priorities;
- Political Program staff recommends targets to RPAC Disbursement Trustees based on above discussion and input;
- RPAC Disbursement Trustees review requests and makes final determination;
- FPC is notified, and if request is approved, Field Staff contact FPC to begin process of planning/executing event

M. FEDERAL OPPORTUNITY RACES:

PURPOSE: The Opportunity Race program channels REALTOR® grassroots support for federal candidates who are advocates of the real estate industry. It may be as simple as educating REALTORS® about the candidate's voting record on real estate issues to ensure REALTOR® support of the candidate on election day; or as involved as encouraging REALTORS® to help directly affect the outcome of the race through their volunteer efforts on behalf of that candidate's campaign.

NOTE: All communication to REALTORS® come from NAR. It is NAR policy as well as RPAC policy that NAR does not make NRDS membership lists available to candidates or political entities for any purpose.

ACTIVITY: NAR's Opportunity Race Program is a grassroots-based program that encourages REALTORS® to support and become active in the campaigns of selected NAR-supported federal candidates. REALTORS® are contacted by NAR through direct mail, phone banks, email and other campaign activities and encouraged to support a particular candidate for Congress in their state or district. Since federal election law allows only a maximum of \$10,000 to be contributed to a candidate by RPAC, the Opportunity Race program allows NAR to go the extra step to help elect pro-REALTOR® candidates.

The Opportunity Race program is funded through voluntary corporate contributions, commonly referred to as "soft dollars." Because all election communications by NAR are provided to members only, NAR may use so-called "soft dollars" or "non-federal funds" and save our RPAC "hard dollars" or "federal funds" to be used only for direct contributions to candidates.

NAR has a unique advantage over many other participants in the political process in that we have over one million members to draw upon. The Opportunity Race program seeks to channel that resource into an effective political force that will make a difference in the election.

This has the effect of also serving as a lobbying tool, in that Members of Congress will be far more receptive to NAR's concerns if they know the REALTORS® in their districts are educated and motivated voters. The program also has the added value of showing REALTORS® their political contributions at work while educating them on the voting record of the candidates running to represent them in Congress.

APPROVAL PROCESS:

National RPAC Disbursement Trustees must approve Opportunity Race requests by a 2/3 vote of the Trustees present.

Opportunity Race Levels

There are three levels of support in the Opportunity Race program. Each level is generally defined by the amount of voter contact between NAR and its members in support of the chosen federal candidate.

The level selected for each race depends on many factors but the two main qualifiers are: how good of a supporter is the candidate, and how viable of a chance does the selected candidate have of winning the race.

Level 1 (1A or 1B)

GOAL: To positively affect the election outcome of NAR-supported candidates in highly competitive races for Congress, as well as to educate the REALTOR® membership on the issues facing Congress.

ACTIVITY: Consists of the following activities:

- 4 pieces of Direct Mail (Postcards, brochures, personalized letters)
- Could also include:
- Telephone Town Halls, Voter File Targeting and Voter Registration, and/or Early/Absentee voting, Facebook and Digital Ads, Online Videos and a Fundraiser
- REALTOR® Action Center emails/” REALTORS® For” websites, and online videos
- For Level 1A races, a NAR Field Rep. will work in the state/district to educate and encourage REALTORS® to become active in the targeted campaign.
- Level 1B races entail the same direct costs as Level 1A, but there is no NAR Field Staff component. (See Request Process below for more details)
- For a candidate to benefit from an Independent Expenditure or NAR Political Advocacy, the candidate must first be approved for a Level 1A or Level 1B Opportunity Race

COMPONENTS:

- Assemble Steering Committee
- Gather a Media Kit (Picture of candidate, campaign address)
- Collect best mailing list of REALTORS® (NRDS, state or local)
- Decide which issues to use on mail pieces
- Choose which mail templates to use
- Encourage volunteers to participate in field activities (Level 1A only)

QUALIFICATIONS:

- Highly competitive race (Defined by “Lean” or “Toss-up” by Cook Report)
- Has championed REALTOR® public policy priorities

Level 2

GOAL: To positively affect the election outcome of NAR-supported candidates in competitive races for Congress, as well as to educate the REALTOR® membership on the issues facing Congress.

ACTIVITY: Consists of the following activity:

- 2 pieces of Direct Mail (Postcards, brochures, personalized letters)

COMPONENTS:

- Assemble Steering Committee
- Gather a Media Kit (Picture of candidate, campaign address)
- Collect best mailing list of REALTORS® (NRDS, state or local)
- Decide which issues to use on mail pieces
- Choose which mail templates to use

QUALIFICATIONS:

- Competitive race (Defined by “Lean” or “Likely” by Cook Report)
- Has consistently supported REALTOR® public policy priorities

Level 3

GOAL: To positively affect the legislative behavior of NAR-supported candidates in minimally competitive races for Congress, as well as to educate the REALTOR® membership on the issues facing Congress.

ACTIVITY: Consists of the following activity:

- 1 piece of Direct Mail (GOTV Postcard)

COMPONENTS:

- Assemble Steering Committee
- Gather a Media Kit (Picture of candidate, campaign address)
- Collect best mailing list of REALTORS® (NRDS, state or local)
- Decide which issues to use on mail pieces
- Choose which mail template to use

QUALIFICATIONS:

- Minimally Competitive race (Defined by “Likely” or “Solid” by Cook Report)
- Has supported at least one key REALTOR® public policy priority

Opportunity Race Request Process

State RPAC Trustees may request an Opportunity Race on behalf of a federal candidate by submitting an electronic candidate request. The Meeting schedule for the National RPAC Disbursement Trustees is listed on the RPAC website along with the respective cut-off date that requests must be received by for each meeting. If the candidate is a challenger or Open seat candidate, a candidate questionnaire must also be submitted.

Since the success of the program is dependent upon sufficient lead-time to manage the logistical challenges of this complex program, a premium will be placed on those requests that are received in a timely manner. The Cook Report rankings are a good barometer of what Opportunity Race level should be requested but of course exceptions may exist based on other factors.

For Level 1 Requests, the state shall simply request Level 1 if they seek maximum support. The choice as to whether the race ultimately is designated as a Level 1A (with Field Staff component) or Level 1B (without Field Staff component) will later be determined by NAR Advocacy staff based on a variety of factors. Such factors include:

- Availability of NAR staff based on other commitments
- Number and motivation level of REALTORS® in state/district
- Geographic factors that determine concentration of REALTORS® in state/district.

For Senate candidates only, the comment field of a Level 1 request should include what resources the state plans to commit in conjunction with NAR to achieve victory if the race is chosen for 1A status. This is not necessary for Level 1 requests for House candidates. Since the Cooperative Agreements state that only NAR may fund federal candidates, the state would commit resources to such activities as voter registration, sample ballots, and/or absentee ballot programs that benefit all candidates.

Because a Level 1A race is such a significant commitment of NAR/RPAC resources and also relies on state resources for maximum benefit, Level 1 requests require a ¾ vote of the State Trustees if they are to be considered for Level 1A status. Furthermore, if NAR Advocacy staff selects a senate race to be a Level 1A target, it requires that the State Board of Directors or State Leadership Team also approves of the State Trustees' Level 1 request and is supportive of contributing state resources to the effort.

When considering requesting an Opportunity Race, it is recommended contacting your NAR Political Representative to seek their input in the process, as they serve as the primary point person during the implementation of the Opportunity race.

N. INDEPENDENT EXPENDITURES

Protocols for NAR/RPAC Federal Independent Expenditure Campaigns

To ensure all NAR/RPAC-funded Independent Expenditures are sufficiently independent to be legal, the following protocols have been developed and will be followed.

Independent Expenditures: Purpose, Criteria & Guidelines (amended April 5, 2019)

Purpose:

To elect carefully chosen REALTOR® Champions and pro-REALTOR® candidates for federal office by making strategic, targeted, and effective independent expenditures (IEs) in support of chosen candidates.

Candidate Selection Criteria:

1. The relevant state and local REALTOR® Trustees (and/or boards and associations) must support both the candidate and the IE, evidence of which is demonstrated through previous and current RPAC contributions, a “Level One” Opportunity Race request, and information about REALTOR® involvement in the candidate’s campaign;
2. The candidate is a proven REALTOR® Champion, with a documented record of supporting REALTOR® causes and issues, or the candidate is recognized as a future leader in Congress with a limited pro-REALTOR® record resulting from the candidate’s short tenure in public office;
3. The candidate is not running against an incumbent who has a demonstrable record of support for REALTOR® issues and substantial history of NAR/RPAC support.
4. The candidate’s race is perceived by the country’s leading political analysts to be statistically close, whereby national and NAR/RPAC polling indicate a successful Independent Expenditure campaign would likely influence the outcome of the election;
5. Polling conducted by NAR political consultants indicates the candidate’s campaign is well established such that the candidate has significant name recognition and is tracking among the top candidates in the election;
6. NAR consultants and staff review the race (demographics, media markets, voter interest and/or receptivity to REALTOR® messaging) and determine an IE will positively influence the race.
7. The candidate’s campaign committee is well funded such that public campaign finance filings, to the extent filings are available, indicate the candidate’s campaign committee has raised funds at least comparable to other leading candidates.
8. The candidate campaign committee is prudently spending campaign funds, to the extent such information is available via public campaign finance filings.
9. “First do no harm” - There are no additional “political” considerations in the race that would jeopardize the effectiveness of the IE (for example, the IE communications may result in a media backlash for the candidate – e.g. outside money).

Implementation Guidelines:

1. By default, NAR-produced IEs will be in support of the selected candidate, unless the process for using compare/contrasting IE communications is followed and approved.

- a. Compare/contrasting communications may be made in conjunction with a federal IE only if the State requesting the Level One Opportunity Race requests such communications.
 - b. Compare/contrasting communications are those that clearly and unambiguously reference the IE candidate's opponent for the purpose of distinguishing the IE candidate from the candidate's opponent. They are not communications about the candidate's personal life, but are communications that highlight professional and policy differences between or among the candidates.
 - c. The RPAC Trustees Federal Disbursements Committee may approve compare/contrast communication for an IE upon a 2/3 vote of the total Trustees.
2. NAR staff and outside political consultants assess candidates meeting the Criteria above and generate a "target" list of potential IE candidates. The Federal IE Advisory Board (FAIEB), a subgroup of the Trustees, reviews the target list and votes on which candidates will receive an IE. For those candidates the FAIEB votes in support of, NAR staff and political consultants will develop formal proposed IE plans and provide those plans to the FAIEB. The FAIEB considers each proposed IE plan, makes edits to the plan/budget where it deems necessary and votes to approve or deny each proposed IE plan. FAIEB-approved IE plans are provided to the full RPAC Trustees Federal Disbursements Committee for consideration.
 - a. Each IE plan includes the message, targeted demographics, the method or types of communications (television, digital, mail, etc.), the timing of communications, and a detailed budget listing all IE expenses.
3. The RPAC Trustees Federal Disbursements Committee, after reviewing the FAIEB's recommendations and proposed IE plans, vote to approve or deny each IE plan. A vote against a proposed IE must carry with a two-thirds majority of all the RPAC Trustees Federal Disbursements Committee.
4. FAIEB members, RPAC Trustees Federal Disbursements Committee members, and relevant NAR staff are required to sign an affidavit confirming no contact or activity with the candidate and/or the candidates campaign staff or consultants for which an IE is approved. Any contact or activity that may call into question the independence of an IE must be reviewed and handled by NAR Political Compliance Counsel and may result in abrupt termination of the IE.
5. NAR lobbyists and political field staff will not be involved in recommending or selecting candidates for consideration of an IE and will be required to describe in writing the nature of any communication or interaction with any of the candidates proposed for support.
6. State and Local Association Leadership will be notified at least 72 hours before an IE becomes public as a courtesy to the REALTOR® Associations. Notification will be done via conference call.

O. PRESIDENTIAL CAMPAIGN CONTRIBUTIONS

On May 10, 1986, the following policy regarding Contributions to Presidential Candidates was adopted. The RPAC Disbursement Trustees reaffirmed the policy on May 10, 2005:

“To encourage the continued expansion and growth of REALTOR® involvement in the political process, the RPAC Trustees, the REALTOR® Legislative Committee, and the Political Affairs Committee join in urging all members of the National Association of REALTORS® to participate fully in the Presidential campaign of their choice, on a personal and financial basis to insure that whomever the next President of the United States may be, REALTORS® will have played an active and vital role in his or her election.

The RPAC Trustees of the NATIONAL ASSOCIATION OF REALTORS® are empowered to contribute to the Presidential campaign committee of a declared candidate for President wherein the RPAC Trustees, in their sole discretion, have determined that such candidate enjoys “significant REALTOR® support,” in accordance with the following criteria:

1. Each volunteer committee of REALTORS® for (Presidential Candidate) should be able to demonstrate contributions to the campaign from at least 100 REALTORS® who are contributors to RPAC, from at least 10 states. There should be a minimum of five REALTOR® from each state that are not duplicative of contributors listed by other similar REALTOR® involved Presidential campaigns.
2. Each volunteer committee of REALTORS® for (Presidential Candidate) should be able to demonstrate at least five REALTORS® in at least ten states that hold volunteer positions of responsibility within the organizational framework of the campaign.

If such support is confirmed the RPAC Trustees will consider a contribution to that particular campaign up to the maximum allowed limit under the law (\$5,000).”

P. THE PRESIDENT’S CIRCLE

Program Overview

In 2001, RPAC was the subject of a Presidential Advisory Group to begin preparing in anticipation of pending Campaign Finance Reform (CFR) legislation that ultimately became law and went into effect in 2003. Although the Supreme Court has since struck down other aspects of the law, the prohibition on corporate contributions to national political party committees and federal candidates is still intact, and personal or “hard” dollars remain important.

In light of that reality, NAR/RPAC leadership developed a National “Direct Giver” Program as a key component of NAR’s overall political program. This program not only strengthens RPAC and NAR’s Grassroots, but it also creates an additional communication tool to candidates and add more political options for NAR. Even more importantly, this new program will keep the REALTORS® ahead of the political curve.

NAR and RPAC Leadership felt this was our chance to reaffirm our status as national trade association with the most political clout in the Washington and decided to move forward with the President’s Circle Program.

The program consists of an annual individual hard dollar pledge of \$2,000 in order to join. Members write checks payable directly to designated federal candidates or National Political Party Committees of their choice when called upon to do so. Participants have flexibility among the NAR designated targets in choosing which federal candidates or National Political Party Committees they wish to support to fulfill their \$2,000 calendar year pledge. Only RPAC Sterling, Crystal, Golden, and Platinum R Major Investors may participate in the President’s Circle program.

NAR staff recommends a select list of program recipients that include National Political Party Committees and federal candidates. The National RPAC Trustees approve or deny staff recommendations of proposed program recipients and these targets are reported to the NAR Leadership Team. Checks or online contributions from President’s Circle members are sent directly to the Committee or Candidate.

President's Circle Purpose and Guidelines *(Amended April 2006)*

Program Purpose and Features:

To establish a National REALTOR® Direct Giver Program with a guiding principle of establishing an elite group of investors that will complement the REALTORS® Political Action Committee. Program features include:

1. Program Name

The name of the direct giver program is the President's Circle. The Leadership Team changed the name in April 2004 from the REALTOR® Party President's Circle (RPPC).

2. Financial Goal

The goal of the President's Circle will be to increase membership and disbursements each year based on the previous year's performance.

3. Eligibility

Only RPAC Major Investor (Sterling, Crystal, Golden and Platinum Rs) program participants are permitted to participate in this elite NAR Direct Giver program.

4. Investment Level

An annual individual hard dollar pledge of \$2,000 is required to join the President's Circle. NAR staff requests program participants to make online contributions directly to designated federal candidates/National Political Party Committees using the Presidents Circle contribution platform (presidentscircle.realtor). Participants have complete discretion and flexibility to choose the designated federal candidates and/or National Political Party Committees that will receive contributions necessary to fulfill the participants \$2,000 pledge.

5. Benefits

President's Circle members receive:

- 1) Legislative briefings and communications from Sr. VP of Advocacy.
- 2) Invitations to private receptions at national meetings.
- 3) Invitation to Annual RPAC/President's Circle Conference

6. Direct Giver Recipients and Program Governance

The NAR staff recommends a select list of program recipients that includes National Political Party Committees and federal candidates, subject to RPAC Trustees approval of such staff recommendations. Actions of the RPAC Trustees are reported to the NAR Leadership Team.

7. Criteria for Direct Giver Recipients

1. Federal Candidates. Selection dependent upon the candidate meeting some or all of the following:

- has demonstrated outstanding commitment to the NAR legislative agenda
- has a key position to affect the NAR legislative agenda
- has a political need for the extra support
- has state and local REALTOR® support
- has received maximum RPAC support and/or an Opportunity Race in last election

2. National Political Party Committee Events. Selection dependent upon some or all of the following Party Leaders being present at event:

- House and Senate Leadership
- House and Senate Committee and Subcommittee Chairs and Ranking Members
- Cabinet Secretaries
- President or Vice President of the United States

8. State RPAC Recognition

States receive no credit towards achieving their Fundraising Goal (originally did when program began).

9. Fundraising Apparatus

The NAR President will annually appoint a Fundraising Liaison and Disbursements Liaison who oversee the program via the RPAC Fundraising Trustees (responsible for membership recruitment) and the RPAC Federal Disbursement Trustees (responsible for target selection and resource allocation per target).

10. Delivery of Funds

- 1) On-line funds must be invested only thru the official President's Circle website www.presidentscircle.realtor.

11. RPAC Hall of Fame Credit

Investments to the program are counted toward entry into RPAC's Hall of Fame. The "Hall of Fame" is an aggregate lifetime total of at least \$25,000 to RPAC.

12. Modifications to the Program

The RPAC Trustees must approve program modifications.

Q. THIRD PARTY POLITICALLY ORIENTED CONTRIBUTIONS

In April 2019, the RPAC Disbursement Trustees voted to permit contributions to politically oriented organizations, such as super PACs and 501c4 entities. Politically

oriented organizations unaffiliated with NAR may be able to reach audiences and influence voters in ways NAR/RPAC is not able. By taking advantage of this available federal spending method, NAR is able to remain relevant and effective in today's ever-changing campaign finance landscape.

PURPOSE: To increase the REALTOR® Political Action Committee's reach and political influence, positioning RPAC for the future as among the most important voices/influencers at the federal level.

ACTIVITY: NAR may make contributions to super PACs and 501c4 entities without limit, from either its hard dollar (RPAC) account or its soft dollar (Congressional Fund) account.

APPROVAL PROCESS:

NAR staff, at regularly scheduled Trustee meetings, will present the RPAC Disbursement Trustees with contribution options, recommendations related to the relevant NAR account to be used and recipient organization information. Approval of such contributions require an affirmative vote of two-thirds of the RPAC Disbursement Trustees.