



Staff Memorandum 2025-01

A candidate who creates a candidate committee while a previous candidate committee is still active has an affirmative duty to dissolve the first candidate committee within sixty days of creating the second candidate committee.

The spirit of Rule 2.69 is to ensure that those donating to a candidate committee are donating to the current, active committee. The rule prohibits having more than one candidate committee open at a time, except that for *no more than* 60 days, a candidate can have two committees open, giving the candidate time to dissolve the first committee.

Rule 2.2 defines a candidate committee as the “only” committee authorized by a candidate to accept contributions or make expenditures on behalf of the candidate. Using this definition in Rule 2.2 combined with Rule 2.69, we find that there is an affirmative duty for candidates to dissolve a first candidate committee within 60 days of creating a new candidate committee.

Candidates have an affirmative duty to dissolve their candidate committee within sixty days of creating a second candidate committee.