



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 2024

Laurence E. Gold, Esq.
1666 Connecticut Avenue, NW Suite 500
Washington, DC 20009

Re: ADR 1129 (A21-09)
Communications Workers of America - COPE Political Contributions
Committee and Ameenah Salaam, Treasurer (C00002089)

Dear Laurence E. Gold, Esq.:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on January 31, 2024 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$3,750 is due on March 1, 2024. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo".

Joshua A. Rebollozo
Assistant Director
Alternative Dispute Resolution Office

Enc: Payment Instructions
Compliance Chart
Negotiated Settlement

ADRO Civil Penalty Payment Instructions

You may remit payment by credit card, debit card, or ACH withdrawal from your bank account through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/adrpayers to be directed to Pay.gov's FEC ADR Payment form.

Unpaid Civil Penalties

Unpaid civil money penalties will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

ADR 1129 Compliance Chart

Type	Date Due
Develop and certify the implementation and distribution of a policy document	March 1, 2024
Certify that a representative participated in an FEC training	January 31, 2025



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Case Number: ADR 1129

Source: AD A21-09

Case Name: Communications Workers of America –
COPE Political Contributions Committee

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Laurence E. Gold, Esq., representing Communications Workers of America - COPE Political Contributions Committee and Ameenah Salaam, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572, and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Audit Division referred Respondents for one (1) finding detailed in the Final Audit Report of the Commission, as approved on August 30, 2023. The finding states that the Committee failed to disclose or adequately disclose the occupation and name of employer information for 18,702 contributions from individuals, totaling \$670,717, during calendar years 2019 and 2020.
4. The FECA requires that a committee disclose the identification of all individuals who contribute in excess of \$200 in an election cycle. Identification is defined as the full name, complete mailing address, occupation and name of employer. 52 U.S.C. § 30104(b)(3); 11 C.F.R. §§ 100.12, 104.3(a)(4), 104.7(b). If unable to provide the identification of contributors, a committee must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," a committee must provide the Commission with a detailed description of the three-part process pursuant to 11 C.F.R. § 104.7(b).
5. In response to the Draft Final Audit Report, the Committee filed amended disclosure reports which corrected the disclosure of occupation and name of employer information for 10,944 contributions from individuals, totaling \$423,840. However, the occupation and name of

employer information for 7,758 contributions, totaling \$246,877, remained inadequate or undisclosed.

6. The Committee further amended its disclosure reports on August 30 and 31, 2023, and contends that the amendments provided additional occupation and name of employer information for 5,824 contributions totaling \$173,968 during the audit period, which the Committee failed to disclose previously due to technological problems arising from a major update of the committee's software after the audit period. The Committee acknowledges its failure to timely disclose this and the other information described, and contends that almost all of the information at issue consisted of occupations rather than names of employers. The Committee further states that it is the separate segregated fund of a connected national labor organization and receives contributions from that organization's members almost exclusively via payroll deduction; there is regular turnover of employment and the identities of its contributors; and the Committee's ability to itemize them accurately and timely is primarily dependent upon receiving current contributor information provided by employers of contributors and the connected organization's affiliated local labor organization collecting agents. In response to the audit, the Committee has addressed an administrative staffing issue and has implemented an improved system for sending out best efforts communications.
7. Respondents, in an effort to avoid similar errors in the future, agree to:
 - a. develop and certify the implementation and distribution of a policy document to be provided to the Committee's staff and collecting agents detailing the Committee's procedures for ensuring "best efforts" are used to obtain contributor information within thirty (30) days of the effective date of this settlement;
 - b. certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this settlement; and
 - c. pay a civil penalty of \$3,750 within thirty (30) days of the effective date of this settlement.
8. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
9. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury for collection.
10. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.

11. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1129 (AD A21-09), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Joshua A. Rebollozo, Assistant Director
Alternative Dispute Resolution Office



01/31/2024

Date Signed

FOR THE RESPONDENTS:

Laurence E. Gold
[Laurence E. Gold \(Jan 17, 2024 17:53 EST\)](#)

Laurence E. Gold, Esq.
Representing Communications Workers of
America - COPE Political Contributions
Committee and Ameenah Salaam, Treasurer

01/17/2024

Date Signed