



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 3, 2024

Helen Schaub, Treasurer  
1199 SEIU United Healthcare Workers East Federal Political Action Fund  
498 Seventh Avenue  
New York, NY 10018

**Response Due Date  
April 24, 2024**

Re: ADR 1163 (RAD 24L-09)  
1199 SEIU United Healthcare Workers East Federal Political Action Fund  
and Helen Schaub, Treasurer (C00348540)

Dear Helen Schaub:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by 1199 SEIU United Healthcare Workers East Federal Political Action Fund which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

The Reports Analysis Division (RAD) referred 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, D.C.  
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its 2021 Year-End and 2022 12-Day Pre-General Reports. On January 24, 2023, the Committee filed an Amended 2021 Year-End Report which disclosed \$102,319.37 in additional debts incurred during the period. On May 16, 2023, the Committee filed an Amended 2022 12-Day Pre-General Report which disclosed \$359,945.19 in additional receipts.

The Committee filed two (2) Form 99s (Miscellaneous Electronic Submissions) on March 16, 2023, and March 20, 2023, explaining the additional activity. The Committee states the additional incurred debts on the Amended 2021 Year End Report, consist of two previously undisclosed debts that were added to the amendment after an internal review. Regarding the 2022 12-Day Pre-General Report, the Committee states that the contribution information from the reporting period was not readily accessible when the original report was filed because of a technical error.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing.

This matter has been designated as **ADR 1163**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,



Rosa Marshall  
Assistant Director  
Alternative Dispute Resolution Office