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By Office of the Commission Secretary at 8:26 am, Jul 30, 2024

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.**SENSITIVE****MEMORANDUM**

July 30, 2024

TO: The Commission

THROUGH: Alec Palmer *DCB* for AP  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1163 - 1199 SEIU United Healthcare Workers East  
Federal Political Action Fund and Helen Schaub, Treasurer  
(C00348540)

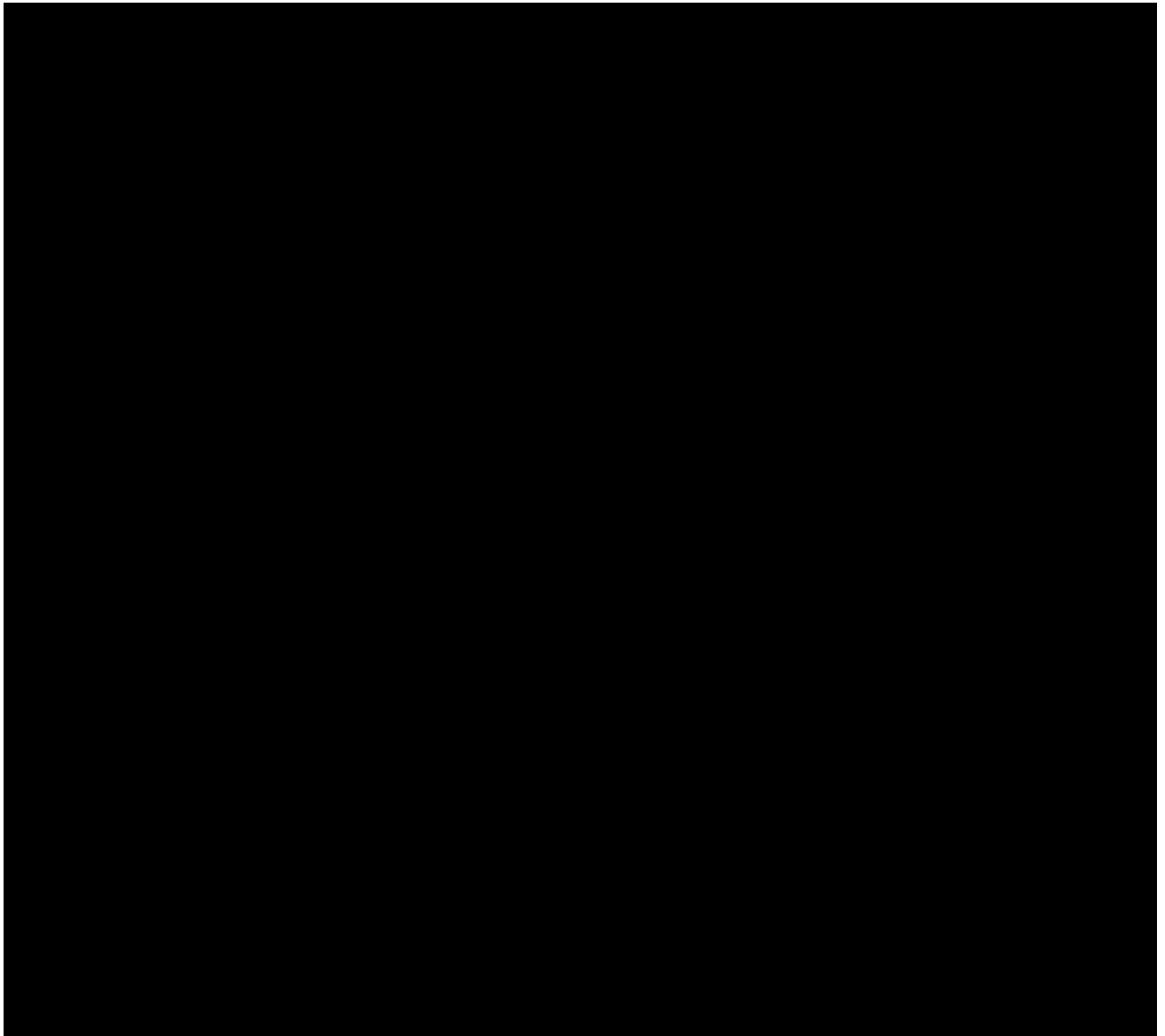
RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC training and pay a civil penalty of \$16,000.

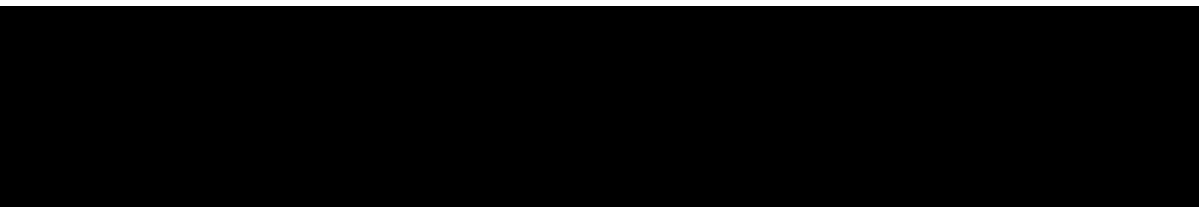
Attached for your review is a signed Negotiated Settlement pertaining to ADR 1163 (RAD 24L-09). The ADR Office received this referral from the Reports Analysis Division (RAD) on March 13, 2024.

**SUMMARY:** 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 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.

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During negotiations, Respondents stated that after conducting an internal review, they discovered that past reports failed to accurately disclose all receipts and debts incurred by the Committee. Respondents stated that all but \$714.01 of the additional incurred debts disclosed on the Amended 2021 Year-End Report were owed to the Committee's connected organization in connection with non-federal election activity and that the omissions were inadvertent. Respondents also stated that the additional receipts disclosed on the 2022 12-Day Pre-General Report were comprised of a large number of connected organization member payroll-deducted contributions that were received during the short timeframe of the report's 19-day reporting period, for which all information was not readily available at the time of the original filing. Respondents further advised that since filing the original reports they have undertaken operational improvements and engagement of compliance personnel in order to attain timely and accurate reporting in the future.





**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.