

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 30, 2024

ANALYST: Michael Williamson

I. COMMITTEE: Transport Workers Union Voice
C00727719
Jerome Lafragola, Treasurer
1220 19th St. NW Ste 600
Washington, DC 20036

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
11 C.F.R. § 11 C.F.R. § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Transport Workers Union Voice (“the Committee”) failed to disclose all financial activity on its 2023 Year-End Report filed on January 31, 2024. On April 15, 2024, the Committee filed an Amended 2023 Year-End Report which disclosed \$125,000.00 in additional receipts which were not disclosed in the original report (Attachment 1).

On January 31 2024, the Committee filed the original [2023 Year-End Report](#) covering the period from July 1, 2023 through December 31, 2023. The report disclosed \$125,000.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) of the [Detailed Summary Page](#).

On April 15, 2024, the Committee filed an [Amended 2023 Year-End Report](#). The report disclosed \$250,000.00 on Line 11(a)(i) of the [Detailed Summary Page](#), a total increase of \$125,000.00.

On May 6, 2024, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2023 Year-End Report, received April 15, 2024. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2023 Year-End Report.

On June 10, 2024, the Committee submitted an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the Amended 2023 Year-End, received April 15, 2024. The Committee stated, in part:

“This letter is being submitted to respond to the RFAI dated May 6, 2024 regarding \$125,000.00 in additional receipts reported on the Amended Year-End Report.

Due to an oversight by our PAC management vendor, a transfer was overlooked prior to the filing deadline for the Year-End Report.

The Amended Year-End report's increase in receipts is correct. We have made adjustments to this process so that the receipt data will be accurately reported going forward and do not anticipate a repeat of this issue in the future.”

To date, the Reports Analysis Division (RAD) has logged three (3) communications with the Committee which reflect efforts to help the Committee voluntary comply with the Act in response to the matters referenced above. RAD was able to connect with Committee on one (1) of these occasions and notified Rich Sylvester, a representative of the Committee, that the matter would be referred to another Commission office for further review (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here: [Transport Workers Union Voice](#).

Transport Workers Union Voice (C00727719)[2023 Year-End Report](#) / [Amended 2023 Year-End Report](#)Overview of Additional Receipts

Report Line	Original 2023 Year-End Report	Amended 2023 Year- End Report, received 4/15/2024	Variance Amount
Receipts			
Line 11(a)(i): Itemized Individual Contributions	\$125,000.00	\$250,000.00	\$125,000.00
		Total:	\$125,000.00