



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 17 2017

American Federation of Teachers,  
AFL-CIO Committee on Political Education  
Loretta Johnson, Treasurer  
555 New Jersey Avenue, NW  
Washington, DC 20001

Dear Ms. Johnson:

The Federal Election Commission ("Commission") has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that the American Federation of Teachers, AFL-CIO Committee on Political Education and you, in your official capacity as treasurer ("Committee"), may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). The Committee has been referred by the Commission to the Office of General Counsel for possible enforcement action under 52 U.S.C. § 30109.<sup>1</sup> Specifically, the Committee has been referred for the following issues that may be in violation of the Act and Commission regulations:

1. 2016 Amended October Monthly Report: Line 23 of the Detailed Summary Page disclosed \$849,320.11. Schedule B supporting Line 23 disclosed \$854,320.11 in disbursements, creating a \$5,000.00 discrepancy.
2. 2016 Amended 30-Day Post General Report: Line 23 of the Detailed Summary Page disclosed \$219,000.00. Schedule B supporting Line 23 disclosed \$224,000.00 in disbursements, creating a \$5,000.00 discrepancy.
3. 2016 Amended September Monthly Report: The Committee's report disclosed additional disbursements totaling \$128,500.00 on Schedule B supporting Line 29, resulting in an increase of more than 5% and \$10,000.00 over the original report
4. 2016 Amended Pre-General Report: The Committee's report disclosed additional receipts totaling \$370,087.24 on Schedule A supporting Line 11(a)(ii) and additional disbursements totaling \$103,307.79 on Schedule B supporting Line 29, resulting in an increase of more than 5% and \$10,000.00 over the original report.
5. 2016 Amended 30-Day Post General Report: The Committee's report disclosed additional receipts totaling \$364,479.31 on Schedule A supporting Line 11(a)(ii) and additional disbursements totaling \$105,000.00 on Schedule B supporting Lines 23 and 29, resulting in an increase of more than 5% and \$10,000.00 over the original report.
6. 2016 Amended October Monthly Report: Schedule B supporting Line 23 failed to disclose the office sought, state, and district for contributions to thirty-six (36) federal candidates totaling \$148,320.11
7. 2016 Amended 30-Day Post General Report: Schedule B supporting Line 23 failed to

<sup>1</sup> Notification of this referral is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

disclose the office sought, state, and district for contributions to seventeen (17) federal candidates totaling \$54,500.00.

8. 2016 Amended October Monthly Report: Schedule B supporting Line 29 failed to disclose an adequate purpose of disbursement to one (1) vendor totaling \$20,671.50

We have numbered this referral

The Act affords you the opportunity to demonstrate in writing that no action should be taken against the American Federation of Teachers, AFL-CIO Committee on Political Education and you, in your official capacity as treasurer, in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.<sup>2</sup>

Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the referral until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

**Mail**  
Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Christal Dennis, Paralegal  
999 E Street, NW  
Washington, DC 20463

OR

**Email**  
CELA@fec.gov

<sup>2</sup> The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

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If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's preliminary procedures for processing possible violations discovered by the Commission.

Sincerely,

*Jeff S. Jordan (by MBS)*

Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination &  
Legal Administration

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