



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

October 28, 2022

**VIA ELECTRONIC MAIL**

Laurence E. Gold, Esq.  
Trister, Ross, Schadler, & Gold, PLLC  
1666 Connecticut Ave., NW, Fifth Floor  
Washington, D.C. 20009  
[lgold@tristerross.com](mailto:lgold@tristerross.com)

RE: MUR 8049 (RR 21L-71)  
Workers Vote and Zaina Tannu in  
her official capacity as treasurer

Dear Mr. Gold:

On October 26, 2022, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your client, Workers Vote and Zaina Tannu in her official capacity as treasurer, in settlement of a violation of 52 U.S.C. § 30104(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.3(d) of the Commission's regulations. Accordingly, the Commission has closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

*Ana J. Peña-Wallace*

Ana J. Peña-Wallace  
Assistant General Counsel

Enclosure:  
Conciliation Agreement

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2 In the Matter of )  
 3 )  
 4 Workers Vote and Zaina Tannu ) MUR 8049  
 5 in her official capacity as treasurer )  
 6 )  
 7 )

8 **CONCILIATION AGREEMENT**

9 This matter was initiated by the Federal Election Commission pursuant to information  
 10 ascertained in the normal course of carrying out its supervisory responsibilities. The  
 11 Commission found reason to believe that Workers Vote and Zaina Tannu in her official capacity  
 12 as treasurer (the "Committee" or "Respondent") violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R.  
 13 § 104.3(d) by failing to accurately report debt.

14 NOW, THEREFORE, the Commission and the Respondent, having participated in  
 15 informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree  
 16 as follows:

17 I. The Commission has jurisdiction over the Respondent and the subject matter of  
 18 this proceeding, and this Agreement has the effect of an agreement entered pursuant to 52 U.S.C.  
 19 § 30109(a)(4)(A)(i).

20 II. Respondent has had a reasonable opportunity to demonstrate that no action should  
 21 be taken in this matter.

22 III. Respondent enters voluntarily into this Agreement with the Commission.

23 IV. The pertinent facts and law in this matter are as follows:

24 1. The Committee is an independent expenditure-only political committee that first  
 25 registered with the Commission on August 7, 2020. Zaina Tannu is its treasurer.

1           2.       On October 15, 2020, the Committee filed its original 2020 October Monthly  
2 Report covering the period from August 7, 2020 through September 30, 2020. The Report did  
3 not disclose any debt.

4           3.       The Committee filed a First Amended October 2020 Monthly Report that  
5 disclosed debt on April 13, 2021. On its Second Amended 2020 October Monthly Report, dated  
6 July 2, 2021, the Committee disclosed \$270,368.37 in debt incurred during the reporting period  
7 that had not been disclosed on its original report.

8           4.       On October 21, 2020, the Committee filed its original 2020 12-Day Pre-General  
9 Report covering the period from October 1, 2020 through October 14, 2020. The Report did not  
10 disclose any debt.

11          5.       The Committee filed a First Amended 12-Day Pre-General Report that disclosed  
12 debt on April 13, 2021. On its Second Amended 2020 12-Day Pre-General Report, dated July 2,  
13 2021, the Committee disclosed \$636,100.37 in debt, \$365,732.00 of which was debt incurred  
14 during the reporting period that had not been disclosed on its original report.

15          6.       On December 3, 2020, the Committee filed its original 2020 30-Day Post-General  
16 Report covering the period from October 15, 2020 through November 23, 2020. The Report  
17 disclosed \$103,537.88 in debt.

18          7.       The Committee filed a First Amended 30-Day Post-General Report that disclosed  
19 additional debt on April 14, 2021. On its Second Amended 2020 30-Day Post-General Report,  
20 dated July 2, 2021, the Committee disclosed \$841,605.97 in debt, \$586,348.03 of which was  
21 debt incurred during the reporting period that had not been disclosed on its original report.

22          8.       On January 30, 2021, the Committee filed its original 2020 Year-End Report,  
23 which disclosed \$2,863,639.35 in debt.

1           9.     The Committee filed a First Amended 2020 Year End Report that disclosed  
2     additional debt on April 13, 2021, and a Second Amended 2020 Year End Report that disclosed  
3     additional debt on May 17, 2021. On its Third Amended 2020 Year End Report, dated July 2,  
4     2021, the Committee disclosed \$3,755,912.20 in debt, \$421,515.88 of which was debt incurred  
5     during the reporting period that had not been disclosed on its original report.

6           10.    On February 4, 2021, the Committee filed its original 2021 30-Day Post-Runoff  
7     Report, which disclosed \$2,707,823.33 in debt.

8           11.    The Committee filed a First Amended 2020 30-Day Post-Runoff Report that  
9     disclosed additional debt on April 13, 2021. On its Second Amended 2020 30-Day Post-Runoff  
10    Report, dated July 2, 2021, the Committee disclosed \$4,277,845.77 in debt, \$608,807.43 of  
11    which was debt incurred during the reporting period that had not been disclosed on its original  
12    report.

13          12.    On April 29, 2021, the Commission's Reports Analysis Division (RAD) sent a  
14    request for additional information ("RFAI") to the Respondent concerning the debts disclosed on  
15    the First Amended 30-Day Post-Runoff Report. On May 3, 2021, RAD sent an RFAI to the  
16    Respondent concerning the debts disclosed on the First Amended 2020 Year-End Report. On  
17    July 8, 2021, RAD sent RFAs to the Respondent concerning the debts disclosed on,  
18    respectively, the Second Amended 2020 October Monthly Report, the Second Amended 2020  
19    Pre-General Report, and the Second Amended 2020 Post-General Report. The Respondent  
20    timely filed a FEC Form 99 responding to each RFAI.

21          13.    The Federal Election Campaign Act of 1971, as amended (the "Act"), and  
22    Commission regulations require political committees to disclose the amount and nature of  
23    outstanding debts and obligations until those debts are extinguished. 52 U.S.C. § 30104(b)(8);

1 11 C.F.R. §§ 104.3(d), 104.11(a). Debts of \$500 or less must be reported no later than 60 days  
2 after the obligation is incurred, while debts of more than \$500 must be reported as of the date the  
3 obligation is incurred. 11 C.F.R. § 104.11(b).

4 14. The Committee failed to report the debt discussed in paragraphs IV.2-11, which  
5 exceeded \$500, as of the date it was incurred. Therefore, the Committee failed to accurately  
6 report its debt on its original 2020 October Monthly Report, 2020 12-Day Pre-General Report,  
7 2020 30-Day Post-General Report, 2020 Year-End Report, and 2021 30-Day Post-Runoff  
8 Report.

9 15. The Respondent contends that its under-reporting of debt was the inadvertent  
10 consequence of operating a multi-state voter-contact canvassing operation that relied on  
11 information secured from numerous providers of goods and services, as well as the result of  
12 inadvertent errors in classifying and reporting that debt. The Respondent further contends that it  
13 uncovered its reporting errors without prompting from the Commission, subsequently directed its  
14 compliance firm to undertake a comprehensive review of its debt reporting, and filed a series of  
15 amended reports in a good faith effort to rectify the debt disclosure errors discovered in the  
16 original reports.

17 V. The Committee violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. § 104.3(d) by  
18 failing to accurately report its debt.

19 VI. 1. The Committee will pay a civil penalty to the Federal Election  
20 Commission in the amount of Sixty-Nine Thousand Dollars (\$69,000), pursuant to 52 U.S.C.  
21 § 30109(a)(5)(A).

22 2. The Committee will cease and desist from violating 52 U.S.C.  
23 § 30104(b)(8) and 11 C.F.R. § 104.3(d).

1           VII.    The Commission, on request of anyone filing a complaint under 52 U.S.C.  
2   § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review  
3   compliance with this Agreement. If the Commission believes that this Agreement or any  
4   requirement thereof has been violated, it may institute a civil action for relief in the United States  
5   District Court for the District of Columbia.

6           VIII. This Agreement shall become effective as of the date that all parties hereto have  
7   executed same and the Commission has approved the entire Agreement.

8           IX.    Respondent shall have no more than 30 days from the date this Agreement  
9   becomes effective to comply with and implement the requirements contained in this Agreement  
10   and to so notify the Commission.

1           X.     This Conciliation Agreement constitutes the entire agreement between the parties  
2     on the matters raised herein, and no other statement, promise, or agreement, either written or  
3     oral, made by either party or by agents of either party, that is not contained in this written  
4     agreement shall be enforceable.

5     FOR THE COMMISSION:

6     Lisa J. Stevenson  
7     Acting General Counsel

8     BY:     **Charles**  
              **Kitcher**

Digitally signed by  
Charles Kitcher  
Date: 2022.10.28  
12:30:29 -04'00'

10/28/22

9     Charles Kitcher  
10    Associate General Counsel

Date

11    FOR THE RESPONDENT:

12     *Laurence E. Gold*

13    Laurence E. Gold  
14    Counsel to Workers Vote and Zaina Tannu  
15    in her official capacity as treasurer

*October 6, 2022*  
Date