



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Via Electronic Mail Only
lgold@tristeross.com

April 1, 2024

Laurence E. Gold
Trister, Ross, Schadler & Gold PLLC
1666 Connecticut Avenue, NW, Firth Floor
Washington, DC 20009

RE: AR 24-01
1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen
Schaub, in her official capacity as treasurer

Dear Mr. Gold:

The Federal Election Commission ("Commission") has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that your clients, 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub in her official capacity as treasurer ("Committee"), may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). Following an audit conducted by the Commission pursuant to 52 U.S.C. § 30111(b), the Committee has been referred by the Audit Division to the Commission's Office of General Counsel for possible enforcement action under 52 U.S.C. § 30109.¹ Specifically, your clients have been referred for failure to properly disclose apparent independent expenditures totaling \$1,075,248, on Schedule E (Independent Expenditures); Calendar Year 2020, and for failure to file 24/48-hour reports for apparent independent expenditures, totaling \$75,500; Calendar Year 2020. We have numbered this referral AR 24-01.

The Act affords your clients the opportunity to demonstrate in writing that no action should be taken against 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub in her 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, including the Department of Justice.² While the matter remains open, it will remain confidential as set forth above. After the matter is closed, certain documents from the file will be made available to

¹ 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).

² 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).

the public on the Commission's website. To learn more about the agency's disclosure policy, please see 81 Fed. Reg. 51,702 (Aug. 2, 2016), <https://fec.gov/resources/cms-content/documents/notice2016-06.pdf>

Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the complaint 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):

U.S. Postal Service
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

Delivery Services
(FedEx, UPS, DHL)
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20002

Email
cela@fec.gov

As indicated in the FEC's Notice found at <https://www.fec.gov/resources/cms-content/documents/status-of-fec-operations.pdf>, the office's mailroom is open on a limited basis and, therefore, processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file responses and additional correspondence via email.

If you have any questions, please contact Christal Dennis at (202) 694-1519. For your information, we have enclosed a brief description of the Commission's procedures for processing possible violations discovered by the Commission.

Sincerely,

Wanda D. Brown

Wanda D. Brown
Assistant General Counsel
Complaints Examination &
Legal Administration

