



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Adrienne C. Baranowicz
Deputy Associate General Counsel for Enforcement

BY: Mark D. Shonkwiler *MS*
Assistant General Counsel

Kimberly D. Hart *KDH*
Attorney

DATE: February 11, 2025

SUBJECT: MUR 8348 (SEIU)
Recommendation to Accept Signed Conciliation Agreement

On November 13, 2024, the Commission found reason to believe that 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub in her official capacity as treasurer (the “Committee”) violated 52 U.S.C. § 30104(b)(4)(H)(iii) and 30104(g)(1) and 11 C.F.R. § 104.4(a) and 104.4(c), provisions of the Federal Campaign Election Act of 1971, as amended (the “Act”) and the Commission’s regulations.¹ The Commission authorized the Office of General Counsel to engage in pre-probable cause conciliation with the Committee and approved a conciliation agreement [REDACTED].²

[REDACTED]

¹ Certification (“Cert.”) ¶¶ 2, 3 (Nov. 13, 2024); Factual & Legal Analysis at 2, MUR 8348 (SEIU) (Nov. 13, 2024).

² Cert. ¶ 5; SEIU RTB Notif. Letter at 1-2 (Nov. 22, 2024) (explaining the calculation of the civil penalty).

[REDACTED]

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35 We recommend that the Commission accept the attached signed conciliation agreement
36 and close the file effective 30 days after the certification of this vote is signed (or on the next
37 business day after the 30th day, if the 30th day falls on a weekend or a holiday).

⁴ Attach. 2.

⁵ Conciliation Agreement §§ 14-16, MUR 8092 (Provenance).

⁶ See Attach. 2.

RECOMMENDATIONS

1. Accept the attached signed conciliation agreement with 1199 SEIU United Healthcare Workers East Federal Political Action Fund and Helen Schaub in her official capacity as treasurer;
2. Approve the appropriate letter; and
3. Close the file effective 30 days after the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or a holiday).

