



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**Via Email**

lgold@tristerross.com

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

March 21, 2025

RE: MUR 8348 (1199 SEIU)

Dear Mr. Gold:

On February 19, 2025, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 52 U.S.C. §§ 30104(b)(4)(H)(iii) and 30104(g)(1) provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, effective today.

Documents related to the case will be placed on the public record today. *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. Payment can be made online by debit, credit card, or automated clearing house (ACH) withdrawal, using this link to the government's secure portal for online collections: <https://www.pay.gov/public/form/start/316805379>. Payment can also be made by check or money order payable to the Federal Election Commission and sent via regular mail to the Federal Election Commission, 1050 First Street NE, Washington, DC 20463, or by courier or overnight delivery to the same address but with a different zip code (20002). Please write the matter number "MUR 8348 civil penalty" on the memo line of the check. If you have any questions, please contact me at (202) 694-1021.

Sincerely,

A handwritten signature in cursive script that reads "R Weiss".

Richard Weiss  
Attorney

Enclosure  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
1199 SEIU United Healthcare Workers East	)	MUR 8348
Federal Political Action Fund and Helen Schaub	)	
in her official capacity as treasurer	)	

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission (the “Commission”) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. 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 (together, “Respondent” or the “Committee”) violated: (1) 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4(a) of the Federal Election Campaign Act of 1971, as amended (the “Act”) and Commission Regulations by failing to report independent expenditures (“IEs”) totaling \$1,075,248 on Schedule E of its 2020 Pre-General and 2020 Post-General Reports; and (2) 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c) by failing to timely file 24-Hour Reports for IEs totaling \$75,500.

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

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

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

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

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

1. 1199 SEIU United Healthcare Workers East Federal Political Action Fund is a separate segregated fund registered with the Commission since 1999.

2. Helen Schaub is the Treasurer of the Committee.

3. The Act and Commission regulations require political committees to provide an accounting of all disbursements, including IEs, on their regularly scheduled disclosure reports. 52 U.S.C. § 30104(b)(4)(H)(iii); 11 C.F.R. § 104.4(a). Committees shall report the name and address of any person who receives a disbursement for an IE from the committee during the reporting period in an aggregate amount in excess of \$200 within the calendar year (or election cycle for an authorized committee), as well as the date, amount, and purpose of any such IE and include a statement that indicates whether such IEs are in support of or in opposition to a candidate, as well as the name and office sought by such candidate. 52 U.S.C. § 30104(b)(6)(B)(iii); 11 C.F.R. § 104.4(a). Committees must also report the total of all IEs. 52 U.S.C. § 30104(b)(4)(H)(iii); 11 C.F.R. § 104.4(a).

4. Political committees that make IEs aggregating \$1,000 or more with respect to a given election after the 20th day, but more than 24 hours before the date of that election, must file a 24-Hour Report to disclose such IEs by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on which a communication is publicly distributed or otherwise publicly disseminated. 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c). Additional 24-Hour Reports must be filed by 11:59 p.m. the following day each time a committee makes or contracts to make IEs aggregating an additional \$1,000. 11 C.F.R. § 104.4(c).

5. During the 2020 election cycle, the Committee failed to report IEs totaling \$1,075,248, on Schedule E of its 2020 Pre-General and 2020 Post-General Reports. In addition, the Committee made two IEs, totaling \$75,500, that were disseminated between October 6 and November 3, 2020, for which it failed to file the requisite 24-Hour Reports.

6. The Committee has amended its 2020 Pre-General and 2020 Post-General Reports to properly disclose Schedule E entries.

V. Respondent contends that it timely reported on 48-Hour Reports and 24-Hour Reports all but \$75,500 of the independent expenditures that it inadvertently omitted or misattributed from the subsequent periodic reports at issue in this matter, and that the latter independent expenditures were made in the same election race as timely reported independent expenditures. Respondent further contends that it has undertaken substantial efforts to improve its reporting compliance operations.

VI. The parties agree to the following:

1. Respondent violated 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4(a) by failing to report IEs totaling \$1,075,248 on Schedule E of its original 2020 Pre-General and 2020 Post-General Reports.

2. Respondent violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c) by failing to file the requisite 24-Hour Reports for the two IEs totaling \$75,500.

VII. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of Eighty-five Thousand Dollars (\$85,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from violating 52 U.S.C. §§ 30104(b)(4)(H)(iii), 30104(g)(1); and 11 C.F.R. § 104.4(a), (c).

