

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

August 6, 2017

SARA STEFFENS, TREASURER COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL CONTRIBUTIONS COMMITTEE 501 THIRD STREET, NW WASHINGTON, DC 20001

Response Due Date 09/11/2017

IDENTIFICATION NUMBER: C00002089

REFERENCE: JUNE MONTHLY REPORT (05/01/2017 - 05/31/2017)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in enforcement action. Additional information is needed for the following  $\underline{1}$  item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer name and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

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Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

• clearly ask for the missing information, without soliciting a contribution,

• inform the contributor of the requirements of federal law for the reporting of such information, and

• if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1176.

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Sincerely,

Mahad Ochry Michael Adamsky

Michael Adamsky Campaign Finance Analyst Reports Analysis Division

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## Inadequate Employer/Occupation Entries COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL CONTRIBUTIONS COMMITTEE (C00002089)

Employer	Occupation
ABC	Information Requested
ALASKA AIRLINES	Information Requested
AMERICAN FED OF GOVT EMPLOYEES	Information Requested
AMERITECH	Information Requested
AT&T COMMUNICATIONS	Information Requested
ATT MOBILITY/ CINGULAR	Information Requested
AVAYA	Information Requested
BECHTEL MARINE	Information Requested
BELLSOUTH TELECOMMS	Information Requested
CAMDEN COUNTY	Information Requested
CITIZENS COMMUNICATIONS	Information Requested
CITIZENS TELECOM, ROCHESTER NY	Information Requested
CITIZENS UTILITY CO	Information Requested
D MAX	Information Requested
DEGRAFF MEMORIAL HOSPITAL RN'S	Information Requested
DEGRAFF MEMORL HSPTL	Information Requested
DMAX	Information Requested
ESSEX CO WELFARE BOARD PROFESSIO	Information Requested
FORMICA CORPORATION	Information Requested
FRONTIER NORTH (FOR:VZ WEST)	Information Requested
GE AIRCRAFT ENGINES	Information Requested
GE APPARATUS SERVICE CENTER	Information Requested
GENERAL ELECTRIC	Information Requested
GLOUCESTER COUNTY EM	Information Requested
HAWAIIAN AIRLINES	Information Requested
Information Requested	Information Requested
KALEIDA HEALTH SYS/PROFESSIONAL	Information Requested
KALEIDA HEALTH SYSTEM	Information Requested
KALEIDA-ADVANCED HOME CARE	Information Requested
MERIDIAN AUTOMOTIVE SYSTEMS, INC	Information Requested
MILLARD FILLMORE RNS	Information Requested
NEW JERSEY CITY UNIVERSITY	Information Requested
NEW JERSEY STATE EMPLOYEES	Information Requested
NJ STATE EMPLOYEES ADMN CLERICAL	Information Requested
NYC HEALTH & HOSP	Information Requested
PACIFIC BELL TEL CO	Information Requested
PUBLIC EMPLOYEES RPRSNTV UNION	Information Requested
QWEST COMMUNICATIONS	Information Requested
SBC - CINGULAR FACILITIES	Information Requested

## Inadequate Employer/Occupation Entries COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL CONTRIBUTIONS COMMITTEE (C00002089)

Employer	Occupation
SBC - SOUTH WESTERN BELL	Information Requested
STATE OF NEW MEXICO	Information Requested
STEEL WAREHOUSE CO., INC.	Information Requested
ULTCW-SEIU 6434	Information Requested
VALOR	Information Requested
VALOR-KERRVILLE TEL	Information Requested
VERIZON CORPORATE SERVICES	Information Requested
VERIZON-BELL ATLANTIC DELAWARE	Information Requested
VERIZON-BELL ATLANTIC NORTH	Information Requested
VERIZON-BELL ATLANTIC NTWK	Information Requested
VERIZON-BELL ATLANTIC PA	Information Requested
VERIZON-BELL ATLANTIC SOUTH MD	Information Requested
VERIZON-BELL ATLANTIC SOUTH VA	Information Requested
VERIZON-GTE HERSHEY	Information Requested
VERIZON-GTE OF SW TEXAS	Information Requested
VERIZON-TELESECTOR RESOURCES	Information Requested
VISITNG NURSES ASSC OF WSTRN NY	Information Requested