



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 4, 2018

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

Response Due Date
03/12/2018

IDENTIFICATION NUMBER: C00002089

REFERENCE: DECEMBER MONTHLY REPORT (11/01/2017 - 11/30/2017)

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 2 item(s):

1. Schedule A (see attached) discloses a contribution from an individual who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) (formerly 2 U.S.C. §441e(a)) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual

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knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

2. Schedule B of your report discloses disbursements with the purpose of "VOID CK0025754 Orig 10/20." Please be advised that if the committee received goods or services from a vendor without making any payment for the services rendered, the committee may be in receipt of a prohibited contribution. 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) prohibits the receipt of contributions from corporations unless made from separate segregated funds established by the corporations and labor organizations. Any prohibited contribution must be refunded or disgorged. (11 CFR § 103.3(b)(1) and (2)) The refund must be made within 30 days of the treasurer becoming aware of the possible illegality of the contribution. (11 CFR § 103.3(b)(2)) If the identity of the contributor cannot be determined, the committee must disgorge funds to a governmental entity or to a qualified charitable organization described in 2 U.S.C. § 170(c). (Commission Advisory Opinions 1995-19 and 1991-39). Please take and report corrective action or amend your report if these transactions were incompletely or incorrectly disclosed.

- Your committee has previously indicated that it has been using "best efforts" to obtain the full name, mailing address, occupation and name of employer for each contributor; however, this report discloses a significant increase in the number of entries that lack this information. Please amend your report to provide the omitted information or provide an explanation of your efforts in this regard. (11 CFR §§104.3(a)(4)(i) and 104.7)

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

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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.

Sincerely,



Michael Adamsky
Campaign Finance Analyst
Reports Analysis Division

Impermissible, Excessive, and Prohibited Contributions
COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL CONTRIBUTIONS
COMMITTEE (C00002089)

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
MORLEY, ELAINE	11/28/17	\$20.00	2017 December Monthly