



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 21, 2019

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

**Response Due Date**  
**04/25/2019**

IDENTIFICATION NUMBER: C00002089

REFERENCE: 30 DAY POST-GENERAL REPORT (10/18/2018 - 11/26/2018)

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 3 item(s):

1. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A

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supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

2. The totals listed on Lines 7, 23, 31, and 32, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

3. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

- 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 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

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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 <http://transition.fec.gov/rad/>. 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

**Apparent Impermissible, Excessive, and Prohibited Contributions****COMMUNICATIONS WORKERS OF AMERICA-COPE POLITICAL CONTRIBUTIONS  
COMMITTEE (C00002089)****Apparent Excessive Contributions to a Committee/Candidate Committee**

| <b>Recipient Name</b>      | <b>Date</b> | <b>Amount</b> | <b>Election</b> | <b>Report</b>            |
|----------------------------|-------------|---------------|-----------------|--------------------------|
| Tim Ryan for Congress      | 11/27/17    | \$5,000.00    | G2018           | 2017 December Monthly    |
| Tim Ryan for Congress      | 11/6/18     | \$5,000.00    | G2018           | 2018 30 Day Post-General |
|                            |             |               |                 |                          |
| LIUBA FOR CONGRESS         | 8/14/18     | \$1,000.00    | G2018           | 2018 September Monthly   |
| LIUBA FOR CONGRESS         | 9/13/18     | \$1,500.00    | G2018           | 2018 October Monthly     |
| LIUBA FOR CONGRESS         | 10/26/18    | \$3,500.00    | G2018           | 2018 30 Day Post-General |
|                            |             |               |                 |                          |
| Sylvia Garcia for Congress | 1/17/18     | \$5,000.00    | G2018           | 2018 February Monthly    |
| Sylvia Garcia for Congress | 10/19/18    | \$5,000.00    | G2018           | 2018 30 Day Post-General |