



American Postal Workers Union, AFL-CIO

Judy Beard, *Legislative and Political Director*



Guidelines for Raising and Reporting COPA Contributions

The Committee on Political Action (COPA) raises voluntary political contributions to support candidates for political office who champion both working families and the public Postal Service. COPA is non-partisan and a proven force in shaping policy. This guide will assist in APWU members' efforts to raise money for COPA and follow the rules on reporting those contributions to APWU.

These guidelines apply to APWU members and are not intended to solicit contributions to COPA from any person outside of the restricted class (defined below).

Soliciting COPA Funds

Solicitations are broadly defined to include communications that encourage COPA contributions or provide detailed information about how to make them, in addition to outright appeals for donations. Solicitations for contributions to COPA may *only* be sent to people who are part of the APWU family or "restricted class."

This "restricted class" includes:

- All APWU active members and their immediate household residents;
- All APWU retiree members and their immediate household residents;
- All APWU Auxiliary members and their immediate household residents.

Remember that you should not solicit anyone outside of the restricted class, including on union bulletin boards and web pages viewed by the general public. If you use your local newsletter to solicit contributions, you should not send that issue to people outside of the "restricted class," including other unions, public officials, or additional people who might be on your mailing list.

All COPA solicitations should be accompanied by a disclaimer to ensure that contributions are voluntary and will not result in an advantage or disadvantage for the person being solicited. The disclaimer should read:

This COPA solicitation is paid for by the American Postal Workers Union, 1300 L Street NW, Washington, DC, (202) 842-4200; it is not authorized by any candidate or candidate's committee. Contributions or gifts to COPA are not deductible as charitable contributions for federal income tax purposes. COPA will use the contributions it receives for political purposes, including making contributions to candidates for federal, state and local offices, and addressing political issues of public importance. Contributions to COPA are voluntary. The amount given or the refusal to give will not benefit or disadvantage the person being solicited. Federal law requires political action committees to report the name, mailing address, occupation, and employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

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COPA Dos and Don'ts

The Federal Election Commission (FEC) is an independent regulatory agency tasked with enforcing federal campaign finance law. Since COPA is a federal political action committee (PAC), the FEC places certain restrictions on what we can and cannot do.

Do Not

- Mix COPA funds with state/local/retiree chapter treasury or personal funds.
 - COPA funds should not be sent via a state/local/retiree chapter check.
- Send COPA money you raise directly to a candidate.
- Solicit contributions from those outside of the “restricted class.”
- Solicit contributions while on USPS property, as doing so may violate the *Hatch Act*.
 - This includes bringing COPA materials or merchandise onto USPS property, and discussing COPA while on USPS property, as this may be considered soliciting.
 - For more information on the federal Hatch Act, which prohibits all “political activities” on postal premises, please visit apwu.org/the-hatch-act/.

Do

- Record the name, amount received, and identifying information (i.e. EIN, last four digits of a Social Security Number) from each COPA contributor.
 - We recommend using our *COPA Donation Record*, found on the APWU website at apwu.org/copa/, to keep proper documentation.
- Document all income and expenditures from all fundraising efforts.
- Send in COPA contributions to APWU within 10 days of receiving them.
- Use the *COPA Contribution Form* to collect COPAmatic, or automatic, deductions via payroll, annuity, or by electronic funds transfer (EFT).
 - This form can be found on the APWU website at apwu.org/copa/

Rules Regarding Fundraising Expenses

Local unions, state organizations, retiree chapters, and APWU Auxiliaries may use treasury funds to urge members to contribute to COPA. We suggest using treasury funds to cover fundraising expenses, NOT the donations collected, since it maximizes the money sent to COPA.

Fundraising efforts that include promotional items, prizes, and entertainment are subject to a limit on the amount of treasury funds that can be used. The value of the prizes, promotions, and entertainment (other than food and drink) may not be disproportionately valuable in comparison to the contributions raised. The Federal Election Commission has determined that a 1/3 rule is a reasonable standard. In other words, if you expect to be able to raise \$900 in COPA donations from a fundraiser, \$300 from the local treasury could be used to purchase prizes or pay for entertainment (other than food and drink).

Due to this 1/3 rule, we ask that all expenses for promotional items, prizes, and entertainment be listed, with receipts, and mailed in with the COPA donations raised. APWU will compare the

total cost of the expenses to the total cost of the donations raised to determine if we are in compliance with the FEC's 1/3 rule.

Additionally, local unions, state organizations, retiree chapters, and APWU Auxiliaries may use treasury funds to pay for the cost of money orders and postage, which do not count as an expense or donation under the 1/3 rule.

How to Properly Collect COPA Donations

Before the Event

1. Grab a few *COPA Donation Record* sheets.
 - a. If the fundraiser is a 50/50 drawing, please use the *COPA Donation Record for 50/50 Drawings* sheet.
 - These record sheets are available on the APWU website at apwu.org/copa/ to print, however we can also email or mail them to you.
2. Keep all receipts for any expenses for promotional items, prizes, and entertainment incurred to run the fundraiser.

During the Event

1. Ensure that everyone who donates to COPA is accounted for on the *COPA Donation Record*.
 - a. Double check that all fields are filled in and are legible. APWU must confirm that everyone who donated is a member of the "restricted class."
2. Add your name, phone number, email address, the date of the fundraiser, and total amount collected at the bottom of each donation record.

After the Event

1. Obtain a money order for any cash collected.
 - a. State, local or retiree chapter checks should not be used to submit COPA donations.
2. Collect any *COPA Donation Records* used, receipts for expenses, and donations collected.
 - a. Copy these documents and keep this record for at least three years.
 - b. Mail these documents to the address below. We recommend sending your donations via priority mail so that tracking is available.

American Postal Workers Union, AFL-CIO
Attn: Legislative and Political Department
1300 L Street NW
Washington, DC 20005

For any questions related to this document, please contact the APWU Legislative and Political Department at 202-842-4211 or email legislative@apwu.org.