



FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 9, 2015

Alison E. Hirsh, Treasurer
Local 32BJ SEIU American Dream Political Action Fund
25 West 18th Street
New York, NY 10011

Re: ADR 749 Local 32BJ Service Employees International Union American Dream Political Action Fund and Alison E. Hirsh, Treasurer

Dear Ms. Hirsh:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by Local 32BJ Service Employees International Union American Dream Political Action Fund which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Local 32BJ Service Employees International Union American Dream Political Action Fund and Alison E. Hirsh, Treasurer, (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

RAD referred Local 32BJ Service Employees International Union American Dream Political Action Fund and Alison E. Hirsh, Treasurer (Respondents or the Committee) for receiving funds originally intended for a non-federal account totaling \$54,580.00 that were transferred-out outside of the permissible timeframe. The Committee received these funds August 22, 2013, and completed the transfer-out on January 31, 2014.

In a Miscellaneous Electronic Transmission (Form 99) filed on October 24, 2014, the Committee stated that it received a wire transfer in the amount of \$54,580.00 from the affiliated labor organization for the Committee's connected organization in August 2013. The Committee mistakenly believed that the origin of the transfer was the labor union's connected federal committee. The Committee states that the error was discovered during the regular audit and review undertaken in preparation of the Committee's 2013 Year-End Report. The Committee contends that the deposit of nonfederal funds was inadvertent, that it discovered the error through an internal audit, and that it quickly and voluntarily rectified the error upon discovery with no prior notification from the Commission.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 749**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions
Commitment to Submit to ADR & Designation of Representative/Counsel

cc: Laurence E. Gold, Esq.