



Federal Election Commission
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2015 MAY 21 A 10:16

SENSITIVE

MEMORANDUM

May 21, 2015

TO: The Commission

THROUGH: Alec Palmer *call for*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 749 Local 32BJ Service Employees International
Union American Dream Political Action Fund and Alison
E. Hirsh, Treasurer, Recommendation to Approve
Settlement Agreement

RESOLUTION TERMS: Perform an annual audit of the Committee's accounts for
calendar year 2015; certify that the Committee performed
reconciliation of the Committee's accounts for each
required FEC report for one year from the effective date of
this agreement; and pay a civil penalty of \$3,900.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 749 (15L-04). The ADR Office received this referral on February 9, 2015.

SUMMARY: *The Reports Analysis Division 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 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.*

Recommendation to Approve
Settlement Agreement
ADR 749 (RAD 15L-04)

Page 1

In a Miscellaneous Electronic Submission (Form 99) filed on October 24, 2014, the Committee stated that it received a wire transfer in the amount of \$54,580 from an affiliated labor organization in August 2013. The Committee mistakenly believed that the origin of the transfer was the affiliated labor organization'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 by transferring the full amount to the intended nonfederal committee, upon discovery, with no prior notification from the Commission.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Local 32BJ Service Employees International Union American Dream Political Action Fund and Alison E. Hirsh, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.