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NAME OF COMMITTEE (In Full)
LOCAL 32BJ SERVICE EMPLOYEES INTERNATIONAL UNION
AMERICAN DREAM POLITICAL ACTION FUND

FEC IDENTIFICATION NUMBER
C00355289

Mailing Address 25 WEST 18TH STREET

City State ZIP Code
NEW YORK NY 10011

Joshua Rebollozo
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission

Re: Year End 2017 Report

Dear Mr. Rebollozo:

I am responding to your letter dated March 29, 2018. We explained the three refunds in memo items in the original report, and provide further information here. The Committee in each case used its best efforts to act in accordance with 11 C.F.R. ? 103.3 under the circumstances with respect to employers of its members with which the Committee had established relationships.

Carlyle Construction Corp. (?Carlyle?) is an employer of members of the connected organization, Local 32BJ SEIU, who make contributions to the Committee via payroll deduction. In July 2017 Carlyle sent a remittance of \$215.00 for such contributions to the Committee. The Committee deposited this remittance and, because there was insufficient documentation, subsequently worked with Carlyle to determine the validity of the remittance. When it was concluded that the remittance was duplicative, the Committee made the refund. The remittance was disclosed on the Committee?s Year End 2017 Report as unitemized contributions on Line 11(a)(ii), and the refund was disclosed on Line 28(a) (page 746) of that report.

Clean Office, Inc. (?Clean?) is also an employer of members of Local 32BJ SEIU who make contributions to the Committee via payroll deduction. In October 2016 Clean sent the Committee a remittance of \$1,364.00 ostensibly consisting of such contributions. The Committee deposited the remittance and, because there was insufficient documentation, subsequently worked with Clean to determine the validity of the remittance. It was ultimately determined that \$955.00 of the remittance did not reflect such contributions and so should be refunded, and the Committee did so in October 2017. The remittance was disclosed as unitemized contributions on the Committee?s Year End 2016 Report, and the refund was disclosed on Line 28(a) (page 746) of the Committee?s Year End 2017 Report.

Culinart Group (?Culinart?) is also an employer of members of the connected organization who make contributions to the Committee via payroll deduction. In December 2016 Culinart sent the Committee a remittance of \$916 ostensibly consisting of such contributions. The Committee deposited the remittance and, because there was insufficient documentation, subsequently worked with Culinart to determine the validity of the remittance. It was ultimately determined that \$600 of the remittance did not reflect such contributions and so should be refunded, and the Committee did so in July 2017. The remittance was disclosed as unitemized contributions on Line 11(a)(ii) of the Committee?s Year End 2016 Report, and the refund was disclosed on Line 28(a) (page 746) of the Committee?s Year End 2017 Report.

In all cases the remittance was reported as unitemized because either the attribution to members did not cause any contributor to reach the \$200.01/yr. threshold for itemization, or because there was no attribution to particular contributors.

Yours truly,

Alison Hirsh
Treasurer, Local 32BJ SEIU AD PAF