



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 15, 2020

LARRY ENGELSTEIN, TREASURER
LOCAL 32BJ SERVICE EMPLOYEES
INTERNATIONAL UNION AMERICAN DREAM
POLITICAL ACTION FUND
25 WEST 18TH STREET 5TH FLOOR
NEW YORK, NY 10011

Response Due Date
07/20/2020

IDENTIFICATION NUMBER: C00355289

REFERENCE: APRIL QUARTERLY REPORT (01/01/2020 - 03/31/2020)

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 an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Line 17 of the Detailed Summary Page discloses \$60,121.50 in dividends, interest, and other federal receipts for which there is no corresponding Schedule A. Any of these receipts that are made to your committee by a single source, which in the aggregate are in excess of \$200 for the calendar year must be itemized on a Schedule A. Please provide a Schedule A or provide an explanation for this apparent discrepancy. (52 U.S.C. §30104(b)(2)(J) and 11 CFR § 104.3(a)(4)(vi))

2. Schedule B of your report discloses a total of \$1,200,000 in payments to your connected organization for "Membership political mobilization". Please be advised that 52 U.S.C. §30118 prohibits a corporation or labor organization from contributing funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives

LOCAL 32BJ SERVICE EMPLOYEES INTERNATIONAL UNION AMERICAN DREAM
POLITICAL ACTION FUND

Page 2 of 3

advance payment for the fair market value of such services. (11 CFR §114.2(f)(2)(i)(A), (C) and (E))

Please amend your report to clarify whether the payment to your connected organization was intended to influence federal elections and provide the dates of the activity conducted by your connected organization. In addition, please clarify whether your committee made advance payment for these services to your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

3. Schedule B supporting Line 28(a) discloses a refund of a contribution made to "Integrity National Corporation". However, it appears that this contribution was not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contribution or provide clarifying information. (52 U.S.C. §30104(b) and 11 CFR § 104.3(a) & (b))

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 those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1148.

LOCAL 32BJ SERVICE EMPLOYEES INTERNATIONAL UNION AMERICAN DREAM
POLITICAL ACTION FUND

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "SB" followed by a long horizontal line extending to the right.

Scott Bennett
Campaign Finance Analyst
Reports Analysis Division

346