



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 7, 2013

ALISON HIRSH, TREASURER
LOCAL 32BJ SERVICE EMPLOYEES
INTERNATIONAL UNION AMERICAN DREAM
POLITICAL ACTION FUND
101 AVENUE OF THE AMERICAS
NEW YORK, NY 10013

Response Due Date
03/14/2013

IDENTIFICATION NUMBER: C00355289

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 2 item(s):

1. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). (2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)) If a new treasurer has been appointed, please file an amended Statement of Organization or a letter (if not an electronic filer) to reflect this change.
2. Schedule B supporting Line 22 discloses \$20,000.00 in transfers to what appears to be a non-federal account of your committee. Please provide further clarification regarding this transfer to your non-federal account.

You are advised that 11 CFR §102.5 prohibits a non federal account from financing activity in connection with federal elections. If any of these disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. (11 CFR §§104.3(b)(3) and 106.1) In addition, if your non federal account has paid any expenditures which should have been allocated, you are advised to correct any non compliance with 11 CFR §§106.6 and 106.7 and establish procedures to insure future compliance

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

Page 2 of 2

with allocation regulations.

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. If you should 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) 694-1167.

Sincerely,



Tyler Culberson
Campaign Finance Analyst
Reports Analysis Division