

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

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

C00355289

Mailing Address 25 WEST 18TH STREET 5TH FLOOR

City NEW YORK State NY ZIP Code 10011

We are responding to your letter dated February 21 (RFAI) regarding the Year-End 2023 Report. The Line 29 disbursements to connected organization SEIU Local 32BJ for Transfers of dues erroneously sent by employers (6 payments totaling \$28,195) are each explained in memo text on that report, as follows: The payment on Line 29 corrected a misdeposit of employer remittances of dues to the committees connected organization, SEIU Local 32BJ. The employer erroneously directed its ACH payment to the Committees account. The Committee promptly discovered the error and transferred the funds to the connected organization. (The employers that so erred also sent actual payroll-deducted contributions from members of SEIU Local 32BJ to the Committee by ACH, which were attributed and reported accurately in the ordinary course and are not at issue here.) The Year-End Report disclosed the receipt of all but \$5,025 of these amounts on Line 17 but did not itemize them because they did not consist of employer funds but of member dues, and no members dues exceeded the \$200 reporting threshold (nor, if any did, would they have reflected a volitional payment by that member to the Committee). We believe that such dues remittances should not be itemized as coming from the employer any more than a collecting agent remitting contributions should be itemized rather than the individual contributors whose contributions the collecting agent forwards to the Committee. The Year-End Report itemized the transfers-out to SEIU Local 32BJ and did so on Line 29 because that appears to be the most appropriate line to do so in the absence of a line on the form thats more specifically tailored to such a payment. If the Reports Analysis Division believes that a different line is more appropriate, we are unaware of any guidance to that effect. Here are the specifics of when the receipts occurred that are associated with each of the 6 transfers (all dates are 2023): a.July 7 transfer of \$5,025: \$380 received on June 22. and \$4,645 received on June 23 (and disclosed on Line 17 of the Mid-Year Report). b.August 11 transfer of \$330: \$330 received on July 20. c.September 13 transfer of \$9,145: \$335 received on August 17, and \$8,810 received on August 29. d.October 5 transfer of \$4,475: \$250 received on September 21, and \$4,225 received on September 29. e.November 6 transfer of \$4,415: \$250 and \$4,165 received on October 19. f.December 22 transfer of \$4,805: \$4,105 received on November 29, and \$700 received during a previous year but on dates uncertain, as the Committee determined following a reconciliation that there was a \$700 overage overall in the amounts deposited in the Committee compared with the amounts remitted by employers of SEIU Local 32BJ member contributions to the Committee. Thank you for your consideration.