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NAME OF COMMITTEE (In Full)
32BJ UNITED AMERICAN DREAM FUND

FEC IDENTIFICATION NUMBER C90016023

Mailing Address 25 WEST 18TH STREET

5TH FLOOR

City NEW YORK State ZIP Code NY 10011

July 16, 2019

Ms. Vicki Davis Senior Campaign Finance Analyst Reports Analysis Division Federal Election Commission 1050 First Street, NE Washington, DC 20463

Re: 2018 October Quarterly Form 5 Report

Dear Ms. Davis:

This responds to your June 11 letter regarding the Filer?s 2018 October Quarterly Form 5 Report. The numbers below correspond to the numbered requests in your letter.

- 1.Our July 10 response to the Commission?s June 5 RFAI regarding the 2018 Year End Form 5 Report addressed the judicially-prompted changes to the Commission?s longstanding policies concerning a non-committee?s reporting on Form 5 of ?contributions? received. As explained below, none of the Filer?s third-quarter 2018 independent expenditures occurred after September 17, so in accordance with the Commission?s October 4, 2018 guidance none are listed on the Amended October Quarterly Report that the Filer is submitting. In any event, the Amended Year End Report disclosed all of the Filer?s 2018 receipts for the reason explained in our July 10 letter.
- 2.The Filer?s two 24-hour reports filed on August 31 estimated the costs incurred on August 29 and 30 for canvass labor independent expenditures in support of House candidate Ayanna Pressley in Massachusetts CD-7. The subsequently determined actual costs were \$2,050.48 for August 29 (reported estimate: \$2,021.25) and \$1,668.44 for August 30 (reported estimate: \$1,600.64). Due to miscommunications between the individuals who were undertaking the independent expenditure canvassing in Boston and the individuals in New York who were preparing the Form 5 reports, the following canvass independent expenditures were not included on 24-Hour Reports:

August 28\$1,337.97 August 31\$2,473.31 September 1\$1,239.36

The Filer regrets these omissions, which were entirely inadvertent and unintentional.

The Filer also made the following canvass independent expenditures in support of Pressley that were not subject to the 24-hour reporting requirement:

September 3\$1,045.02 September 4\$9,034.66

The total of the actual expenditures for this canvass from August 28 through September 4 (every day except Sunday, September 2, when there was no canvass) is \$18,849.23, which was accurately disclosed on the October Quarterly Report. Accordingly, of that figure, \$5,050.64 should have been but was not disclosed on 24-Hour Reports; meanwhile, both the Filer was reporting that it was undertaking this canvass, as did its affiliated political committee, the Local 32BJ Service Employees International Union American Dream Political Action Fund, which filed timely Schedule E 24-Hour Reports about the canvass on August 22, 23, 24, 27 and 28.

3.We have just explained the composition of the reported \$18,849.23 amount. Its attribution on the October Quarterly Report to September 25 was an inadvertent error, reflecting the payment date rather than the dissemination date.

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The reported amount of \$3,339.60 reflects the costs of independent expenditure mailers supporting Pressley (actually, the Pressley portion of mailers that also supported nonfederal candidates) whose design and productions costs were attributable to three mailings, as follows:

August 28\$2,895.60 August 29\$ 308.00 September 3\$ 136.00

Similarly, the September 21 date attributed to the \$3,339.60 figure was an inadvertent error, reflecting the payment date rather than the dissemination dates.

The separate reported amount of \$1,104.59 reflects the postage associated with the three mailings, but no precise breakdown is available (an allocation proportional to the respective design/production costs would be a reasonable estimate), and the attributed September 21 date was an inadvertent error also reflecting the payment date rather than the dissemination dates.

The August 28 and 29 mailings, but not the September 3 mailing, should have been disclosed on 24-Hour Reports. The Filer regrets this omission, which was also completely inadvertent and unintentional and resulted from a similar miscommunication between the individuals who respectively carried out and reported to the Commission the independent expenditure effort in this House election.

Thank you for your consideration.