

A-G79 @ B9CI G'H9LH'fl 97 : cfa ' - - Ł

In response to your letter dated March 28, 2014, please be advised as follows regarding the receipt on the Committee's 2013 Year End Report. On August 23, 2013, the Committee received an ACH wire transfer in the amount of \$54,580.00 from the Service Employees International Union (SEIU), the affiliated international labor organization of the Committee's connected organization. The Committee understood that the origin of the transfer was SEIU's connected federal committee, SEIU COPE.

In January 2014, during the regular audit and review undertaken in preparation of the Committee's 2013 Year-End Report, the Committee discovered that this transfer had instead originated from the SEIU PEA State Fund, a nonfederal committee of SEIU, and that it should have been deposited in the 32BJ United American Dream Fund, a nonfederal committee of the Committee's connected organization. Accordingly, on January 31, the Committee rectified the misdeposit by transferring the full amount of \$54,580.00 to that nonfederal committee, as is reflected on Line 29 of the Committee's April 2014 Quarterly Report.

The original wire of the funds at issue to the Committee from SEIU and the subsequent deposit in the Committee's account arose from a miscommunication between the two labor organizations. The Committee acted well within the 30 days prescribed by 11 C.F.R. ? 103.3(b)(2) following its discovery of the unlawful source of the receipt. Rather than refund the amount to SEIU PEA State Fund, the Committee transferred the funds to the proper recipient non-federal committee. This was appropriate in light of the fact that the federal and nonfederal committees and connected organizations involved are all affiliated with each other under the Commission's regulations. See 11 C.F.R. ?? 100.5(g), 100.6, 106.6.

Because the deposit of nonfederal funds was inadvertent; the Committee discovered the error through its own self-examination, unprompted by the Commission; the Committee immediately rectified the error; and the Committee fully and accurately reported and explained the matter to the Commission in a miscellaneous text in its January 31, 2014 Year End Report, the Committee respectfully requests that no further action be taken regarding this matter.
