



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 16, 2005

Hector Figueroa, Treasurer
Local 32BJ SEIU American Dream Political Action
Fund (32BJ American Dream Fund)
101 Avenue of the Americas
New York, NY 10013

**Response Due Date:
October 17, 2005**

Identification Number: C00355289

Reference: Mid-Year Report (01/01/05-06/30/05)

Dear Mr. Figueroa:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses a receipt(s) from your connected organization totaling \$41,110.35 for the apparent misdeposit of funds originally intended for your connected organization. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations, except that a connected organization may pay for the solicitation or other administrative costs of its separate segregated fund. 11 CFR §114.5(b)(3) Further, you are advised that contributions deposited in either a federal account or an account used for both federal and non-federal activity must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a)

The Commission notes a partial transfer-out on Schedule B to your connected organization for the apparent misdeposit of prohibited funds totaling \$18,697.51. However, please provide clarification regarding the remaining portion of prohibited funds totaling \$22,412.84 in your federal account.

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If any apparently prohibited receipt(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

Although the Commission may take further legal action concerning the apparent misdeposited funds, your prompt action in refunding or transferring out the entirety of these funds will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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) 694-1139.

Sincerely,



Karen E. Trainer
Campaign Finance Analyst
Reports Analysis Division

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