



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

February 5, 2015

TO: The Commission

THROUGH: Alec Palmer *AP for*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *LMF/KJZ*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 749 Local 32BJ Service Employees International Union
American Dream Political Action Fund and Alison E. Hirsh,
Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 15L-04 for processing on January 30, 2015, and the ADR Office designated the referral ADR 749. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 749 on February 9, 2015. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred Local 32BJ Service Employees International Union American Dream Political Action Fund and Alison E. Hirsh, Treasurer (Respondents or the Committee) for receiving funds originally intended for a non-federal account totaling \$54,580.00 that were transferred-out outside of the permissible timeframe. The Committee received these funds August 22, 2013, and completed the transfer-out on January 31, 2014.

In a Miscellaneous Electronic Transmission (Form 99) filed on October 24, 2014, the Committee stated that it received a wire transfer in the amount of \$54,580.00 from the affiliated labor organization for the Committee's connected organization in August 2013. The Committee mistakenly believed that the origin of the transfer

was the labor union's connected federal committee. The Committee states that the error was discovered during the regular audit and review undertaken in preparation of the Committee's 2013 Year-End Report. The Committee contends that the deposit of nonfederal funds was inadvertent, that it discovered the error through an internal audit, and that it quickly and voluntarily rectified the error upon discovery with no prior notification from the Commission.