



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 22, 2009

Anna Burger, Treasurer
Service Employees International Union Committee
on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date:
May 22, 2009

Identification Number: C00004036

Reference: Amended September Monthly Report (8/1/08-8/31/08), received
10/31/08

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 7 items:

1. Your amended report discloses additional disbursements totaling \$4,547,011.47 on Line(s) 21(b), 23, 24 and 29 of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR §104.3
- 2: Your committee has filed a 48 hour notice for an independent expenditure supporting "Barack Obama" (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

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3. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures totaling \$1,000,000.00 from "SEIU (General Fund)" during this reporting period. However, there is \$528,281.02 in debts to this entity disclosed on Schedule D supporting Line 10. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please provide clarifying information regarding this discrepancy and amend your report(s) if necessary.

4. Schedule B of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement may have to be itemized. For example, if the related payment(s) to any one vendor by the staff aggregates in excess of \$200 for the calendar year, the payment(s) must be itemized as a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must clarify this in an amendment to this report. 11 CFR §104.9 and Advisory Opinion 1996-20, footnote 3

5. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "canvass staff and expenses." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

6. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "Squier Knapp Dunn Communications," "SEIU (General Fund)," "Lit Happens" and "MNP Partners Inc." as the payee(s). However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your

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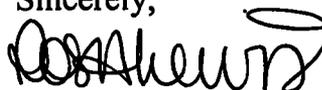
reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

7. Schedule B discloses an expenditure(s) for "database polling services," "Research & Polling" and "media research services." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

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

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) 694-1152.

Sincerely,



Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

Service Employees International Union Committee On Political Education (SEIU COP-E)
1800 Massachusetts Ave NW

Washington DC 20036

FEC ID No. C00004036

24-Hour Notice 48-Hour Notice

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

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FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Service Employees International Union Committee On Political Education (SEIU COPE)	FEC IDENTIFICATION NUMBER C C00004036
Check if <input type="checkbox"/> 24-hour notice <input checked="" type="checkbox"/> 48-hour notice	

Full Name (Last, First, Middle, Initial) of Payee Peter D. Hart Research Associates, Inc.	Date MM / DD / YYYY 08 / 04 / 2008
Mailing Address 1724 Connecticut Avenue NW	Amount 56000.00

City Washington	State DC	Zip Code 20009	Office Sought: <input type="checkbox"/> House State: DC <input type="checkbox"/> Senate District: 00 <input checked="" type="checkbox"/> Presidential
Purpose of Expenditure Polling and research for web posting	Category/ Type	005	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose

Name of Federal Candidate supported or Opposed by expenditure: Barack Obama	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2008 <input type="checkbox"/> Other (specify) : _____
Calendar Year-To-Date Per Election for Office Sought 1110625.31	Transaction ID: D13483

Full Name (Last, First, Middle, Initial) of Payee SEIU (General Fund)	Date MM / DD / YYYY 08 / 04 / 2008
Mailing Address 1800 Massachusetts Ave NW	Amount 110.00

City Washington	State DC	Zip Code 20036	Office Sought: <input type="checkbox"/> House State: DC <input type="checkbox"/> Senate District: 00 <input checked="" type="checkbox"/> Presidential
Purpose of Expenditure reimb staff time for website	Category/ Type	004	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose

Name of Federal Candidate supported or Opposed by expenditure: Barack Obama	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2008 <input type="checkbox"/> Other (specify) : _____
Calendar Year-To-Date Per Election for Office Sought 1110625.31	Transaction ID: D13484

(a) SUBTOTAL of Itemized Independent Expenditures	56110.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	56110.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Anna Burger
Signature
MM / DD / YYYY
08 / 04 / 2008

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Handwritten initials "PW" in a circle.