FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Patricia Ford, Treasurer
Service Employees International Union
Political Campaign Committee
1313 L Street, NW
Washington, DC 20005

DEC 9 1998

Identification Number: C00004036

Reference: Amended July Monthly Report (6/1/98-6/30/98), dated 11/17/98

Dear Ms. Ford:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your response of November 17, 1998, states the following: "In April 1998 Local 1199 became affiliated with SEIU. Thus on June 5, 1998, Local 1199 transferred a total of $770,714 as a collecting agent to SEIU COPE." Your response further states that Local 1199 became affiliated with SEIU in April 1998. The Commission, however, was first notified of this affiliation in your amended Statement of Organization filed *October 2, 1998.* Please clarify whether any part of the $770,714 transfer-in was composed of funds received prior to Local 1199's affiliation with SEIU.

11 CFR 102.6(b)(4)(c)(1) states that the "separate segregated fund shall be responsible for ensuring that the recordkeeping, reporting and transmittal requirements of this section are met." The collecting agent must forward contributions exceeding $50 to the separate segregated fund within ten days of receipt; contributions of $50 or less must be forwarded within thirty days of receipt. Please clarify Local 1199's procedures for collecting and transmitting the contributions to your separate segregated fund including whether the transmittal requirements of 11 CFR 102.8(b) were met.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days