

**ETEXT ATTACHMENT**

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September 4, 2007  
via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: SEIU COPE (ID # C00004036)  
June Monthly Report (5/1/07 - 5/31/07) and  
July Monthly Report (6/01/07- 6/30/07)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter to SEIU COPE dated August 3, 2007 regarding the above referenced reports. In that letter you ask about payments made to another political committee(s) and reported on Line 21(b). There was one such payment disclosed in each report and I will address them in turn below.

The June Monthly Report disclosed a payment of \$15,000.00 to the Nevada State Democratic Party on 5/21/07 for the use of a voter file. It is our understanding and belief that the state party is the exclusive source of certain data in its voter file and that it has established a uniform price for every group or entity seeking access to that data. SEIU COPE was charged the uniform price for that data which we believe is the 'usual and normal charge' for the use of that data under the FEC s regulations. Therefore, we do not believe a contribution was made to or by SEIU COPE as a result of this purchase and that the transaction was properly reported on SEIU COPE's Report.

The July Monthly Report disclosed a payment of \$7,500 to the Iowa Democratic Party on 6/13/07. We have reviewed the transaction and determined that the disbursement was made in error and should have been made from a different, non-federal, account. We have requested that the party refund the full amount to SEIU COPE and when we receive the check we will include it on the next filed report.

If you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

Sincerely,

John J. Sullivan  
Associate General Counsel  
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

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