ETEXT ATTACHMENT

11/19/2004 18 : 19

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November 19, 2004

via electronic filing

Ms. Alissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036
September 2004 Monthly Report

Dear Ms. Sagri:

This is in response to your letter dated October 20, 2004 concerning SEIU COPE s September Monthly Report covering the period from August 1 thought August 31, 2004. In your letter you ask about payments to political committees without identifying the committees or the payments in question. Your letter goes on to question whether these payments were for the provision of goods or services and whether the goods and services were provided at the usual and normal charge. Finally, you ask SEIU COPE to amend its report to include a brief statement or description of why the disbursements were made.

SEIU COPE reported two disbursements on its September monthly Report to a Federally registered political action committee (Committee), of $25,000 and $14,000, describing them as payments for litigation and research services. The recipient Committee has reported receiving those payments as offsets to its operating expenses. These payments were for field staff, consultants and office space for SEIU s investigations to determine whether or not legal grounds existed to challenge the ballot access of certain candidates for Federal Office in the States of Oregon and Maine. SEIU COPE also paid for expenses associated with filing challenges to petitions and petition signatures found to be invalid. SEIU COPE paid the usual and normal charge for these services and the Committee has informed us that a small portion of the funds advanced by SEIU were not spent and that it is transmitting refunds which will be reflected in a subsequent report.

We believe that these disbursements comply with the requirements of the statute and the Commission s regulations and are fairly and accurately described in SEIU COPE s Monthly Report. Please feel free to contact me if you have any further question.

Sincerely,
John J. Sullivan
Associate General Counsel, SEIU
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