ETEXT ATTACHMENT

08/04/2005 18 : 43

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August 4, 2005

via electronic filing

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

RE: SEIU COPE, FEC ID C00004036
May Monthly Report (4/1/05 - 4/30/05)

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 dated July 5, 2005, concerning entries in the Year-to-Date column for itemized and unitemized contributions.

The software program we used to prepare all of the reports for 2005 prior to July calculated line 11(a)(i) to include all prior contributions made by an individual reported on Schedule A, consistent with the "Aggregate Year-to-Date" amount included there. While this seems to be a reasonable and useful interpretation of how to complete this line, we now understand from your letter that the FEC wants us to use an alternative calculation that accumulates the amount itemized each month even if that ignores some of the contributions that are included in an individual contributor s Schedule A year-to-date entry, but were made before that person had reached the over $200 aggregate level. We believed that the Commission s prior instructions were not clear on this point and that we were correctly reporting the aggregate year-to-date information. However, starting with the July Monthly Report we will modify our reporting to comply with your clarification.

We have filed amendments to the February, March, April, May and June reports to reflect your instructions for completing Lines 11(a)(i) and 11(a)(ii). We note that the changes to these 2 lines are exactly offsetting and none of the other information previously reported was amended. Moreover, we would hope that these amendments to comply with your instructions are not considered as audit flags that would serve as a basis for future legal or audit actions by the Commission.

If you have any further questions regarding this mater, please feel free to contact me at 202-898-3465.

Very truly yours,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE
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