

VIA ELECTRONIC FILING

June 2, 2008

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Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: C00430876
Year-End Report (07-01-07 to 12-31-07)

With reference to your request for additional information pertaining to the above-referenced report, please be advised of the following information, which generally corresponds to the order of items noted in your letter:

1) With respect to excessive contributions, the contributions in question should not be aggregated for calendar year 2007. The contribution from SEIU COPE dated 01/08/07 in fact was postmarked and mailed by SEIU COPE in late December 2006, so SEIU COPE then relinquished control over it within the meaning of 11 CFR 110.1(b)(6). WFU PAC received the contribution during the December 23-December 30 mail delivery period when WFU PAC's office was entirely closed for a holiday break and mail accumulated without opening and processing. When WFU PAC operations resumed on January 2, the check was discovered in the holiday mail, and then processed and timely deposited pursuant to 11 CFR 103.3(a). That deposit date was used for the Form 3X, but we are amending both the Year-End Report at issue and the July 2007 Mid-Year Report to more accurately reflect the committee's actual receipt of the SEIU COPE contribution in December 2006.

SEIU COPE's second contribution listed in your letter was sent, received and deposited later during 2007.

Thus, the two contributions span two calendar years and should not be aggregated and then attributed to 2007.

2) Regarding the Schedule B disclosure of a disbursement for "Polling and Research", this was not related to public communications or voter drive activity.

If you require further information or clarification, please contact Gary Gruver at 202-962-7250.
