ETEXT ATTACHMENT

03/18/2005 20 : 11

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March 18, 2005
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
12 Day Pre-General Report (10/1/04-10/13/04)

Dear Ms. Sagri:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated February 16, 2005, requesting additional information regarding the 12 Day Pre-General Report filed by SEIU COPE. Specifically, you request additional information with respect to a reported independent expenditure in the amount of $11,340 paid to SEIU Communication Center Inc.

On or about 10/19 SEIU COPE received an invoice from the SEIU Communications Center, Inc (the Call Center) for communications made during the period October 3–16, 2004. Since the 24 hour notice period had already passed, the obligation for this activity was reflected on the next report filed with the FEC 2 days hence. This expenditure was listed as an obligation on Schedule D and itemized as a memo entry on Schedule E of SEIU COPEs 12 Day Pre-General Report filed on 10/21/04. On 10/26, the invoice was paid and that payment was reflected on Schedule D and itemized as a non-memo entry on Schedule E on the next filed report, the Post-General report filed on 12/2/04.

The Call Center provides a wide variety of phone bank services and projects for SEIU and for SEIU COPE. Further examination of the invoice revealed that the 10/19 invoice for $11,340 was for two separate and distinct sets of calls in support of John Kerry. The fist phone bank communication occurred during the 10/3 - 10/5 period and cost $9,163. No 24 hour notice was filed for this expenditure. A second set of phone bank calls, supporting the same candidate, was made on Oct 16 and cost $2,177. At the time the 10/19 invoice was received, it was not realized that it included the $2,177 obligation for the 10/16 calls which had already been timely reported on the 24 hour notice filed on 10/17/04. Nor did SEIU COPE realize that the 10/16 calls were included in the 10/19 invoice from the Call Center when that bill was paid or when it subsequently paid the Call Center $2,177 a second time for the 10/16 calls. That is why the entire invoice amount -- $11,340 -- was reported on the Pre-General report instead of just the portion related to the 10/3 - 10/5 communication.

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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