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March 10, 1999

HAND DELIVERED

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: SEIU COPE

Dear Mr. Gibson:

We represent the Service Employees International Union Committee on Political Education ("SEIU COPE"). This letter responds to your January 25, 1999, letter regarding the SEIU COPE's Report (6/1/98 - 6/30/98), dated November 17, 1998.

We will respond to your questions in the order that you presented them in your January 29, 1999, request for information relating to SEIU COPE's Amended July Monthly Report:

- \$639,524;
- All of the contributions were by voluntary payroll check-off, not by check;
- See response directly above;
- The funds were solicited for Local 1199;
- Local 1199's records reflect that its political committee did not receive individual contributions in excess of \$50 from its check-off program during the period in question;

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- See letter dated November 16, 1988, from Counsel for Local 1199 to us. We have previously furnished this letter from Local 1199's counsel to the Commission via a letter from us of the same date.

Finally, we must note in closing that we do not understand certain of your office's inquiries. Counsel for Local 1199 and its political committees have explained the funds in question were transferred to SEIU COPE after Local 1199's April 1988 affiliation with the SEIU. Commission regulations permit a separate segregated fund to receive unlimited transfers of federally permissible funds from an affiliated committee. 11 C.F.R. § 110.3(c)(1); 11 C.F.R. § 102.6(a)(1)(i). There can be no dispute that in April 1988 (and thus prior to the transfer in question), Local 1199 became affiliated with the SEIU; neither federal law nor Commission regulations prohibit a separate segregated fund from transferring to an affiliated committee federally permissible funds that were raised prior to the date the committees became affiliated.

We hope the foregoing responds fully to your request for information and apologize for the time it took to assemble the information you requested.

Sincerely,

BRAND, LOWELL & RYAN, P.C.



Stanley M. Brand
David E. Frulla

Counsel for SEIU COPE

DEF:ytb

Federal Election Commission

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