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June 12, 2013

Ms. Nicole Miller  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00004036  
RE: Year-End Report (11/27/2012-12/31/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to: (1) a payment on Schedule E that was not reflected on Schedule D and (2) the possible failure to file 24-hour notices to disclose independent expenditures on the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

Specifically, as to the first matter, the Commission has inquired about payments made to The Pivot Group for independent expenditures that were disclosed on Schedule E but not on Schedule D. The transactions that the Commission is questioning are not actually debts incurred by the committee. These were payments made for independent expenditures that were originally disclosed by SEIU COPE's affiliated committee, Service Employees International Union PEA-Federal (C00523621).

With regard to the the second matter, the Commission has suggested that the committee may have failed to file required 24-hour reports to disclose independent expenditures. As the committee noted on the Year-End Report, these three independent expenditures were originally disclosed on a 24-Hour Notices filed on November 1, 2012, by SEIU COPE's affiliated committee, Service Employees International Union PEA-Federal (C00523621). We have disclosed these payments on Schedule E based on a telephone conversation and guidance provided by the Service Employees International Union PEA-Federal's FEC Reports Analyst, Rosa Lewis. You can view the disclosure of these three independent expenditures on the 24-Hour Notices using image numbers 12940748788 and 12940748789.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider  
Counsel for SEIU COPE

cc: Eliseo Medina, Treasurer, SEIU COPE