ETEXT ATTACHMENT

03/18/2005 20 : 01

[BeginText]
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
30 Day Post-General Report (10/14/04-11/22/04)

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 30 Day Post-General Report filed by SEIU COPE. Specifically, you request additional information with respect to a reported independent expenditure in the amount of $58, 000 supporting North Carolina U.S. Senate candidate Erskine Bowles. This expenditure was reported on a 24 hour notice filed on 10/31/04, however, you state that it was not itemized on Schedule E of SEIU COPE s 30 Day Post-General Report.

On 10/31/04 SEIU COPE filed a 24 hour notice with the FEC in an effort to correct a 24 hour notice which was previously filed on 10/26/04. The 10/26/04 24 hour notice correctly states the amount of the Independent Expenditure at $52,600, but incorrectly attributes the purpose of the expenditure as being to support Presidential candidate John Kerry. After that error was discovered, and because there is no mechanism for amending previously filed 24 hour notices, we filed another 24 hour notice on 10/31/04 in an attempt to correct the error. However, in our effort to correct this error as quickly as possible during the weekend prior to the election, the 10/31/04 notice incorrectly stated the amount of the expenditure as $58,000 rather than $52,600.

The reason there is no $58,000 expenditure for Erskine Bowles itemized on Schedule E of SEIU COPE s 30 Day Post-General Report is because there was no expenditure made by SEIU COPE in support of Erskine Bowles in that amount. The only independent expenditure in support of candidate Bowles was in the amount of $52,600 and, with the exception of the candidate s name, was accurately reported on 10/26/04. The Independent Expenditure was accurately itemized, both with respect to the candidate s name and the amount of the expenditure, on Schedule E of SEIU COPE s 30 Day Post-General Report. The $58,000 expenditure listed on the 10/31/04 24 hour notice was intended to refer to this same transaction, not to any other, but was listed with the incorrect amount.

You also asked about an independent expenditure of $2,177 in support of John Kerry s candidacy dated 10/15/04. This expenditure for phone bank services was included on a 24 hour notice filed on 10/17/04. However, the calls were actually made on 10/16/04 and not on 10/15/04 as reported, and thus the notice was timely.

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