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Dec 30 12 11 PM '98

December 23, 1998

Mr. Neil Evans
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: C00004036
Amended July Monthly Report, dated 11/17/98

Dear Mr. Evans:

I am writing on behalf of the Service Employees International Union ("SEIU") Local 1199 in response to your December 9, 1998 letter regarding the SEIU's Committee on Political Education's ("COPE") July 1998 monthly report.

Specifically, you requested additional information regarding the transfer of funds by Local 1199 to SEIU, an affiliated committee. A portion of the permissible funds transferred by Local 1199 to SEIU COPE in June 1998 may have been raised prior to the date that the committees became affiliated in April 1998. The post-affiliation transfer was made pursuant to Commission regulations which state that a separate segregated fund may receive unlimited transfers of permissible funds from other affiliated committees. 11 CFR 110.3(c)(1). The Commission regulations do not prohibit the transfer of permissible funds between affiliated committees that were raised prior to the date the committees became affiliated. Therefore, when Local 1199 became affiliated with SEIU in April 1998 it was free to transfer unlimited amounts of permissible funds to SEIU without regard to the date that such funds were originally raised by Local 1199.

Please contact me if you have any further questions regarding this matter.

Sincerely,

Lyn Utrecht

Lyn Utrecht

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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