



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 4, 2013

ELISEO MEDINA, TREASURER
SERVICE EMPLOYEES INTERNATIONAL UNION
PEA-FEDERAL
1800 MASSACHUSETTS AVENUE NW
WASHINGTON, DC 20036

Response Due Date
04/08/2013

IDENTIFICATION NUMBER: C00523621

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Line 11(a)(ii) of the Detailed Summary Page discloses \$7,069,915.80 in unitemized receipts from individuals/persons other than political committees during the reporting period. When contributions from an individual reach \$200 for a calendar year, each subsequent contribution from that individual must be itemized, regardless of the amount. Please amend your report to provide a Schedule A if necessary, or to clarify that for the contributions in question, the aggregate year-to-date total for each contributor does not exceed \$200. (11 CFR § 104.3(a)(4)(i))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description: "Voter Outreach Activities (Non-Express Advocacy)." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour reports for independent

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expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

4. Your committee has filed 48 hour reports for independent expenditures supporting Tim Kaine, Barack Obama, Elizabeth Warren, Manny Yevancey, and opposing Mitt Romney (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)


Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

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Sincerely,

A handwritten signature in black ink that reads "ROSA Lewis". The signature is written in a cursive style with a mix of uppercase and lowercase letters.

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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Late 48 Hour Report (Schedule E)

SERVICE EMPLOYEES INTERNATIONAL UNION PEA-FEDERAL (C00523621)

Name of Payee	Date	Amount	Candidate	Election	Report Received
GRSC Consulting	9/18/12	\$231,813.00	Obama, Barack	G2012	10/15/12

Missing Schedule E (48 Hour Report)

SERVICE EMPLOYEES INTERNATIONAL UNION PEA-FEDERAL (C00523621)

Name of Payee	Date	Amount	Candidate	Election
Good Jobs Better Baltimore	9/6/12	\$11,520	Kaine, Tim	G2012
Good Jobs Better Baltimore	9/7/12	\$6,400	Obama, Barack	G2012
Good Jobs Better Baltimore	9/6/12	\$19,200	Obama, Barack	G2012
Good Jobs Better Baltimore	9/6/12	\$16,000	Romney, Mitt	G2012
SEIU Local 3	9/6/12	\$1,551	Warren, Elizabeth	G2012
1 Miami	9/6/12	\$22,183	Yevancey, Manny	G2012