ETEXT ATTACHMENT

09/16/2005 12 : 30

[BeginText]
September 16, 2005
via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE July Monthly Report (6/01/05-6/30/05)

Dear Ms. Lewis:

In your letter to SEIU COPE, dated August 17, 2005, you ask two questions regarding expenditures reported on line 29 and detailed on Schedule B of SEIU COPE's July, 2005 Monthly Report.

The first question relates to a series of expenditures made by SEIU COPE in local elections in Texas. Under Texas law, such expenditures must be made with the equivalent of Federal Funds ("hard money"); either from a Texas registered political action committee or from a political action committee registered with the Federal Election Commission. Each of these expenditures is identified with an explicit reference to "TX election", using the postal abbreviation for Texas. None of these expenditures involved a Federal candidate or an election in which a Federal candidate was on the ballot. We believe that these expenditures were accurately described on Schedule B and properly reported on line 29 of the Monthly Report.

The second item concerns a contribution in the amount of $4,000 from SEIU COPE to the North Carolina Democratic Party. North Carolina, like Texas, requires all campaign contributions and expenditures to be made with hard money. When SEIU COPE made its $4,000 contribution to the North Carolina Democratic Party, it intended that its contribution would be deposited in the Party's non federal account for use in state and local races in North Carolina. However, the Party deposited this contribution into its federal account and reported the contribution on its FEC filings. We only learned of this fact when we received your August 17, 2005 letter.

We have amended our July, 2005 Monthly Report to reflect that the $4,000 contribution, which we originally reported as a contribution to a non-federal account, should be treated as a contribution to the North Carolina Democratic Party's federal account. The contribution is reported on line 23 of the amended Monthly Report. This is SEIU COPE's only contribution to the North Carolina Democratic Party's federal account so far this year. We have also amended our August, 2005 Monthly Report to reflect the changed year-to-date totals for lines 23 and 29.

Please feel free to contact me if you have any further questions.
Sincerely,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs
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