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April 8, 2013

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

Identification Number: C00523621
RE: October Quarterly Report (7/1/2012-9/30/2012)

Dear Ms. Lewis:

This letter is in response to the Commission's request for additional information related to unitemized contributions on Line 11(a)(ii) on the Detailed Summary Page, the disbursement purposes used on Schedule B supporting Line 21(b), a possible missed 48-Hour Notice to disclose an independent expenditure and independent expenditures that were disclosed on 48-Hour Notices but not on Schedule E of the above referenced report filed by the Service Employees International Union PEA-Federal committee.

The Commission has inquired about \$7,069,915.80 disclosed as unitemized receipts from individuals/persons other than political committees during the reporting period. As an independent expenditure only committee, Service Employees International Union PEA-Federal is permitted to fund its activity using membership dues. The \$7,069,915.80 in receipts represents the dues received from a great many members of Service Employees International Union that individually do not reach the \$200 itemization threshold required for disclosure of individual contributions.

In addition, the Commission has asked the committee to clarify the description "'Voter Outreach Activities (Non-Express Advocacy)'" for disbursements disclosed on Schedule B supporting Line 21(b). The committee has filed an amendment to the October Quarterly Report to provide a fuller description of the acceptable purpose of disbursement for these transactions.

The Commission also indicated that the committee may have failed to file a 48-Hour Notice to disclose an independent expenditure made on behalf of Barack Obama. After reviewing the committee's independent expenditure activity, it was determined that this expenditure was actually made to support a New Hampshire gubernatorial candidate and did not contain express advocacy made on behalf of any federal candidates. The amended October Quarterly Report now discloses this expenditure on Schedule B supporting Line 29.

Finally, the Commission has noted that 48-Hour Notices were filed to disclose independent expenditures supporting Tim Kaine, Barack Obama, Elizabeth Warren, Manny Yevancey and opposing Mitt Romney while no expenditures appear on the Quarterly Report. The committee filed the 48-Hour Notice on 9/8/12 in anticipation that the dissemination of direct mail supporting Elizabeth Warren, canvassing supporting Tim Kaine, Barack Obama, Manny Yevancey and opposing Mitt Romney would take place. After further consultations with the committee's vendors, it was determined that these activities never occurred. As such, the committee did not report these estimated expenditures on its October Quarterly Report.

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

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cc: Eliseo Medina, Treasurer, SEIU COPE
