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October 21, 1999

VIA HAND DELIVERY

Mr. Neil Evans
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

**Re: Service Employees Int'l Union Political Campaign Committee
FEC Identification Number C00004036
April 1999 Monthly Report (3/1/99-3/31/99)**

Dear Mr. Evans:

As you know, we represent the Service Employees International Union ("SEIU") Political Campaign Committee.

This letter responds to your October 6, 1999, request for information relating to the above-referenced April monthly report filed by the SEIU Political Campaign Committee.

Specifically, you have requested clarifying information regarding the source of funds for a transfer from SEIU Local 1199 to the SEIU Political Campaign Committee dated March 16, 1998, and reported on the committee's April 1999 monthly report.

In response to your question, we understand that the source of funds for the transfer in question is comprised of permissible federal contributions raised from voluntary contributions by Local 1199 members. As you know, Local 1199 is an affiliate of the SEIU. Please see Brand, Lowell & Ryan's letter to you dated November 16, 1998, with an attached letter from counsel for Local 1199, also dated November 16, 1998.

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Nr. Neil A. Evans

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Finally, notwithstanding that the funds comprising the transfer at issue represent permissible federal contributions from SEIU Local 1199 members, the SEIU Political Campaign Committee has returned the transfer to Local 1199. The refund of funds will be reported on the committee's next-filed report.

Sincerely,

BRAND & FRULLA, P.C.

A handwritten signature in black ink, appearing to be a stylized combination of the initials 'SMB' and 'DEF', written over a horizontal line.

Stanley M. Brand
David E. Frulla

Counsel for SEIU
Political Campaign Committee

Federal Election Commission

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