



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 29, 2009

Anna Burger, Treasurer  
Service Employees International Union  
Committee on Political Education (SEIU COPE)  
1800 Massachusetts Ave NW  
Washington, DC 20036

Response Due Date:  
June 29, 2009

Identification Number: C00004036

Reference: Amended October Monthly Report (9/1/08-9/30/08), received 10/31/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 7 items:

1. Your amended report discloses additional debts totaling \$100,295.80 on Line 10 of the Detailed Summary Page that were not disclosed as having been incurred on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR §104.3
2. Your amended report fails to disclose disbursements previously disclosed on your October Monthly Report, received 10/23/08. Please be advised that when amending an electronically filed document, you must submit a complete version of the report, rather than just those portions that are being amended. Please resubmit your report to include any omitted activity or provide clarifying information as to why this activity was omitted from this amended report. 11 CFR §104.18(f)
3. Your committee has filed a 48 hour notice for an independent expenditure supporting "Barack Obama" (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate

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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.

4. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and E supporting Line(s) 21b and 24, respectively, of your report to clarify the following description(s): "Canvass staff and expenses." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

5. Schedule B of your report discloses reimbursements to individuals for "Reimbursed Convention Expense." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

6. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "SEIU (General Fund)" as the payee(s). However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

7. Schedule B discloses an expenditure(s) for "video production for future use," "media consulting" and "polling, not for specific IE." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that

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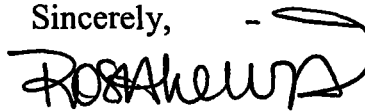
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refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

**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.

Sincerely,



Rosa G. Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division

## 24 / 48 HOUR NOTICE OF INDEPENDENT EXPENDITURE, on :

FEC ID No.

24-Hour Notice

48-Hour Notice

SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURESPAGE OF 3 / 4  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Service Employees International Union Committee On Political Education (SEIU COPE)		FEC IDENTIFICATION NUMBER <b>C</b> C00004036	
Check if <input type="checkbox"/> 24-hour notice <input checked="" type="checkbox"/> 48-hour notice			
Full Name (Last, First, Middle, Initial) of Payee SEIU (General Fund)		Date M M / D D / Y Y Y Y 09 / 01 / 2008	
Mailing Address 1800 Massachusetts Ave NW		Amount 1060000.00	
City Washington	State DC	Zip Code 20036	Office Sought: House State: DC Senate District: 00 <input checked="" type="checkbox"/> Presidential
Purpose of Expenditure canvass staff and ex- penses	Category/ Type 007	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Name of Federal Candidate supported or Opposed by expenditure: Barack Obama		Disbursement For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> 2008 Other (specify) : _____	
Calendar Year-To-Date Per Election for Office Sought 4626489.81		Transaction ID: D13552	
Full Name (Last, First, Middle, Initial) of Payee SEIU (General Fund)		Date M M / D D / Y Y Y Y 09 / 01 / 2008	
Mailing Address 1800 Massachusetts Ave NW		Amount 229975.00	
City Washington	State DC	Zip Code 20036	Office Sought: House State: DC Senate District: 00 <input checked="" type="checkbox"/> Presidential
Purpose of Expenditure canvass staff and ex- penses	Category/ Type 007	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Name of Federal Candidate supported or Opposed by expenditure: Barack Obama		Disbursement For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> 2008 Other (specify) : _____	
Calendar Year-To-Date Per Election for Office Sought 4626489.81		Transaction ID: D13554	

(a) SUBTOTAL of Itemized Independent Expenditures .....

1289975.00

(b) SUBTOTAL of Unitemized Independent Expenditures .....

(c) TOTAL Independent Expenditures .....

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Anna Burger  
Signature

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09 / 01 / 2008

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## 24 / 48 HOUR NOTICE OF INDEPENDENT EXPENDITURE, on :

FEC ID No.

24-Hour Notice

48-Hour Notice

## SCHEDULE E (FEC Form 3X)

## ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF 4 / 4  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Service Employees International Union Committee On Political Education (SEIU COPE)			FEC IDENTIFICATION NUMBER <b>C</b> C00004036		
Check if <input type="checkbox"/> 24-hour notice <input checked="" type="checkbox"/> 48-hour notice			Date M M / D D / Y Y Y Y 09 / 01 / 2008		
Full Name (Last, First, Middle, Initial) of Payee SEIU (General Fund)			Amount 50000.00		
Mailing Address 1800 Massachusetts Ave NW			Office Sought: House State: DC Senate District: 00 <input checked="" type="checkbox"/> Presidential		
City Washington		State DC	Zip Code 20036		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Purpose of Expenditure cost of Road to Heal- th Care tour		Category/ Type 007			
Name of Federal Candidate supported or Opposed by expenditure: Barack Obama			Disbursement For: Primary <input checked="" type="checkbox"/> General 2008 Other (specify) : _____		
Calendar Year-To-Date Per Election for Office Sought 4626489.81			Transaction ID: D13555		

(a) SUBTOTAL of Itemized Independent Expenditures .....	50000.00
(b) SUBTOTAL of Unitemized Independent Expenditures .....	
(c) TOTAL Independent Expenditures .....	1414943.31

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Anna Burger  
Signature

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