



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 30, 2009

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

Response Due Date:  
October 30, 2009

Identification Number: C00004036

Reference: Amended May Monthly Report (4/1/08-4/30/08), received 6/11/09

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 item:

-In response to a missing 48 hour notice for an independent expenditure disclosed on your 2008 May Monthly Report totaling \$33,224 in support of Barack Obama you state in part that, "Our amended report will correct the characterization of this expenditure to reflect that it was to support Barack Obama in the general election, not in the Iowa primary as originally described in error." However, a review of this transaction on the Amended 2008 May Monthly Report, received 6/11/09 indicates an election designation of "General" and memo text attached to this transaction states, "invoice for ind expenditure was not known or paid until after the election date, but the activity was conducted before the primary." Please amend Schedule E of your report to clarify the election designation or provide further information concerning the activity.

Please be advised that if this independent expenditure was made in connection with the General election, your committee may have failed to file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and

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twenty days before an election. The notice must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 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)

**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

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**Missing 24 Hour Notice**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>	<b>Candidate</b>
The New Media Firm, Inc.	4/2/08	\$33,224.00	Obama billboard-Iowa IE	Barack Obama

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