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Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

RE: SEIU COPE, FED. ID. C00004036

September Monthly Report (8/1/07-8/31/07)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated October 19, 2007, regarding the September Monthly Report filed by SEIU COPE. In that letter you ask about an expenditure disclosed by SEIU COPE on Schedule B of its Monthly Report.

The expenditure was for the placement of "banner ads", which were imbedded on a newspaper website, which referred to clearly identified Federal candidates. These public communications were not coordinated with any candidate or party committee and did not expressly advocate the election or defeat of the identified candidates; as such they were not independent expenditures or in-kind contributions. These expenditures were correctly reported on Line 21(b).

If you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

Very truly yours,
John J. Sullivan

Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

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