



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 18, 2016

GERALD HUDSON, TREASURER
SEIU COPE (SERVICE EMPLOYEES
INTERNATIONAL UNION COMMITTEE ON
POLITICAL EDUCATION)
1800 MASSACHUSETTS AVE NW
WASHINGTON, DC 20036

Response Due Date
09/22/2016

IDENTIFICATION NUMBER: C00004036

REFERENCE: APRIL MONTHLY REPORT (03/01/2016 - 03/31/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 3 item(s):

1. Schedule B supporting Line 21(b) discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)
2. Please clarify the disbursement(s) made for "Direct Mail to Members" on Schedule B supporting Line 21(b). If this disbursement(s) constitutes a communication to your restricted class which is exempt from the definition of contribution and expenditure under 11 CFR §114.3, it should be disclosed on Line 29 of the Detailed Summary Page. Furthermore, the purpose of each disbursement should include the type of expense, the name, office sought, state, and district, if applicable; of each federal candidate identified in the communication, and a statement that the expense is for an internal communication to the restricted class (see Advisory Opinion 2000-3). Please amend your report to properly disclose this activity or provide clarifying information.

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3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) 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 twenty days before an election. The report 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))

- Schedule B discloses an expenditure(s) for "Communications Consulting Services", "Issue Advocacy Canvassing Services" and "Issue Advocacy Canvass Literature". If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) 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 that 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

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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) 694-1185.

Sincerely,

A handwritten signature in black ink that reads "Samantha Hay". The signature is written in a cursive, flowing style.

Samantha Hay
Campaign Finance Analyst
Reports Analysis Division

Late 24 Hour Report (Schedule E)
SEIU COPE (Service Employees International Union Committee On
Political Education) (C00004036)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
SEIU General Fund	3/19/16	\$95.71	HILLARY RODHAM CLINTON	P2016 - AZ	3/21/16
SEIU General Fund	3/19/16	\$5.04	HILLARY RODHAM CLINTON	P2016 - AZ	3/21/16
Image Pointe	3/19/16	\$920.67	HILLARY RODHAM CLINTON	P2016 - AZ	3/21/16
SEIU General Fund	3/19/16	\$39.23	HILLARY RODHAM CLINTON	P2016 - WA	3/21/16
Image Pointe	3/19/16	\$546.79	HILLARY RODHAM CLINTON	P2016 - WA	3/21/16
SEIU General Fund	3/19/16	\$135.56	HILLARY RODHAM CLINTON	P2016 - WA	3/21/16
Image Pointe	3/19/16	\$297.44	HILLARY RODHAM CLINTON	P2016 - WA	3/21/16
Image Pointe	3/19/16	\$4,006.17	HILLARY RODHAM CLINTON	P2016 - WA	3/21/16