

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 5, 2010

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

Response Due Date: June 9, 2010

Identification Number: C00004036

Reference: February Monthly Report (1/1/10-1/31/10)

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 2 items:

1. Schedule E of your report discloses an apparent independent expenditure paid to "SEIU Health & Wealth Fu" in the amount of \$136,596.70 with a purpose of "revised cost door-to-door canvass staff expenses." In addition, memo text attached to the report states, "late billed expenses for pension costs related to staff time used and paid for in 2008 and in addition to estimated expenditures reported on 48 hour notices at the time."

Please clarify whether this activity relates to a previously reported independent expenditure(s). If so, please identify which report contained the original independent expenditure(s) and identify which transaction(s) it corresponds with on Schedule E, Schedule D, and the 24 or 48 hour notices, as appropriate. If the independent expenditure(s) was not previously disclosed, the appropriate prior report(s) must be amended to fully itemize the independent expenditure(s) as a memo entry on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b).

2. Schedule E supporting Line 24 of your report discloses payments made to credit card companies for independent expenditures made on behalf of federal candidates. Please be advised that payments made to credit card companies for independent expenditures must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.3(b)(3)(vii) and clearly identify on the Schedule E, which credit card payment each memo entry relates to.

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

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Senior Campaign Finance Analyst

Reports Analysis Division