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NAME OF COMMITTEE (In Full)
SEIU COPE (Service Employees International Union Committee On
Political Education)

FEC IDENTIFICATION NUMBER
C00004036

Mailing Address 1800 Massachusetts Ave NW

City State ZIP Code
Washington DC 20036

September 21, 2016

Ms. Samantha Hay
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00004036
RE: April Monthly Report (3/1/2016-3/31/2016)

Dear Ms. Hay:

This letter is in response to the Commission's request for additional information related to several disbursements and independent expenditures disclosed on Schedules B and E of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

The Commission inquired about a disbursement to American Express that lacked the required itemization of the original vendor payments. In this instance, there was no need to itemize original vendor payments. American Express required the committee to make a duplicate payment on its account when the initial payment was incorrectly applied to the account of the committee's connected organization. The payment that was applied to the committee's connected organization is in the process of being refunded.

The disbursement disclosed as "Direct Mail to Members" was a communication to the connected organization's membership that is exempt from the definition of contribution and expenditure. The committee amended its April Monthly Report to move the disbursement to Schedule B, supporting line 29. The disbursement purpose now contains the information notated in Advisory Opinion 2000-3.

The Commission also indicated that independent expenditures were disclosed on Schedule E of the April Monthly Report but were not disclosed on a 24-hour notice. The internal tracking system the committee uses to track its independent expenditures malfunctioned, which resulted in the disclosure of several independent expenditures one day after the reporting deadline. As soon as the committee determined that it had missed the reporting deadline for this activity, a 24-hour notice was filed immediately to correct and update the public record.

Finally, the Commission asked about several disbursements disclosed on Schedule B for "Communications Consulting Services," "Issue Advocacy Consulting Services" and "Issue Advocacy Canvass Literature." These disbursements were not for public communications containing express advocacy, did not refer to any federal candidates and were made exclusively to support the activities of the committee.

If you have any further questions regarding this mater, please feel free to contact me at 202/730-7469.

Sincerely,

Dora V. Chen
Counsel for SEIU COPE

cc: Gerald Hudson, Treasurer, SEIU COPE