



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 14, 2019

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

Response Due Date
05/20/2019

IDENTIFICATION NUMBER: C00004036

REFERENCE: AMENDED 12 DAY PRE-GENERAL REPORT (10/01/2018 -
10/17/2018), RECEIVED 12/06/2018

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 enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule B of your report discloses one or more contributions to "RADINOVICH FOR CONGRESS" for the retirement of debts incurred by the 2018 primary election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist. (11 CFR §§ 110.1(b) and 110.2(b))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly in writing and

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provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made.

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

2. Schedule E of your report indicates that your committee may have failed to 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))

3. Your committee has filed a 48 hour report for an independent expenditure supporting "CROW, JASON" (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

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

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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. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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) 694-1185.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Beckman". The signature is fluid and cursive, with the first name "Michael" and last name "Beckman" clearly distinguishable.

Michael Beckman
Campaign Finance Analyst
Reports Analysis Division

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

Name of Payee	Dissemination Date	Amount	Candidate	Election
Gumbinner & Davies	10/12/18	\$7,429.99	CROW, JASON	G2018

Missing Schedule E (48 Hour Report)**SEIU COPE (Service Employees International Union Committee On Political Education)
(C00004036)**

Name of Payee	Dissemination Date	Amount	Candidate	Election
SEIU General Fund	10/9/18	\$889.68	CROW, JASON	G2018