



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 30 DAY POST-GENERAL REPORT (10/18/2018 -
11/26/2018), RECEIVED 01/29/2019

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 2 item(s):

1. Your committee has filed 24 hour reports for independent expenditures (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 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)
2. Your committee filed 24 hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Gumbinner & Davies", "M&R Strategic Services", and "SEIU General Fund" as the payee(s). However, the amounts of public dissemination disclosed on these reports do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 24 hour reports supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide

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further information concerning these reports. (11 CFR §104.4)

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, refunds of contributions made to federal committees should be properly disclosed on a separate Schedule(s) A, supporting Line(s) 16 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

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. 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,



Michael Beckman
Campaign Finance Analyst
Reports Analysis Division

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

Name of Payee	Dissemination Date	Amount	Candidate	Election
Bergmann Zwerdling Direct	10/23/18	\$617.90	CARTWRIGHT, MATT	G2018
Bergmann Zwerdling Direct	10/23/18	\$6,003.38	CASEY JR, ROBERT P	G2018
Bergmann Zwerdling Direct	10/23/18	\$251.19	SCOTT, GEORGE	G2018
Bergmann Zwerdling Direct	10/23/18	\$249.23	HOULAHAN, CHRISSY	G2018