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May 30, 2013

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

Identification Number: C00004036  
RE: Amended 12-Day Pre-General Report (10/1/2012-10/17/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to: (1) Candidate contributions made to retire debt; and (2) An independent expenditure that does not correspond to the amount disclosed on a 48-Hour Notice of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

Specifically, as to the first matter, the Commission has inquired about contributions made to Healy-Abrams for Congress and Nolan for Congress Volunteer Committee that were designated for 2012 Primary Election debt retirement and disclosed on Schedule B of the report. On September 12, 2012, SEIU COPE was solicited in writing by the Nolan committee for assistance with retiring \$53,000 in debt for the 2012 Primary Election campaign. In addition, on October 15, 2012, SEIU COPE was also solicited in writing by the Healy-Abrams for Congress committee requesting a contribution to help retire \$70,000 in 2012 Primary Election campaign debt. SEIU made these contributions in reliance on these solicitations. If you have any other questions regarding the debts of the Healy-Abrams or Nolan campaigns, SEIU COPE would ask that you contact those committees directly.

As to the second matter, the Commission has noted that a 48-Hour Notice filed with the Strategy Group as the vendor did not correlate with the entry on Schedule E, supporting Line 24 of the report. The 48-Hour Notice filed on October 3, 2012, disclosed an expense for voter canvass literature incurred to the Strategy Group of \$29,855.69, which was the same amount disclosed on the Schedule E, supporting Line 24 of the original Pre-General Report. The initial amount of the expenditure that was disclosed was only an estimate provided by the vendor. By the time SEIU COPE amended the Pre-General Report on December, 28, 2012, the Strategy Group had adjusted the actual cost of the independent expenditure down to \$8,352.89.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider  
Counsel for SEIU COPE

cc: Eliseo Medina, Treasurer, SEIU COPE