

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 2, 2013

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

Response Due Date 06/06/2013

IDENTIFICATION NUMBER: C00004036

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 - 11/26/2012), RECEIVED 01/31/2013

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 an audit or enforcement action. Additional information is needed for the following <u>3</u> item(s):

**1.** Your report discloses a payment(s) on Schedule E to "The Dover Group" that has not been recorded on Schedule D. Debt payments) must also be reflected on Schedule D. Please amend your report to clarify this discrepancy. (2 U.S.C. §434(b)(4))

**2.** Your report discloses in-kind activity which appears to be reported incorrectly. The value of the in-kind contributions must be added to the contributions to federal candidates and committees total on Line 23, in order to avoid inflating the cash-on-hand amount. (11 CFR \$104.13(a)(2)) Please amend your report to properly disclose the in-kind activity.

**3.** 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

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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))

- Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, Other federal receipts (including non-federal refunds) should be properly disclosed on a separate Schedule A, supporting Line 17 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (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.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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) 694-1164.

Sincerely,

nicole miller

Nicole Miller Senior Campaign Finance Analyst Reports Analysis Division

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Image# 13330030362

Attachment Page 1 of 1 Missing 24 Hour Report (Schedule E) SEIU COPE (Service Employees International Union Committee On Political Education) (C00004036)

Name of Payee	Date	Amount	Candidate	Election
Centaur North Strategic Communications	10/19/12	\$4,620.00	BERKLEY, SHELLEY	G2012
Centaur North Strategic Communications	10/19/12	\$4,620.00	OBAMA, BARACK	G2012