



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 28, 2009

Anna Burger, Treasurer  
Service Employees International Union  
Committee on Political Education (SEIU COPE)  
1800 Massachusetts Ave NW  
Washington, DC 20036

Response Due Date:  
November 27, 2009

Identification Number: C00004036

Reference: Amended 30 Day Post-General Report (10/16/08-11/24/08), received  
8/24/09

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 2 items:

1. Schedule A of your report discloses a receipt(s) from "SEIU (General Fund)" totaling \$100,000.00 for the apparent misdeposit of funds originally intended for your connected organization. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations, except that a connected organization may pay for the solicitation or other administrative costs of its separate segregated fund. 11 CFR §114.5(b)(3) Further, you are advised that contributions deposited in a federal account must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a)(1) and (2)

The Commission notes your transfer-out of the misdeposited funds on your Amended 2008 Year End Report, received 8/24/09. Although the Commission may take further legal action concerning the apparent misdeposited funds, your prompt action in refunding or transferring out these funds will be taken into consideration.

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2. Your amended report discloses additional receipts totaling \$952,686.64 on Lines 11(a)(i), 11(a)(ii) and 17 of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR §104.3

**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. 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) 694-1152.

Sincerely,



Rosa G. Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division

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