

October 8, 2009
via electronic filing

Ms. Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE Amended May Monthly Report (4/01/08-4/30/08), received 6/11/09

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated September 30, 2009 which requests clarification about the \$33,224 independent expenditure in support of Barack Obama included on this report.

As you noted, in previous correspondence we stated that, ""Our amended report will correct the characterization of this expenditure to reflect that it was to support Barack Obama in the general election, not in the Iowa primary as originally described in error."" The amended May Monthly Report we filed on 6/11/09 did make this correction by showing the election designation as ""General."" However, a memo text from previous filing that should have been deleted was left attached to the item in error.

We have reviewed our records and confirmed that the communication was not distributed until April 2008, well after the Iowa Primary and is correctly characterized as relating to the General election. It is the memo text that is incorrect and we filed an amended report on October 8, 2009 to eliminate this erroneous memo text.

As we previously discussed on May 15, 2009 in response to your letter dated April 15, 2009, no 48 hour notice was filed for this expenditure. We indicated then ""(o)ther independent expenditures that used this vendor were reported correctly -- including 48 hour notices -- at the time. However, it appears that this expenditure was paid for via wire transfer in a different part of the accounting department and was overlooked until the amended monthly report was filed."" Please feel free to contact me if you have any further questions.

Sincerely,

Robert Hauptman
For SEIU COPE
