

July 12, 2010

via electronic filing

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

RE: SEIU COPE, FEC ID C00004036
February Monthly Report (1/1/10 - 1/31/10)

Dear Ms. Lewis:

This letter supplements my letter of June 8 responding to your letter of May 5th concerning the above-referenced report. In particular, we would like to provide to you further information about the \$136,596.70 disbursement that was one of the subjects of your letter.

As we indicated in our report, and in our letter of June 8, the amount in question was a disbursement to the SEIU Health and Welfare Fund associated with employee expenses for the door-to-door canvass effort the union undertook in the 2008 general election campaign.

In further explanation, hundreds of SEIU members were employed by multiple local unions and state councils affiliated with SEIU to undertake door-to-door canvass efforts on behalf of SEIU's efforts to support Barack Obama's candidacy in 2008. Some of these canvass efforts were directed at the general public and were funded by SEIU COPE.

As part of their employment benefits, these employees received health insurance. Some of these employees received their health insurance through the SEIU Health & Welfare Fund. Most of the costs of the health insurance were paid by the local unions, using the funds provided ultimately by SEIU COPE.

In a review in 2009, the Health & Welfare Fund discovered that insurance charges totaling \$136,596.70 were still owed by 19 different union entities affiliated with the international union. These charges were associated with benefits made available from July through November 2008. We attach below a table which was provided to SEIU COPE by the Health & Welfare Fund which identifies each of the local unions that had outstanding balances to the Health & Welfare Fund.

All of these canvass expenses are associated with that part of SEIU's 2008 national canvass effort funded by advances from SEIU COPE to the SEIU general fund, an effort whose estimated expenses were previously reported on a series of 24 hour and 48 hour independent expenditure reports filed with the FEC beginning on July 18, 2008 and concluding on November 1, 2008. Because the disbursement reflects unpaid balances of multiple benefit payments for hundreds of employees paid by 19 different union entities covering the entire 5 month period of the canvass, it is not possible to connect any one of the thousands of items making up the \$136,596.70 balance to any particular estimate reflected in the 24 hour and 48 hour reports. Instead, the most accurate statement is that this payment is part of the payment made for the national canvass activities whose estimated costs were previously reported in the series of 24 and 48 hour reports provided by SEIU COPE starting in July 18 and concluding on November 1, 2008.

We appreciate the opportunity to supplement our previous answer to your inquiry. If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

ATTACHMENT

Member Political Organizers, 2008

Premium

Site Employer	Premium Amount	not paid	Notes
1 NH	8325.84		
2 Iowa	6046.77		
3 Nevada	0		
4 PA State C	5022.88		
5 FL H.C.	45907.89		
6 AZ	1249.36		
7 Ohio/W/K	<8618.76>	credit	
8 MO State Council	0		
9 Local 105, Denver	8081.71		
10 Oregon State C.	0		
11 Local 1877/CA	<785.62>	credit	
12 Local 26/MN	0		
13 NY 1199	3297.06		
14 MI State Council	49488.67		
15 NJ State Council	0		
16 Local 99	2666.02		
17 IL/IN	1094.78		5 Chicago mpo's that were registered on the IL/INsite.
18 WI State Council	0		
19 Local 6434	5415.69		
	136596.7		