

ETEXT ATTACHMENT

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

RE: SEIU COPE, FED. ID. C00004036

Amended October Monthly Report (9/1/06-9/30/06)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated December 29, 2006, regarding the amended October Monthly Report filed by SEIU COPE on 12/4/06. In that letter you ask about an expenditure disclosed by SEIU COPE on Schedule B of its Monthly Report.

The expenditure for "Billboard Ads Multi States" was for a series of billboards which referred to clearly identified Federal candidates and as such are properly characterized as public communications. However, these public communications did not expressly advocate the election or defeat of the identified candidates and were not independent expenditures or in-kind contributions. These expenditures were correctly reported on Line 21(b).

You also requested that we amend the Schedule E to include the signature of the Treasurer. The omission of signatures on the original report was an inadvertent oversight. We are having trouble with the electronic filing software and an amendment will be filed with signatures on Schedule E as soon as the program problem is solved. I would point out that Schedules E were submitted with signatures for these same expenditures as a 24 hour report before the Form 3x was filed.

If you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

Very truly yours,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

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