



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 15, 2009

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

Response Due Date:
May 15, 2009

Identification Number: C00004036

Reference: Amended May Monthly Report (4/1/08-4/30/08), received 12/19/08

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 5 items:

1. The beginning cash balance of this report should equal the ending balance of your Amended April Monthly Report, received 11/10/08. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

2. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures 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

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concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

3. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "canvass staff and expenses." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

4. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "Compass Media Group Inc." as the payee(s). However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

5. Schedule E supporting Line 24 of your report discloses an independent expenditure(s) on behalf of "Barack Obama" which appears to have been publicly disseminated or distributed after the primary date(s) in the respective state(s). Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the primary date(s).

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

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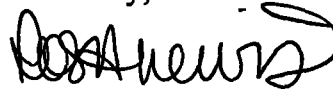
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taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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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Missing 48 Hour Notice

Name of Payee	Date	Amount	Purpose	Candidate
The New Media Firm, Inc.	4/2/08	\$33,224.00	Obama billboard- Iowa IE	Barack Obama

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