

August 25, 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  
May Monthly Report (4/1/10 ? 4/30/10)

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 July 21, 2010. I will address each of the items in your letter in turn:

1) The check voided in May involved a check originally issued in September 2009. The purpose of the disbursement was to pay part of the cost of a PAC fundraising effort planned by one of our Local Unions. The funds were not needed for that activity so the check was not cashed and it was formally voided in May 2010 with no plan to re-issue.

2).Your letter noted that the estimated amounts and dates for an IE disclosed on 48 hour notices with ""The New Media Fund, Inc"" listed as the payee did not appear to correlate with the entries on Schedule E of the Monthly Report disclosing the actual payments to The New Media Firm, inc. We think the confusion may be caused by the fact that the 24 hour notice was filed on the last day of the month, while the cash disbursements for the IE were made in two parts; one in the May monthly reporting period and the other in the June monthly reporting period. (note: your letter mentioned ""48 hour notices"" but it appears to reference what was in fact a 24 hour notice filed on 4/30/10. Please let me know if this is incorrect). The 24 hour notice filed on 4/30/10 disclosed an estimated \$100,000 for internet ads. The May Monthly Report included a \$40,000 cash disbursement on 4/21/10 that was described as ""internet ads start 4/29; part of 4/30 24hr notice."" The June Monthly Report included a \$60,000 disbursement dated 5/11/10 that was described as ""internet ads reported on 4/30 24hr notice."" Together, these two disbursements paid for the estimated cost as disclosed on the 4/30/10 24 hour notice. We believe this should clarify the question you raised.

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: Gerald Hudson, Treasurer, SEIU COPE

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