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December 21, 2012

Ms. Nicole Miller
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00004036
RE: September Monthly Report (8/1/2012-8/31/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to the Calendar-Year-to-Date Per Election for Office Sought total for the 2012 General Presidential Election and the 2012 Ohio Senate General Election on Schedule E of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

The committee has determined that an error with the software used to file SEIU COPE's disclosure reports resulted in the double counting of independent expenditures that were initially disclosed as memo entries, because they had been disseminated, but not yet paid. These IEs were inadvertently counted twice, first when they were reported as memo entries, and then again when the independent expenditure was actually paid.

On December, 21, 2012, an amendment to the September Monthly Report was filed to correct this issue. However, it should be noted that the Committee's software vendor calculates the calendar-year-to-date per election totals somewhat differently than the FEC's reporting software calculates these expenditures. Rather than immediately count the independent expenditures that are first disclosed as memo entries, as the FEC's software does, the Committee's software does not add the cost of an independent expenditure to the calendar-year-to-date per election for office sought total until the independent expenditure is actually paid. Accordingly, only when the committee discloses payment of the independent expenditures, will our totals match the Commission's totals.

The Commission also asked about debt payments to Chambers Lopez Strategies that were disclosed on Schedule B and Schedule E, but, not on Schedule D of the September Monthly Report. The Chambers Lopez debt payment on Schedule D is included in December 21, 2012, amendment to the September Monthly Report.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Counsel for SEIU COPE

cc: Eliseo Medina, Treasurer, SEIU COPE
