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July 14, 2008

via electronic filing

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

Re: SEIU COPE March Monthly Report (1/01/08-1/31/08)

Dear Ms. Lewis:

In your letter to SEIU COPE, dated June 11, 2008, you ask four questions regarding the above referenced Monthly Report. On March 21, 2008 SEIU COPE filed an amended report for this period and these responses are consistent with that report.

The first question relates to an amount reported on Schedule D, but not reflected in a MEMO item on Schedule E. The \$120,000 amount in question was correctly included as part of the \$420,000 in the 24 hour report filed on 2/25. However, it was inadvertently omitted as a memo entry when the monthly report was filed. It will be included as a memo item on the amended report that is being filed for the period.

The second question relates to two receipts reported on Schedule A as offsets to operating expenses.

---- We received \$5,000 from Moveon.org Political Action committee as their share of the expenses we paid to a vendor for producing a TV ad in support of Donna Edwards in the special election for the MD 4th District. Each PAC paid to air the ad with its own disclaimer. The payment to the vendor for the total production expense, along with expenses for airing the SEIU COPE version of the ad, was reported on Schedule E dated 2/1/08.

----- We reported receiving \$2,263.74 from the Wisconsin State Council, SEIU as an offset to operating expenses. This was a clerical error and that payment should have been reported as unitized contributions from individuals transmitted from one of our collecting agents in Wisconsin. An amended monthly report will be submitted with the payment correctly reported on Line 11.

The third question requested clarification of expenditures made for "advance for future media buy". During the reporting period, the vendor was paid an advance in anticipation of a purchase of media time for an independent expenditure. However, the communication was not aired during the period. At a later date, 4/29/08, the funds were used for an Independent Expenditure and were reported on a 24 hour report dated 4/30/08 and included on Schedule E and as a negative on Schedule B on the May 2008 Monthly Report.

The fourth question requested clarification of expenditures made for "polling". The two expenditures in this report were made to a polling firm for research on voter attitudes regarding federal candidates prior to any specific independent expenditures being made and thus were correctly included on the Report on line 21.

Please feel free to contact me if you have any further questions.

Sincerely,

John J. Sullivan  
Associate General Counsel, SEIU

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# ETEXT ATTACHMENT

Counsel for Political Programs

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