



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 1 0 2008

29044223014
Nancy Picard, Esquire
Robein, Urann, Spencer, Picard & Cangemi
2540 Severn Avenue
Suite 400
Metairie, Louisiana 70002

RE: MUR 5970
SEIU Local 100

Dear Ms. Picard:

On February 5, 2008, the Federal Election Commission notified your client, Service Employees International Union Local 100 ("SEIU Local 100"), of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). On October 22, 2008, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe SEIU Local 100 violated the Act. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003). The Factual and Legal Analysis, which explains the Commission's findings, is enclosed for your information.

If you have any questions, please contact Elena Paoli, the attorney assigned to this matter at (202) 694-1548.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie K. McConnell/ags".

Julie K. McConnell
Assistant General Counsel

Enclosure
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: SEIU Local 100 **MUR:** 5970

L. INTRODUCTION

This matter was generated by a complaint filed with the Federal Election Commission by Sherwood. See 2 U.S.C. § 437g(a)(1).

II. FACTUAL AND LEGAL ANALYSIS

13 The complaint states that SEIU Local 100 has the same address as some other
14 organizations and also states that the chief organizer of SEIU Local 100 is the founder of
15 ACORN, a nonprofit organization. The complaint implies that SEIU Local 100 must have
16 collaborated with other organizations at the same address to benefit Donna Edwards for Congress
17 ("Committee").

18 SEIU Local 100 is a labor organization representing employees in Louisiana, Texas, and
19 Arkansas. It has no operations in Maryland. SEIU Local 100 states that to the extent the
20 complaint implies any improper conduct in the Edwards campaign, it is denied. SEIU Local 100
21 was not involved with the campaign. SEIU Local 100 did not contribute to or cooperate with the
22 Edwards Committee.

23 The facts alleged do not state a FECA violation. As it appears that SEIU Local 100 has
24 no connection to the Edwards Committee, there is no reason to believe that SEIU Local 100
25 violated the Act.