



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

11L-06

March 16, 2011

MEMORANDUM

TO: Christopher Hughey
Acting General Counsel

THROUGH: Alec Palmer
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Mike Hartsock / Rosa Lewis
Party/Non-Party Branch
Reports Analysis Division

SUBJECT: Referral of Service Employees International Union Committee on Political Education (SEIU COPE)

RECEIVED
FEDERAL ELECTION
COMMISSION
2011 MAR 17 AM 9:21
CELA

The Reports Analysis Division (RAD) is referring Service Employees International Union Committee on Political Education ("the Committee") to the Office of General Counsel (OGC) for failing to file four (4) 24-Hour Notices to support four (4) independent expenditures totaling \$119,624.44 disclosed on the 2010 September Monthly Report during the 2009-2010 election cycle. According to the 2009-2010 *RAD Review and Referral Procedures for Unauthorized Committees (Standard 7)*, a review by your office is required.

11044304576

If you have any questions regarding this matter, please contact Mike Hartsock at 694-1398 or Rosa Lewis at 694-1152.

Attachments

11044304577

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 16, 2011

ANALYST: Rosa Lewis

I. COMMITTEE: Service Employees International Union Committee on Political Education (SEIU COPE)
C00004036
Gerald Hudson, Treasurer
1800 Massachusetts Ave NW
Washington, DC 20036

II. RELEVANT STATUTE: 2 U.S.C. §434(g)(1)
11 CFR §104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to File 24-Hour Notices)

Service Employees International Union Committee on Political Education (SEIU COPE) ("the Committee") failed to file four (4) 24-Hour Notices to support four (4) independent expenditures totaling \$119,624.44, disclosed on Schedule E of the 2010 September Monthly Report made after the 20th day but more than 24 hours before the 2010 Primary Election in the State of Florida (Attachment 2).

Prior Notices listing the official filing dates for monthly filers were sent to the Committee on January 27, 2010 and August 27, 2010. The notices included a section titled *48- and 24-Hour Reports of Independent Expenditures* which read as follows:

Any PAC or Party Committee that makes independent expenditures in 2010 may have to disclose this activity within 48- or 24-hours based upon the date and the amount of the expenditures. See 11 CFR 104.4, the Web Page: http://www.fec.gov/info/charts_in_dates_2010.shtml, or the Campaign Guide. These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate (Attachment 3).

11044304578

On September 20, 2010, the Committee filed a 2010 September Monthly Report covering the period from August 1, 2010 to August 31, 2010, which included a Schedule E (Itemized Independent Expenditures) disclosing four (4) independent expenditures totaling \$119,624.44 made in opposition of one (1) federal candidate, each of which required a 24-Hour Notice to be filed. The Committee failed to file four (4) required 24-Hour Notices for these four (4) independent expenditures totaling \$119,624.44 (Images 10991208755-56).

On October 21, 2010, the Committee filed a 2010 Amended September Monthly Report. This amended report disclosed no change in the independent expenditure transactions that were disclosed on the original 2010 September Monthly Report (Image 10931733248-49).

On November 30, 2010, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2010 September Monthly Report, received October 21, 2010. Among other issues, the RFAI noted that the Committee may have failed to timely file one or more of the required 24-Hour Notices regarding "last minute" independent expenditures. A chart was included with the RFAI identifying the four (4) independent expenditures, totaling \$119,624.44, for which a 24-Hour Notice had not been filed (Image 10330002748).

On December 8, 2010, Bob Hauptman, a Committee representative, called the Reports Analysis Division ("RAD") Analyst to discuss the RFAI referencing the Committee's 2010 Amended September Monthly Report. Mr. Hauptman stated that the Committee had failed to file the 24-Hour Notices for the independent expenditures noted in the RFAI. He asked whether he should file the notices and the Analyst told Mr. Hauptman to instead file a Miscellaneous Electronic Submission (FEC Form 99) stating why the notices had not been filed on time and to add any additional information to clarify for the public record. Mr. Hauptman said that he would file a response to the RFAI by the due date (Attachment 4).

On December 28, 2010, the Committee filed an FEC Form 99 referencing the Amended 2010 September Monthly Report. The FEC Form 99 stated, in part,

The independent expenditures in support of Jeff Greene were made before the Florida primary was held on August 24. Due to a failure of communications, the reporting staff was not aware of these expenditures until after the primary was over and therefore no 24 hour notice was filed. However, the expenditures were reported correctly on the Schedule E of the next report filed, the September Monthly Report Form 3x filed on September 20, 2010. After this 24 hour notice error was detected, the Committee put additional procedures in place designed to avoid any future recurrence of this type of problem (Image 10932158866).

On February 2, 2011, the RAD Analyst called Gerald Hudson, the Committee's treasurer, and left a voicemail message stating that issues disclosed on the Committee's Amended 2010 September Monthly Report were referable for further action by the Commission. The Analyst further explained that an FEC Form 99 had been filed by the Committee on December 28, 2010, regarding the missing 24-Hour Notices, and that the Committee can add any additional information to the public record if they so choose (Attachment 4).

Also on February 2, 2011, the Analyst left similar voicemail messages with Mark Schneider, Committee Counsel, and Mr. Hauptman, making them aware of the pending action regarding the failure to file the 24-Hour Notices and suggested any additional information be added to the public record via a Miscellaneous Electronic Submission (FEC Form 99) (Attachment 4).

To date, no additional information has been provided by the Committee regarding this matter.

11044304580

04/06/2011									
Cmte ID: C00004036		Cmte Name: SEIU COPE (SERVICE EMPLOYEES INTERNATIONAL UNION COMMITTEE ON POLITICAL EDUCATION)		Treasure: Name: HUDSON, GERALD		Address: 1800 MASSACHUSETTS AVE NW, WASHINGTON, DC 20036			
Cmte Type: Q (QUALIFIED NON-PARTY/SEE 2 USC SECT 4312(A)(4))		Cmte Designation: B (LOBBYIST/REGISTRANT PAC)		Filing Frequency: MONTHLY FILER					
Form Tr	Rpt Tr	Pgs	Recpt Dt	Begin Ing#	Reg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Reg Cvg Dt
2/20/2011	14	11960232674	1/1/2011	1/1/2011	1/1/2011	1/1/2011	1/1/2011	\$1,497,928	\$2,589,405
Totals								\$786,475	\$26,356
F3XN		M2	N	Debits		Credits			
2/20/2011		14	11960232674	1/1/2011	1/1/2011	1/1/2011	1/1/2011	\$1,497,928	\$2,589,405
Totals								\$786,475	\$26,356

O-Index (2009-2010)																
Committee ID: C00004076 Committee Name: SEIU COPE (SERVICE EMPLOYEES INTERNATIONAL UNION COMMITTEE ON POLITICAL EDUCATION)																
Treasurer Name: HUDSON, GERALD Address: 1800 MASSACHUSETTS AVE NW, WASHINGTON, DC 20036																
Committee Type: Q (QUALIFIED NON-PARTY)(SEE 2 USC SECT 441(A)(4)) Committee Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER																
Form ID	Rep ID	Rep Typ	A4	Receipt Dt	Pgs	Begin Inq#	Begin Pvg Dt	End Cvg Dt	Ctrl Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T				4/6/2009	6	28030062466				-	-	-	-	-	-	-
MS-N				5/1/2009	1	28030062734				-	-	-	-	-	-	-
MS-T				5/15/2009	1	28982107030				-	-	-	-	-	-	-
MS-T				5/15/2009	1	28933757855				-	-	-	-	-	-	-
MS-T				5/15/2009	1	28633757869				-	-	-	-	-	-	-
MS-T				5/22/2009	1	28982158785				-	-	-	-	-	-	-
MS-T				6/29/2009	2	28982280577				-	-	-	-	-	-	-
MS-T				6/29/2009	1	28834203367				-	-	-	-	-	-	-
MS-T				6/29/2009	1	28982290560				-	-	-	-	-	-	-
MS-T				7/1/2009	1	28834208108				-	-	-	-	-	-	-
MS-T				7/13/2009	1	28992425363				-	-	-	-	-	-	-
MS-N				7/22/2009	2	28030124969				-	-	-	-	-	-	-
MS-T				10/5/2009	1	28982852581				-	-	-	-	-	-	-
MS-T				11/25/2009	1	28983401429				-	-	-	-	-	-	-
MS-T				11/25/2009	1	28835523494				-	-	-	-	-	-	-
MS-T				11/26/2009	1	28835523485				-	-	-	-	-	-	-
MS-T				12/10/2009	1	28993419187				-	-	-	-	-	-	-
MS-T				5/4/2010	1	288355549663				-	-	-	-	-	-	-
MS-T				6/6/2010	1	10880732262				-	-	-	-	-	-	-
MS-T				7/12/2010	2	10880841665				-	-	-	-	-	-	-
MS-T				8/25/2010	1	10981118864				-	-	-	-	-	-	-
MS-T				8/25/2010	1	10831193028				-	-	-	-	-	-	-
MS-T				12/28/2010	1	10832158866				-	-	-	-	-	-	-
RQ2	M2	A		11/6/2009	3	28030182353	11/1/2009	1/31/2009	11/6/2009	-	-	-	-	-	-	-
RQ2	M5	A		11/6/2009	3	28030182422	4/1/2009	4/30/2009	11/6/2009	-	-	-	-	-	-	-
RQ2	M12	N		4/14/2010	2	10030282567	11/1/2009	11/30/2009	4/14/2010	-	-	-	-	-	-	-
RQ2	M2	N		5/5/2010	3	10030322183	1/1/2010	1/31/2010	5/5/2010	-	-	-	-	-	-	-
RQ2	M5	N		7/21/2010	3	10030381317	4/1/2010	4/30/2010	7/21/2010	-	-	-	-	-	-	-
RQ2	M6	N		7/21/2010	5	10030391320	5/1/2010	5/31/2010	7/21/2010	-	-	-	-	-	-	-
RQ2	M9	A		11/30/2010	3	10030002748	8/1/2010	8/31/2010	11/30/2010	-	-	-	-	-	-	-
F3XA	M2	N		2/21/2009	23	28832240828	1/1/2009	1/31/2009	1/31/2009	\$1,887,980	\$1,003,295	\$182,660	\$2,708,615	\$286,512	-	\$286,512
F3XA	M2	A		2/21/2009	25	289811065978	1/1/2009	1/31/2009	1/31/2009	\$1,093,864	\$1,003,295	\$163,685	\$1,933,574	\$486,881	-	\$286,512
F3XA	M2	A		9/30/2009	35	28834551831	1/1/2009	1/31/2009	1/31/2009	\$1,978,645	\$1,003,293	\$120,188	\$2,861,750	\$44,704	-	\$44,704
F3XA	M2	A		9/24/2009	36	28934688765	1/1/2009	1/31/2009	1/31/2009	\$1,978,645	\$1,003,293	\$120,188	\$2,861,750	\$44,704	-	\$44,704

F3XN	M3	N	3/21/2008	30	289333384280	2/1/2008	2/28/2008	\$1,933,574	\$770,847	\$319,176	\$2,385,246	\$321,052	\$321,052
F3XA	M3	A	4/20/2008	32	289335596557	2/1/2008	2/28/2008	\$1,933,574	\$939,463	\$319,176	\$2,653,862	\$511,421	\$321,052
F3XA	M3	A	9/28/2008	36	28934551987	2/1/2008	2/28/2008	\$2,881,750	\$939,463	\$319,176	\$3,482,037	\$57,271	\$57,271
F3XN	M4	A	4/20/2008	50	289335896868	3/1/2008	3/31/2008	\$2,553,862	\$818,144	\$801,828	\$2,830,381	\$490,077	\$288,512
F3XN	M4	A	9/20/2008	48	28934552011	3/1/2008	3/31/2008	\$3,482,037	\$818,144	\$801,828	\$3,698,555	\$32,731	\$32,731
F3XN	M5	N	5/20/2008	75	28982132879	4/1/2008	4/30/2008	\$2,830,381	\$2,208,043	\$107,358	\$4,988,065	\$490,077	\$288,512
F3XA	M5	A	9/20/2008	75	28982839287	4/1/2008	4/30/2008	\$3,698,555	\$2,208,043	\$107,358	\$5,857,240	\$32,731	\$32,731
F3XA	M6	N	10/20/2008	75	289922267408	5/1/2008	5/31/2008	\$4,988,065	\$886,211	\$41,870	\$5,857,240	\$32,731	\$32,731
F3XN	M6	A	9/20/2008	83	289928396362	5/1/2008	5/31/2008	\$5,857,240	\$886,211	\$41,870	\$6,701,781	\$31,231	\$31,231
F3XA	M6	A	10/20/2008	84	28935368444	5/1/2008	5/31/2008	\$5,857,240	\$886,211	\$41,870	\$6,701,781	\$31,231	\$31,231
F3XN	M7	N	7/28/2008	113	28994532846	6/1/2008	6/30/2008	\$5,833,608	\$1,281,500	\$187,413	\$6,887,693	\$369,595	\$230,521
F3XA	M7	A	9/20/2008	110	28934552171	6/1/2008	6/30/2008	\$6,701,781	\$1,281,500	\$187,413	\$7,785,868	\$31,231	\$31,231
F3XA	M7	A	10/20/2008	113	28993275868	6/1/2008	6/30/2008	\$6,701,781	\$1,281,500	\$187,413	\$7,785,868	\$31,231	\$31,231
F3XN	M8	N	8/20/2008	98	28934487140	7/1/2008	7/31/2008	\$6,897,693	\$1,418,468	\$34,895	\$8,279,466	\$488,748	\$285,097
F3XA	M8	A	9/20/2008	95	28982839452	7/1/2008	7/31/2008	\$7,785,868	\$1,418,468	\$34,895	\$9,147,640	\$31,231	\$31,231
F3XA	M8	A	10/20/2008	97	28993275811	7/1/2008	7/31/2008	\$7,785,868	\$1,418,468	\$34,895	\$9,147,640	\$31,231	\$31,231
F3XN	M9	N	9/20/2008	97	28934552288	8/1/2008	8/31/2008	\$9,147,640	\$1,437,420	\$68,888	\$10,915,391	\$31,231	\$31,231
F3XA	M9	A	10/20/2008	98	28993275808	8/1/2008	8/31/2008	\$9,147,640	\$1,437,420	\$68,888	\$10,915,391	\$31,231	\$31,231
F3XN	M10	N	19/20/2008	115	28935368569	9/1/2008	9/30/2008	\$10,517,391	\$1,516,617	\$671,889	\$11,382,140	\$16,231	\$16,231
F3XN	M11	N	11/20/2008	103	28935505482	10/1/2008	10/31/2008	\$11,382,140	\$2,917,324	\$1,874,028	\$12,605,436	\$16,231	\$16,231
F3XA	M11	A	5/4/2010	104	10890853970	10/1/2008	10/31/2008	\$11,382,140	\$2,917,324	\$1,874,028	\$12,605,436	\$16,231	\$16,231
F3XA	M12	N	8/25/2010	105	10831192308	10/1/2008	10/31/2008	\$11,382,140	\$2,917,324	\$1,874,028	\$12,605,436	\$16,231	\$16,231
F3XN	M12	N	12/20/2008	128	28935601707	11/1/2008	11/30/2008	\$12,605,436	\$748,189	\$2,293,081	\$11,058,564	\$24,856	\$24,856
F3XA	M12	A	5/4/2010	129	10890854074	11/1/2008	11/30/2008	\$12,605,436	\$748,189	\$2,293,081	\$11,058,564	\$24,856	\$24,856
F3XN	YE	N	1/30/2010	138	10890854228	12/1/2008	12/31/2008	\$11,058,564	\$2,308,729	\$1,600,208	\$11,787,085	\$104,285	\$104,285
F3XA	YE	A	5/4/2010	138	10890854228	12/1/2008	12/31/2008	\$11,058,564	\$2,308,729	\$1,600,208	\$11,787,085	\$104,285	\$104,285
F3XN	M2	N	2/18/2016	45	10890328032	1/1/2010	1/31/2010	\$11,787,085	\$1,058,076	\$841,659	\$12,181,502	\$889,858	\$889,858
F3XA	M2	A	6/8/2008	43	10890732123	1/1/2010	1/31/2010	\$12,181,502	\$1,058,076	\$841,659	\$12,181,502	\$889,858	\$889,858
F3XN	M3	N	3/10/2010	31	10890378210	2/1/2010	2/28/2010	\$12,375,437	\$994,941	\$1,592,019	\$11,778,359	\$24,856	\$24,856
F3XN	M4	N	4/20/2010	70	10890808556	3/1/2010	3/31/2010	\$11,778,359	\$1,037,044	\$1,982,005	\$10,822,398	\$235,359	\$235,359
F3XN	M5	N	5/20/2010	194	10830745472	4/1/2010	4/30/2010	\$10,822,398	\$4,041,005	\$2,942,118	\$11,922,286	\$363,986	\$363,986
F3XN	M6	N	6/18/2010	113	10890745980	5/1/2010	5/31/2010	\$10,822,398	\$4,041,005	\$2,942,118	\$11,922,286	\$272,884	\$272,884
F3XA	M6	A	7/20/2010	114	10831055948	5/1/2010	5/31/2010	\$10,822,398	\$4,041,005	\$2,942,118	\$11,922,286	\$272,884	\$272,884
F3XA	M6	A	8/25/2010	114	10831192793	5/1/2010	5/31/2010	\$11,922,286	\$1,297,079	\$2,038,250	\$11,181,114	\$170,356	\$170,356
F3XN	M7	N	7/20/2010	62	10891018457	6/1/2010	6/30/2010	\$11,181,114	\$1,387,938	\$748,414	\$11,802,636	\$85,356	\$85,356
F3XN	M8	N	8/20/2010	109	10831181446	7/1/2010	7/31/2010	\$11,181,114	\$1,387,938	\$748,414	\$11,802,636	\$85,356	\$85,356
F3XA	M8	A	10/21/2010	108	10831731799	7/1/2010	7/31/2010	\$11,802,636	\$1,198,564	\$2,843,456	\$10,155,744	\$236,980	\$236,980
F3XN	M9	N	9/28/2010	114	10891208643	8/1/2010	8/31/2010	\$11,802,636	\$1,198,564	\$2,843,456	\$10,155,744	\$236,980	\$236,980
F3XA	M9	A	10/28/2010	115	10831733135	8/1/2010	8/31/2010	\$11,802,636	\$1,198,564	\$2,843,456	\$10,155,744	\$236,980	\$236,980
F3XN	M10	N	10/28/2010	145	10831824068	9/1/2010	9/30/2010	\$10,155,744	\$2,118,684	\$5,588,310	\$6,686,118	\$105,356	\$105,356
F3XA	M10	A	10/21/2010	152	10831738350	9/1/2010	9/30/2010	\$10,155,744	\$2,118,684	\$5,588,310	\$6,686,118	\$105,356	\$105,356
F3XN	12G	N	10/23/2010	105	10831753834	10/1/2010	10/13/2010	\$8,886,118	\$515,823	\$5,165,479	\$2,038,461	\$371,295	\$371,295
F3XA	12G	A	10/22/2010	117	10891788218	10/1/2010	10/13/2010	\$8,886,118	\$515,823	\$5,165,479	\$2,038,461	\$371,295	\$371,295
F3XN	30G	N	12/22/2010	221	10892378488	10/1/2010	11/22/2010	\$2,038,461	\$1,841,647	\$681,581	\$1,497,928	\$28,356	\$28,356
F3XN	YE	N	1/31/2011	115	11890145143	11/23/2010	12/31/2010	\$547,882	-	-	-	-	-
F1A	F1A	A	5/19/2008	8	28933758803	-	-	-	-	-	-	-	-
F1A	F1A	A	7/8/2008	9	28982402889	-	-	-	-	-	-	-	-
F1A	F1A	A	8/28/2010	11	10891057504	-	-	-	-	-	-	-	-

[illegible]

Attachment I

F3XA	M10	A	8/24/2008	172	28822634115	9/1/2008	9/30/2008	\$16,000,317	\$1,251,145	\$8,617,543	\$8,633,918	\$38,008	-	\$38,008
F3X	12G	N	10/23/2008	126	28893028524	10/1/2008	10/15/2008	\$12,058,173	\$314,963	\$4,941,944	\$7,428,193	\$579,291	-	\$328,781
F3X	12G	A	10/31/2008	180	28834187822	10/1/2008	10/15/2008	\$8,152,428	\$887,196	\$2,704,878	\$6,334,746	\$1,334,869	-	\$1,194,122
F3XA	12G	A	8/24/2008	174	28822634876	10/1/2008	10/15/2008	\$8,633,918	\$887,196	\$2,635,710	\$6,685,404	\$1,141,143	-	\$1,141,143
F3XN	30G	N	12/4/2008	56	28834480362	10/16/2008	11/24/2008	\$8,334,746	\$135,894	\$3,870,478	\$2,800,155	\$1,194,122	-	\$1,194,122
F3XA	30G	A	12/22/2008	125	28894320001	10/16/2008	11/24/2008	\$8,334,746	\$135,894	\$5,271,551	\$1,198,129	\$437,080	-	\$286,512
F3XA	30G	A	8/24/2008	283	28822635150	10/16/2008	11/24/2008	\$8,685,404	\$1,088,571	\$7,121,757	\$652,219	\$211,763	-	\$211,763
F3XN	YE	N	1/31/2009	23	28832131036	11/25/2008	12/31/2008	\$1,198,129	\$47,421	\$152,581	\$1,083,959	\$484,641	-	\$286,512
F3XA	YE	A	8/24/2008	216	28834480635	11/25/2008	12/31/2008	\$852,218	\$1,584,783	\$241,287	\$2,005,715	\$109,523	-	\$109,523
F1A		A	10/6/2008	8	28892228111								-	-
Totals:								\$12,219,517	\$47,404,896					

Missing Notice Chart for Primary Election¹

Name of Payee	Date of Expenditure (Schedule E)	Expenditure Amount	Candidate Opposed	State and Date of Election in which Disseminated
4900 Group LLC	8/11/10	\$29,906.11	Jeff Greene	Florida- 2010 Primary (8/24/10)
4900 Group LLC	8/13/10	\$29,906.11	Jeff Greene	Florida- 2010 Primary (8/24/10)
4900 Group LLC	8/16/10	\$29,906.11	Jeff Greene	Florida- 2010 Primary (8/24/10)
4900 Group LLC	8/18/10	\$29,906.11	Jeff Greene	Florida- 2010 Primary (8/24/10)

¹ Please note, the dates disclosed in the chart attached to the RFAI are incorrect. (Image 10330002748) The dates listed on the above chart accurately reflect the dates disclosed by the Committee on the report.



MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

January 27, 2010

MONTHLY REPORTING SCHEDULE FOR 2010

REPORTING DATES

REPORT	CLOSE OF BOOKS ¹	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
February	01/31/10	02/20/10	02/20/10 ²
March	02/28/10	03/20/10	03/20/10 ²
April	03/31/10	04/20/10	04/20/10
May	04/30/10	05/20/10	05/20/10
June	05/31/10	06/20/10	06/20/10 ²
July	06/30/10	07/20/10	07/20/10
August	07/31/10	08/20/10	08/20/10
September	08/31/10	09/20/10	09/20/10
October	09/30/10	10/20/10	10/20/10
Pre-General	10/13/10	10/18/10	10/21/10
Post-General	11/22/10	12/02/10	12/02/10
Year-End	12/31/10	01/31/11	01/31/11

[Click here for Supplemental Filing Information](#)

¹A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

² Notice that this filing date falls on a weekend. Filing deadlines are not extended when they fall on nonworking days. Accordingly, reports filed by methods other than Registered, Certified or Overnight Mail, or electronically, must be received before the Commission's (or for committees supporting only Senate candidates, the Secretary of Senate's) close of business on the last business day before the deadline.

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2010 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2010. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide: Nonconnected Committees (Nonconnected), pp. 51-53 [PDF]; Corporations and Labor Organizations (SSF), pp. 49-51 [PDF]; Political Party Committees (Party), pp. 69-71 [PDF].

Paper Filing – Meeting the Filing Deadline

Paper report filing options – Registered, Certified or Overnight or First Class Mail.

See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: Nonconnected, pp. 47-48 [PDF]; SSF, pp. 45-46 [PDF]; Party, p. 65 [PDF].

COMPLIANCE

Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.30.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF]

PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: [2010 Congressional Pre-Primary Reporting Dates Page](#)
- The Record: [January 2010 issue](#) [PDF]
- Campaign Guide: [Nonconnected, pp. 49-51](#) [PDF]; [SSF, pp. 46-48](#) [PDF]; [Party, pp. 67-68](#) [PDF].

2010 REPORTING SCHEDULE

- Web Page: [2010 Reporting Dates Page](#)
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DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must simultaneously file FEC Form 3L if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of the lobbyist bundling disclosure threshold during the covered period (see page 1 of this notice). See 11 CFR 104.22.

NOTE: The lobbyist bundling disclosure threshold for calendar year 2009 was \$16,000. This threshold amount may increase in 2010 based upon the annual cost of living adjustment (COLA). As soon as the adjusted threshold amount is available, the Commission will publish it in the Federal Register and post it on its website. See 11 CFR 110.17(e).

- The Record: [March 2009 issue](#) [PDF]
- Federal Register: [Notice 2009-03 \(February 17, 2009\)](#) [PDF]
- Campaign Guide: [Party, pp. 143-149](#) [PDF]

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: [Filing Frequency by Type of Committee](#)
- Campaign Guide: [Nonconnected, p. 51](#) [PDF]; [SSF, p. 49](#) [PDF]; [Party, p. 67](#) [PDF].

48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2010 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure. See 11 CFR 104.4.

- Web Page: [48- and 24-hour reporting periods for independent expenditures for 2010 elections](#)
- Campaign Guide: [Nonconnected, pp. 72-74](#) [PDF]; [SSF, pp. 65-67](#) [PDF]; [Party, pp. 87-89](#) [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100



MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

August 27, 2010

MONTHLY REPORTING SCHEDULE FOR REMAINDER OF 2010

REPORTING DATES

REPORT	CLOSE OF BOOKS ¹	REG./CERT. & OVERNIGHT MAILING DEADLINE.	FILING DEADLINE
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See 11 CFR 104.22 and 110.17(e).

- The Record: March 2009 issue [PDF]
- Campaign Guide: Party, pp. 143-149 [PDF]

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