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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

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2011 OCT 17 PM 3: 28

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MEMORANDUM

TO: The Commission

FROM: Anthony Herman
General Counsel

Kathleen M. Guith
Acting Associate General Counsel for Enforcement

BY: Peter G. Blumberg
Assistant General Counsel

Dominique Dillenseger
Attorney

SUBJECT: MUR 6499 (Service Employees International Union Committee on
Political Education (SEIU COPE) and Gerald Hudson, in his official
capacity as treasurer)

RE: Pre-Probable Cause Conciliation Agreement

ACTIONS RECOMMENDED

(1) Accept the signed conciliation agreement; (2) approve the appropriate letter;
and (3) close the file.

DISCUSSION

Attached is a conciliation agreement signed by counsel on behalf of SEIU COPE
and Gerald Hudson, in his official capacity as treasurer, (the "Committee" or
"Respondents"). The agreement would settle violations of 2 U.S.C. § 434(g) stemming
from the Committee's failure to file four 24-Hour Reports of independent expenditures
totaling \$119,624.44.

_____ we recommend that the Commission accept the
signed conciliation agreement, approve the appropriate letter, and close the file.

RECOMMENDATIONS

1. Accept the signed conciliation agreement;
2. Approve the appropriate letter; and
3. Close the file.

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