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NAME OF COMMITTEE (In Full)  
Planned Parenthood VotesFEC IDENTIFICATION NUMBER  
C00489799

Mailing Address 123 William St, 10th Floor

City	State	ZIP Code
New York	NY	10038

May 16, 2017

Quy Vuong  
Senior Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington D.C. 20463

Re: ID number C00489799, Amended 12 Day Pre-General Report (10/01/2016-10/19/2016),  
Filed 03/17/2017

Dear Mr. Vuong:

We received your letter of April 11, 2017 requesting additional information on the 12 Day Pre-General Report (10/01/2016-10/19/2016) amended 03/17/2017 (the Amended Pre-General) by Planned Parenthood Votes (PPVotes).

Question 1 of your letter asks PPVotes to provide clarifying information about the increase in receipts disclosed on the Amended Pre-General from the amount disclosed on the original report, totaling \$305,008.71. As detailed below, these receipts were reported before the election, except for three low dollar receipts totaling \$13,209.31. In total, these receipts represent less than 1.4% of PPVotes' receipts in the 2016 election cycle.

The vast majority of the receipts in question represent one related set of in-kind contributions (together, totaling \$291,799.40) which, while mistakenly left off an earlier report, were made available to the public before the election. These receipts represent the value of pre-purchased digital advertising time that was contributed by an independent expenditure committee to PPVotes. While properly reporting the expenditures of these in-kind contributions on the original Pre-General Report filed on October 28, 2016 (FEC-1120008), an inexperienced staffer inadvertently omitted them as receipts on that report. Due to the limited timeframe our vendor provided staff to review the draft Pre-General Report, this omission was not discovered before the report was due. However, as soon as this inadvertent error was discovered, PPVotes amended the Pre-General Report on November 7, 2016 (FEC-1125126), and thus, made the in-kind contributions available to the public before Election Day.

The remaining \$13,209.31 consists of three low dollar receipts that were reported after the election. During a voluntary review of its 2016 activity, PPVotes discovered that these receipts had been inadvertently omitted from the Pre-General Report. As soon as these minor administrative errors were identified, PPVotes disclosed these receipts via amendments: one \$5,000 itemized and one \$100 unitemized contribution on December 23, 2016 (FEC-1136062) and an \$8,109.31 unanticipated vendor refund on January 31, 2017 (FEC-1145926).

Question 2 of your letter asks whether PPVotes failed to timely file 48-hour reports for certain independent expenditures made in the reporting period. As detailed below, these expenditures were all reported well before the election, except for two low dollar independent expenditures totaling \$2,416.41. In total, these expenditures represent less than 3.5% of the independent expenditures PPVotes made in the 2016 election cycle.

The majority of the independent expenditures detailed in your letter relate to the in-kind contributions discussed in Question 1 above. Those in-kind contributions of pre-purchased digital advertising time that PPVotes received from the independent expenditure committee were expended on 35 separate low dollar communications distributed between October 10-19, 2016, ranging in value from \$457-\$24,603 (Transactions B633760-71, B633794-96, B633798-802, B633815, B633818-825, B633827-28, B633843, B634430-31, B634433). PPVotes reported the production costs for these communications on 48-hour

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reports. However, an inexperienced staffer inadvertently omitted the related expenditure of those in-kind contributions. As soon as this was discovered on October 21, 2016, PPVotes amended the corresponding 48-Hour Reports for October 12, 14, 18, and 20, 2016, on that same day. Although these expenditures -- which represent only 2% of the total independent expenditures PPVotes made in the 2016 election cycle -- were reported between 1 and 9 days late, PPVotes made them available to the public 17 days before the election and reported them in a timely fashion on the original Pre-General Report.

In addition, as a result of these amendments, four low dollar expenditures reported on 48-Hour Reports filed October 14 and October 20 (Transactions B632661, B633532, B633533, B633545, together totaling \$14,047.89) appear to have been reported 1 to 4 days late. While at the time they were reported PPVotes believed them to be timely, the additional expenditures represented by the amendments discussed above triggered the \$10,000 reporting threshold per election for these four expenditures earlier than originally calculated. They were nonetheless made available to the public 18-24 days before the election and were reported on the original Pre-General report in a timely fashion.

Further, PPVotes omitted from its October 5 Report (FEC-1102680) a field organizing campaign in the Ohio Senate and Presidential elections (Transactions B630167-68, B630170-176) due to a clerical error, and from its October 12 Report (FEC-1104795) a digital advertisement against Kelly Ayotte for Senate (NH) and Donald Trump for President (Transactions B632828, B632829, B632830, B632831) due to an administrative error. In both instances, as soon as the inadvertent omission was discovered, PPVotes amended the corresponding report that same day. While the field work was reported 2 days late, it was available to the public over 30 days prior to Election Day. Likewise, while the digital ad was reported 6 days late, PPVotes made these expenditures available to the public 21 days prior to Election Day. All of these independent expenditures -- which represent less than 1.3% of the total expenditures PPVotes made in the 2016 election -- were timely reported on the original Pre-General Report.

Finally, during a voluntary review of its 2016 activity following the election, PPVotes discovered that two low dollar independent expenditures made on October 17, 2016 in the Nevada Senate election totaling \$2,416.41 (Transactions B636178 and B636179) had been inadvertently omitted from the October 18 Report (FEC-1109910). As soon as the minor administrative error was discovered on December 2, 2016, PPVotes amended the October 18 Report that same day (FEC-1128127). While these independent expenditures were not reported until after the election, they represent only 0.1% of the total expenditures that PPVotes was required to report in the Nevada Senate election overall and only 0.02% of the independent expenditures PPVotes made in the 2016 election cycle.

In conclusion, to avoid similar inadvertent omissions in the future, PPVotes has been undertaking a thorough review of its reporting and training procedures.

Yours sincerely,

Sarah Rozensky  
Attorney for Planned Parenthood Votes