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March 27, 2015
VIA ELECTRONIC TRANSMISSION

Bradley Matheson, Senior Campaign & Reviewing Analyst
Federal Election Commission-Reports Analysis Division
999 E Street, NW
Washington, DC 20463

RE: Planned Parenthood Action Fund of the Pacific Southwest (ID #C90011412) ? October Quarterly Report (07/01/2014-09/30/2014)

Dear Mr. Matheson:

Our office acts as campaign counsel for Planned Parenthood Action Fund of the Pacific Southwest (ID #C90011412). We are in receipt of your letter dated October 28, 2014 regarding our client?s year-end Report of Independent Expenditures Made and Contributions Received (FEC Form 5) covering the period July 1, 2014 through September 30, 2014. Unfortunately, this letter was not received via email or mail and was instead discovered when reviewing the organization?s information on the FEC website. Please note that the organization?s address is 1075 Camino Del Rio South, not 1075 Damino Del Rio South. Because we did not timely receive this letter, we were unable to file a response by the December 2, 2014 due date.

Your letter questions why 48-hour reports were filed late for four independent expenditures. As explained further below, a large percentage of the payments in question were reported on a 48-hour report filed September 25, 2014. That report was amended on October 15, 2014 to update several figures and to add two small, additional expenditures.

On September 25, 2014, the organization filed a 48-hour report disclosing two expenditures of \$8,689.25 with Protecting Choice in California, a Project of Planned Parenthood Affiliates of California as the vendor. These two expenditures were estimates, which were each updated to \$9,396.28 on a 48-hour report amendment filed October 15, 2014. The phrase ?estimate? was unintentionally left off these entries on the initial 48-hour report.

In addition, on the amended 48-hour report filed on October 15, 2014, the organization added two expenditures listing Wagaman Strategies as the payee. The organization was not aware of these expenditures at the time the initial 48-hour report was filed, and filed a 48-hour report amendment to disclose these expenditures before the election.

As you can see, of the expenditures in question, the committee reported 92 percent of these on the 48-hour report filed September 25, 2014 and the remaining expenditures were reported on the 48-hour report amendment filed October 15, 2014.

Importantly, all expenditures were disclosed prior to the election.

Please feel free to contact me with any additional questions.

Very truly yours,
OLSON HAGEL & FISHBURN LLP
LACEY E. KEYS
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