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NAME OF COMMITTEE (In Full)
Planned Parenthood Votes

FEC IDENTIFICATION NUMBER
C00489799

Mailing Address 123 William St, 10th Floor

City	State	ZIP Code
New York	NY	10038

December 19, 2016

Quy Vuong
Senior Campaign Finance & Reviewing Analyst
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: ID number C00489799, August Monthly Report (07/01/2016-07/31/2016)

Dear Quy Vuong:

We received your letter of November 20, 2016 requesting additional information on the August Monthly Report (07/01/2016-07/31/2016) filed by Planned Parenthood Votes (PPVotes).

Question 1 of your letter asks whether PPVotes failed to file a 48 hour report for a \$4,464.00 independent expenditure made on July 19, 2016. This independent expenditure was for online advertising in opposition to Rob Portman for U.S. Senate (Ohio) in the general election (payee: Blueprint Interactive) (July 19 expenditure). This independent expenditure was reported to the Federal Election Commission (FEC) on August 9, 2016 on PPVotes' Amended July 28 Report (FEC-1093181).

At the time the July 19 expenditure was made, this \$4,464.00 expenditure alone did not trigger the \$10,000 reporting threshold in the given election, pursuant to 11 C.F.R. 104.4(b). On July 27, 2016, PPVotes made additional expenditures in that election totaling \$114,252.26; accordingly, the committee filed a 48 hour report one day early on July 28, 2016 (FEC-1091427) (the July 28 Report) in compliance with 11 CFR 104.4(b). Due to a clerical error, the July 19 expenditure was inadvertently omitted from this original July 28 Report. On August 9, 2016, PPVotes realized this clerical error, and the same day filed an amendment to the July 28 Report to disclose the July 19 expenditure.

This low dollar expenditure -- \$4,464.00, which was less than 0.4% of the total expenditures PPVotes was required to report in this election overall -- was made available to the public on a 48 hour notice 10 days before the applicable monthly report was due and over 3 months before the relevant election. Further, this expenditure was properly disclosed on PPVotes' August Monthly Report filed on August 19, 2016 (FEC-1095942) and was in fact available to the public prior to the August 20th monthly deadline.

Question 2 of your letter asks whether PPVotes failed to timely file a 48 hour report for a \$559.44 independent expenditure made on July 20, 2016. This independent expenditure was for staff time for direct voter contact in opposition to Donald Trump for U.S. President in the general election (payee: Planned Parenthood Action Fund Inc.) (July 20 expenditure). This independent expenditure was reported to the FEC on July 29, 2016 on PPVotes' July 29 Report (the July 29 Report)(FEC-1091600).

On July 21, 2016, PPVotes filed a 48 hour report to disclose activity that triggered the reporting threshold on July 19, 2016 (July 21 Report) (FEC-1089925). This report also included \$10,035 in expenditures which would not have triggered a reporting threshold until July 20, 2016 and therefore were not required to be reported until July 22, 2016. However, in the spirit of full disclosure, PPVotes chose to report these expenditures on July 21, 2016 - earlier than required by 11 CFR 104.4(b). As a result of this early reporting, the low dollar expenditure at issue here did not trigger the \$10,000 reporting threshold until additional expenditures in the given election were made on July 25, 2016 (\$3639.21) and July 27, 2016 (\$114,252.26); accordingly, PPVotes filed a

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48 hour report on July 28, 2016 (the July 28 Report) (FEC-1091427) covering this activity. Due to a clerical error, the July 20 expenditure was inadvertently omitted from the July 28 report. PPVotes realized the error on July 29, 2016, and, rather than amending the July 28 Report for such a low dollar expenditure (\$559.44), PPVotes disclosed this expenditure that same day on its July 29 Report.

This \$559.44 expenditure was less than 0.01% of the total expenditures PPVotes was required to report in this election overall. At most, this low dollar expenditure may have been reported 1 day late, but it was made available to the public 22 days before the applicable monthly report was due and 102 days before the relevant election. Further, this expenditure was properly disclosed on PPVotes' August Monthly Report on August 19, 2016 (FEC-1095942) and was in fact available to the public prior to the August 20th monthly deadline.

In conclusion, to ensure that minor inadvertent omissions like those referenced here, are avoided in the future, PPVotes is undertaking a thorough review of its reporting procedures as part of its year-end review.

Yours sincerely,

Zoe Segal-Reichlin
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123 William Street
New York, NY 10038