

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

NAME OF COMMITTEE (In Full)  
Planned Parenthood Action Fund, Inc.

FEC IDENTIFICATION NUMBER  
C90005471

Mailing Address 123 William St, 10th Floor

City	State	ZIP Code
New York	NY	10038

May 11, 2017

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

Re: ID number C90005471, Year End Report (10/01/2016-12/31/2016)

Dear Ms. Mongeon:

We received your letter of April 14, 2017 requesting additional information on the Year End Report (10/01/2016-12/31/2016) filed by Planned Parenthood Action Fund, Inc. (the Action Fund).

Question 1 of your letter asks the Action Fund to amend the Year End Report to itemize donors who contributed in excess of \$200 to the organization. Federal Election Commission (FEC) regulations require reports of independent expenditures to disclose only those contributors to the organization who made contributions in excess of \$200 "for the purpose of furthering the reported independent expenditure." 11 CFR 109.10(e)(1)(vi). The Action Fund had no contributors who made such contributions. Therefore, no amendment of the Year End Report is required.

Question 2 of your letter asks the Action Fund to amend the Year End Report to include independent expenditures (Transactions 7633603 and 57633602) (October 19 Expenditures) disclosed on the 24-Hour Report filed on October 25, 2016 (FEC-1114717) (October 25 Report) that do not appear on Schedule 5-E of the Year End Report. The October 19 Expenditures were timely reported on a 24-Hour on October 20, 2016 (FEC-1112055), and again on the Year End Report where they are properly reflected on Schedule 5-E. However, due to a clerical error, the identical expenditures were also included on the October 25 Report. The Action Fund has since amended the October 25 Report to remove these duplicative transactions. No amendment of the Year End Report is required.

Question 3 of your letter asks whether the Action Fund failed to timely file a 48-Hour Report for two independent expenditures totaling \$113,536.16 made on October 13, 2016 in support of Deborah Ross and in opposition of Richard Burr for Senate (North Carolina) in the general election (Transactions 57633589 and 57633590). These expenditures represent a communication originally scheduled to be distributed on October 18, 2016. When preparing the appropriate 48-Hour Report on October 20, 2016, we became aware that the communication was in fact distributed earlier than planned, at which point, the Action Fund disclosed the communication on a 48-Hour Report that same day (FEC-1112055). Due to a clerical error, the incorrect amount was disclosed on this report. However, as soon as this discrepancy was discovered, the Action Fund filed an amended report on October 25, 2016 (FEC-1114829). While the full amount of these expenditures were reported late, the Action Fund acted quickly to correct the public record, making the information available to the public 13 days before the relevant election.

Question 4 of your letter asks whether the Action Fund failed to timely file a 24-Hour Report for five independent expenditures totaling \$1,297.20 made between October 31, 2016-November 8, 2016 in support of Hillary Clinton or in opposition of Donald Trump for U.S. President in the general election. Pursuant to 11 CFR 109.10(d), four of these expenditures (Transactions 57640478, 57640479, 57640480, 57640481) did not aggregate \$1,000 or more during the 24 hour reporting period because the \$1,000 reporting threshold in the given election was not triggered until Election Day itself, when on November 8, 2016, the Action Fund made an additional \$632.10 expenditure (Transaction 57640481). Accordingly, the Action Fund disclosed these four expenditures in a timely fashion on its Year End Report on January 31, 2017. The Action Fund should have, however, reported one of the five expenditures mentioned in your letter -- a low

\*\*\*\*\*

A-G79 @ B9CI G'H9LH'fl 97 : cfa ' - - t

NAME OF COMMITTEE (In Full)  
Planned Parenthood Action Fund, Inc.

FEC IDENTIFICATION NUMBER  
C90005471

Mailing Address 123 William St, 10th Floor

City	State	ZIP Code
New York	NY	10038

dollar independent expenditure totaling \$33.00 made on October 31, 2016 (Transaction 57634651) -- on the 24-Hour Report the Action Fund filed on November 3, 2016. The Action Fund has since amended this report to disclose this low dollar expenditure -- which represents less than 0.0051% of the total expenditures that the Action Fund was required to report in this election overall.

In conclusion, to ensure that incidental duplicative reporting and minor inadvertent omissions like those referenced here, are avoided in the future, the Action Fund has been undertaking a thorough review of its reporting procedures.

Yours sincerely,  
Sarah Rozensky  
Attorney for Planned Parenthood Action Fund Inc.