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Federal Election Commission
Washington, DC 20463

MEMORANDUM

July 28, 2017

TO: The Commission

THROUGH: Alec Palmer *AP by JDR*
Staff Director

FROM: Patricia C. Orrock
Chief Compliance Officer Patricia Orrock
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Krista J. Roche
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Date: 2017.07.28 10:51:34 -0400

SUBJECT: ADR 835 Planned Parenthood Action Fund Inc. DBA Planned
Parenthood Federal PAC and Tshombe Hubbard, Treasurer,
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred 17L-21 for processing on July 27, 2017, and the ADR Office designated the referral ADR 835. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 835 on August 3, 2017. Please contact Krista Roche if you have any questions or concerns before that date.

Summary of Case: RAD referred Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC and Tshombe Hubbard, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity on its 2016 12 Day Pre-General Report. On February 21, 2017, the Committee filed an Amended 2016 12 Day Pre-General Report disclosing an additional \$51,756.51 in disbursements.

In a Miscellaneous Electronic Submission (Form 99) filed on April 28, 2017, the Committee indicated that it performed an internal review of its 2016 activities and realized the need for an amendment. It was discovered that one \$50,000 disbursement was made to a state-level independent expenditure committee from non-federal cash. This was the Committee's first and only donation to a state-level independent expenditure committee, which was directed to the attention of a non-PAC staffer who was therefore not involved in the systematic review of the

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original report before its filing. The Committee contends this error was minor, representing a very small portion of its overall reporting, and that it is undertaking a thorough review of reporting procedures to ensure this type of error does not occur in the future.

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