



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 3, 2017

Tshombe Hubbard, Treasurer,
Planned Parenthood Action Fund Inc.
123 William Street, 10th Floor
New York, NY 10038

Re: ADR 835 (RAD)
Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC and
Tshombe Hubbard, Treasurer

Dear Mr. Hubbard:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division/Audit Division (RAD) was based on a review of reports filed by Planned Parenthood Action Fund Inc. which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC and Tshombe Hubbard, Treasurer, (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

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.

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
999 E STREET N.W., WASHINGTON, DC 20463
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EMAIL: KROCHE@FEC.GOV

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 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.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 835**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

Krista J. Roche

Krista J. Roche
Acting Director

Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions
Commitment to Submit to ADR & Designation of Representative/Counsel