



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2020 FEB -5 PM 3: 29

SENSITIVE

MEMORANDUM

February 5, 2020

TO: The Commission

THROUGH: Alec Palmer *AP by hAH*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director, ADR Office

Joshua A. Rebollozo *JAR*
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 937 — Planned Parenthood Votes and Vickie Barrow-Klein, Treasurer (C00489799)

RESOLUTION TERMS: Certify that the Committee has conducted an on-site training with those responsible for preparing and filing its reports and pay a civil penalty of \$4,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 937 (RAD 19L-35). The ADR Office received this referral on September 19, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred Planned Parenthood Votes and Vickie Barrow-Klein, Treasurer (Respondents or the Committee) for failing to file or timely file two (2) 24-Hour Reports totaling \$53,842.21 to support three (3) independent expenditures disclosed on the 2018 30 Day Post-General Report.

The Committee stated that while reviewing expenditures on November 6, 2018, Election Day, it discovered it had inadvertently omitted an independent expenditure disseminated on October 29, 2018 (totaling \$49,302.21) from a 24-Hour Report. The Committee contended that it immediately filed a 24-Hour Report within the hour to disclose that expenditure. The independent expenditure was reported on

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Election Day, upon discovery of the clerical error. The Committee also stated that on December 5, 2018, while preparing the 30 Day Post-General Report, it discovered that two independent expenditures disseminated on October 18, 2018 (totaling \$4,540), had been inadvertently omitted from the 24-Hour Report, filed on October 19, 2018. The Committee reported these independent expenditures on its 30 Day Post-General Report, filed on December 6, 2018. The Committee's finance and compliance staff, responsible for reporting, participated in an FEC webinar held on December 4, 2019. Staff will also continue to engage in ongoing training and review the Commission's "Tips for Treasurers" updates. Additionally, the Committee stated that it has a compliance operations manual and will continue to review its procedures to improve reporting and compliance.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Planned Parenthood Votes and Vickie Barrow-Klein, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.