



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

SEP 26 2006

Mr. Jeff Mechanick, Designated Agent  
Planned Parenthood Action Fund Inc.  
434 West 33<sup>rd</sup> Street  
New York, New York 10001

RE: MUR 5808

Dear Mr. Mechanick:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission (the "Commission") became aware of information suggesting that Planned Parenthood Action Fund Inc. may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). On September 12, 2006, the Commission found reason to believe that Planned Parenthood Action Fund Inc. violated 2 U.S.C. § 441b, a provision of the Act. Enclosed is the Factual and Legal Analysis that sets forth the basis for the Commission's determination.

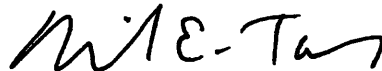
We have also enclosed a brief description of the Commission's procedures for handling possible violations of the Act. In addition, please note that you have a legal obligation to preserve all documents, records and materials relating to this matter until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519. In the meantime, this matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

27044154173

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed Designation of Counsel form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

We look forward to your response.

Sincerely,



Michael E. Toner  
Chairman

Enclosures  
Factual and Legal Analysis

27044154174

**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Planned Parenthood Action Fund Inc.

MUR: 5808

**I. INTRODUCTION**

This matter was generated by the Federal Election Commission (“Commission”) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities.

**II. FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended (“the Act”), broadly prohibits corporations from making contributions in connection with any Federal election. 2 U.S.C. § 441b(a). The available information indicates that on September 15, 2004, Planned Parenthood Action Fund, Inc., a domestic not-for-profit corporation registered in the State of New York,<sup>1</sup> transferred \$24,309 in corporate funds to its separate segregated fund, Planned Parenthood Action Fund, Inc. PAC, a political committee within the meaning of 2 U.S.C. § 431(4), *see* 11 C.F.R. § 100.5(b). Therefore, there is reason to believe Planned Parenthood Action Fund, Inc. violated 2 U.S.C. § 441b.

---

<sup>1</sup> The Fund’s website describes the company as an independent, non-partisan, not-for-profit organization formed as the political arm of Planned Parenthood Federation of America. <http://www.ppaction.org/ppvotes/AboutPPAF.html>.

27044154175