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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

December 14, 2017

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Acting Director, ADR Office

SUBJECT: ADR 835 Planned Parenthood Action Fund Inc. DBA  
Planned Parenthood Federal PAC and Tshombe Hubbard,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

RESOLUTION TERMS: Pay a civil penalty of \$2,600

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 835 (RAD 17L-21). The ADR Office received this referral on July 27, 2017.

**SUMMARY:** The Reports Analysis Division (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 the 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 a voluntary 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 for non-federal activity, which had been timely reported to the relevant state election board four days before the election, had been inadvertently omitted from the original 2016 12 Day Pre-General Report. This donation was one of only six non-federal cash donations made by the Committee over the last three election

Recommendation to Approve  
Settlement Agreement  
ADR 835 (RAD 17L-21)



**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC and Tshombe Hubbard, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.