

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 6, 2017

ANALYST: Jill Sugarman

- I. COMMITTEE: Planned Parenthood Advocates of
Wisconsin Political Fund
C90016510
Mel Barnes, Legal Associate
10 E. Doty Street, Suite 205
Madison, WI 53703
- II. RELEVANT STATUTES: 52 U.S.C. § 30104(g)
11 CFR §109.10(c) and (e)
- III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to File 48-Hour Reports)

The Planned Parenthood Advocates of Wisconsin Political Fund ("Planned Parenthood") failed to file two (2) 48-Hour Reports to support independent expenditures totaling \$116,898.08 disclosed on the 2016 October Quarterly Report, made during the period up to and including the 20th day before the 2016 General Election (Attachment 2).

On October 11, 2016, Planned Parenthood filed its 2016 October Quarterly Report covering the period from July 1, 2016 through September 30, 2016. Schedule 5-E of the report disclosed four (4) independent expenditures totaling \$133,305.04, made in support of two (2) federal candidates. Planned Parenthood failed to file two (2) 48-Hour Reports to support independent expenditures totaling \$116,898.08 for the 2016 General Election (Attachment 2, Images 201610119032236885-87).

On August 4, 2017, a Request for Additional Information (RAFI) was sent to Planned Parenthood referencing the 2016 October Quarterly Report. Among other items, the RAFI noted that Planned Parenthood may have failed to file 48-Hour Reports for two (2) independent expenditures disclosed on Schedule 5-E (Image 201708050300089079).

On August 31, 2017, Planned Parenthood filed a Miscellaneous Electronic Submission ("Form 99") which stated, in full:

"This report is filed in response to an August 4, 2017 letter from the FEC stating that independent expenditures disclosed on our October 2016 Quarterly Report were not disclosed via 48-hour reports when 48-hour reports were required. This error was due to a misunderstanding of the requirements by filing staff, who mistakenly believed 48-hour reports were not required unless expenditures were made within 20 days of the election. Staff has since been trained on all required reports and how to monitor aggregate amounts so that appropriate 48-hour reports will be made going forward, in addition to required 24-hour reports. Staff has created an internal memo on reporting so that any new staff filing reports will be appropriately trained before filing. This training has been added to a compliance checklist for election related processes (Image 201708319071187578)."

On the same day, Planned Parenthood filed an Amended 2016 October Quarterly Report that disclosed no changes from the original report with regard to the independent expenditures for which the 48-Hour Reports were not filed (Images 201708319071209888-90).

On September 25 and September 27, 2017, Reports Analysis Division (RAD) Management left voice mail messages for Mel Barnes, legal associate for Planned Parenthood. RAD Management explained that the missing 48-Hour Reports cited in the August 4, 2017 RFAI will be referred for further Commission action. RAD Management informed Ms. Barnes that the explanation provided in the Form 99 will be taken into consideration and added that any further clarification should be provided to the Commission as soon as possible (Attachment 3).

To date, no additional information has been provided by Planned Parenthood regarding this matter.

O-Index (2017)

Cmte. ID: C90016510 Cmte. Name: PLANNED PARENTHOOD ADVOCATES OF WISCONSIN POLITICAL FUND
 Treasurer Name: null Address: 10 E DOTY ST SUITE 205, MADISON, WI 53703
 Cmte. Type: J (INDEPENDENT EXPENDITURE - PERSON OR GROUP NOT A COMMITTEE) Cmtc. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	AI	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans		
MS-T			8/31/2017	1	201708319071187578	1/1/2017	6/30/2017		-	-	\$0	-	-	-	-		
F5N	Q2	N	7/27/2017	1	201707279069827420	1/1/2017	6/30/2017		-	-	\$0	-	-	-	-		
Totals															\$0		\$0

O-Index (2015-2016)

Cmte. ID: C90016510 Cmte. Name: PLANNED PARENTHOOD ADVOCATES OF WISCONSIN POLITICAL FUND
 Treasurer Name: null Address: 10 E DOTY ST SUITE 205, MADISON, WI 53703
 Cmte. Type: J (INDEPENDENT EXPENDITURE - PERSON OR GROUP NOT A COMMITTEE) Cmtc. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

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RQ2	Q3	N	8/4/2017	3	201708050300089079	7/1/2016	9/30/2016	8/4/2017	-	-	-	-	-	-	-		
F5A	Q3	A	8/31/2017	4	201708319071209888	7/1/2016	9/30/2016		-	\$360,000	\$133,305	-	-	-	-		
F5N	Q3	N	10/11/2016	4	201610119032236885	7/1/2016	9/30/2016		-	\$360,000	\$133,305	-	-	-	-		
F5N	48	N	10/15/2016	2	201610169032881322	10/14/2016	10/14/2016		-	\$20,000	\$0	-	-	-	-		
F5N	YE	N	1/27/2017	2	201701279041513700	10/1/2016	12/31/2016		-	\$34,810	\$774,810	-	-	-	-		
Totals															\$0		\$266,610

Planned Parenthood Advocates of Wisconsin Political Fund (C90016510)
2016 October Quarterly Report
Missing 48-Hour Reports

Name of Payee	Date of Expenditure (Schedule 5-E)	Expenditure Amount	Candidate Supported	Election
Community Outreach Group	8/31/2016	\$58,449.04 48-Hour Report Required	Hillary Clinton	2016 General
Community Outreach Group	8/31/2016	\$58,449.04 48-Hour Report Required	Russ Feingold	2016 General
	TOTAL	\$116,898.08		