

PLANNED PARENTHOOD'S CAMPAIGN FINANCE VIOLATIONS

Planned Parenthood is diverting taxpayer funds to support candidates who will increase taxpayer funding of Planned Parenthood and oppose candidates who do not want to increase forced taxpayer subsidies to Planned Parenthood.

Planned Parenthood of Northern New England is a 501(c)3 organization that receives over \$2.5 million in state and federal grants every year including \$548,000 in general funds from the state of New Hampshire's taxpayers. PPNNE then diverts \$422,192 to Planned Parenthood New Hampshire Action Fund, a 501(c)4 organization. See Exh. A. Planned Parenthood New Hampshire Action Fund has then registered two PAOs with the NH Secretary of State, a "Planned Parenthood New Hampshire Action Fund PAC" Political Advocacy Organization and a "Planned Parenthood New Hampshire Action Fund (c)(4)" Political Advocacy Organization. Both organizations share the same treasurer.

According to the PAC's most recent Receipt and Expenditure Report, the PAC received contributions of \$14,627.61 from various individuals and expended \$13,640.79 in campaign literature and contributions to various candidates. See October 17, 2018 Report at Exhibit B. According to the c(4)'s most recent Receipt and Expenditure Report, the c(4) received contributions of \$190,018.05 (the vast majority of which comes from taxpayers via the 501c(3) organization) but has expended only \$2,940.00. See October 17, 2018 Report at Exhibit C. Neither R & E report reflect the four "independent" expenditure reports indicating \$48,150 in support of Gray Chynoweth for Executive Council and in opposition to Ted Gatsas as well as in support of Mason Donovan for state senate and in opposition to Bob Giuda and Harold French. See attached as Exhibit D.

There appear to be several ongoing campaign finance violations.

First, Planned Parenthood appears to have violated RSA 664 by failing to indicate which organization paid for the \$48,150 in "independent" expenditures. The independent expenditure reports are signed with the letterhead of "Planned Parenthood New Hampshire Action Fund" and does not indicate whether it is the "Planned Parenthood New Hampshire Action Fund PAC" or the "Planned Parenthood New Hampshire Action Fund (c)(4)." Where the PAC does not have adequate funds and the c4 has over \$180,000 (most of which originated with the taxpayers), it is likely that the funds came from the c4. Regardless, one or both organizations violated RSA 664 by failing to indicate these expenditures on the R & E report. See Exhibits B, C & D.

Second, the c4's "independent" expenditures do not appear to actually be independent but rather coordinated with the candidate. Prior to expending these funds, Planned Parenthood met with the candidates and had the candidates pose with PP t-shirts and signs. See pictures attached at Exhibit E. The depth of collusion should be investigated. It does not appear these expenditures were completely independent.

Third, the c4 PAO organization appears to have violated RSA 664:4(V) by accepting contributions from the c4 and c3 organizations in excess of the \$5,000 limit. Although the c4 PAO alleges that its contributions are anonymous, it indicates on its September 5, 2018 filing that at least \$50,000 of the campaign funds were contributed by the Planned Parenthood New Hampshire Action Fund sister organization. See attached as Exhibit F (indicating \$31,945.50 from "Planned Parenthood Action Fund" and \$20,967.44 from "PPAF"). As previously stated, \$422,192 of Planned Parenthood New Hampshire

Action Fund funding came from Planned Parenthood of Northern New England, a 501(c)3 organization that receives over \$2.5 million in state and federal grants every year including \$548,000 in general funds from the state of New Hampshire's taxpayers. See Exh. A. This violation of transferring funds from one organization to another has some similarities to the campaign violations in Vermont where the same organization was fined for failing to adhere to Vermont's \$2,000 campaign contribution limitation. See Exhibit G.

Finally, where the ultimate funding for these campaign contributions are coming from Planned Parenthood of Northern New England which is a 501(c)3 organization, Planned Parenthood of Northern New England must register as a Political Advocacy organization as required by RSA 664:3-a and RSA 664:2, XXII. Whereas Planned Parenthood of Northern New England has spent more than \$5,000 in 2018 to advocate for "the election or defeat of a clearly identified candidate or candidates," they would appear to meet the definition. In fact, PPNNE has contributed over \$400,000 to PPNHAF which has spent at least \$48,150 in direct support or opposition to 5 candidates. Therefore, it appears Planned Parenthood has violated RSA 664 by failing to register Planned Parenthood of Northern New England and disclose the donors and expenditures. Although RSA 664:6 exempts 501(c)4 organizations from disclosing the identity of its donors, there is no statutory exemption for 501(c)(3) organizations such as Planned Parenthood of Northern New England. The public has a right to know how much of its tax dollars are going to support or oppose electoral candidates.