

23L-35

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 5, 2023

ANALYST: Jack Baisden

- I. COMMITTEE: Field Team 6  
C00695346  
Beverly Grossman Palmer, Treasurer  
1250 Sixth Street, Suite 205  
Santa Monica, CA 90401
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)  
52 U.S.C. § 30104(b)(4)  
11 C.F.R. § 104.3(a)  
11 C.F.R. § 104.3(b)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Field Team 6 (“the Committee”) failed to disclose all financial activity on its 2022 October Quarterly and 2022 12-Day Pre-General Reports. On December 8, 2022, the Committee filed an Amended 2022 October Quarterly Report which disclosed additional receipts totaling \$76,029.67 and additional disbursements totaling \$157,984.83, which were not disclosed on the original report. On the same day, the Committee filed an Amended 2022 12-Day Pre-General Report which disclosed additional receipts totaling \$99,258.99 and additional disbursements totaling \$67,411.77, which were not disclosed on the original report (Attachment 1).

**2022 October Quarterly Report**

On October 15, 2022, the Committee filed the original [2022 October Quarterly Report](#) covering the period from July 1, 2022, through September 30, 2022. The report disclosed \$174,874.93 in receipts on Line 11(a)(i) (Itemized Individual Contributions) and \$58,900.15 in receipts on Line 11(a)(ii) (Non-Itemized Individual Contributions) of the [Detailed Summary Page](#). Additionally, the report disclosed \$16,186.57 in disbursements on Line 21(b) (Other Federal Operating Expenses), \$0.00 in disbursements on Line 28(a)

(Refunds of Contributions to Individuals), and \$0.00 in disbursements on Line 29 (Other Disbursements) of the [Detailed Summary Page](#) (Attachment 1).

On December 8, 2022, the Committee filed an [Amended 2022 October Quarterly Report](#). The report disclosed \$249,606.05 on Line 11(a)(i) and \$60,198.70 on Line 11(a)(ii) of the [Detailed Summary Page](#), a total increase of \$76,029.67 from the original report. Additionally, the report disclosed \$173,238.48 on Line 21(b), \$22.92 on Line 28(a), and \$910.00 on Line 29 of the [Detailed Summary Page](#), a total increase of \$157,984.83 from the original report (Attachment 1).

On March 15, 2023, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2022 October Quarterly Report, received December 8, 2022. The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2022 October Quarterly Report.

On April 14, 2023, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the Amended 2022 October Quarterly Report, received December 8, 2022. The Committee stated:

“The amended report reflects additional receipts and disbursements that were not timely entered into our database at the time of filing, due to the increase in number of manual data entry required for this committee. In the future, we are working to increase the automation and processing so that we do not have a lag in entering data when reports are due. We are fully caught up with our manual data entries and should not encounter this issue moving forward.”

## **2022 12-Day Pre-General Report**

On October 27, 2022, the Committee filed the original [2022 12-Day Pre-General Report](#) covering the period from October 1, 2022, through October 19, 2022. The report disclosed \$60,872.32 in receipts on Line 11(a)(i) and \$0.00 in receipts on Line 15 (Offsets to Operating Expenditures) of the [Detailed Summary Page](#). Additionally, the report disclosed \$5,544.78 in disbursements on Line 21(b) and \$0.00 in disbursements on Line 29 of the [Detailed Summary Page](#) (Attachment 1).

On December 8, 2022, the Committee filed an [Amended 2022 12-Day Pre-General Report](#). The report disclosed \$160,072.32 on Line 11(a)(i) and \$58.99 on Line 15 of the [Detailed Summary Page](#), a total increase of \$99,258.99 from the original report. Additionally, the report disclosed \$68,966.55 on Line 21(b) and \$3,990.00 on Line 29 of the [Detailed Summary Page](#), a total increase of \$67,411.77 from the original report (Attachment 1).

On March 15, 2023, an [RFAI](#) was sent to the Committee referencing the Amended 2022 12-Day Pre-General Report, received December 8, 2022. The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2022 12-Day Pre-General Report.

On April 14, 2023, the Committee filed an [FEC Form 99](#) in response to the RFAI referencing the Amended 2022 12-Day Pre-General Report, received December 8, 2022. The Committee stated:

“The amended report reflects additional receipts and disbursements that were not timely entered into our database at the time of filing, due to the increase in number of manual data entry required for this committee. In the future, we are working to increase the automation and processing so that we do not have a lag in entering data when reports are due.”

On May 16, 2023, the Committee filed an additional [FEC Form 99](#) in response to the RFAI referencing the Amended 2022 12-Day Pre-General Report, received December 8, 2022. The Committee stated:

“Field Team 6 would like to add to our prior response a more detailed explanation for the increase of receipts and disbursements between the timely-filed October 27, 2022 Pre-General Report and the subsequently filed amended reports.

Under my supervision, LaKeitha Oliver performs the day-to-day reporting services for Field Team 6. It is her normal practice to check the committees bank account on a regular basis (at least three to four times a week), to ensure that the receipts and disbursements are correctly recorded into the compliance software system that we use.

Due to COVID, since March of 2020 our entire office staff had been working from home. When our lease was up (October 31, 2022), the firm down-sized our office space and relocated. Ms. Oliver was heavily involved in the process of packing and organizing materials to move and to recycle or donate. During this time the committee received two very large contributions of \$50,000 each via wire transfer. Both the size and method of contribution was unusual for Field Team 6. Unfortunately, due to being heavily involved in the moving process, Ms. Oliver's normal practice of reviewing the committees bank account was not followed, and these items were missed. The committee did not report any information regarding these donations to the treasurer so the only way the treasurer would have been aware of them is to observe them in the bank account.

Ms. Oliver was aware that she had been unable to record all of the Committees disbursements into the reporting software and that she would be unable to complete that process before the October 27 Pre-General report was due. When the quarterly report was due, it was timely filed with the intention to amend at a later date to add items that had not been captured in the reporting system, expecting that these would constitute a relatively small number of disbursements on the Field Team 6 credit card. Ms. Oliver and I were unaware of the large wires received in mid-October.

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Since becoming aware of this issue, I have worked to implement improved practices by requiring the individuals within Field Team 6 who are aware of contributor plans to inform me and Ms. Oliver of the impending wire transfers. I believe that that this approach, along with our normal practice of regularly reviewing the bank account, will keep Field Team 6 current with its disclosure obligations.

Field Team 6 has been in operation since 2020 and has had a strong record of compliance, timely filing all required reports. This committee generates many small contributions and small expenditures because it relies largely upon volunteers to perform its political activities, and thus the reporting burden for this committee is quite high relative to its total income and expenditures. I hope the FEC can recognize this as an honest mistake under the unusual circumstances of moving office spaces during an election period and treat this matter accordingly.”

Since May 11, 2023, the Reports Analysis Division (RAD) logged two (2) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act in response to the matters referenced above. RAD was able to connect with the Committee on both occasions and notified Beverly Grossman Palmer, Treasurer, and LaKeitha Oliver, the Treasurer’s assistant, that the matters could be referred to another Commission office for further review (Attachment 2). To date, no further communications have been received from the Committee regarding these matters.

Filings and correspondence related to the Committee can be found here:  
[Field Team 6](#).

**Field Team 6**

2022 October Quarterly Report / Amended 2022 October Quarterly Report

Overview of Additional Receipts and Disbursements

<b>Report Line</b>	<b><u>Original 2022 October Quarterly Report</u></b>	<b><u>Amended 2022 October Quarterly Report, Received 12/8/22</u></b>	<b>Variance Amount</b>
<b>Receipts</b>			
Line 11(a)(i): Itemized Individual Contributions	\$174,874.93	\$249,606.05	\$74,731.12
Line 11(a)(ii): Non-Itemized Individual Contributions	\$58,900.15	\$60,198.70	\$1,298.55
		<b>Total:</b>	<b>\$76,029.67</b>
<b>Disbursements</b>			
Line 21(b): Other Federal Operating Expenses	\$16,186.57	\$173,238.48	\$157,051.91
Line 28(a): Refunds of Contributions to Individuals	\$0.00	\$22.92	\$22.92
Line 29: Other Disbursements	\$0.00	\$910.00	\$910.00
		<b>Total:</b>	<b>\$157,984.83</b>

**Field Team 6**

2022 12-Day Pre-General Report / Amended 2022 12-Day Pre-General Report

Overview of Additional Receipts and Disbursements

<b>Report Line</b>	<b><u>Original 2022 12-Day Pre-General Report</u></b>	<b><u>Amended 2022 12-Day Pre-General Report, Received 12/8/22</u></b>	<b>Variance Amount</b>
<b>Receipts</b>			
Line 11(a)(i): Itemized Individual Contributions	\$60,872.32	\$160,072.32	\$99,200.00
Line 15: Offsets to Operating Expenditures	\$0.00	\$58.99	\$58.99
		<b>Total:</b>	<b>\$99,258.99</b>
<b>Disbursements</b>			
Line 21(b): Other Federal Operating Expenses	\$5,544.78	\$68,966.55	\$63,421.77
Line 29: Other Disbursements	\$0.00	\$3,990.00	\$3,990.00
		<b>Total:</b>	<b>\$67,411.77</b>