



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 18, 2023

Beverly Grossman Palmer, Treasurer  
Field Team 6  
10940 Wilshire Boulevard, Suite 2000  
Los Angeles, CA 90024

**Response Due Date**  
**August 9, 2023**

Re: ADR 1125 (RAD 23L-35)  
Field Team 6 and Beverly Grossman Palmer, Treasurer (C00695346)

Dear Beverly Grossman Palmer:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by Field Team 6 which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Field Team 6 and Beverly Grossman Palmer, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

RAD referred Field Team 6 and Beverly Grossman Palmer, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on the 2022 October Quarterly Report and the 2022 12-Day Pre-General Report. On December 8, 2022, the Committee filed an Amended 2022 October Quarterly Report which disclosed \$76,029.67 in additional receipts and \$157,984.83 in additional disbursements. On December 8, 2022,

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
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the Committee filed an Amended 2022 12-Day Pre-General Report which disclosed \$99,258.99 in additional receipts and \$67,411.77 in additional disbursements.

On April 14, 2023, and May 16, 2023, the Committee filed Form 99s (Miscellaneous Electronic Submissions) stating the Committee failed to timely enter its receipts and disbursements into its filing software due to disruptions related to relocating the Committee's office. The Committee further stated it aims to improve internal communication and implement automation to avoid errors in the future.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing.

This matter has been designated as **ADR 1125**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,



Joshua A. Rebollozo  
Assistant Director  
Alternative Dispute Resolution Office