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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

November 15, 2023

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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

Krista J. Roche *KJR*
Director, ADR Office

Joshua A. Rebollozo *JAR*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1125 - Field Team 6 and Beverly Grossman Palmer,
Treasurer (C00695346)

RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to be provided to Committee staff detailing the Committee's reporting procedures for contributions received to ensure timely and accurate reporting; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$14,450.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1125 (RAD 23L-35). The ADR Office received this referral from the Reports Analysis Division (RAD) on July 5, 2023.

SUMMARY: 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 and an Amended 2022 12-Day Pre-

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General Report which disclosed \$99,258.99 in additional receipts and \$67,411.77 in additional disbursements.

During negotiations, the Committee stated it failed to timely report all financial activity due to logistical challenges it faced after receiving a high volume of receipts and disbursements that required manual entry in addition to receiving two (2) \$50,000 contributions by wire transfer that were inadvertently excluded from reporting totals. The Committee amended its 2022 October Quarterly Report within eight (8) weeks of the original filing and its 2022 12-Day Pre-General Report six (6) weeks after the original filing. The Committee further stated it has implemented measures to improve internal communication for contributions received and aims to implement automation for tasks requiring manual entry to ensure timely and accurate future reporting.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Field Team 6 and Beverly Grossman Palmer, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.