



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 2023

David Gould, Treasurer
Democratic Party of Orange County FED PAC
249 E. Ocean Blvd #685
Long Beach, CA 90802

**Response Due Date
July 19, 2023**

Re: ADR 1115 (RAD 23L-19)
Democratic Party of Orange County FED PAC and David Gould, Treasurer (C00321943)

Dear David Gould:

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 Democratic Party of Orange County FED PAC which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

An email was sent to your office on June 1, 2023, regarding an opportunity to participate in the ADR program at the Commission to resolve this matter. To date, the Commission has received no response. 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 Democratic Party of Orange County FED PAC and David Gould, 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:

The Reports Analysis Division (RAD) referred the Democratic Party of Orange County Fed PAC and David Gould, Treasurer (Respondents or the Committee) to the Alternative

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
1050 FIRST STREET N.E., WASHINGTON, DC 20463
TELEPHONE: (202) 694-1152
EMAIL: RMARSHALL@FEC.GOV

Dispute Resolution Office for failing to timely remedy an excessive contribution totaling \$70,000 and for failing to remedy a prohibited contribution totaling \$75.00 within the permissible timeframes.

On September 20, 2022, the Committee filed its 2022 September Monthly Report to disclose a full refund of the excessive receipt. At this time, the Committee has not yet transferred out or refunded the prohibited contribution totaling \$75.00.

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 by July 19, 2023, 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 1115**. 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,

A handwritten signature in black ink that reads "Rosa Marshall". The signature is fluid and cursive, with the first name "Rosa" and last name "Marshall" clearly distinguishable.

Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office