

23L-57

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 26, 2023

ANALYST: R. Bradley Austin

I. COMMITTEE: Citizens for Responsible Energy Solutions Inc.
C90014838
Neil Reiff, Counsel
455 Massachusetts Avenue NW #142
Washington, DC 20001

II. RELEVANT STATUTES: 52 U.S.C. §30104(c) and (g)
11 CFR §109.10(b) and (e)

III. BACKGROUND:

Failure to File Reports and Late Filing (Failure to Timely File the 2022 Year-End Report)

Citizens for Responsible Energy Solutions Inc. (“CRES”) failed to timely file the 2022 Year-End Report supporting independent expenditures totaling \$200,000.00 as disclosed in one (1) 24-Hour Report.

On October 25, 2022, CRES filed a [24-Hour Report](#) disclosing ten (10) independent expenditures totaling \$200,000.00, made in support of ten (10) federal candidates, on Schedule 5-E (Itemized Independent Expenditures).

On February 22, 2023, a [Notice of Failure to File \(“RQ-7”\)](#) was sent to CRES referencing the 2022 Year-End Report. The RQ-7 stated that CRES may have failed to file the Year-End Report for the independent expenditures made during the quarterly report coverage period of October 1, 2022 through December 31, 2022.

RAD Referral 23L-57
Citizens for Responsible Energy Solutions Inc.
Page 2 of 2

On May 4, 2023, CRES filed a [2022 Year-End Report](#) covering the period from October 1, 2022 through December 31, 2022. The report disclosed independent expenditures totaling \$200,000.00, which were previously reported on the [24-Hour Report](#).

On May 31, 2023, a [Request for Additional Information \(RAI\)](#) was sent referencing the 2022 Year-End Report. The RAI requested that the entity clarify if any contributions were received during the reporting period.

On July 7, 2023, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) that stated,

“This submission supplements the committee's Year-End Form 5 filing in connection with independent expenditures [sic] made during the fourth quarter of 2022.

Please note that the committee did not accept any contributions earmarked for any independent expenditures or for political purposes during the reporting period.”

Since July 7, 2023, the Reports Analysis Division (RAD) logged four (4) communications with a representative of CRES which reflect efforts to help CRES voluntarily comply with the Act regarding the matters referenced above. RAD was able to connect with a representative of CRES on two (2) of these occasions and notified Neil Reiff, counsel for CRES, that CRES would be referred to another Commission office for further review. RAD advised CRES to file an FEC Form 99 with any clarifying information for the public record (Attachment 1). To date, no further communications have been received from CRES regarding this matter.

Filings and correspondence related to CRES can be found on the [FEC website](#).