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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

February 13, 2024

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1144 - Citizens for Responsible Energy Solutions Inc.

RESOLUTION TERMS: Retain an outside consultant to review its compliance procedures and conduct a training with those responsible for preparing and filing its reports.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1144 (RAD 23L-57). The ADR Office received this referral from the Reports Analysis Division (RAD) on September 26, 2023.

**SUMMARY:** RAD referred Citizens for Responsible Energy Solutions Inc. (the Respondent) for failing to timely file its 2022 Year-End Report to support \$200,000 in independent expenditures as disclosed in one (1) 24-Hour Report. The 2022 Year-End Report was due on January 31, 2023, with a coverage period of October 1, 2022, through December 31, 2022. On May 4, 2023, the Respondent filed its 2022 Year-End Report, albeit untimely.

During negotiations, the Respondent stated that the activity on its 2022 Year-End Report is identical to the 24-Hour Report filing from October 25, 2022. Further, the Respondent stated that it immediately prepared and filed the report upon identifying the filing requirement.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Citizens for Responsible Energy Solutions Inc.
2. Approve the appropriate letters.
3. Close the file on this matter.