



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 2024

Neil P. Reiff, Esq.
1090 Vermont Avenue, NW
Suite 750
Washington, DC 20005

Re: ADR 1144 (23L-57)
Citizens for Responsible Energy Solutions Inc. (C90014838)

Dear Mr. Reiff.:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on March 6, 2024 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office

Enc: Payment Instructions
Compliance Chart
Negotiated Settlement

ADR 1144 Compliance Chart

Type	Date Due
Retain an outside consultant to review compliance procedures and conduct training	6/7/2024



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WASHINGTON, D.C. 20463

Case Number: ADR 1144

Source: RAD 23L-57

Case Name: Citizens for Responsible Energy Solutions Inc. (C90014838)

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Neil Reiff, Esq., representing Citizens for Responsible Energy Solutions Inc. (Respondent). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and the Respondent addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of the Respondent. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. The Respondent voluntarily enters into this settlement with the Commission.
3. The Reports Analysis Division (RAD) referred 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.
4. Entities that are not registered and reporting to the Commission as political committees that spend in excess of \$250 on independent expenditures within a calendar year with respect to a given election must also file a quarterly report (i.e., Form 5) for any quarterly period in which the independent expenditures exceed \$250 and any subsequent quarterly period during that calendar year when additional independent expenditures are made. 52 U.S.C. §30104(c), 11 C.F.R. §109.10(b).
5. The Respondent states that the activity on its 2022 Year-End Report is identical to the 24-Hour Report filing from October 25, 2022. Further, the Respondent states that it immediately prepared and filed the report upon identifying the filing requirement.

6. The Respondent, in an effort to avoid similar errors in the future, agrees to retain an outside consultant to review its compliance procedures and conduct a training with those responsible for preparing and filing its reports within ninety (90) days of the effective date of this settlement.
7. The Respondent agrees that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if the Respondent fails to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
9. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondent shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1144 (RAD 23L-57), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Rosa Marshall, Assistant Director
Alternative Dispute Resolution Office

Rosa Marshall

March 6, 2024

Date Signed

FOR THE RESPONDENT:

Neil Reiff
Neil Reiff (Feb 12, 2024 10:41 EST)

Neil Reiff, Esq.
Representing Citizens for Responsible
Energy Solutions Inc.

Feb 12, 2024

Date Signed

ADR 1144 Negotiated Settlement for Respondent

Final Audit Report

2024-02-12

Created:	2024-02-08
By:	Rosa Marshall (rmarshall@fec.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAgJRFDSg2C3yOBxZzVlmgVHoHu32CmHe

"ADR 1144 Negotiated Settlement for Respondent" History

 Document created by Rosa Marshall (rmarshall@fec.gov)

2024-02-08 - 4:52:58 PM GMT

 Document emailed to Neil Reiff (reiff@sandlerreiff.com) for signature

2024-02-08 - 4:53:17 PM GMT

 Email viewed by Neil Reiff (reiff@sandlerreiff.com)

2024-02-08 - 6:21:14 PM GMT

 Document e-signed by Neil Reiff (reiff@sandlerreiff.com)

Signature Date: 2024-02-12 - 3:41:07 PM GMT - Time Source: server

 Agreement completed.

2024-02-12 - 3:41:07 PM GMT



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