



January 19, 2024

BY EMAIL

Phone: (949) 441-5352

Federal Election Commission
Wanda Brown
Assistant General Counsel
1050 First Street, NE
Washington, DC 20463
Email: cela@fec.gov

Re: AR 23-06

Dear Ms. Brown:

On behalf of my client, Citizens for Waters ("Committee") and David Gould, in his official capacity as Treasurer, I am writing in response to the Commission's letter of December 5, 2023 regarding the above-referenced referral.

For the reasons set forth below, we respectfully request that the OGC recommend that no further action be taken in this matter, or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

The Committee acknowledges errors were made which were not willful or purposeful. As indicated in the Committee's response to the draft audit report, the errors were primarily a result of limited staff availability and resources during the pandemic. The Committee made every effort to cooperate with Commission staff during the audit process and amended its reports to correct the financial misstatements. The Committee also refunded or disgorged all excess contributions reflected in the audit report. Finally, the Committee has taken steps to improve its compliance procedures.

The Committee appreciates the opportunity to respond to the audit referral. Please let me know if you have any questions or need additional information.

Sincerely,

Leilani Row Beaver
Counsel for Citizens for Waters

cc: David Gould
Congresswoman Maxine Waters