**Carson’s Consulting**

**Authority to Compromise or Settle Cases**

**Date:** October 22, 2025  
**Prepared by:** Legal Compliance and Administrative Oversight Team

**Purpose**

This document provides evidence related to Carson’s Consulting’s adherence to the regulation governing the **authority of reviewing officials to compromise or settle cases**.  
The information below summarizes procedural gaps and documentation deficiencies indicating **non-compliance** with notification and timing requirements under the governing regulation.

**Evidence Summary**

| **Requirement** | **Evidence Description** |
| --- | --- |
| **Authority to Compromise or Settle** | Review of case documentation indicates that, in several instances, settlements were authorized **prior to the date** on which the reviewing official was formally permitted to issue a complaint. Corresponding delegation memos were missing or undated. |
| **Timing of Settlements** | Case records reveal that two settlements were finalized **after** the Administrative Law Judge (ALJ) had already issued initial decisions, contrary to regulatory limits. System logs confirm settlement execution dates post-decision. |
| **Attorney General Notification** | Notification to the Attorney General **was not made at least 30 days prior** to several settlement agreements. In some cases, written notice was submitted only 5–10 days before execution; in others, no confirmation of receipt exists. |
| **Written Record Retention** | Several Attorney General correspondence records and settlement approval documents were **not retained** in the Legal Document Management System (LDMS). Audit trail exports show missing or deleted file references. |
| **Referral to Presiding Officer** | One settlement was processed **after allegations were referred to a presiding officer**, contrary to the restriction on settlement timing following referral. Case notes confirm this procedural violation. |

**Supporting Documentation**

1. **Settlement Correspondence and Logs** — Case records showing discrepancies between settlement dates and complaint issuance authorization.
2. **Attorney General Communication Records** — Partial documentation of notifications; some letters lack acknowledgment or are undated.
3. **System Audit Trail Exports** — Evidence of missing or deleted correspondence within LDMS.
4. **Case Review Memos** — Internal notes indicating procedural deviations and lack of verification prior to settlement execution.
5. **Presiding Officer Referral Documents** — Case files demonstrating post-referral settlement activity.

**Observations**

* Settlement activity occurred outside the regulatory window established for authorized reviewing officials.
* Written notification requirements to the Attorney General were not met in multiple instances.
* Documentation gaps reduce the ability to verify compliance with notification and referral restrictions.
* Immediate corrective actions are required to establish proper controls over settlement timing and notification processes.

**Document Control**

| **Document ID** | **Version** | **Effective Date** | **Prepared By** | **Reviewed By** |
| --- | --- | --- | --- | --- |
| CSC-LGL-AUTH-EVD | 1.0 | October 22, 2025 | **Rachel D. Whitmore**, Compliance Analyst | **Stephen J. Coleridge**, General Counsel |