

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 5, 2015

ANALYST: Romy Adame-Wilson

I. COMMITTEE: All Citizens for Mississippi
C00564351
Jacqueline Vann, Treasurer
1750 Ellis Ave., Suite 600
Jackson, MS 39204

II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(1)
11 CFR § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

All Citizens for Mississippi ("the Committee") failed to timely file four (4) 24-Hour Reports totaling \$26,775.71 to support five (5) independent expenditures disclosed on the 2014 July Quarterly Report made after the 20th day but more than 24 hours before the 2014 Primary Runoff election in the state of Mississippi held on June 24, 2014(Attachment 3).

A Prior Notice listing the official filing dates for Quarterly filers was sent via email to the Committee on June 20, 2014. The notice included a section titled *48- and 24-Hour Reports on Independent Expenditures*, which read:

"Any PAC or Party Committee that makes independent expenditures may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure. See 11 CFR 104.4(b)(2) and (c). See generally, 11 CFR 104.4., the WebPage: http://www.fec.gov/info/charts_ie_dates_2014.shtml, or the Campaign Guide. These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate" (Attachment 2).

On July 10, 2014, Jacqueline Vann, Treasurer for the Committee, contacted the Reports Analysis Division (RAD) Analyst with questions about completing the Form 3X and reporting independent expenditures. The Analyst directed Ms. Vann to the *Campaign Guide for Nonconnected Committees*, advised her to read the portions covering independent expenditures, and to call back with any reporting questions (Attachment 4).

On July 15, 2014, the Committee filed the 2014 July Quarterly Report, covering the period from June 6, 2014 through June 30, 2014, which disclosed no independent expenditures on Schedule E (Itemized Independent Expenditures) (Image 14961619076).

On July 18, 2014, Ms. Vann, called the RAD Analyst for assistance in amending the Committee's 2014 July Quarterly Report. Ms. Vann asked if independent expenditures should be moved from Schedule B (Itemized Disbursements) to Schedule E. The Analyst stated all independent expenditures should be disclosed on Schedule E and advised Ms. Vann to file an amended report. Ms. Vann explained that the Committee did not file 48-Hour Reports for the independent expenditures because the Committee had just received the invoice. The Analyst stated that 24- and 48-Hour Reports are required based on the date of public dissemination and not on the date of payment. The Analyst advised the Committee to file the missing reports as soon as possible (Attachment 4).

On July 29, 2014, the Committee filed an Amended 2014 July Quarterly Report covering the period from May 24, 2014 through June 30, 2014, which included a Schedule E disclosing six (6) independent expenditures totaling \$27,575.71, made in support of one (1) federal candidate. The Committee failed to file four (4) 24-Hour Reports to support five (5) independent expenditures, totaling \$26,775.71, for the 2014 Primary Runoff Election in the state of Mississippi (Images 14942380953-5).

On the same day, the Committee also filed one (1) 48-Hour Report¹ to support five (5) independent expenditures, totaling \$26,775.71, disseminated on June 11, 2014, June 16, 2014, June 19, 2014, and June 21, 2014 (Images 14942380919-21).

On December 7, 2014, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2014 July Quarterly Report, received July 29, 2014. Among other items, the RFAI noted that the Committee may have failed to timely file one or more of the required 24-Hour Reports for the independent expenditures disclosed on the amended report. A chart was included with the RFAI identifying the five (5) independent expenditures, totaling \$26,775.71, for which 24-Hour Reports had not been timely filed (Images 14330067347-50).

On January 12, 2015, the Committee filed an Amended 2014 July Quarterly Report. The amended report included no changes to the independent expenditures disclosed on the previous amended report (Images 15950020378-80).

¹ The Committee filed a 48-Hour Report, however, the dissemination date provided on the 48-Hour Report occurred during the 24-Hour reporting period.

On the same day, the Committee submitted a Miscellaneous Electronic Submission ("Form 99") in response to the RFAI. The Form 99 stated in part:

"The \$20,577.81 amount was for radio ads that was disseminated on 6/21/14 and paid on 7/2/14. I didn't include it on the original report because my understanding was I needed to file the expense in the quarter it was paid. After investigating I understood that I handle that expense incorrectly and it should have been included in the July report on the Schedule D as well as submit a 24-48 report. I amended the report prior to this notice to correct the error..."

My inexperience at completing and filing FEC reports was the purpose of failure to file timely 24-48 report. After researching and understanding when and how to file I amended my report to show the correct report and information. I amended and filed the proper 24-48 expenditures and have complied with these regulations. I have a better understanding of the necessary reports and the filing time frame and will have filed timely since this assurance" (Image 15950020355).

On February 26, 2015, the RAD Analyst called Ms. Vann and informed her that the Committee may be referred for further action to the Commission for the apparent late 24-Hour Reports to support the independent expenditures disclosed on the Amended 2014 July Quarterly Report. The Analyst invited the Committee to file a Form 99 with any additional clarifying information they wished to include (Attachment 4).

To date, no further communication has been received from the Committee regarding this matter.

O-Index (2015-2016)															
Cmte. ID: C00564351		Cmte. Name: ALL CITIZENS FOR MISSISSIPPI													
Treasurer Name: VANN, JACQUELINE		Address: 1750 ELLIS AVE., SUITE 600, JACKSON, MS 39204													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)		Cmte. Designation: U (UNAUTHORIZED)		Filing Frequency: QUARTERLY FILER											
Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T		1	1/12/2015	1	15950020355										
MS-T			3/6/2015	1	15950847019										
Totals										\$0	\$0				

O-Index (2013-2014)															
Cmte. ID: C00564351		Cmte. Name: ALL CITIZENS FOR MISSISSIPPI													
Treasurer Name: VANN, JACQUELINE		Address: 1750 ELLIS AVE., SUITE 600, JACKSON, MS 39204													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)		Cmte. Designation: U (UNAUTHORIZED)		Filing Frequency: QUARTERLY FILER											
Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T		7/29/2014	1	14962166857											
RC02	Q2	A	12/7/2014	4	14330067347	5/24/2014	6/30/2014	12/7/2014							
RC02	30G	A	2/1/2015	3	15330073088	10/1/2014	11/24/2014	2/1/2015							
F3XN	Q2	N	7/15/2014	16	14961619073	6/6/2014	6/30/2014		\$0	\$144,685	\$111,122	\$33,562			\$0
F3XA	Q2	A	7/29/2014	24	14942380932	5/24/2014	6/30/2014		\$0	\$154,340	\$117,122	\$37,217	\$20,577		\$20,577
F3XA	Q2	A	1/12/2015	24	15950020357	5/24/2014	6/30/2014		\$0	\$154,340	\$117,122	\$37,217	\$20,577		\$20,577
F3XN	Q3	N	10/15/2014	13	14978300589	7/1/2014	8/30/2014		\$37,217	\$10,000	\$38,157	\$9,059	\$0		\$0
F3XA	Q3	A	1/1/2015	13	15950020422	7/1/2014	8/30/2014		\$37,217	\$10,000	\$38,157	\$9,059	\$0		\$0
F3XN	30G	N	12/2/2014	17	14952691382	10/1/2014	11/24/2014		\$9,059	\$19,000	\$27,451	\$807			\$0
F3XA	30G	A	1/1/2015	17	15950020435	10/1/2014	11/24/2014		\$9,059	\$19,000	\$27,451	\$607			\$0
F3XN	YE	N	1/29/2015	8	15950153873	11/25/2014	12/31/2014		\$607	\$10,000	\$9,000	\$1,607			\$0
F1		N	6/6/2014	7	14031243227										
F24N	48		7/29/2014	3	14942380919										
F24N	24		10/29/2014	5	14952558231										
F1A		A	11/19/2014	4	14952594331										
Totals									\$193,340	\$191,732					

O-Index (2011-2012)															
Cmte. ID: C00564351		Cmte. Name: ALL CITIZENS FOR MISSISSIPPI													
Treasurer Name: VANN, JACQUELINE		Address: 1750 ELLIS AVE., SUITE 600, JACKSON, MS 39204													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)		Cmte. Designation: U (UNAUTHORIZED)		Filing Frequency: QUARTERLY FILER											
Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
No records were found for this cycle.															

JULY QUARTERLY REPORT NOTICE**FEDERAL ELECTION COMMISSION****CONGRESSIONAL COMMITTEES
PARTIES AND PACS****June 20, 2014****CURRENT REPORT DUE**

REPORT	CLOSE OF BOOKS <u>1</u>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
July Quarterly	06/30/14	07/15/14	07/15/14

PRE- AND POST-ELECTION REPORTS**Congressional Committees**

The principal campaign committee of any candidate participating in a 2014 state primary, nominating convention or runoff election – even if unopposed – must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The principal campaign committee of a candidate participating in the general election must file pre- and post-general election reports. Separate notices will be sent to explain these additional reporting obligations. See 11 CFR 104.5(a)(2).

Parties and PACs

Committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: [2014 Congressional Pre-Primary Reporting Dates](#)
- *The Record*:
 - [FEC Record Blog: Reporting](#)
 - [January 2014 Reporting Article \[PDF\]](#)

SUPPLEMENTAL FILING INFORMATION

- [Congressional Committees](#)
- [Parties and PACs](#)

REPORTING SCHEDULE FOR REMAINDER OF 2014

<July Quarterly (2014)>

REPORT	CLOSE OF BOOKS ¹	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
October Quarterly	09/30/14	10/15/14	10/15/14
Pre-General ²	10/15/14	10/20/14	10/23/14
Post-General	11/24/14	12/04/14	12/04/14
Year-End	12/31/14	01/31/15	01/31/15 ³

SUPPLEMENTAL FILING INFORMATION

- Congressional Committees
- Parties and PACs

FOOTNOTES:

1 These dates indicate the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

2 **Parties and PACs:** required only if committee makes contributions or expenditures in connection with the general election during the reporting period. See 11 CFR 104.5(c)(1)(ii).

Congressional Committees: the principal campaign committee of a candidate who participates in the general election must file pre-and post-general election reports. See 11 CFR 104.5(a)(2).

3 Notice that this filing deadline falls on a weekend. Filing deadlines are not extended when they fall on nonworking days. Accordingly, reports filed by methods other than Registered, Certified or Overnight Mail, or electronically, must be received before the Commission's (or for committees supporting only Senate candidates, the Secretary of the Senate's Public Records Office) close of business on the last business day before the deadline. See also Supplemental Filing Information [Congressional Committees] [Parties and PACs].

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

Return to 2014 Reporting Schedule

Other Filing Information:

- Electioneering Communications Periods
- 48- and 24-Hour Reports of Independent Expenditures Periods
- Coordinated Communications Periods
- Federal Election Activity Periods

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ALL CITIZENS FOR MISSISSIPPI (C00564351)

2014 July Quarterly Report

24-Hour Reports Not Timely Filed

Name of Payee	Date of Expenditure (Schedule E)	Expenditure Amount	Candidate Supported	Election	48-Hour Report Filed ²
The Jackson Advocate	6/11/14	\$1,174.90 24-Hour Report Required	THAD COCHRAN	Mississippi 2014 Primary Runoff (6/24/14)	7/29/14
Jackson Free Press	6/16/14	\$1,875.00 24-Hour Report Required	THAD COCHRAN	Mississippi 2014 Primary Runoff (6/24/14)	7/29/14
The Jackson Advocate	6/19/14	\$1,548.00 24-Hour Report Required	THAD COCHRAN	Mississippi 2014 Primary Runoff (6/24/14)	7/29/14
The Mississippi Link	6/19/14	\$1,600.00 24-Hour Report Required	THAD COCHRAN	Mississippi 2014 Primary Runoff (6/24/14)	7/29/14
American Media & Advocacy Group	6/21/14	\$20,577.81 24-Hour Report Required	THAD COCHRAN	Mississippi 2014 Primary Runoff (6/24/14)	7/29/14
	TOTAL	\$26,775.71			

² The Committee filed a 48-Hour Report on 7/29/14. However, the dissemination date provided on the 48-Hour Report occurred during the 24-Hour Reporting Period.