



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

November 4, 1999

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF NATIONAL COTTON COUNCIL COMMITTEE  
FOR THE ADVANCEMENT OF COTTON

This is a referral of the National Cotton Council Committee for the Advancement of Cotton ("the Committee") for failure to file the 1998 July Quarterly Report within thirty (30) calendar days from the date of the Non-Filer Notice.

According to the 1997-1998 RAD Review and Referral Procedures for Unauthorized Committees this matter requires examination by your office.

This Committee was referred for a possible 2 U.S.C. 438(b) audit covering the 1997-98 election cycle. The Commission voted on October 19, 1999 not to audit the Committee (see RAD Referral A99-81).

If you have any questions regarding this matter, please contact Edward D. Ryan at 694-1130.

Attachment

2025-10-24 10:40:02

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: November 4, 1999

ANALYST: Edward D. Ryan

I. COMMITTEE: National Cotton Council Committee  
for the Advancement of Cotton  
(C00023028)  
William R. Tracy, Treasurer  
1918 N. Parkway, P.O. Box 12292  
Memphis, TN 38182

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)  
11 CFR §104.5(c)(1)(i)(A)

III. BACKGROUND:

**Failure to Timely File a Report**

The National Cotton Council Committee for the Advancement of Cotton ("the Committee") failed to timely file the July Quarterly Report of Receipts and Disbursements covering the period of April 1 through June 30, 1998.

On December 29, 1997 and June 19, 1998, Prior Notices were sent to the Committee informing it that the 1998 July Quarterly Report was due on July 15, 1998 (Attachments 2 and 3). A Non-Filer Notice was sent to the Committee via mailgram on August 7, 1998 (Attachment 4).

The Reports Analysis Division ("RAD") analyst attempted to contact Mr. William R. Tracy, treasurer of the Committee, on August 28, 1998. The analyst spoke with Debra Holderfield who said she thought the Committee had sent the original report in, but since the Commission had not received it, it may have been sent on one of five days the mail had been "trashed by an employee". The analyst informed Ms. Holderfield that Commission records did not reflect the receipt of the report. The analyst advised her to file a copy of the report with a cover letter explaining why it was late and any mailing documentation she had to prove it was originally mailed. The RAD analyst further advised her to send everything certified/registered mail (Attachment 5).

NATIONAL COTTON COUNCIL CMTE FOR THE ADVANCEMENT OF COTTON  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

The Committee filed the 1998 July Quarterly Report via certified/registered mail on September 18, 1998 (Attachment 5).

20.04.401.5912

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
					TYPE OF FILER	
NATIONAL COTTON COUNCIL COMMITTEE FOR THE ADVANCEMENT OF COTTON				ID #C00023028 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: COTTON COUNCIL OF AMERICA; NAT'L						
	1997 FILING FREQUENCY CHANGE NOTICE			16JUN97	1	97FEC/208/2654
	ACKNOWLEDGEMENT OF FILING FREQUENCY CHANGE			29AUG97	2	97FEC/237/4128
	FEBRUARY MONTHLY	9,550	11,600	1JAN97 -31JAN97	8	97FEC/189/1732
	MARCH MONTHLY	19,312	0	1FEB97 -28FEB97	7	97FEC/191/4533
	APRIL MONTHLY	4,490	11,641	1MAR97 -31MAR97	8	97FEC/199/1477
	MAY MONTHLY	1,786	10,000	1APR97 -30APR97	7	97FEC/208/2655
	NOTICE OF FAILURE TO FILE			1APR97 -30APR97	2	97FEC/208/1305
	JULY QUARTERLY	8,916	25,989	1MAY97 -30JUN97	8	97FEC/216/3669
	YEAR-END	34,506	38,887	1JUL97 -31DEC97	19	98FEC/281/2443
	YEAR-END - AMENDMENT	34,506	38,887	1JUL97 -31DEC97	19	98FEC/357/4761
	1'ST LETTER INFORMATIONAL NOTICE			1JUL97 -31DEC97	8	98FEC/307/4387
	1998 MISCELLANEOUS NOTICE FROM FEC			18DEC98	3	98FEC/412/3830
	APRIL QUARTERLY	29,089	11,841	1JAN98 -31MAR98	10	98FEC/307/1192
	APRIL QUARTERLY - AMENDMENT			1JAN98 -31MAR98	5	98FEC/357/4730
	APRIL QUARTERLY - AMENDMENT	29,089	11,841	1JAN98 -31MAR98	10	98FEC/357/4751
	REQUEST FOR ADDITIONAL INFORMATION			1JAN98 -31MAR98	6	98FEC/317/4648
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN98 -31MAR98	7	98FEC/323/0807
	JULY QUARTERLY	23,721	38,232	1APR98 -30JUN98	16	98FEC/357/4735
	JULY QUARTERLY - AMENDMENT	18,721	33,232	1APR98 -30JUN98	15	99FEC/462/2565
	NOTICE OF FAILURE TO FILE			1APR98 -30JUN98	2	98FEC/344/0890
	REQUEST FOR ADDITIONAL INFORMATION			1APR98 -30JUN98	3	98FEC/413/1268
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR98 -30JUN98	3	99FEC/417/0236
	OCTOBER QUARTERLY	30,450	14,446	1JUL98 -30SEP98	15	98FEC/375/3193
	OCTOBER QUARTERLY - AMENDMENT	30,450	14,446	1JUL98 -30SEP98	16	99FEC/462/2597
	REQUEST FOR ADDITIONAL INFORMATION			1JUL98 -30SEP98	6	98FEC/413/1262
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL98 -30SEP98	6	99FEC/417/0239
	PRE-GENERAL	1,350	12,211	1OCT98 -14OCT98	7	98FEC/390/1186
	PRE-GENERAL - AMENDMENT	1,350	12,211	1OCT98 -14OCT98	7	99FEC/462/2580
	REQUEST FOR ADDITIONAL INFORMATION			1OCT98 -14OCT98	3	98FEC/413/1259
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT98 -14OCT98	4	98FEC/417/0245
	POST-GENERAL	2,800	1,000	15OCT98 -23NOV98	5	98FEC/422/0530
	POST-GENERAL - AMENDMENT	3,883	814	15OCT98 -23NOV98	5	99FEC/462/2587
	NOTICE OF FAILURE TO FILE			15OCT98 -23NOV98	2	98FEC/414/3774
	REQUEST FOR ADDITIONAL INFORMATION			15OCT98 -23NOV98	3	99FEC/442/0304
	REQUEST FOR ADDITIONAL INFORMATION 2ND			15OCT98 -23NOV98	4	99FEC/447/2224
	YEAR-END	7,645	16,526	30SEP98 -31DEC98	8	99FEC/426/2169
	YEAR-END - AMENDMENT	2,411	3,500	24NOV98 -31DEC98	5	99FEC/462/2592
	REQUEST FOR ADDITIONAL INFORMATION			30SEP98 -31DEC98	4	99FEC/442/0300
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30SEP98 -31DEC98	4	99FEC/447/2220

All Reports Reviewed

Ending Cash on Hand as of 12/31/98: \$20,101.89

Debts and Obligations owed to the Committee as of 12/31/98: \$0.00

Debts and Obligations owed by the Committee as of 12/31/98: \$0.00

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
						TYPE OF FILER
1999	MISCELLANEOUS REPORT TO FEC			25MAY99	2	99FEC/450/3618
	TOTAL	164,464	0 174,161		0	273 TOTAL PAGES

2004043914

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
				TYPE OF FILER		
NATIONAL COTTON COUNCIL COMMITTEE FOR THE ADVANCEMENT OF COTTON CONNECTED ORGANIZATION: COTTON COUNCIL OF AMERICA; NAT'L 1999 MID-YEAR REPORT		63,285	77,982	1JAN99 -30JUN99	26	99FEC/476/1396
TOTAL		63,285	0 77,982	0	26	TOTAL PAGES

ID #C00023028 NON-PARTY QUALIFIED

20044013915

# REPORT NOTICE

FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

December 29, 1997

**WHO MUST FILE**

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

**I. Semi-annual Filers**

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

**II. Monthly Filers**

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

**LABEL**

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

**ELECTRONIC FILING**

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

\*These dates indicate the beginning and 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.

\*\* Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

2004044013916

## 1998 FILING SCHEDULE

**I. QUARTERLY FILERS**

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

**II. MONTHLY FILERS**

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

\*These dates indicate the beginning and 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.

\*\* Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.



# QUARTERLY REPORT NOTICE

---

## FEDERAL ELECTION COMMISSION

---

**PARTIES AND PACS**

June 19, 1998

### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in July.

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98

### 24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

### PRE-ELECTION REPORTING

Committees which 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 the January 1998 Record.

### LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

\*These dates indicate the beginning and 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.

\*\* Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

2004.04.401.3512

**PARTIES AND PACS**

**July Quarterly**

**CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

**ELECTRONIC FILING**

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

2010.04.10.10.02



**WESTERN  
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM TO: BILL TRACY  
NAT COTTON CNCL CMTE/ADVANCMT OF COTTON  
1918 N PARKWAY PO BOX 12292  
MEMPHIS TN 38182

FEDERAL ELECTION COMMISSION  
SHAWN WERTH  
999 E ST. NW.  
WASHINGTON DC 204630001

AUGUST 7, 1993

IDENTIFICATION NUMBER: C00023028

REFERENCE: JULY QUARTERLY (04/01/1998 - 06/30/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT EDWARD RYAN ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

0320 10440 02

TELECON

ANALYST: Edward D. Ryan

CONVERSATION WITH: Debra Holderfield - (901) 274-9030

COMMITTEE: National Cotton Council Committee for the  
Advancement of Cotton - C00023028

DATE: August 28, 1998

SUBJECTS(S): Failure to File the 1998 July Quarterly Report

---

I called the Committee and asked to speak with Mr. William R. Tracy, the treasurer of the Committee. He was not available and I was put in touch with Debra Holderfield who knew something about filing the FEC disclosure reports. I identified myself and told her that the Commission had not yet received the 1998 July Quarterly Report (4/1/98 - 6/30/98). She said that she thought the Committee had sent the original report in, but since the Commission had not received it, it may have been sent on one of five days the mail had been "trashed by an employee". I said that may have been the case because Commission records do not reflect the receipt of the report. I advised her to file a copy of the report with a cover letter explaining why it was late and any documentation she had to prove the report was originally mailed. I further advised her to send everything Certified/Registered mail.

20040415

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

SEP 28 11 32 AM '98

USE FEC MAILING LABEL  
TYPE OR PRINT

1. NAME OF COMMITTEE (In full)  
National Cotton Council Committee for the Advancements of Cotton

ADDRESS (number and street)  Check if different than previously reported  
P. O. Box 820292

CITY, STATE and ZIP CODE  
Memphis, TN 38182

2. FEC IDENTIFICATION NUMBER  
C00023028

3.  This committee has qualified as a multi-candidate committee. (see FEC FORM 1M)

### 4. TYPE OF REPORT

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20     June 20     October 20
- March 20     July 20     November 20
- April 20     August 20     December 20
- May 20     September 20     January 31

- 12-Day Pre-Election Report for the \_\_\_\_\_  
(Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_
- 30-Day Post-Election Report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  YES  NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year to Date
5. Covering Period April 1, 1998 through June 30, 1998		
6. (a) Cash on Hand January 1, 1998		\$ 10,240.33
(b) Cash on Hand at Beginning of Reporting Period	\$ 27,488.67	
(c) Total Receipts (from Line 19)	\$ 23,721.97	\$ 52,811.31
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 51,210.64	\$ 63,051.64
7. Total Disbursements (from Line 30)	\$ 38,232.25	\$ 50,073.25
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,978.39	\$ 12,978.39
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 899 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer  
William R. Tracy

Signature of Treasurer  
William R. Tracy

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

--	--	--	--	--	--	--	--	--	--

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 9-18-98
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SEP</i> PREPARER	9-29-98 DATE PREPARED

2004013923