



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

June 24, 2005

**MEMORANDUM**

TO: LAWRENCE H. NORTON  
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

ROBERT J. COSTA  
DEPUTY STAFF DIRECTOR

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

SUBJECT: REFERRAL OF WOMEN'S CAMPAIGN FUND

The Reports Analysis Division is referring Women's Campaign Fund ("the Committee") for amending its 2004 October Quarterly Report to disclose additional receipts totaling \$51,586.04, a 68.5% increase over the financial activity reported in the original 2004 October Quarterly Report. According to the 2003-2004 *RAD Review and Referral Procedures for Unauthorized Committees (Standard 7)*, this matter requires further examination by your office. Please note that on January 19, 2005, RAD referred a Standard 7 matter (2004 April Quarterly) for the same Committee to OGC (05L-03). That referral was subsequently transferred to the Office of Alternative Dispute Resolution (ADR) on March 21, 2005. Given the amount of additional receipts questioned within this referral and the fact that ADR is posed to begin negotiations with the Committee in regards to ADR case 247, RAD would recommend an expeditious transfer of this matter to ADR.

Copies of any reports or letters either filed by the Committee or sent by the Reports Analysis Division and referenced in this referral are available for your review on the FEC Imaging System or the web site.

If you should have any questions regarding this matter, please feel free to contact Jennifer Thangavelu at 694-1143.

Attachments

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## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 24, 2005

ANALYST: Jennifer Thangavelu

- I. COMMITTEE: Women's Campaign Fund (C00015024)  
Robin Nancy Clack, Treasurer, as of 6/04/04  
Lynn Martin, Treasurer, 1/30/99 – 6/03/04  
734 15<sup>th</sup> St. NW, Suite 500  
Washington, DC 20005
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)  
11 C.F.R. §104.3(a)(2)(i)(A)  
11 C.F.R. §104.3(a)(2)(i)(B)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Women's Campaign Fund ("the Committee") filed an Amended 2004 October Quarterly Report on March 10, 2005 which disclosed additional receipts totaling \$51,586.04, a 68.5% increase over the financial activity reported in their original 2004 October Quarterly Report (Image 24981341490) (Attachment 2).

On October 15, 2004, the Committee filed its 2004 October Quarterly Report covering the period from July 1, 2004 through September 30, 2004. The report disclosed \$16,966.64 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons other than Political Committees), \$57,514.39 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons other than Political Committees), \$290.56 on Line 15 (Offsets to Operating Expenditures), \$2.11 on Line 17 (Other Federal Receipts), and \$0.00 on Line 18(a) (Transfers from Non-Federal Account for Joint Activity) of the Detailed Summary Page (Image 24981341492).

On March 10, 2005, the Committee filed an Amended 2004 October Quarterly Report, which disclosed \$17,466.64 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons other than Political Committees), \$58,328.39 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons other than Political Committees), \$1,062.60 on Line 15 (Offsets to Operating Expenditures), \$20,002.11 on Line 17 (Other Federal Receipts), and \$30,000.00 on Line 18(a) (Transfers from Non-Federal Account for Joint Activity) of the Detailed Summary Page (Image 25990208389).

On May 4, 2004, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2004 October Quarterly Report, received March 10,

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2005. The RFAI requested clarification regarding the additional receipts that had not been disclosed on the Committee's original filing<sup>1</sup> (Image 25038804).

On June 6, 2005, the Committee filed a miscellaneous report to the Commission. The filing was an e-text response to the RFAI for the Amended 2004 October Quarterly Report which was sent on May 4, 2005. The Committee's response stated that "The Committee maintains several accounts out of which it conducts its federal activities. The primary discrepancy between the initial reports and the amended reports is attributable to a high volume of small unitemized contributions deposited into one of these federal accounts. Because the data received from the vendor that receives and deposits contributions from the Committee's small donor programs is in a form not compatible with the Committee's electronic database system the data must be hand entered. To assure the accuracy of the information entered and reported to the Federal Election Commission, the Committee's practice has been to confirm and reconcile the data received from the vendor with its reports before filing it with the Commission. The Committee has therefore filed its reports timely and then amended the reports when the accuracy of the data can be confirmed. This is consistent with the advice that we have received from the Commission." The response also highlighted that the Committee was seeking software that would allow the vendor's data to be entered directly into its system, to enable more timely confirmation of report accuracy and less dependency on the filing of amendments (Image 25991001761).

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

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<sup>1</sup> Please note that the RFAI also questioned the disclosure of additional disbursements disclosed on the Amended 2004 October Quarterly Report. The additional disbursements totaled \$27,144.61 which is below the Standard 7 threshold for referable matters.

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WOMEN'S CAMPAIGN FUND  
Clack, Nancy  
FILING FREQUENCY: QUARTERLY

734 15th St. NW

Washington

PARTY QUALIFIED  
DC 20005

ID #C00015024

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	6/04/2004	4	24961533779						
1			A	12/14/2004	4	24981783846						
MS			T	1/07/2003	1	23990029178						
MS			T	6/10/2004	1	24961553726						
MS			T	11/01/2004	2	24038610245						
MS			T	11/04/2004	1	24971893488						
MS			T	11/04/2004	1	24971893489						
MS			T	11/09/2004	1	24962860791						
MS			T	11/19/2004	1	24962891788						
MS			T	6/13/2005	3	25038823273						
RQ	Q2	2		11/12/2003	4	23038241090	1/01/2003 6/30/2003					
RQ		1		10/27/2004	3	24038603525	10/27/2004					
RQ	Q1	2		9/08/2004	3	24038512599	1/01/2004 3/31/2004					
RQ	Q1	2		4/29/2005	5	25038803331	1/01/2004 3/31/2004					
RQ	M4	2		5/12/2004	5	24038410211	1/01/2004 3/31/2004					
RQ	Q2	2		9/08/2004	7	24038512592	4/01/2004 6/30/2004					
RQ	Q2	2		3/11/2005	3	25038752136	4/01/2004 6/30/2004					
RQ	Q2	2		4/29/2005	3	25038803328	4/01/2004 6/30/2004					
RQ	Q3	2		2/16/2005	4	25038734057	7/01/2004 9/30/2004					
RQ	Q3	2		5/04/2005	3	25038804326	7/01/2004 9/30/2004					
RQ	30G	2		3/23/2005	5	25038762474	10/14/2004 11/22/2004					
RQ	30G	2		5/11/2005	3	25038811564	10/14/2004 11/22/2004					
RQ	YE	2		5/27/2005	3	25038814769	11/23/2004 12/31/2004					
3	Q2	N	P	7/30/2003	302	23991620028	1/01/2003 6/30/2003	98888	549220	452782	195326	417
3	Q2	A	P	12/01/2003	318	23992381219	1/01/2003 6/30/2003	98888	558485	466715	190658	0
3	Q2	A	P	1/09/2004	319	24990040001	1/01/2003 6/30/2003	98888	558485	466715	190658	0
3	Q2	A	P	1/17/2004	320	24990110001	1/01/2003 6/30/2003	254425	558485	466987	345923	0
3	YE	N	P	1/28/2004	244	24990222777	7/01/2003 12/31/2003	345923	318469	417357	247035	0

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WOMEN'S CAMPAIGN FUND  
Clack, Nancy  
FILING FREQUENCY: QUARTERLY

734 15th St. NW

Washington

PARTY QUALIFIED  
DC 20005

ID #C00015024

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	Q1	N	P	4/16/2004	178	24991075446	1/01/2004 3/31/2004	134176	263356	233998	163534	0
3	Q1	A	P	5/11/2004	194	24971219473	1/01/2004 3/31/2004	247035	287671	258034	276672	0
3	Q1	A	P	6/10/2004	194	24961553752	1/01/2004 3/31/2004	247035	296825	259034	284826	0
3	Q1	A	P	7/27/2004	188	24962045122	1/01/2004 3/31/2004	247035	326989	259034	314990	0
3	Q1	A	P	10/08/2004	188	24962394342	1/01/2004 3/31/2004	247035	324464	260534	310965	0
3	Q1	A	P	10/14/2004	188	24962456608	1/01/2004 3/31/2004	247035	324464	260484	311015	0
3	Q1	A	P	3/10/2005	218	25990208058	1/01/2004 3/31/2004	247035	419567	275695	390907	0
3	Q2	N	P	7/15/2004	95	24981249082	4/01/2004 6/30/2004	284826	72144	167622	189348	0
3	Q2	A	P	7/27/2004	97	24962045447	4/01/2004 6/30/2004	314990	77968	167622	225336	0
3	Q2	A	P	3/10/2005	111	25990208276	4/01/2004 6/30/2004	390907	166102	188087	368922	0
3	Q3	N	P	10/15/2004	73	24981341490	7/01/2004 9/30/2004	263412	75273	125627	213058	0
3	Q3	A	P	3/10/2005	85	25990208387	7/01/2004 9/30/2004	368922	126859	151920	343861	0
3	12G	N	P	10/21/2004	12	24962659847	10/01/2004 10/13/2004	213058	1158	6257	207959	0
3	12G	A	P	3/10/2005	14	25990208472	10/01/2004 10/13/2004	343861	1171	10768	334264	0
3	30G	N	P	12/02/2004	54	24981562917	10/14/2004 11/22/2004	207959	64550	64529	207980	0
3	30G	A	P	3/10/2005	63	25980444478	10/14/2004 11/22/2004	334264	84463	87048	331680	0
3	YE	N	P	1/31/2005	38	25980386062	11/23/2004 12/31/2004	309715	112329	103064	318980	0
3	YE	A	P	3/10/2005	39	25980444541	11/23/2004 12/31/2004	331680	112920	102614	341986	0
TOTAL									1788036	1700476		

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WOMEN'S CAMPAIGN FUND  
Clack, Nancy  
FILING FREQUENCY: QUARTERLY

734 15th St. NW

Washington

PARTY QUALIFIED  
DC 20005

ID #C00015024

FORM TYPE RPT TYPE AI PGI REC DATE PGS BEG IMAGE COVERAGE DATES BEG CASH RECEIPTS DISBURSE END CASH DEBTS BY

1			A	5/23/2005	4	25990913224						
MS			T	3/02/2005	1	25990173444						
MS			T	3/21/2005	1	25990273199						
MS			T	4/13/2005	2	25990453077						
MS			T	5/31/2005	1	25990982332						
MS			T	5/31/2005	1	25990982333						
MS			T	6/06/2005	1	25991001760						
MS			T	6/06/2005	1	25991001761						
MS			T	6/21/2005	1	25970419830						

TOTAL 0 0

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**Women's Campaign Fund (C00015024)**

2004 October Quarterly Report Amended 2004 October Quarterly Report

**Overview of Receipt Variance**

Line	2004 October Quarterly Report, Received 10/15/2004 (Image 24981341492)	Amended 2004 October Quarterly Report, Received 03/10/05 (Image 25990208389)	Receipt Variance
11(a)(i)	\$16,966.64	\$17,466.64	\$500.00
11(a)(ii)	\$57,514.39	\$58,328.39	\$814.00
15	\$290.56	\$1,062.60	\$772.04
17	\$2.11	\$20,002.11	\$20,000.00
18(a)	\$0.00	\$30,000.00	\$30,000.00

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