

**REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL**

DATE: February 28, 2007

ANALYST: Jennifer Thangavelu

- I. COMMITTEE:** Women's Campaign Fund (C00015024)
Allison Thompson, Treasurer, as of 11/28/05
Robin Nancy Clack, Treasurer, 6/4/04 – 11/27/05
Lynn Martin, Treasurer, 1/30/99 – 6/3/04
734 15th Street NW, Suite 500
Washington, DC 20005
- II. RELEVANT STATUTES:** 2 U.S.C. §432(b)(3)
2 U.S.C. §432(c)(5)
2 U.S.C. §432(h)(1)
2 U.S.C. §439a(b)
2 U.S.C. §434(b)(4)(H)(v)
2 U.S.C. §434(b)(6)(B)(v)
11 CFR §102.9(b)
11 CFR §102.15

III. BACKGROUND:

Other Violations of the Federal Election Campaign Act (Unauthorized Disbursement of Committee funds)

On January 10, 2006, Women's Campaign Fund ("the Committee") filed an Amended 2003 July Quarterly Report, covering the period January 1, 2003, to June 30, 2003, disclosing an opening cash-on-hand balance of \$203,278.19. However, the Committee's Amended 2002 Year End Report, received January 14, 2004, disclosed an ending cash-on-hand balance of \$254,425.22, thus creating a discrepancy of \$51,147.03 (Images 26980013034 and 24990082815).

On March 3, 2006, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2003 July Quarterly Report, received January 10, 2006.

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The letter requested clarification of the opening cash-on-hand discrepancy disclosed on the report (Image 26039010131).

On March 22, 2006, the Committee filed a miscellaneous text submission in response to the RFAI dated March 3, 2006, referencing the Amended 2003 July Quarterly Report, received January 10, 2006. The submission read in part: "You ask about the beginning cash balance and the discrepancy between the ending cash balance for the Amended Year End Report (11/26/02-12/31/02). The Committee is currently doing a full review of the reports and will submit an amended Year End Report to reflect the correct cash balance." (Image 26930010646)

On April 13, 2006, the Reports Analysis Division's (RAD) analyst called Allison Thompson, Treasurer of the Committee. The Analyst notified Ms. Thompson that the Committee had not yet responded to correct the cash-on-hand discrepancy, which was potentially referable for legal action or alternative dispute resolution at the Commission. Ms. Thompson explained that she was aware that a response to correct the discrepancy was due and that the Committee was currently working with an outside firm in completing an internal audit to investigate employee fraud that occurred in 2001-2002. Ms. Thompson stated that she did not want to amend the 2003 July Quarterly Report in response to the request because she would have to amend all reports again upon completion of the fraud investigation (Attachment 2).

On September 13, 2006, the RAD analyst called Ms. Thompson and left a message requesting that the Committee correct the opening cash discrepancy disclosed on the Committee's Amended 2003 July Quarterly Report, received January 10, 2006. The Analyst again noted that the issue was a referable matter and requested a response by September 20, 2006 (Attachment 2).

On September 20, 2006, Ms. Thompson returned the RAD analyst's call. She stated that the embezzlement of Committee funds was now under investigation by the Federal Bureau of Investigations (FBI) and not yet resolved to the point where the Committee's reports could be amended accurately (Attachment 2).

On October 5, 2006, the RAD analyst called Ms. Thompson to ask when the FBI investigation would be completed and if the Committee had an estimate of the total funds embezzled. Ms. Thompson explained that the investigation was still in the FBI's hands. She highlighted that she had asked the FBI to give her an idea of when the investigation would be completed, but they could not provide a specific time frame. Ms. Thompson did have an estimate of the total funds embezzled: for the 2001-02 election cycle, approximately \$37,000, and for the 2003-04 cycle, approximately \$38,000. Ms. Thompson said that these were the amounts that the Committee had discovered when it handed the investigation over to the FBI. She said, however, that it is possible that the FBI will discover a larger embezzled amount (Attachment 2).

On December 18, 2006, the RAD analyst called Ms. Thompson for an update on the embezzlement investigation. Ms. Thompson said that the last time she heard from the FBI was in November, at which time the officials working on the case estimated completing the investigation at the end of 2006. She said that since the Women's Campaign Fund will close temporarily for the holidays, she would call the FBI sometime in the middle of this week to check on their progress. The Analyst requested that Ms. Thompson call her after talking with the

FBI to keep the Commission apprised of when the investigation will be completed and how the Committee plans to proceed with amendments based on the findings. Ms. Thompson said that she would do so (Attachment 2).

On January 16, 2007, Ms. Thompson called to say that the FBI officer working on the embezzlement case sent her an e-mail indicating that the investigation was complete, but that it was now pending legal action at the Department of Justice (DOJ). Ms. Thompson provided the RAD analyst the name and phone number of the DOJ trial attorney assigned, in case the Commission required further information (Attachment 2).

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

29044232306

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JOHN'S CAMPAIGN FUND INC
LYNN S MARTIN
FILING FREQUENCY: QUARTERLY

734 15TH STREET NW SUITE 500

WASHINGTON

NON-PARTY QUALIFIED
DC 20005

ID #C00015024

20044232307

FORM TYPE	NPT TYPE	AI	P&I	REC DATE	P&S	BES IMAGE	COVERAGE DATES	BES CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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RQ	NY	2		1/18/2002	5	22037383416	1/01/2001 8/30/2001					
RQ	NY	2		8/03/2005	3	25038874375	7/01/2001 12/31/2001					
RQ	NY	3		2/07/2002	4	22037433482	1/01/2001 8/30/2001					
RQ	YE	2		9/11/2002	5	22037724177	7/01/2001 12/31/2001					
RQ	YE	3		10/03/2002	6	22037750382	7/01/2001 12/31/2001					
RQ	Q1	2		7/10/2002	5	22037833551	1/01/2002 3/31/2002					
RQ	Q1	2		10/02/2002	5	22037744163	1/01/2002 3/31/2002					
RQ	Q2	2		10/02/2002	7	22037744286	4/01/2002 8/30/2002					
RQ	Q2	3		10/24/2002	3	22037814779	4/01/2002 8/30/2002					
RQ	Q3	2		12/18/2002	5	22037901812	7/01/2002 9/30/2002					
RQ	Q3	3		1/09/2003	1	23037820477	7/01/2002 9/30/2002					
RQ	126	2		12/18/2002	3	22037901817	10/01/2002 10/18/2002					
RQ	126	3		1/09/2003	2	23037820478	10/01/2002 10/18/2002					
RQ	306	2		6/04/2003	6	23038100158	10/17/2002 11/28/2002					
RQ	306	3		7/10/2003	4	23038124794	10/17/2002 11/28/2002					
RQ	YE	2		5/14/2003	4	23038081521	11/28/2002 12/31/2002					
RQ	YE	2		6/18/2003	3	23038110273	11/28/2002 12/31/2002					
RQ	YE	3		8/05/2003	3	23038100858	11/28/2002 12/31/2002					
RQ	YE	3		7/10/2003	3	23038124802	11/28/2002 12/31/2002					
3	NY	N	P	7/31/2001	279	21980338829	1/01/2001 8/30/2001	105987	435737	314861	226872	-
3	NY	A	P	1/29/2002	294	22980152159	1/01/2001 8/30/2001	105987	443787	378478	173308	-
3	NY	A	P	2/27/2002	294	22980488085	1/01/2001 8/30/2001	105987	444207	378678	174526	-
3	NY	A	P	12/22/2003	308	23982557133	1/01/2001 8/30/2001	107952	519502	384380	233084	0

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JOHN'S CAMPAIGN FUND INC
LYNN S MARTIN
FILING FREQUENCY: QUARTERLY

734 15TH STREET NW SUITE 800

WASHINGTON

NON-PARTY QUALIFIED
DC 20005

ID #C00015024

FORM TYPE	RPT TYPE	AI	PSI	REC DATE	POS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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3	YE	A	P	10/16/2002	194	22992138533	7/01/2001 12/31/2001	174528	218212	297022	95716	-
3	YE	A	P	1/14/2004	223	24990075206	7/01/2001 12/31/2001	233094	336754	318268	253579	0
3	Q1	N	P	4/12/2002	180	22990627407	1/01/2002 3/31/2002	95899	328492	223260	201131	-
3	Q1	A	P	7/31/2002	188	22991503454	1/01/2002 3/31/2002	94539	339999	245283	189945	-
3	Q1	A	P	10/16/2002	189	22992135868	1/01/2002 3/31/2002	91716	345365	245283	191798	-
3	Q1	A	P	11/16/2002	189	22992577950	1/01/2002 3/31/2002	95716	349965	245283	197399	-
3	Q1	A	P	1/29/2003	189	23990182168	1/01/2002 3/31/2002	95716	349965	245283	196399	0
3	Q1	A	P	1/14/2004	194	24990077711	1/01/2002 3/31/2002	253579	347040	272485	328154	0
3	Q2	N	P	7/09/2002	134	22991208141	4/01/2002 6/30/2002	201131	217868	175315	243684	-
3	Q2	A	P	10/16/2002	132	22992140313	4/01/2002 6/30/2002	195961	207892	175315	228558	-
3	Q2	A	P	11/16/2002	131	22992576172	4/01/2002 6/30/2002	197399	208292	175315	228375	-
3	Q2	A	P	1/29/2003	131	23990182498	4/01/2002 6/30/2002	196398	208292	175315	227375	0
3	Q2	A	P	1/14/2004	137	24990078827	4/01/2002 6/30/2002	328154	208277	202762	331689	0
3	Q3	N	P	10/16/2002	100	22992153457	7/01/2002 9/30/2002	228558	158529	137882	248205	-
3	Q3	A	P	11/16/2002	100	22992576485	7/01/2002 9/30/2002	228375	158529	137882	249022	-
3	Q3	A	P	1/29/2003	99	23990182850	7/01/2002 9/30/2002	227375	157529	137882	247022	0
3	Q3	A	P	1/14/2004	107	24990082202	7/01/2002 9/30/2002	331689	157579	169968	319279	0
3	129	N	P	10/21/2002	33	22992358477	10/01/2002 10/16/2002	249205	17862	50519	218347	-
3	129	A	P	12/04/2002	35	22992835138	10/01/2002 10/16/2002	249022	18212	59920	207314	-
3	129	A	P	1/29/2003	35	23990182749	10/01/2002 10/16/2002	247022	18212	59920	205314	0
3	129	A	P	1/14/2004	38	24990082363	10/01/2002 10/16/2002	319279	18212	62231	275280	0
3	309	N	P	12/04/2002	63	22992853075	10/17/2002 11/25/2002	207314	85702	184626	105389	-
3	309	A	P	1/29/2003	62	23990182792	10/17/2002 11/25/2002	205314	82702	184626	103389	0
3	309	A	P	6/20/2003	62	23991122095	10/17/2002 11/25/2002	207314	81248	182082	106479	0
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3	309	A	P	1/14/2004	65	24990082731	10/17/2002 11/25/2002	275280	81248	94559	281949	0
3	YE	N	P	1/29/2003	35	23990182854	11/28/2002 12/31/2002	103389	38885	35864	106220	0
3	YE	A	P	5/30/2003	38	23991018925	11/28/2002 12/31/2002	106389	47485	45309	110545	0
3	YE	A	P	6/20/2003	40	23991122223	11/28/2002 12/31/2002	106479	47485	54686	99288	0
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TOTAL									1713677	1587202		

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

734 15th St. NW

Washington

NON-PARTY QUALIFIED
DC 20005

ID #C00015024

29044232309

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PBS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	Q2	A	P	1/08/2004	319	24980040001	1/01/2003 8/30/2003	88888	558485	488715	180858	0
3	Q2	A	P	1/17/2004	320	24980110001	1/01/2003 8/30/2003	284428	588485	488887	348823	0
3	Q2	A	P	1/10/2008	328	28980013033	1/01/2003 8/30/2003	203278	585979	514598	254859	0
3	YE	N	P	1/28/2004	244	24980222777	7/01/2003 12/31/2003	345923	318489	417357	247035	0
3	YE	A	P	1/08/2008	235	28980012788	7/01/2003 12/31/2003	254859	350217	419888	184888	0
3	Q1	N	P	4/16/2004	178	24981078448	1/01/2004 3/31/2004	134176	283356	233998	163534	0
3	Q1	A	P	5/11/2004	194	24971218473	1/01/2004 3/31/2004	247035	287871	258034	278872	0
3	Q1	A	P	6/10/2004	184	24981883752	1/01/2004 3/31/2004	247035	298825	258034	284828	0
3	Q1	A	P	7/27/2004	188	24982045122	1/01/2004 3/31/2004	247035	328989	258034	314990	0
3	Q1	A	P	10/08/2004	188	24982394342	1/01/2004 3/31/2004	247035	324484	280634	310886	0
3	Q1	A	P	10/14/2004	188	24982488808	1/01/2004 3/31/2004	247035	324484	280484	311015	0
3	Q1	A	P	3/10/2005	218	25880208058	1/01/2004 3/31/2004	247035	418567	275885	380807	0
3	Q1	A	P	1/10/2008	224	28980034741	1/01/2004 3/31/2004	184988	389785	317248	281525	0
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3	Q2	A	P	7/27/2004	87	24982045447	4/01/2004 8/30/2004	314880	77988	187822	228338	0
3	Q2	A	P	3/10/2005	111	28980208278	4/01/2004 8/30/2004	380807	188102	188087	388822	0
3	Q2	A	P	1/09/2008	114	28980033818	4/01/2004 8/30/2004	281525	184265	188120	240671	0
3	Q3	N	P	10/15/2004	73	24981341480	7/01/2004 9/30/2004	283412	75273	125827	213058	0
3	Q3	A	P	3/10/2005	85	25880208387	7/01/2004 9/30/2004	388822	128858	151920	343881	0
3	Q3	A	P	1/09/2008	88	28980033833	7/01/2004 9/30/2004	240871	108889	187843	178417	0
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3	128	A	P	1/09/2008	12	28980034019	10/01/2004 10/13/2004	178417	1171	9202	171388	0
3	308	N	P	12/02/2004	54	24981582917	10/14/2004 11/22/2004	207858	84550	84529	207880	0
3	308	A	P	3/10/2005	83	25880444478	10/14/2004 11/22/2004	334284	84483	87048	331880	0
3	308	A	P	7/12/2005	82	25870581576	10/14/2004 11/22/2004	333249	84488	87048	330880	0
3	308	A	P	1/10/2008	83	28980034888	10/14/2004 11/22/2004	171388	87273	81888	178781	0
3	YE	N	P	1/31/2005	38	25880388082	11/23/2004 12/31/2004	308715	112329	103084	318880	0
3	YE	A	P	3/10/2005	39	25880444541	11/23/2004 12/31/2004	331880	112820	102814	341888	0
3	YE	A	P	1/09/2008	42	28980034088	11/23/2004 12/31/2004	178781	112506	101887	187379	0
TOTAL									1781884	1787784		

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NOMEN'S CAMPAIGN FUND

Clack, Nancy

734 15th St. NW

Washington

NON-PARTY QUALIFIED

ID #C00015024

FILING FREQUENCY: QUARTERLY

DC 20005

29044232310

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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RS			T	6/10/2004	1	24981553728						
RS			T	11/01/2004	2	24038810248						
RS			T	11/04/2004	1	24971893488						
RS			T	11/04/2004	1	24971883488						
RS			T	11/08/2004	1	24982880791						
RS			T	11/18/2004	1	24982891788						
RS			T	6/13/2005	3	25038823273						
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RQ		1		10/27/2004	3	24038803525	10/27/2004					
RQ	Q1	2		9/08/2004	3	24038812589	1/01/2004 3/31/2004					
RQ	Q1	2		4/28/2005	5	25038803331	1/01/2004 3/31/2004					
RQ	R4	2		5/12/2004	5	24038410211	1/01/2004 3/31/2004					
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RQ	Q2	2		3/11/2005	3	25038782138	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					
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RQ	308	2		3/23/2005	5	25038782474	10/14/2004 11/22/2004					
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RQ	YE	2		5/27/2005	3	25038814769	11/23/2004 12/31/2004					
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3	Q2	A	P	12/01/2003	318	23982381219	1/01/2003 6/30/2003	98888	558485	466715	190855	0

FEDERAL ELECTION COMMISSION

DATE 2/28/2007

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WOMEN'S CAMPAIGN FUND

Allison Thompson

FILING FREQUENCY: QUARTERLY

734 15th Street NW

Washington

NON-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
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1			A	9/20/2005	4	259800530036						
1			A	11/28/2005	4	25971551364						

NS			T	3/02/2005	1	25980173444						
NS			T	3/21/2005	1	25980273198						
NS			T	4/13/2005	2	25980463077						
NS			T	5/31/2005	1	25980882332						
NS			T	5/31/2005	1	25980882333						
NS			T	6/06/2005	1	25981001780						
NS			T	6/06/2005	1	25981001781						
NS			T	6/21/2005	1	25970419830						
NS			N	6/22/2005	3	25038824644						
NS			T	6/27/2005	1	25970438381						
NS			T	9/02/2005	1	25970988498						
NS			T	9/23/2005	1	25971088630						
NS			T	9/23/2005	1	25971088631						
NS			T	11/04/2005	1	25971433388						
NS			T	3/22/2006	1	26930010648						
NS			T	5/16/2006	1	26930136582						
NS			T	5/18/2006	1	26940158541						
NS			T	7/10/2006	2	26940224516						
NS			T	7/17/2006	1	26940281852						
NS			T	10/18/2006	1	26930487988						

RQ			1	8/19/2005	3	26038883962	8/19/2005					
RQ	NY	2		10/05/2005	8	26038902381	1/01/2005	6/30/2005				
RQ	NY	2		4/19/2006	4	26039052943	1/01/2005	6/30/2005				
RQ	YE	2		4/14/2006	5	26039034518	7/01/2005	12/31/2005				
RQ	YE	2		8/14/2006	5	26039100383	7/01/2005	12/31/2005				
RQ	YE	2		9/13/2006	3	26039182248	7/01/2005	12/31/2005				
RQ	Q1	2		8/07/2006	4	26039083810	1/01/2006	3/31/2006				
RQ	Q2	2		9/13/2006	3	26039182243	4/01/2006	6/30/2006				
RQ	Q3	2		12/08/2006	4	26039301278	7/01/2006	9/30/2006				

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WOMEN'S CAMPAIGN FUND
Allison Thompson
FILING FREQUENCY: QUARTERLY

734 15th Street NW

Washington

NON-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
RQ	128	2		1/10/2007	3	27039332108	10/01/2006 10/18/2006					
RQ	306	2		1/12/2007	3	27039334888	10/19/2006 11/27/2006					
3	NY	N	P	7/31/2005	234	25980614293	1/01/2005 8/30/2005	341988	353084	306322	388748	0
3	NY	A	P	1/31/2006	235	28870060087	1/01/2006 8/30/2006	187379	352288	306283	233401	0
3	NY	A	P	1/31/2006	235	28980265500	1/01/2006 8/30/2006	187379	352288	306283	233401	0
3	NY	A	P	8/12/2006	235	28930168867	1/01/2006 8/30/2006	187379	352288	306722	233843	0
3	YE	N	P	1/31/2006	179	28960092285	7/01/2005 12/31/2005	233401	312179	511082	34488	0
3	Q1	N	P	4/15/2006	39	28930071438	1/01/2006 3/31/2006	34488	175675	180486	29678	0
3	Q1	A	P	7/13/2006	47	28960195012	1/01/2006 3/31/2006	34488	175675	181703	28460	0
3	Q2	N	P	7/15/2006	17	28960221030	4/01/2006 8/30/2006	28460	18283	11168	38578	0
3	Q2	A	P	10/27/2006	18	28960652916	4/01/2006 8/30/2006	28460	18283	11168	38578	0
3	Q3	N	P	10/15/2006	17	28940440719	7/01/2006 8/30/2006	38578	20899	27839	29835	0
3	Q3	A	P	1/31/2007	17	27940128112	7/01/2006 8/30/2006	38578	20899	20139	37335	0
3	126	N	P	10/26/2006	6	28830631122	10/01/2006 10/18/2006	29835	135	41	28928	0
3	129	A	P	1/31/2007	6	27980043316	10/01/2006 10/18/2006	37335	135	41	37428	0
3	308	N	P	12/07/2006	6	28940798811	10/19/2006 11/27/2006	29829	850	0	30779	0
3	308	A	P	1/31/2007	7	27930120860	10/19/2006 11/27/2006	37428	850	41	38237	0
3	YE	N	P	1/31/2007	10	27940128543	11/28/2006 12/31/2006	38237	2500	16833	23903	0
TOTAL									883807	1046739		