



State of Washington
PUBLIC DISCLOSURE COMMISSION
711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

December 10, 2018

Delivered electronically to “winwithwomenwa@gmail.com”

Subject: PDC Case 42872

Dear Win With Women PAC:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to timely deposit contributions and report contributions and expenditures. The formal written warning will include staff’s expectation that you pay closer attention to your primary source of contributions, and timely reports all contribution and expenditure activity. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 10, 2018

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Win with Women PAC, PDC Case 42872

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 29, 2018. Your complaint alleged that Win with Women PAC may have violated RCW 42.17A.220 and .235 for failure to timely deposit contributions and failure to timely report contributions and expenditures.

PDC staff reviewed your allegations, and as a result of staff’s initial review, we found the following:

- Win with Women PAC deposited a small number of contributions beyond the 5 day requirement set forth in RCW 42.17A.220, such as C-3 report 100703430, depositing \$1,153 in contributions 4 days late.
- From 2015 to 2018, Win with Women PAC late filed reports of contributions and expenditures between 1-62 days beyond the timeline required by RCW 42.17A.235.
- Most of the late filed C-3 and C-4 reports disclosed minor activity, and were reported before the election in question, with isolated exceptions such as C-4 report 100654116, disclosing \$0 in contributions and \$968 in expenditures, 32 days beyond the requirement for 7-day pre-general reports.
- Win with Women PAC contacted PDC staff regarding an ORCA crash, contributing to late filing of 12 reports, but most of the non-compliance was attributed by the Respondent to not paying adequate attention to direct deposits from their website contributions.

- Win with Women PAC's primary source of contributions is website contributions, as stated in their response to the complaint, and they have instituted a weekly schedule of verifying account activity to prevent future non-compliance.
- Win with Women PAC has no prior found violations of PDC laws or rules.

Based on these initial findings, staff has determined that in this instance, failure to timely deposit contributions and report contributions and expenditures does not amount to an actual material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Win with Women PAC will receive a formal written warning concerning failure to timely deposit contributions and report contributions and expenditures. The formal written warning will include staff's expectation that Win with Women PAC pays closer attention to their primary source of contributions, and timely reports all contribution and expenditure activity. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
For Peter Lavalley
Executive Director

cc: Win with Women PAC