

November 23, 2018

Dear Mx. Blackhorn;

Win With Women PAC received the Glen Morgan complaint, PDC Case Number 42872 on November 9, 2018. We have a volunteer Treasurer for the PAC, who has reviewed our records and responded to each item in the attached spreadsheet.

Win With Women PAC is not secret. We were established to help elect women to the state legislature in 2014. We have no paid staff and solicit contributions through our website and occasional public events. We make every effort to comply with PDC requirements and have never intentionally, much less maliciously, withheld information. We are not a large PAC, and we are transparent in our purpose to our donors and to the public.

Many of the complaints alleged here were for filings that occurred fewer than 5 days late. Our contributions tend to come in at particular times – when we hold an event, for example. However, since we have an online donation site, there are times when contributions come in, are directly deposited into our account, and, as a volunteer, the Treasurer failed to notice that this occurred. Many of the late filings were because we had very little activity, and we did not pay as much attention to the PDC reporting as we should have.

To remedy this, we have established a calendar item for the treasurer that will ensure the account is checked every Friday, regardless of activity, to see if there have been deposits during the week. Similarly, we also have calendar items for every filing period since early in this process, we did not attend to changes in the filing date, and especially in 2015, did not pay close attention to the PAC since we had very little activity.

Two critical technological failings occurred over the past three years. In 2017, the treasurer's hard drive crashed and we were unable to retrieve ORCA data. Data had not been backed up frequently, so several months were lost. Since we had filed regularly, we were able to recapture much of the data, but it did result in late filings in early 2017. To remedy this, all data is now backed up when C4 reports, or multiple C3 reports are filed.

In early 2018, we were unable to access C4 reports in our Orca file. We knew this was because of an error we made, but could not figure out what it was. We contacted the PDC when we realized it was not simply a failure on the part of the computer to download the reports and as soon as we received assistance, we found the problem, remedied it, and filed all the reports.

Mr. Morgan seems to count amended reports as late. He lists several C4 reports as very late, when the initial report was actually submitted on time, or only minimally late. We noted this in the spreadsheet.

While there have been periods when we have been less attentive to immediately filing reports because we have little activity, we have tried very hard to ensure we are thorough in our reporting, particularly during times when we have a lot of activity and during campaign season. We have taken steps to ensure that we will not miss deadlines in the future and will try our best to be more diligent because we expect 2019 will be quite slow. We will also consider hiring a professional during the 2020 campaign season when, if the PAC continues, we may have increased activity.

Please let us know if there is any further information you need from us.

Sincerely,
Win with Women PAC

Exhibit A -- Illegally Late filed C3 and C4 re

Approximate Cumulative Days Late --

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Days Late	Deposit
1	100864604	C3	N	9/28/18		0
2	100860020	C3	N	9/11/18		0
3	100860024	C3	Y	9/11/18		0
4	100860018	C3	N	9/11/18		0
5	100860017	C3	N	9/10/18		0
6	100860019	C3	N	9/11/18		0
7	100857060	C3	N	8/30/18		0
8	100855403	C3	N	8/24/18		0
9	100854876	C3	N	8/17/18		0
10	100854877	C3	N	8/19/18		0
11	100854878	C3	N	8/23/18		0
12	100851903	C3	N	6/12/18		0
13	100842086	C3	N	6/26/18		0
14	100842088	C3	N	6/28/18		0
15	100842087	C3	N	6/27/18		0
16	100840656	C3	N	6/13/18		0
17	100839750	C3	N	6/12/18		0
18	100839751	C3	N	6/11/18		0
19	100820796	C4	Y			
20	100820158	C4	N			
21	100808667	C4	N			
22	100804802	C4	N			
23	100793653	C3	N	10/13/17		0
24	100786193	C3	N	8/31/17		0
25	100781948	C3	N	8/3/17		0
26	100778959	C4	N			
27	100776321	C4	N			
28	100769145	C3	N	6/6/17		0
29	100769142	C3	N	5/26/17		0
30	100769141	C3	N	5/30/17		0
31	100769143	C3	N	5/30/17		1
32	100769144	C4	N			
33	100760966	C3	N	4/24/17		0
34	100760956	C3	N	4/17/17		0
35	100760967	C4	N			
36	100756314	C3	N	3/20/17		0
37	100756315	C3	N	3/21/17		0
38	100756316	C4	N			
39	100752994	C3	N	2/24/17		0
40	100752995	C4	N			
41	100749315	C3	N	12/27/16		0
42	100749312	C3	N	12/15/16		0
43	100749310	C3	N	12/12/16		0

44	100749309	C3	N	12/7/16	0
45	100749311	C3	N	12/6/16	0
46	100749313	C3	N	12/14/16	0
47	100749314	C3	N	12/23/16	0
48	100749319	C4	Y		
49	100749325	C4	Y		
50	100749322	C3	N	1/24/17	0
51	100749321	C3	N	1/10/17	0
52	100749324	C4	Y		
53	100749323	C4	N		
54	100738439	C4	N		
55	100738440	C4	Y		
56	100733375	C4	Y		
57	100733377	C4	Y		
58	100733370	C3	N	10/21/16	0
59	100733363	C3	N	10/18/16	0
60	100733362	C3	N	10/18/16	0
61	100733378	C4	Y		
62	100733372	C4	N		
63	100728581	C4	N		
64	100725956	C3	N	10/6/16	0
65	100725958	C3	N	10/7/16	0
66	100723725	C3	N	9/8/16	0
67	100723080	C3	N	9/13/16	0
68	100723081	C3	N	9/22/16	0
69	100723082	C3	N	9/23/16	0
70	100720393	C4	Y		
71	100720394	C4	Y		
72	100716861	C3	N	8/4/16	0
73	100716863	C3	N	8/8/16	0
74	100716864	C3	N	8/17/16	0
75	100714079	C3	N	7/15/16	0
76	100714080	C3	N	7/26/16	0
77	100714083	C3	N	7/28/16	0
78	100714081	C3	N	7/29/16	0
79	100713628	C4	Y		
80	100713629	C4	N		
81	100703430	C3	N	6/14/16	4
82	100703432	C3	N	6/14/16	4
83	100700811	C4	Y		
84	100700735	C3	N	6/2/16	0
85	100700736	C3	N	6/3/16	0
86	100690593	C3	N	3/28/16	0
87	100690596	C4	N		
88	100687969	C3	N	2/4/16	0
89	100687975	C3	N	2/27/16	0
90	100687971	C3	N	2/23/16	0
91	100687970	C3	N	2/10/16	0

92	100687974	C3	N	2/18/16	0
93	100687979	C3	N	2/29/16	0
94	100687973	C3	N	2/26/16	0
95	100687972	C3	N	2/27/16	0
96	100678971	C4	N		
97	100675521	C4	N		
98	100672233	C4	N		
99	100664531	C4	N		
100	100657163	C4	N		
101	100654116	C4	N		
102	100643112	C3	N	3/24/15	0
103	100643111	C3	N	3/20/15	0
104	100643113	C3	N	6/3/15	0
105	100643110	C4	N		
106	100636782	C4	N		
107	100633395	C4	N		
108	100629460	C4	N		
109	100629463	C4	Y		

ports

1441

Due Date	Date Submitted	Approximate Days Late
10/1/18	10/15/18	14
9/17/18	9/21/18	4
9/17/18	9/21/18	4
9/17/18	9/21/18	4
9/17/18	9/21/18	4
9/17/18	9/21/18	4
9/3/18	9/9/18	6
8/27/18	9/1/18	5
8/20/18	8/28/18	8
8/20/18	8/28/18	8
8/27/18	8/28/18	1
6/18/18	8/10/18	53
7/2/18	7/5/18	3
7/2/18	7/5/18	3
7/2/18	7/5/18	3
6/18/18	6/26/18	8
6/18/18	6/21/18	3
6/18/18	6/21/18	3
2/12/18	3/12/18	28
2/12/18	3/9/18	25
1/10/18	1/11/18	1
12/11/17	12/12/17	1
10/16/17	10/17/17	1
9/4/17	9/11/17	7
8/7/17	8/11/17	4
7/25/17	7/26/17	1
7/11/17	7/21/17	10
6/12/17	6/13/17	1
6/12/17	6/13/17	1
6/12/17	6/13/17	1
6/12/17	6/13/17	1
6/12/17	6/13/17	1
5/10/17	5/16/17	6
5/10/17	5/16/17	6
5/10/17	5/16/17	6
4/10/17	4/13/17	3
4/10/17	4/13/17	3
4/10/17	4/13/17	3
3/10/17	3/20/17	10
3/10/17	3/20/17	10
1/10/17	2/18/17	39
1/10/17	2/18/17	39
1/10/17	2/18/17	39

1/10/17	2/18/17	39
1/10/17	2/18/17	39
1/10/17	2/18/17	39
1/10/17	2/18/17	39
1/10/17	2/18/17	39
1/10/17	2/18/17	39
2/10/17	2/18/17	8
2/10/17	2/18/17	8
2/10/17	2/18/17	8
2/10/17	2/18/17	8
12/12/16	12/13/16	1
12/12/16	12/13/16	1
9/12/16	11/2/16	51
10/18/16	11/2/16	15
10/24/16	11/2/16	9
10/24/16	11/2/16	9
10/24/16	11/2/16	9
11/1/16	11/2/16	1
11/1/16	11/2/16	1
10/18/16	10/19/16	1
10/10/16	10/13/16	3
10/10/16	10/13/16	3
9/12/16	10/3/16	21
9/19/16	9/27/16	8
9/26/16	9/27/16	1
9/26/16	9/27/16	1
7/12/16	9/12/16	62
7/26/16	9/12/16	48
8/8/16	8/24/16	16
8/15/16	8/24/16	9
8/22/16	8/24/16	2
7/18/16	8/3/16	16
8/1/16	8/3/16	2
8/1/16	8/3/16	2
8/1/16	8/3/16	2
7/12/16	8/1/16	20
7/26/16	8/1/16	6
6/20/16	6/21/16	1
6/20/16	6/21/16	1
5/11/16	6/10/16	30
6/6/16	6/10/16	4
6/6/16	6/10/16	4
4/11/16	4/13/16	2
4/11/16	4/13/16	2
3/10/16	4/1/16	22
3/10/16	4/1/16	22
3/10/16	4/1/16	22
3/10/16	4/1/16	22

3/10/16	4/1/16	22
3/10/16	4/1/16	22
3/10/16	4/1/16	22
3/10/16	4/1/16	22
2/10/16	2/16/16	6
1/11/16	1/14/16	3
12/10/15	12/14/15	4
10/13/15	10/26/15	13
9/10/15	9/15/15	5
7/28/15	8/29/15	32
4/10/15	6/11/15	62
4/10/15	6/11/15	62
6/8/15	6/11/15	3
6/10/15	6/11/15	1
5/11/15	5/13/15	2
4/10/15	4/13/15	3
2/10/15	3/9/15	27
2/10/15	3/9/15	27

Total Days late

1441

Explanation

This was a \$3.00 bank refund. We had never received one before, automatically applied and I didn't notice
direct deposit from website, didn't see it immediately
initially submitted 9/11; amended
direct deposit from website, didn't see it immediately
branch deposit right after event by another volunteer, did not get info until 8/31
direct deposit from website, didn't see it immediately
direct deposit from website, didn't see it immediately
only one day
I am not sure how this happened, recorded deposits and c3s - may have failed to upload
only three days
only three days
only three days
direct deposit from website, didn't see it immediately
only three days
only three days
I did not have c4's in Orca - contacted PDC because I couldn't figure out how to get them, filed as soon as I
same as above, this was the first, 100820796 was the amended report
only one day
only one day
only one day
direct deposit from website, didn't see it immediately
only four days
only one day
was on vacation and forgot to file
only one day
very few transactions in April - website deposit I failed to notice until doing C4
very few transactions in May - website deposit I failed to notice until doing C4
very few transactions in May - website deposit I failed to notice until doing C4
only three days
only three days
only three days
beginning of year, PAC committee was making \$10 contributions to PAC online, I did not keep up
should not have been late - mistake on my part
my computer crashed, wiped out ORCA - contacted PDC and worked with them to get things straight again
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible

computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
Submitted C4 on January 10 (100741063) this is the amended C4
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible
computer crashed, wiped out ORCA - fixed as quickly as possible

only one day

only one day

submitted C4 on September 12 (#100720395)

C4 submitted on October 19 (#100728581) one day late

I am not sure why these were late, possible didn't realize I didn't upload, possible I didn't get to them until
same problem as above

same problem as above

only one day

only one day

only one day

only three days

only three days

these are data I lost in computer crash, looking at confirmations, and bank account, seems I deposited, for
electronic deposit - did not notice

only one day

only one day

C4 submitted on July 11 #100706453 - likely revised when doing later C4

C4 submitted on Aug 1 (#100713628) - it was 6 days late - failure to track early deadline soon enough

online deposit after event, didn't realize it came in

same problem as above

only two days

branch deposit, thought uploaded, noticed when making 8/1 deposits

only two days

only two days

only two days

submitted initial C4 on July 11 (#100706453)

also repeat of above, this C4 was late - failed to track early deadline

took some time to get checks to banks; only one day late on filing

took some time to get checks to banks; only one day late on filing

C4 submitted on May 10 (#100693833)

only four days

only four days

only two days

only two days

cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to uploac

cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to uploac

cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to uploac

cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to uploac

cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to upload
branch deposit, recorded C3's but failed to upload them properly
cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to upload
cannot totally reconstruct what happened, most were website deposits, recorded C3's but failed to upload
no deposits in January, so little activity, forgot to file
only three days
only four days
very little activity in 2015- forgot to file on time
very few transactions in 2015, failure on my part to file
cannot reconstruct, likely with very little activity, in July had no deposits, only 2 auto payments for website
cannot reconstruct, website donation, may have missed it, or failed to upload
cannot reconstruct, direct deposit, may have failed to upload
only three days
only one day
only two days
only three days
no deposits in February, only two auto payments for website,
this was a revision of the previous made the same day

it until I was doing the C3's and C4's for the 10/15 period.

earned

, took awhile to figure out what had been reported. Had failed to back up data.

11/2

got to upload and noticed when submitting another c3

1
1
1
1

1

1

1

:e,