Respondent Name

Christopher Roberdeau

Complainant Name

Sylvia Schultz

Complaint Description

Sylvia Schultz

(Fri, 29 Oct 2021 at 2:49 AM)

A review of reports filed by the Committee to Elect Chris Roberdeau and Conner Edwards, an experienced treasurer, appear to show a pattern of incomplete public disclosure. A report filed 9/19/2021 did not disclose the name of the employer of Janice Kary who had contributed over \$100. A report filed 6/12/2021 did not disclose the employer and occupation of Dominique France who had contributed \$100 or more in the aggregate. A report filed 10/26/2021 shows an expenditure described only as "Advertisements" for \$1,510 in the Northshore News but does not describe details of the service that had been provided, such as dates or quantities. The campaign's "paid for by" sponsor identification shown on two flyers distributed as inserts in the Northshore New appears incomplete, and the printed disclaimer on the flyer itself is not set apart from other printing.

What impact does the alleged violation(s) have on the public?

Disclosure of a contributor's employer and occupation for those who contribute over \$100 allows the public to more fully consider the donor's interests in providing the contribution and prevents abuses. Disclosure of the sponsor's mailing address allows the public to clearly identify the sponsor of political advertising and prevents abuses.

List of attached evidence or contact information where evidence may be found

Attachment 1 – Committee to Elect Chris Roberdeau C1 Registration 5/19/2021 https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=44486

Attachment 2 – PDC 2021 Contribution Records for "Chris Roberdeau" As attached.

Attachment 3 – Committee to Elect Chris Roberdeau C3 9/19/2021 (PDC #110048364) https://web.pdc.wa.gov/rptimg/default.aspx?docid=4968115

Attachment 4 – Committee to Elect Chris Roberdeau C3 7/13/2021 (PDC #110032830) https://web.pdc.wa.gov/rptimg/default.aspx?docid=4952312

Attachment 5 – Committee to Elect Chris Roberdeau C3 6/21/2021 (PDC #110027715) https://web.pdc.wa.gov/rptimg/default.aspx?docid=4947161

Attachment 6 – Committee to Elect Chris Roberdeau C4 7/27/2021 (PDC #110036562) http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=110036562

Attachment 7 – PDC 2021 Expenditure Records for "Chris Roberdeau" As attached.

Attachment 8 – Committee to Elect Chris Roberdeau C4 10/12/2021 (PDC #110054514) http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=110054514

Attachment 9 – Committee to Elect Chris Roberdeau C4 10/26/2021 (PDC #110058836) http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=110058836

Attachment 10 – Roberdeau – two 5"x7" flyers, received approx 10-15-2021 & on 10-22-2021 As attached.

List of potential witnesses

JANICE KARY: Woodinville, WA 98072 [contributor record]

DOMINIQUE FRANCE: Woodinville, WA 98072 [contributor record]

Woodinville, WA 98072 [C1 Registration for Students First]

NORTHSHORE NEWS ADVERTISING: Woodinville, WA 98072

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Attachments to Formal Complaint

Date: October 29, 2021 Complainant: Sylvia Schultz

Address: PO Box 2354, Woodinville, WA 98072

Respondents' names:

Christopher Roberdeau (Committee to Elect Chris Roberdeau);

Conner Edwards

File to Attach:

Christopher Roberdeau (Committee to Elect Chris Roberdeau) filed to register as a candidate for school director position 4, Northshore School District 417 on May 19, 2021 and designated Conner Edwards as treasurer (Attachment 1).

During the course of the election, the Roberdeau campaign reported it received contributions, expended funds, and incurred debts. Reports of C3 contributor records were signed by candidate Chris Roberdeau and treasurer Conner Edwards (Attachment 2).

Records of contributions and in-kind contributions included the following:

Filed: 9/19/2021 – Contribution, Date Received: 9/14/2021; Contributor's Name and Address: JANICE KARY, 19806 131 PL NE Woodinville, WA 98072; Employer's Name and City/State: [employer name not reported] San Francisco, CA; General; Amount: \$200.00 (emphasis added, Attachment 3)

Filed: 6/21/2021 – Contribution, Date Received: 6/14/2021; Contributor's Name and Address: DOMINIQUE FRANCE, 14267 157th PI NE, Woodinville, WA 98072; Amount: \$100.00; Primary; Employer Name and Occupation: [not reported] (emphasis added, Attachment 4)

Filed: 7/13/2021 – Schedule B In-Kind Contribution - Date Received: 6/8/2021; Contributor's Name and Address: DOMINIQUE FRANCE, 14267 157th PI NE, Woodinville, WA 98072; Description of Contribution: In-Kind Loan; Fair Market Value: \$474.54; Primary; Employer Name and Occupation: Deloitte, Seattle WA, MANAGING DIRECTOR (Attachment 5, page 3)

Filed: 7/27/2021 – Schedule L Loans – Date Paid: 7/26/2021; DOMINIQUE FRANCE, 14267 157th PI NE, Woodinville, WA 98072; Principal Paid: \$474.54; Interest Paid \$0.00; Total Payment: \$474.54; Balance Owed: \$0.00 (Attachment 6, page 3)

The 9/19/2021 and 6/21/2021 filings above do not disclose the contributor's occupation and employer's name for each person who had made a contribution of \$100 or more in the aggregate. The 9/19/2021 report for Janice Kary, who contributed \$200, does not disclose the employer's name. The 6/21/2021 report for Dominique France, who contributed \$574.54 in the aggregate, does not disclose the employer's name and the contributor's occupation. The loan was repaid on 7/26/2021, subsequent to the filing of the 6/21/2021 report.

In addition, C4 expenditure reports were signed by candidate Chris Roberdeau and treasurer Conner Edwards (Attachment 7). The Roberdeau campaign prepared the following C4 expenditure reports:

Filed: 10/12/2021 – Date Paid: 9/28/2021; Vendor or Recipient: VISTAPRINT, 170 Data Drive, Waltham, MA 02451; Purpose of Expense and/or Description: Campaign Flyers (35000); Amount: \$834.45 (Attachment 8, page 2)

Filed: 10/26/2021 – Date Paid: 10/21/2021; NORTHSHORE NEWS ADVERTISING, PO Box 2540, Woodinville, WA 98072; Purpose of Expense and/or Description: Advertisements; Amount: \$1,230.00 (Attachment 9, page 2)

The 10/12/2021 filing that described 35,000 flyers is the only expenditure record for printed literature reported by the Roberdeau campaign, and no mailing expenses were reported. The 10/26/2021 filing shows an expenditure described only as "Advertisements" for \$1,510 in the *Northshore News* but does not report dates or quantities.

I, the complainant, received two 5"x7" flyers with the *Northshore News* that is delivered by the USPS to my mailbox. The first flyer was received on or about 10/15/2021; the second on 10/22/2021 (Attachment 10).

The description used by the Roberdeau campaign in the 10/26/2021 filing does not disclose whether the \$1,230 expenditure to *Northshore News* was advertising or for inserting the flyers in the newspaper. If the Roberdeau campaign had an agreement with the *Northshore News* to provide a service of inserting flyers in the weekly newspaper for \$1,230, the disclosure should describe that expenditure arrangement in detail and attribute the number of flyers inserted.

The two 5"x7" flyers included a sponsor identification statement:

PAID FOR BY THE COMMITTEE TO ELECT CHRIS ROBERDEAU
HTTPS://CHRISROBERDEAUNSD.COM/

Neither flyer included a mailing address for the Roberdeau campaign. The sponsor identification statement was printed in an area partly bisected by graphic bands printed in two shades of green.

Relevant Law:

Each report must be certified by the candidate and the treasurer and "shall" disclose contributions and expenditures and other information required by the commission, per RCW 42.17A.240.

A report filed by candidate or political committee "shall disclose" the occupation and employer's name and address of each person who has "made one or more contributions in the aggregate amount of more than one hundred dollars", per <u>WAC 390-16-034</u>.

A loan is included in the definitions of (15) "Contribution" in RCW 42.17A.005.

The political advertising definition for "mass communication" includes "fliers" under <u>WAC 390-05-290(1)(b)</u>.

For any person required to report expenditures, the purpose of the expenditure must be disclosed, according to <u>WAC 390-16-037(1)</u>. Further, if the expenditure is pursuant to an agreement, the report "must describe in detail that agreement and the goods and/or services to be provided" and must include vendor, purpose (and number of items), and amount of expenditure, per <u>WAC 390-16-037(2)</u>.

Expenditures made "on behalf of a candidate...by any person" who is "employed or retained" for the purpose of organizing, directing, managing or assisting" the candidate shall be reported "as if" made or incurred by the candidate directly, per <u>WAC 390-16-205(1)</u>.

"All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address" per RCW 42.17A.320(1). In addition, the required information shall be "set apart from any other printed matter" according to RCW 42.17A.320(3)(c).

"All advertising must clearly state, in an area set apart from any other printed matter, that it has been paid for by the sponsor (Example: (1) Paid for by the XYZ committee, mailing address, city, state, zip code; (2) Vote for John Doe, paid for by John Doe, mailing address, city, state, zip code)", as described by WAC 390-18-010(2), (emphasis added).

Attachments

Attachment 1 – Committee to Elect Chris Roberdeau C1 Registration 5/19/2021 https://apollo.pdc.wa.gov/public/registrations/registration?registration id=44486

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Attachment 5 – Committee to Elect Chris Roberdeau C3 6/21/2021 (PDC #110027715) https://web.pdc.wa.gov/rptimg/default.aspx?docid=4947161

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Attachment 9 – Committee to Elect Chris Roberdeau C4 10/26/2021 (PDC #110058836) http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=110058836 Attachment 10 - Roberdeau - two 5"x7" flyers, received approx 10-15-2021 & on 10-22-2021 As attached.

Attachment 2 – PDC 2021 Contribution Records for "Chris Roberdeau"

contributor_name	contributor_address	contributicon	t electi	receipt_date	amount	cash_primacontributo c	contributor_occupation	report_num
GRIGORENKO DMITRY	18030 30th Ave SE	Bothell WA	2021	8/20/2021	\$1,000.00	Cash Gene Facebook S	SOFTWARE ENGINEER	110043096
ROBERDEAU CHRIS	12948 NE 198th PI	Woodinvi WA	2021	9/25/2021	\$1,000.00	Cash Gene Astronics E	EXECUTIVE MANAGEME	110049587
HEYWOOD BRIAN	12025 154th PI NE	Redmond WA	2021	7/8/2021	\$1,000.00	Cash Prima Self Emplo B	BUSINESS OWNER	110031319
FLEEGAL ERIC	2020 Maltby Rd	Bothell WA	2021	8/24/2021	\$500.00	Cash Gene Facebook C	COMPUTER SCIENTIST	110043098
SNOHOMISH COUNTY GOP	3115 Oakes Ave	Everett WA	2021	10/10/2021	\$500.00	Cash General		110053352
NEIDER TOM	18311 244th Ave NE	Woodinvi WA	2021	8/24/2021	\$500.00	Cash Gene Retired R	RETIRED	110043098
FRANCE DOMINIQUE	14267 157th PI NE	Woodinvi WA	2021	6/8/2021	\$474.54	In kin Prima Deloitte M	MANAGING DIRECTOR	110032830
BAKAUSHIN TIMOFEY	18450 146th Ave NE	Woodinvi WA	2021	8/31/2021	\$350.00	Cash Gene Facebook E	ENGINEER	110044476
NEIDER TOM	18311 244th Ave NE	Woodinvi WA	2021	6/14/2021	\$250.00	Cash Prima Retired R	RETIRED	110027715
Christopher Roberdeau (Ch	112948 NE 198th PI	Woodinvi WA	2021	5/25/2021	\$200.00	Cash		110021833
BOSTON RICHARD	31223 State Highwa	Poulsbo WA	2021	7/8/2021	\$200.00	Cash Prima Astronics P	PMO	110031319
KARY JANICE	19806 131 PL NE	Woodinvi WA	2021	9/14/2021	\$200.00	Cash Gene NONE GIVI F	FINANCE	110048364
MCCRAVEY DAWN	4808 Westside Rd	Friday HaiWA	2021	8/27/2021	\$200.00	Cash General F	RETIRED	110043101
NEIDER TOM	18311 244th Ave NE	Woodinvi WA	2021	10/13/2021	\$200.00	Cash Gene Retired R	RETIRED	110055797
BOSTON RICHARD	31223 State Highwa	Poulsbo WA	2021	10/13/2021	\$150.00	Cash Gene Astronics P	PMO	110055797
ELLISON KEVIN	7345 164th Ave NE	Redmond WA	2021	9/8/2021	\$125.00	Cash General F	RETIRED	110047170
WALTIER CYNTHIA	12955 NE 201st PI	Woodinvi WA	2021	7/22/2021	\$100.00	Cash Primary		110035405
FRANCE DOMINIQUE	14267 157th PI NE	Woodinvi WA	2021	6/14/2021	\$100.00	Cash Primary		110027715
SEPE AMANDA	18008 176th Ave NE	Woodinvi WA	2021	6/14/2021	\$100.00	Cash Primary		110027715
JOHNSON KEITH	14246 157th PI NE	Woodinvi WA	2021	7/22/2021	\$100.00	Cash Primary		110035405
BRADFORD PROPERTY MAN	NPO Box 3002	Kirkland WA	2021	7/22/2021	\$100.00	Cash Primary		110035405
KAJI ROSALIE	22306 45th PI West	Mountlak WA	2021	8/22/2021	\$100.00	Cash General		110041836
GOURLIE AMANDA	18615 92nd Ave NE	Bothell WA	2021	8/17/2021	\$100.00	Cash General		110043095
REMILLARD GEMMA	10424 NE 195th St	Bothell WA	2021	8/24/2021	\$100.00	Cash General		110043098
HILL KELLY	10111 NE 200th St	Bothell WA	2021	8/27/2021	\$100.00	Cash Gene NONE PRO N	NONE PROVIDED	110043100
ASHFORD ANN	Po Box 3002	Kirkland WA	2021	8/24/2021	\$100.00	Cash General		110043098
VERESCHAK MARIA	16818 198TH AVE N	E Woodinvi WA	2021	8/31/2021	\$100.00	Cash General		110044476
SCHWARTZ LANCE	13100 179th Ave NE	Redmond WA	2021	9/8/2021	\$100.00	Cash General		110047170
GONZALEZ VIVIAN	7640 Kerrington Dr	Melbourn FL	2021	10/8/2021	\$100.00	Cash General		110053355
MISCELLANEOUS RECEIPTS			2021	7/26/2021	\$59.27	Cash		110037598
SKAGEN ROY	16212 Bothell-Evere	Mill CreekWA	2021	8/22/2021	\$50.00	Cash General		110041836
PELLINO AUGUST	2121 159th Ave SE	Snohomis WA	2021	7/23/2021	\$50.00	Cash Primary		110036238
VICTOR PAUL	15003 181st Ave SE	Monroe WA	2021	7/23/2021	\$50.00	Cash Primary		110036238
CONNELLY DIANA	PO Box 2277	Bothell WA	2021	10/9/2021	\$50.00	Cash General		110053352

KRAMER VICTORIA 4321 2	40th St SE Bothell	WA	2021	7/22/2021	\$50.00	Cash Primary	110035405
	NE 200th St Bothell		2021			Cash Primary	110035405
	VE 5th Circle Renton		2021			Cash Primary	110026527
	168th Ave NE Woodin					Cash General	110049587
SMALL CONTRIBUTIONS	100011AVC NE WOOdill	*****	2021	9/14/2021	\$50.00		110048364
	NE 177th PI Bothell	1A/A	2021	6/14/2021		Cash Primary	110070307
	SE 155th PI Renton		2021	6/29/2021		Cash Primary	110027713
	6th Circle NE Redmon					Cash General	110023344
SMALL CONTRIBUTIONS	our circle NE Reuliion	iu wa	2021	8/20/2021	\$35.00		110047105
ROBERDEAU CHRISTOPHER PO BO	X 2847 Woodin	ui IA/A		5/4/2021		In kin Prima Astronics (MANAGEMENT	110043098
ROBERDEAU CHRISTOPHER PO BO				5/4/2021		In kin Prima Astronics (MANAGEMENT	110022798
ROBERDEAU CHRISTOPHER PO BO						In kin Prima Astronics (MANAGEMENT	110022798
ELLINGSON MARCIA 4209 N	Mission Beach Tulalip		2021		\$30.00	Cash General	110047169
GOULD COURTNEY 19021	84th Place NE Bothell	WA	2021	10/13/2021	\$25.00	Cash General	110055797
SMALL CONTRIBUTIONS			2021	7/9/2021	\$25.00	Cash	110031318
SMALL CONTRIBUTIONS			2021	6/17/2021	\$25.00	Cash	110027717
SMALL CONTRIBUTIONS			2021	10/13/2021	\$25.00	Cash	110055797
SMALL CONTRIBUTIONS			2021	7/22/2021	\$25.00	Cash	110035405
SMALL CONTRIBUTIONS			2021	8/13/2021	\$25.00	Cash	110040773
BAUTISTA KATYA 3927 2	43rd PI SE Uni Bothell	WA	2021	10/22/2021	\$25.00	Cash General	110057146
SMALL CONTRIBUTIONS			2021	8/27/2021	\$20.00	Cash	110043101
Christopher Roberdeau (Chr 18311	244th Ave NE Wooding	vi WA	2021	7/13/2021	\$20.00	Cash	110034001
SMALL CONTRIBUTIONS			2021	7/8/2021	\$10.00	Cash	110031319
SMALL CONTRIBUTIONS			2021		\$10.00		110043098
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Attachment 7 - PDC 2021 Expenditure Records for "Chris Roberdeau"

filer_name	recipient_name	expenditure_	electio	amount	recipient_city	reci	description	report_num
Christopher Roberdeau	(CONNER EDWARDS	7/9/2021	2021	100	Woodinville	WA	Treasury	110032830
Christopher Roberdeau	(VISTAPRINT	7/6/2021	2021	194.61	Waltham	MA	4x6' Vinyl Banner & Car Magnet	110032830
Christopher Roberdeau	(ROBERDEAU CHRISTOPHE	5/4/2021	2021	34.66	Woodinville	WA	Website Hosting and Domain Registr	110022798
Christopher Roberdeau	(FRANCE DOMINIQUE	7/26/2021	2021	-474.54	Woodinville	WA	LOAN PAYMENT	110036562
Christopher Roberdeau	(FRANCE DOMINIQUE	7/26/2021	2021	474.54	Woodinville	WA	LOAN REPAYMENT	110036562
Christopher Roberdeau	(FRANCE DOMINIQUE	6/8/2021	2021	474.54	Woodinville	WA	In-Kind Loan	110032830
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	6/1/2021	2021	82.26				110032830
Christopher Roberdeau	(CONNER EDWARDS	6/15/2021	2021	200	Woodinville	WA	Treasury	110032830
Christopher Roberdeau	(ISAM MARTIN	6/24/2021	2021	250	Hermosa	CA	Website	110032830
Christopher Roberdeau	(ISAM MARTIN	7/12/2021	2021	770	Hermosa	CA	Website	110032830
Christopher Roberdeau	(EFUNDRAISINGCONNECTI	7/8/2021	2021	55.95	Sacremento	CA	Fees	110032830
Christopher Roberdeau	(ROBERDEAU CHRISTOPHE	5/12/2021	2021	34	Woodinville	WA	3 Months Rent USPS PO Box	110022798
Christopher Roberdeau	(ROBERDEAU CHRISTOPHE	5/4/2021	2021	34.12	Woodinville	WA	WordPress Website Template	110022798
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	5/4/2021	2021	0				110022798
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	7/13/2021	2021	22.13				110036562
Christopher Roberdeau	(VISTAPRINT	7/15/2021	2021	410.11	Waltham	MA	18 x 24" Yard Signs (100)"	110036562
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	7/27/2021	2021	47.88				110044692
Christopher Roberdeau	(CONNER EDWARDS	8/16/2021	2021	100	Woodinville	WA	Treasury	110044692
Christopher Roberdeau	(VISTAPRINT	8/23/2021	2021	1,153.84	Waltham	MA	18 x 24" Yard Signs (300)"	110044692
Christopher Roberdeau	(CONNER EDWARDS	8/30/2021	2021	400	Woodinville	WA	Treasury	110044692
Christopher Roberdeau	(EFUNDRAISINGCONNECTI	8/24/2021	2021	56.95	Sacremento	CA	Fees	110044692
Christopher Roberdeau	(EFUNDRAISINGCONNECTI	8/20/2021	2021	53.08	Sacremento	CA	Fees	110044692
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	9/1/2021	2021	28.89				110054514
Christopher Roberdeau	(INORTHSHORE NEWS ADV	10/8/2021	2021	1,510.00	Woodinville	WA	Advertising (10-1 to 10-31)	110054514
Christopher Roberdeau	(VISTAPRINT	9/28/2021	2021	834.45	Waltham	MA	Campaign Flyers (35000)	110054514
Christopher Roberdeau	(EXPENSES OF \$50 OR LESS	10/12/2021	2021	21.64				110058836
Christopher Roberdeau	(INORTHSHORE NEWS ADV	10/21/2021	2021	1,230.00	Woodinville	WA	Advertisements	110058836



