



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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January 24, 2022

Delivered electronically to Sylvia Schultz at eyeonwaelections@gmail.com

Subject: Complaint regarding Christopher Roberdeau, PDC Case 100440

Dear Ms. Schultz:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 28 and 29, 2021. Your complaints alleged that Christopher Roberdeau, a 2021 candidate for Northshore School Director, Position 4, may have violated: (1) RCW 42.17A.240 and WAC 390-16-207 by failing to timely and accurately report the description for an in-kind contribution received by the Campaign; and (2) RCW 42.17A.320 by failing to disclose the full sponsor identification on a political advertisement sponsored by the Campaign.

PDC staff reviewed your allegation; the applicable statutes, rule(s), and the reporting requirements; the Summary Full Report Receipt and Expenditure (C4) reports filed by Committee to Elect Chris Roberdeau (Campaign); attachments sent with the complaint; and the November 4, 2021, response to the complaint provided by Conner Edwards, Treasurer, on behalf of the Campaign.

Based on staff's review, we found the following:

- On May 19, 2021, Christopher Roberdeau timely filed a Candidate Registration (C-1) report declaring his candidacy for Northshore School Director, selecting the Full Reporting Option, and listing Connor Edwards as Treasurer.
- The complaint alleged that the Campaign failed to timely and accurately disclose the descriptions for an in-kind contribution received by the Campaign on the Schedule B to C-4 report. Specifically, the complaint alleged that the Campaign failed to disclose the required description details for an in-kind loan/contribution depicted on the 21-Day Pre-Primary C-4 report for an in-kind loan/contribution received from Dominique France on June 8, 2021, in the amount of \$474.54 (Fair Market Value), including the required occupation and employer information for the contributor Dominique France.
- Staff reviewed the C-4 reports filed by the Campaign and noted that the Campaign failed to provide the required description details for the \$474.54 in-kind contribution/loan received from Dominique France for yard signs and business cards.

- On November 3, 2021, the Campaign filed an amended 21-Day Pre-Primary C-4 report and provided the required description(s) for the \$474.54 in-kind contribution received on June 8, 2021, from Dominique France.
- Staff also reviewed the 5”x7” flyer that was attached to the complaint as evidence that the Campaign failed to include the full sponsor identification on a political advertisement as required in RCW 42.17A.320. Staff noted that while the flyer stated it had been “Paid for by the Committee to Elect Chris Roberdeau,” it did not include the full address as required by the statutory scheme/rule.
- In its response to the complaints, the Campaign, by way of Conner Edwards, Treasurer, stated: “This 474.54 in-kind loan from Dominique France was also for 100 yard signs and business cards purchased from VistaPrint. The relevant report has been amended to include this information. I would also note that I sent a copy of the draft loan documentation (which included the purpose of the in-kind contribution/loan) to the PDC on 6/6/21 to verify that the loan agreement was OK.” Mr. Edwards further stated: “As the complaint notes, the mailing address was not present on the “5x7” flyers, however the language ‘Paid for By The Committee to Elect Chris Roberdeau’ was. The flyer also included a link to the campaign’s website where the mailing address is present at the bottom of the page.”

Based on our findings, staff has determined that, in this instance, the failure to provide the required description for one In-kind contribution/loan in the amount of \$474.54 and the occupation/employer information does not amount to a violation that warrants further investigation. The Campaign was responsive and timely amended the pertinent C-4 report disclosing the required information as soon as the deficiency concerning the in-kind contribution description requirement was brought to its attention.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

However, Christopher Roberdeau will receive a reminder concerning his 2021 Campaign’s failure to include the full sponsor identification on a political advertisement and the failure to provide the required description details for the \$474.54 in-kind contribution/loan received by the Campaign on June 8, 2021.

If you have questions, you may contact Erick Agina, Compliance Officer at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
Kim Bradford, Deputy Director for
Peter Lavalley, Executive Director

cc: Christopher Roberdeau