



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.pdcca.wa.gov

January 17, 2023

Sent electronically to Chartisha Roberts and Marsha Manning, Treasurer for 2022 Chartisha Roberts Campaign

Subject: Complaint filed by Robert Anderson, PDC Case 113883

Dear Chartisha Roberts and Marsha Manning:

Enclosed is a copy of an electronic letter sent to Robert Anderson concerning a complaint he filed on October 31, 2022, against you and your 2021 School Board Campaign. On December 22, 2022, PDC staff received a signed Statement of Understanding (SOU) completed by Ms. Roberts acknowledging one violation of RCW 42.17A.235 and .240 for failing to timely file the 2021 Post Primary Election C-4 report.

The receipt of the SOU and the payment of the \$150 civil penalty assessed in this matter, in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), resolves the issue of failing to timely file the 2021 Post Primary Election C-4 report. Concerning the transfer of 2021 surplus funds into your 2022 Clark County Council race, pursuant to WAC 390-37-060(1)(d), the PDC is hereby issuing a formal written warning to you. This warning is regarding the requirement for a candidate to receive permission from contributors, whether the funds are active or surplus funds, prior to transferring those funds into the campaign account for a different office being sought.

The formal written warning includes staff's expectation that you will adhere and comply with the PDC reporting requirements, including the provision to receive permission of contributors prior to transferring funds in the Campaign account for a different office being sought in the future. The Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). Thank you for your cooperation and assistance in resolving this matter. If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
PDC Compliance Officer

/s _____
Electronically Signed Peter Lavallee
PDC Executive Director



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.pdcca.wa.gov

January 17, 2023

Sent electronically to Robert Anderson

Subject: Complaint filed against Chartisha Roberts, PDC Case 113883

Robert Anderson:

Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed on October 31, 2022, against Chartisha Roberts, a 2021 candidate for School Board, Vancouver School District, Position #2. Ms. Roberts was also a 2022 candidate seeking election to the office of Clark County Council Member, Position #2.

The complaint alleged that the 2021 Chartisha Roberts Campaign violated: (1) RCW 42.17A.235 and .240 by failing to timely and accurately file a 2021 Post Primary Summary Full Campaign Contribution and Expenditure Report (C-4 report); and (2) RCW 42.17A.490 by failing to receive permission from 2021 contributors to her Vancouver school board Campaign that made up her final surplus funds balance prior to transferring those funds into her 2022 County Council race.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and the 2021 and 2022 Campaigns for Chartisha Roberts; select Monetary Contributions Reports (C-3 reports) and the C-4 reports filed by the Chartisha Roberts Campaign (Campaign); and the email responses from Marsha Manning, the 2022 Campaign Treasurer on behalf of Ms. Roberts, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On June 14, 2021, Chartisha Roberts filed a Candidate Registration declaring her candidacy for School Board Member, Position #2 on the Vancouver School Board, selecting the Full Reporting Option and listed herself as Treasurer and the only Officer.
- Ms. Roberts was a first-time candidate for public office in 2021, who came in third in a four-way contested 2021 primary election, and her name did not appear on the 2021 general election ballot.
- The 2021 Post-Primary Election C-4 report was a required filing for all candidates under the Full Reporting option and appearing on the primary election ballot. The Post-Primary Election C-4 report covered the period July 27 through August 31, 2021, and was required to have been filed by the 2021 Elect Chartisha Roberts Campaign (2021 Campaign) no later than September 10, 2021.

- On November 17, 2022, the 2021 Campaign filed the 2021 Post-Primary Election C-4 report, disclosing \$1,450 in monetary contributions received and \$9,698.32 in expenditures made that included the following: (1) A \$4,980.11 expenditure made to Morel Ink on August 11, 2021, for a “Mailer, printing, postage, handling, 6,000 pieces”; (2) A \$2,250 expenditure made to NW Union Solutions on August 10, 2021, for Campaign “Manager contact payment”; (3) A \$1,466.38 expenditure made to Morel Ink on July 27, 2021, for “Printing Campaign signs: Yard Signs – 7 large, 50 small”; and (4) A \$679.21 expenditure made to Morel Ink on July 27, 2021, to print “5,000 walk pieces.”
- The 2021 Post-Primary Election C-4 report was filed 433 days late by the Campaign. Ms. Manning went on to state that “there is no real excuse for this omission, I can only provide the extenuating circumstances surrounding the failure. Chartisha had attempted to do her own compliance work for the 2021 campaign, so there was no official treasurer. Her family helped with data entry but did not necessarily understand the rules of compliance.” After being defeated in the primary, she stated that Ms. Roberts experienced the normal feelings as any losing candidate “but she also had a family emergency...(which is) not as an excuse but as a reason why some campaign things were overlooked.”
- On December 22, 2022, PDC staff received a signed Statement of Understanding (SOU) completed by Ms. Roberts, acknowledging one violation of RCW 42.17A.235 and .240 by her 2021 Campaign for failing to timely file the 2018 Post Primary Election C-4 report, along with a check for \$150 for penalty assessed in the matter. The signed SOU and \$150 penalty payment resolves the allegation concerning the missing C-4 report.
- On May 10, 2022, Ms. Roberts filed a Candidate Registration declaring her candidacy and seeking election to the office of Clark County Council Member Position 2, selecting the Full Reporting Option and listed Marsha Manning as the Ministerial Treasurer. Ms. Manning was only the Ministerial Treasurer for Ms. Roberts 2022 County Council Campaign but provided a response concerning the late filed 2021 Post-Primary C-4 report.
- Concerning the allegation of transferring 2021 Campaign surplus funds into the 2022 Campaign without first obtaining permission of contributors, Ms. Manning stated a total of \$176.29 in 2021 Campaign surplus funds remained in the Campaign bank account. When she came on board the 2022 Campaign as Treasurer, she stated that was not familiar with the details of the 2021 Campaign, and she started the 2022 campaign with \$176.29 beginning balance that she disclosed as “candidate’s personal funds”. She stated that appeared “to be an error on my part. I should have shown that as Surplus from the previous campaign. I can follow through on an amendment if you deem that is necessary.”
- After speaking with PDC Staff, Ms. Manning confirmed that Ms. Roberts wrote a personal check to her 2022 campaign account in the amount of \$176.29 to cover money that was left over from the 2021 Campaign and transferred into the 2022 Campaign. The 2022 Campaign filed a new C-3 report disclosing the beginning balance of \$176.29 as a Miscellaneous Receipt rather than the previously reported candidate’s personal funds. The C-3 report included the attached description stating “Chartisha contributed \$176.29 in personal funds to reimburse the 2022 Campaign for monies from the 2021 campaign inadvertently carried forward into the Council race on RepNo 110085559.”
- Ms. Manning stated that the 2022 Campaign made two final expenditures for the \$176.29 in funds contributed by Ms. Roberts, that included the \$150 penalty payment for the SOU, and a \$26.29 expenditure made to an approved charity to close the Campaign bank account. In addition, the Campaign filed a final C-4 report to close the 2021 Campaign account with a zero balance.

Based on these findings, including the facts that Ms. Roberts was a first-time candidate for public office in 2021, served as her own Treasurer, completed an SOU, and paid a \$150 civil penalty to resolve the late filed report, and has no prior complaints or PDC violations, PDC staff found no evidence of further violations that would require conducting a more formal investigation into the complaint or pursuing any enforcement action in this instance.

Concerning the transfer of 2021 surplus funds into Chartisha Roberts 2022 Clark County Council race, pursuant to WAC 390-37-060(1)(d), the PDC is issuing a formal written warning to her about the requirement for a candidate to receive permission from contributors, whether the funds are active or surplus funds, prior to transferring those funds into the campaign account for a different office being sought. The formal written warning includes staff's expectation that Chartisha Roberts will adhere to the reporting requirements, including the provision to receive permission from contributors prior to transferring funds in the Campaign account for a different office being sought for any future candidacy. The Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
Compliance Officer

/s _____
Electronically Signed Peter Lavalley
PDC Executive Director



cc: Chartisha Roberts and Marsha Manning