



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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January 31, 2022

Delivered electronically to "eyeonwaelections@gmail.com"

Subject: Complaint regarding Students First (Dominique France, Angela Chapman, and Melissa Wells),  
PDC Case 100491

Dear Sylvia Schultz:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 4, 2021. Your complaint alleged Students First (Dominique France, Angela Chapman, and Melissa Wells) may have violated RCW 42.17A.260 by failing to file a report of Independent Expenditure Ads (C-6 report) disclosing details of a political mailer; and RCW 42.17A.240 by failing to disclose political committee expenditure description details.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; responses provided by Students First (Dominique France, Angela Chapman, and Melissa Wells); applicable PDC reports filed by Respondent; and spoke with Respondent, to determine whether the record supports a finding of one or more violations.

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

Post-Election C-4 Report (10/26-11/30/21)

- The Post-Election C-4 Report covering the period 10/26-11/30/21 was due 12/10/21 but was filed 24 days late on 1/3/22 because of personal matters that contributed to the late filing.

7-Day Pre General C-4 Report (10/12-10/25/21)

- On 12/28/21, PDC staff reminded Melissa Wells, Treasurer, to report as if Students First paid each vendor/subvendor directly. Staff instructed Students First to report the amounts paid to all subvendors when reporting payments to vendors, and any amount retained by the original vendor.
- Students First confirmed there were no subvendors for its 10/18/21 expenditure to Peerly for \$1,029.97 for peer-to-peer text messaging services.
- Students First confirmed its expenditure to Cornerstone Media LLC on 10/20/21 for \$1,215 was an expenditure to Northshore News for an ad in the Northshore News newspaper. Students First

confirmed the name of the vendor is Cornerstone Media LLC Doing Business As (DBA) Northshore News. On 1/31/22, Students First amended its timely filed C-4 to reflect the correct name of the vendor and to include the run dates for the ad in the description field.

#### 21-Day Pre-General C-4 Report (9/1-10/11)

- Students First confirmed there were no subvendors for its 10/7/21 expenditure to Vista Print for \$539.26 for pamphlets and flyers. The original C-4 was filed timely on 10/11/21 but did not report the number of items printed. The treasurer amended the C-4 on 11/8/21 to reflect the expenditure was to purchase 20,000 pamphlets and flyers. The Committee amended the C-4 again on 1/31/22 to reflect the size of the flyer.
- Students First confirmed there was one subvendor for its 9/27/21 expenditure to CRS Printing totaling \$19,055.23 for printing and mailing services. The one subvendor, United States Postal Service (USPS), received \$14,811.84 for postage. Students First confirmed CRS Printing retained the remaining \$4,243.39 for all remaining services associated with this expenditure. On 1/31/22, Students First amended its C-4 to list and describe these expenditures.

#### C-6 Report filed by Dmitry Grigorenko on 9/16/21 and by Students First as In-Kind Contribution

- A C-6 report was filed 9/16/21 for \$248.01, allocating \$82.67 equally between three candidates for Northshore School Board. The expenditure was for obtaining a domain name and for stickers.
- Students First also reported the \$248.01 expenditure as an in-kind contribution on its 21-day Pre-General Election C-4 report. Students First stated Dmitry Grigorenko obtained a domain name to support three candidates for school board and initially reported the expenditure as an Independent Expenditure on a C-6 Report, but later mutually decided with Students First to repurpose the expenditure as an in-kind contribution to Students First for the creation of its website. The in-kind contribution description stated, "Website Development for Students First."

#### Other Matters

- Electioneering Communications - Students First stated they did not file a C-6 Report of Electioneering Communications for its \$19,055.23 expenditure made 9/27/21, because it was their understanding a C-6 was not required when a communication qualified as a Sample Ballot/Slate Card, which they believed to be applicable because the mailing included at least three candidates. Students First stated they inquired during the Primary election and understood advertising they sponsored at that time qualified as a Sample Ballot/Slate Card because it included at least three candidates. PDC staff explained that, to qualify as a Sample Ballot/Slate Card, the material must comply with all the provisions in WAC 390-17-030, and that the material generated by the \$19,055.23 expenditure did not comply with all the provisions in WAC 390-17-030 and was required to be reported as an Electioneering Communication. On 1/31/22, Students First filed the required C-6 report and allocated the cost to the three candidates supported and the three candidates opposed.
- Occupation and Employer Information on C-3 Reports - Occupation and Employer information was missing for Katya Bautista who gave \$100 and \$25, making the occupation and employer information required. In addition, the Complaint alleged the occupation and employer information for Larry Chapman did not correspond with the occupation and employer information for the same individual listed on Angela Chapman's C-3 reports during her primary election campaign. Students First amended the missing or incomplete occupation and employer information.
- The complaint alleged the Font Size on some advertising may have been smaller than the allowed minimum size. Students First will be reminded of the minimum font size requirements.

- The complaint speculated Students First may have coordinated its activities with those of the three candidates supported by the PAC. Students First strongly denied this allegation, stating every filed report attests it is true and accurate and stating Students First decided to be independent of the three candidates supported and told the candidates they could not talk until after the election. No evidence was provided or uncovered to suggest otherwise.

While the Students First campaign made errors, the mitigating factors include: 2021 was the committee's first campaign; most reports were filed timely; and the committee's officers have worked diligently and cooperatively with PDC staff to correct the committee's filing discrepancies noted above.

Based on these findings, staff has determined that in this instance, the failure to provide complete expenditure descriptions, properly report subvendor information, include occupation and employer information, and file a C-6 for an electioneering communication does not appear to be a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Students First will receive a formal written warning concerning its failure to provide complete expenditure descriptions, properly report subvendor information, include occupation and employer information, and file a C-6 for an electioneering communication. The formal written warning will include staff's expectation that in future elections Students First timely files all required reports and that those reports include all required information. 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 finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director

cc: Students First (Dominique France, Angela Chapman, and Melissa Wells)