



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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February 3, 2022

Delivered electronically to "eyeonwaelections@gmail.com"

Subject: Complaint regarding Students First (Dominique France, Angela Chapman, and Melissa Wells) PDC Case 100734

Dear Sylvia Schultz:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 5, 2021. Your complaint alleged Students First (Dominique France, Angela Chapman, and Melissa Wells) may have violated RCW 42.17A.320 and .350 by failing to disclose full sponsor identification on political advertising, including required Top 5 and Top 3 sponsor information.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; responses provided by Students First (Dominique France, Angela Chapman, and Melissa Wells); 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:

- The complaint alleged the required sponsor identification Top 5 and Top 3 Contributor information was inaccurate for the committee's political advertising. Students First stated the Top 5 and Top 3 contributor information was accurate as of the date the advertising was presented to the advertiser, in accordance with WAC 390-18-025(1), which states, "The sponsor may calculate the twelve-month period from the date the advertisement is submitted to a third-party publisher for reasonably prompt publication, so long as there is no anticipated or intentional delay in the publication or presentation."
- Students First filed C-3 Report 110 056 447 showing receipt of a \$2,000 contribution from Snohomish County Republican Party on 10/12/21, three days before an ad in the Northshore News was ordered, indicating that Snohomish County Republican Party needed to be listed as a Top 5 Contributor and that its Top 3 non-PAC donors would also need to be identified. However, Students First has determined that its treasurer mistakenly listed the date the check was issued (10/12/21) as the date the contribution was received, rather than the actual date received, which was 10/16/21.

- On 1/31/22, PDC staff asked Students First to amend its C-3 Report to reflect the correct received date and on 2/2/22, Students First amended C-3 Report 110 056 447 to reflect that the \$2,000 contribution from Snohomish County Republican Party was received on 10/16/21, the day after the ad in the Northshore News was placed, meaning Snohomish County Republican Party was not a Top 5 Contributor when the order for the ad was placed.
- Students First also stated they updated the Top 5 and Top 3 Contributor information on multiple occasions for their website based on updated contributor information.

Students First (Dominique France, Angela Chapman, and Melissa Wells) made a minor or ministerial error by listing the wrong received date on a required C-3 report. This error did not materially impact the public interest, and upon notification of the error, Students First promptly amended its C-3 report, making the necessary technical corrections as requested by staff.

Based on these findings, staff has determined that in this instance, the alleged failure of Students First to include accurate Top 5 and Top 3 contributor information in the sponsor identification for its political advertising does not appear to be a violation warranting further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter as a technical correction 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 [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

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

Endorsed by,  
*Electronically Signed Kim Bradford*  
Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

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