



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

March 28, 2022

Delivered electronically to Norhshore School District at “[dkf@pattersonbuchanan.com](mailto:dkf@pattersonbuchanan.com)”  
& “[superintendent@nsd.org](mailto:superintendent@nsd.org)”

Subject: Complaint filed by Dmitry Grigorenko, PDC Case 102734

Dear Mr. Fobes:

Below is a copy of an electronic letter sent to Dmitry Grigorenko concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Grigorenko, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Although not part of the complaint, staff’s review of the content of the levy and bond materials found them to be potentially problematic. PDC staff is reminding you about the importance of limiting the content of information produced by the District regarding ballot propositions to factual information only. PDC staff expects in the future that you will produce a set of factual information about the necessity for a bond or levy and the financial impact of the ballot propositions in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Electronically signed

Jennifer Hansen  
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford  
Deputy Director  
For Peter Frey Lavallee  
Executive Director



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March 28, 2022

Delivered electronically to Dmitry Grigorenko at “grigorenko@gmail.com”

Subject: Complaint regarding Northshore School District, PDC Case 102734

Dear Mr. Grigorenko:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 8, 2022. The complaint alleged that Northshore School District (the District), a public school district serving King and Snohomish Counties, may have violated RCW 42.17A.555 for using of public facilities to promote a ballot proposition in the February 8, 2022 special election.

PDC staff reviewed the allegations; the applicable statutes, rules; *PDC Interpretation No. 01-03*; and the response provided by Attorney Duncan Fobes with Patterson Buchanan Fobes & Leitch Inc. P.S. on behalf of the Respondent, to determine whether the record supports a finding of one or more violations.

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

- Northshore School District Bond & Levies (Propositions 1, 2 & 3) were placed on the February 8, 2022 special election ballot.
- The District created a set of facts describing the reasons for the bond and levies and how the funds would be spent if the ballot propositions passed. This information was disseminated via mail, the District’s website and posted on social media, including Twitter.
- The complaint alleged that the Respondent paid for the promotion of advertisement regarding the February ballot propositions in a way that was not “normal and regular” or otherwise consistent with the usual practice of the District and that by doing so influenced the outcome of the election.
- PDC Interpretation No. 01-03 Guidelines for School Districts describes permissible activities of a publicly funded entity including the dissemination of “objective and fair presentation of the facts” which means that in addition to presenting facts, any materials should present accurately the costs and other anticipated impacts of a ballot measure. The Interpretation also allows a school district to distribute these materials in accordance with the normal and regular conduct of the school district.
- In his response, Mr. Fobes stated that the January 3, 2022, Twitter post included in the complaint was informational, was meant to educate the community about the ballot measures and not done in support or opposition to any ballot measures.
- Regarding the use of Twitter by the District as part of its normal conduct, Mr. Fobes’ response stated that it is common practice for the District to use paid advertisements to communicate with the community. Mr. Fobes included the District’s current use of social media platforms to advertise for employment opportunities within the District.

- In response to staff's inquiry regarding the District's historical use of paid advertisement, Mr. Fobes stated that from 2017 to 2022 the District spent a total of \$49,444 for paid advertising. Fifty-four percent was spent on levy and bond advertising, specifically including advertising for the 2018 ballot measures, while the remaining forty-six percent was used for other advertisement done by the District.

It appears that the District uses paid advertisement, including Twitter and other social media platforms, for levies, bonds, and other communication with the community and has done so with regularity for the last five years.

Based on our findings staff has determined that, in this instance regarding the use of paid advertisement and social media posts to communicate information about the February bond and levies, no evidence supports a finding of a violation that warrants further investigation.

However, although not part of the complaint, staff's review of the content of the levy and bond materials found them to be potentially problematic. PDC staff is reminding Northshore School District about the importance of limiting the content of information produced by the District regarding ballot propositions to factual information only in accordance with the statutes, rules and PDC Interpretation No. 01-03.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed

Jennifer Hansen  
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

cc: Northshore School District