

<b>Respondent Names</b>
Vistaprint
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#"><u>Conner Edwards</u></a> reported via the portal <i>(Wed, 23 Apr 2025 at 11:04 AM)</i>  See complaint.
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint & PDC website.
<b>List of potential witnesses with contact information to reach them</b>
See complaint & PDC website.
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

**Complaint Against: Vistaprint****Submitted:** 4/23/2025**Notice to Respondent Due By:** 5/3/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 7/22/2025 per RCW 42.17A.755(3)**Statutes Violated:** RCW 42.17A.345, see also WAC 390-18-050**Background****Commercial Advertiser Disclosure Law**

Washington state law allows any member of the public to request information about a political advertisement from the company that provided the advertising.<sup>1</sup> These companies are referred to as “commercial advertisers” in the law.

This disclosure, which dates back 50 years to Initiative 276 which created the PDC, is an important counterpart to the reporting done by campaigns and sponsors of independent expenditures. It also provides critical information when sponsors of political advertising fail to identify themselves.

A commercial advertiser is defined as any person or entity that sells a service communicating messages or producing material for distribution to the public, when the message includes an appeal for votes or financial support in an election campaign.

Examples include, but are not limited to, print shops, copying center businesses, direct mail services, billboard companies, broadcasters, print or online publications and online digital platforms. See RCW 42.17A.005(10), RCW 42.17A.345 and WAC 390-18-050.

**Violations**

On June 28, 2024, I e-mailed a request to inspect the books of account for this respondent. The books were not provided. I filed a complaint which was posted to the PDC’s website. No update has been posted to that case file in more than 6 months. I was ultimately unable to inspect the company’s books of account prior to the November 2024 general election.

By all outward indications, the PDC is doing absolutely nothing to bring this commercial advertiser into compliance. This is especially disappointing because Vistaprint is one of the largest commercial advertisers utilized by campaigns in WA state.

For this reason, on April 11, 2025, I sent a new request to inspect the books of account of Vistaprint. I gave the company until April 18, 2025 to respond. No response was received. To date, I have been unable to inspect the books of account for this company.

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<sup>1</sup> <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide>

## **Conclusion**

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I am filing this complaint with the hope that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

/s/ Conner Edwards  
(425) 533-1677 cell

## **Notice to Respondent**

I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff.

This complaint is one of over one thousand complaints that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

**“Be the change that you wish to see in the world.”  
— Mahatma Gandhi**



Conner Edwards &lt;cg.edwards53@gmail.com&gt;

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## RCW 42.17A.345 Book Inspection Request

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**Conner Edwards** <cg.edwards53@gmail.com>

Fri, Apr 11, 2025 at 11:21 AM

To: PublicRelations@vistaprint.com, PDC Support &lt;pdcc@pdcc.wa.gov&gt;

Hello:

I have still not received a response to my request.

If I do not hear back from you by this coming Friday (April 18, 2025), I intend to file a new PDC complaint.

-Conner

On Mon, Jul 1, 2024 at 2:55 PM Conner Edwards &lt;cg.edwards53@gmail.com&gt; wrote:

Hello:

Per RCW 42.17A.345, I am requesting to view your commercial advertising books of account.

See link for additional information: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide> .

If you have questions about this request, you should call the PDC @ (360) 753-1111.

If I do not receive the records I am requesting by 5:00 PM PST on 7/5/24, I intend to file a complaint.

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Best,

Conner Edwards

----- Forwarded message -----

From: **Vistaprint US** <customer.service@vistaprint.com>

Date: Mon, Jul 1, 2024 at 1:40 PM

Subject: RE: Vistaprint: Thank you for contacting us [ thread::xQ5yfkGocRac4DmZ8Cu8Kwl:: ]

To: cg.edwards53@gmail.com &lt;cg.edwards53@gmail.com&gt;

Hi Conner,

Thanks for contacting Vistaprint.

Welcome back to Vista! I hope you're having a wonderful evening.

I apologize for the delayed response to your question. To better assist with your request, I recommend sending an email to [PublicRelations@vistaprint.com](mailto:PublicRelations@vistaprint.com). Our team will be able to provide you with the advice you need.

I hope this information is helpful. It has been a pleasure assisting you. Should you have any additional questions or concerns, please feel free to reply directly to my email. I'm always here to help.

Thank you for choosing Vista, Conner. Your patience and understanding mean a lot to us, and we are committed to resolving any issues promptly for you.

Sincerely

Carrest  
Customer Care Specialist



----- Original Message -----

From: Conner Edwards [cg.edwards53@gmail.com]

Sent: 6/28/2024 4:58 PM

To: customer.service@vistaprint.com

Subject: New Order - Document Assistance

Hello:

Per RCW 42.17A.345, I am requesting to view your commercial advertising books of account.

See link for additional information: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide> .

Please let me know if you need additional information from me to process this request.

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Best,

Conner Edwards

thread::xQ5yfkGocRac4DmZ8Cu8Kwl::

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Best,

Conner Edwards  
(425) 533-1677 cell



Sender notified by  
Mailtrack

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Best,

Conner Edwards  
(425) 533-1677 cell