



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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September 16, 2025

Delivered electronically to [pmcdermott@vista.com](mailto:pmcdermott@vista.com) and [stephen.anderson@vista.com](mailto:stephen.anderson@vista.com)

Subject: PDC Case 157887

Paul McDermott, Vice President and General Counsel:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on July 29, 2024 and April 23, 2025. The complaints alleged VistaPrint violated RCW 42.17A.345 and WAC 390-18-050 by failing to respond to a request to inspect a commercial advertiser's books-of-accounts.

Applicable Laws & Rules

[RCW 42.17A.345](#) requires each commercial advertiser who has accepted or provided political advertising or electioneering communications associated with a Washington state entity to:

- 1) maintain current books-of-account and related materials and
- 2) make them available and open for inspection during normal business hours during the election and for a period of no less than five years after the date of the applicable election.

The books-of-account shall include the following:

- 1) the names and addresses of persons from whom the commercial advertiser accepted political advertising or electioneering communications;
- 2) the exact nature and extent of the services rendered; and
- 3) the total cost and the manner of payment for the services.

[WAC 390-18-050](#) states that commercial advertiser books of account information must be made available for public inspection by any person in one of the following manners:

- 1) in person during normal business hours;
- 2) electronically, in machine readable format and structured in a way that enables the data to be fully discoverable and usable by an end user;

- 3) by digital transmission, such as email, promptly upon request, but no later than two business days; or
- 4) by online publication on the advertiser's primary website or on a website created for this purpose that is controlled by the advertiser, if a link is prominently displayed on the advertiser's primary website directing users to the latter.

Commercial advertiser books-of-account must be updated within 24 hours of the distribution or broadcast of an advertisement or communication and any updates or changes to this information. WAC 390-18-050(6) & (7) provide a detailed list of the information to be maintained and made available for public inspection, including but not limited to: 1) the name of the candidate or ballot proposition supported or opposed; 2) a copy of the advertisement or communication; 3) the name and address of the sponsor of the advertising or communication; 4) dates of service; 5) the total cost; 6) payment information; and 7) a description of the major work components or tasks performed.

### Background & Findings

- Conner Edwards first submitted a request to view VistaPrint's commercial advertiser books-of-account on July 1, 2024. Edwards then filed a complaint with the PDC on July 29, 2024, providing an email sent to "publicrelations@vistaprint.com" and stating no response was received.
- PDC staff made initial contact with VistaPrint on Aug. 9, 2024, receiving a response Aug. 19, 2024, which stated the company was "eager to discuss this matter with...the PDC staff."
- The company's initial response also noted:
  - VistaPrint is the largest business unit of Cimpress plc, an Irish publicly-traded company, and is operated through a number of Cimpress global subsidiary companies.
  - VistaPrint is a global e-commerce brand that aims to be the marketing and design partner to small businesses in the US, Canada, Europe, Australia, New Zealand, and elsewhere. VistaPrint serves its customers through its [www.vistaprint.com](http://www.vistaprint.com) website and 20+ country-specific websites.
- PDC staff began meeting with VistaPrint in late August 2024 and learned VistaPrint was not familiar with the requirements of RCW 42.17A.345 and WAC 390-18-050.
- VistaPrint representatives also noted it would continue to do business in Washington but stated there would be extensive technical requirements to change its business practices in order to reach compliance.
- While working to reach compliance, VistaPrint representatives regularly updated PDC staff.
- Conner Edwards filed a second complaint on April 23, 2025, providing emails sent to [customer.service@vistaprint.com](mailto:customer.service@vistaprint.com), to which a return email directed the request to [publicrelations@vistaprint.com](mailto:publicrelations@vistaprint.com). No response was received.
- In May 2025, PDC staff was provided a proposed compliance solution from VistaPrint, which displayed how the company would provide customers the ability to report an online order as political advertising and also how the company would communicate to its customers both the need to report and what the company would provide to those

requesting the information in accordance with RCW 42.17A.345 and WAC 390-18-050.

- As of this writing, VistaPrint provides the following information:
  - <https://www.vistaprint.com/legal-matters>
  - <https://www.vistaprint.com/wa-campaign-finance-disclosure-law-matters>
- The Respondent does not have any previous warnings/violations of PDC requirements.

### Summary and Resolution

Noncompliance appears to be the result of a good-faith lack of knowledge of RCW 42.17A.345 and WAC 390-18-050 and a lack of understanding that commercial advertiser books-of-account requests may be broad and span multiple years. The company made necessary changes to its external and internal business process and took steps to develop a process by which they can better respond to commercial advertiser books-of-account inspections in the future.

Based on our findings, PDC staff has determined that, in this instance, failure to respond to a request and have its commercial advertiser books-of-account available for inspection does not amount to a violation that warrants further investigation.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning VistaPrint's failure to respond and have commercial advertiser books-of-account available for inspection as required. PDC staff expect VistaPrint to maintain current commercial advertiser books-of-account available for inspection in the future. The Commission will consider this 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 has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, contact Alice Fiman at 1-877-601- 2828 or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically signed by Alice Fiman*

Alice Fiman  
Compliance Manager

Endorsed by,

*Electronically signed by Peter Frey Lavallee*

Peter Frey Lavallee  
Executive Director

cc: Conner Edwards