

Respondent Name
Hulu/Disney Streaming/The Walt Disney Company
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Fri, 11 Oct 2024 at 1:12 PM) Description of Complaint See attached complaint. 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 with a so-called "warning letter". This complaint is one of hundreds 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 Overcomplicated and outdated requirements that are difficult to understand and comply with.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
What impact does the alleged violation(s) have on the public?
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.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them
See complaint and also PDC website.
Certification (Complainant)

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.



Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Request (Hulu - 10/8/24)

Conner Edwards <cg.edwards53@gmail.com>

Tue, Oct 8, 2024 at 12:04 AM

To: hulu.legal@disney.com

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.

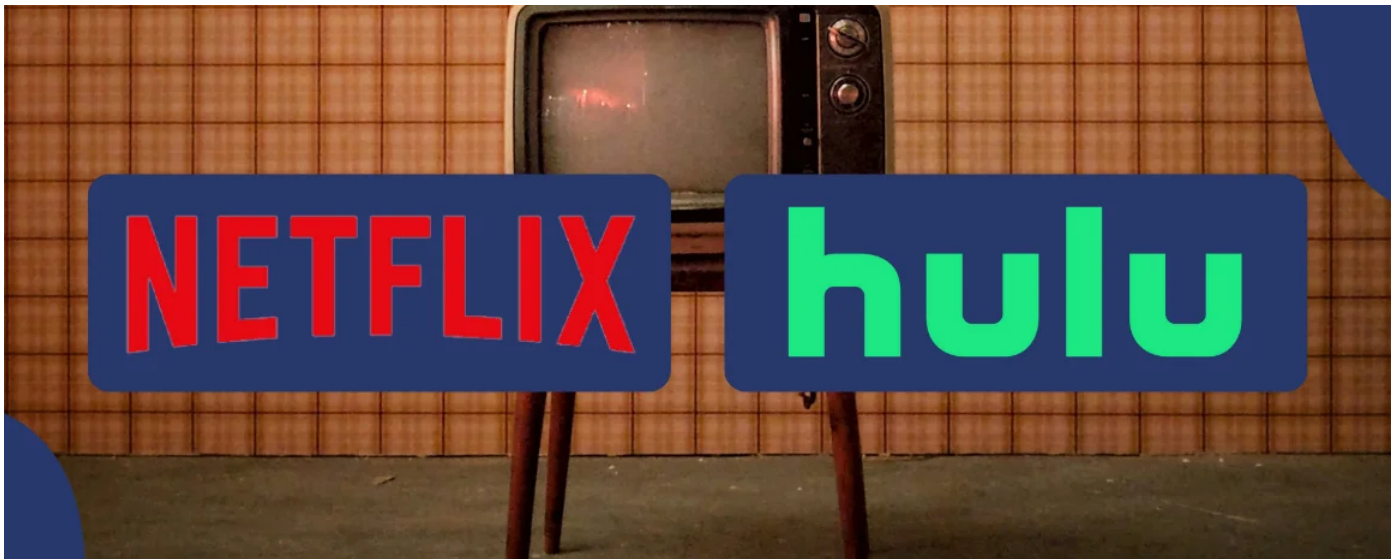
—

Best,

Conner Edwards
(425) 533-1677 cell

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Who Owns Netflix and Hulu?

**Written by**

AdSkate

Published on

July 30, 2024

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Who Owns Netflix and Hulu?

Streaming services have become a prominent part of our entertainment landscape, allowing us to access a wide array of movies, TV shows, and documentaries at our convenience. Two of the most popular streaming platforms, Netflix and Hulu, have revolutionized the way we consume media. But have you ever wondered who actually owns these giants? In this article, we will delve into the ownership structure of Netflix

and Hulu, exploring their origins, current stakeholders, and the future predictions for these [streaming services](#).

Understanding the Structure of Streaming Services

Before we dive into the specifics, it is important to understand the business model behind streaming platforms. The streaming industry operates by licensing and distributing content over the internet, allowing users to access it through a subscription-based model. This model relies on a vast library of movies, TV shows, and original content, which makes it appealing to millions of viewers worldwide.

Streaming services generate revenue through monthly subscriptions, which provide users with unlimited access to their extensive catalog. Additionally, they often offer tiered pricing plans that grant access to different features, such as high-definition streaming and ad-free viewing.

The Business Model of Streaming Platforms

One key aspect of the streaming industry's business model is the licensing agreements with content producers. These agreements determine which movies and TV shows will be available on the platform and for what duration. For example, Netflix may secure a licensing deal with a production company to exclusively stream their content for a specific time period.

These licensing agreements are crucial for streaming platforms to secure popular and in-demand content. Negotiations between streaming platforms and content producers can be complex, involving factors such as exclusivity, territorial rights, and revenue sharing. It is a delicate dance to strike a balance between providing a diverse range of content to attract subscribers and managing the costs associated with licensing fees.

Furthermore, streaming platforms invest heavily in producing original content to attract new subscribers and retain existing ones. This strategy allows them to differentiate themselves from competitors and create a unique offering that keeps viewers engaged. Original content can range from blockbuster movies to critically acclaimed TV series, providing a wide variety of options for viewers to choose from.

Producing original content comes with its own set of challenges. Streaming platforms need to carefully analyze market trends, audience preferences, and production costs to ensure that their investments in original content yield positive returns. It is a high-stakes game, as a successful original production can become a major draw for subscribers, while a poorly received one can result in financial losses.

Key Players in the Streaming Industry

The streaming industry is fiercely competitive, with several key players vying for viewers' attention. Besides Netflix and Hulu, other major players include Amazon Prime

Video, Disney+, and Apple TV+. Each platform offers its own compelling features and exclusive content to attract subscribers.

Moreover, traditional media companies such as HBO, CBS, and NBC have also entered the streaming space with their respective platforms, contributing to the growing market competition. This expansion of streaming services by traditional media companies demonstrates the shifting landscape of the entertainment industry, as they adapt to changing consumer preferences and the rise of digital platforms.

As the streaming industry continues to evolve, competition among these key players will only intensify. Viewers can expect to see more innovative features, exclusive content, and strategic partnerships as streaming platforms strive to capture and retain their audience's attention.

The Ownership of Netflix

Now, let's take a closer look at the ownership structure of Netflix. The popular streaming service was [founded in 1997](#) by Reed Hastings and Marc Randolph, with the initial goal of providing a convenient way to rent DVDs through mail delivery.

The Founding of Netflix

Reed Hastings, a technology entrepreneur, conceived the idea for Netflix after facing a hefty late fee charge on a rented movie. This experience sparked the vision of a service that would eliminate late fees and revolutionize the way people consume media. Alongside Marc Randolph, Hastings launched Netflix, laying the foundation for an entertainment powerhouse.

As Netflix gained momentum, it transitioned from a DVD rental service to a streaming giant, reshaping the entertainment landscape. The company's innovative approach to content delivery and personalized recommendations quickly attracted a large subscriber base, propelling Netflix to the forefront of the industry.

Current Shareholders and Stakeholders

Netflix, being a publicly traded company, has a diverse range of shareholders. The largest shareholders include institutional investors such as [Vanguard Group and BlackRock](#), each holding a significant stake in the company. Additionally, Reed Hastings himself remains one of the largest individual shareholders.

Furthermore, Netflix has partnered with various production companies to create original content, thus establishing strong relationships with key stakeholders in the entertainment industry.

These partnerships have not only expanded Netflix's content library but have also solidified its position as a major player in the competitive streaming market. By collaborating with renowned studios and talented creators, Netflix continues to produce award-winning shows and movies that captivate audiences worldwide.

The Ownership of Hulu

Turning our attention to Hulu, this streaming service has an intriguing history of ownership and partnerships. Hulu was [launched in 2007](#) as a joint venture between three major media companies: NBCUniversal, Fox Entertainment Group, and Disney-ABC Television Group.

The Creation of Hulu

The collaboration between NBCUniversal, Fox Entertainment Group, and Disney-ABC Television Group aimed to create a streaming service that would compete with other emerging platforms. This joint venture allowed Hulu to access a vast library of TV shows and movies from its parent companies.

Furthermore, Hulu's inception marked a significant shift in the entertainment industry, as it was one of the first major attempts by traditional media companies to enter the digital streaming market. This move was a response to the changing viewing habits of consumers, who were increasingly turning to online platforms for their entertainment needs.

Current Ownership and Stakeholders

Hulu's [ownership structure](#) has seen several changes over the years. As of now, Hulu is majority-owned by The Walt Disney Company after its acquisition of 21st Century Fox. Disney holds a 67% stake in Hulu, effectively making it the controlling shareholder. The remaining 33% belongs to Comcast/NBCUniversal.

With Disney's acquisition of 21st Century Fox, the landscape of media ownership underwent a significant transformation. This consolidation of power in the hands of a few major players has raised concerns about competition and diversity in the industry, prompting regulatory scrutiny and debate.

Comparing Netflix and Hulu

Now that we have discussed the ownership of both Netflix and Hulu, let's delve into a comparison of these two streaming giants. While both platforms offer a wide range of content, there are notable differences in their business strategies and market positioning.

Differences in Business Strategies

Netflix focuses on a subscription-only model, offering a vast library of content from various genres and sources, including original shows and movies that have gained critical acclaim. Their strategy is centered around providing an extensive catalog for binge-watchers, catering to the diverse tastes of their global subscriber base.

But what sets Netflix apart is not just the quantity of content, but also the quality. They have made a name for themselves by investing heavily in producing original content, resulting in groundbreaking shows like "Stranger Things" and "House of Cards." These

shows have not only captivated audiences worldwide but have also garnered numerous awards and critical acclaim. Netflix's commitment to creating innovative and compelling content has set them apart from their competitors.

In contrast, Hulu has adopted a hybrid model, offering both a subscription-based service and an ad-supported free tier. This unique approach allows users to access a limited selection of content without paying a subscription fee, with the option to upgrade to an ad-free experience if desired.

By offering a free tier, Hulu has managed to attract a wider audience, including those who might be hesitant to commit to a monthly subscription. This strategy has proven successful in capturing the attention of viewers who are looking for an alternative to traditional cable and satellite subscriptions. Additionally, Hulu's next-day streaming for popular TV shows has made it a go-to platform for those who want to stay up-to-date with their favorite series without the hassle of waiting.

Impact on the Streaming Market

Both Netflix and Hulu have played instrumental roles in shaping the streaming market. Netflix, being the pioneer of the streaming media concept, has revolutionized the way content is produced and consumed. They took a bold step by shifting from the traditional DVD rental business to a streaming platform, and it paid off. Their success has not only inspired other streaming services but has also forced traditional media companies to adapt and embrace the digital era.

However, Hulu has also made a significant impact on the streaming market. By providing a platform for networks to distribute their shows, Hulu has given them an opportunity to reach a wider audience. This has led to a shift in the way TV shows are distributed, with many networks now opting for simultaneous streaming on Hulu to cater to the growing number of cord-cutters. Hulu's presence has challenged the dominance of traditional cable and satellite subscriptions, giving viewers more choices and flexibility in how they consume their favorite content.

In conclusion, while both Netflix and Hulu are major players in the streaming industry, their business strategies and market positioning set them apart. Netflix's focus on a subscription-only model and investment in original content has solidified its position as a global powerhouse, while Hulu's hybrid model and emphasis on next-day streaming have made it a popular choice for those looking for an alternative to traditional TV subscriptions. Together, these two streaming giants have reshaped the way we watch and enjoy entertainment.

Future Predictions for Netflix and Hulu

As the streaming industry continues to evolve, it is interesting to consider the potential changes in ownership for Netflix and Hulu. While the current ownership structures have proven successful, the landscape may shift in the coming years.

Potential Changes in Ownership

Rumors of potential mergers and acquisitions have circulated within the industry, suggesting that both Netflix and Hulu could be subject to changes in ownership. The constantly shifting market dynamics and the entry of new players could lead to strategic partnerships or consolidation.

For instance, industry insiders have speculated about the possibility of a merger between Netflix and a major telecommunications company. This partnership could allow Netflix to leverage the telecommunications company's extensive infrastructure and customer base, while also providing the telecommunications company with a strong foothold in the streaming market.

Additionally, there have been talks of major media conglomerates expressing interest in acquiring Hulu. The allure of Hulu's extensive library of content and its established subscriber base has attracted attention from companies looking to expand their streaming offerings. Such a move could potentially lead to a significant shift in the streaming landscape, as the new owner may bring their own unique strategies and content to the platform.

The Future of Streaming Services

Looking ahead, the future of streaming services seems promising but uncertain. With technological advancements, increasing competition, and changing viewer preferences, the industry is poised for continuous evolution.

One potential area of growth for both Netflix and Hulu is the expansion into international markets. As more countries embrace streaming platforms, there is a vast untapped audience waiting to be captivated by the diverse range of content these platforms offer. By tailoring their offerings to different cultural preferences and investing in localized content, Netflix and Hulu can establish a strong global presence and tap into new revenue streams.

Furthermore, the future of streaming services may see a shift towards more interactive and immersive viewing experiences. Virtual reality (VR) and augmented reality (AR) technologies are rapidly advancing, and incorporating these technologies into the streaming experience could revolutionize how audiences engage with content. Imagine being able to step into your favorite TV show or movie, interacting with characters and exploring their world in a whole new way.

In conclusion, Netflix and Hulu have firmly established themselves as leaders in the streaming industry, providing millions of users with entertainment on demand. While Netflix is a publicly traded company with a diverse range of shareholders, Hulu is majority-owned by The Walt Disney Company. The unique strategies and offerings of these platforms have had a profound impact on the way we consume media. As the streaming industry continues to evolve, only time will tell what future ownership changes and innovations lie ahead for these industry giants.

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Hulu

X

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Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ No on 2117	2024	Political Committee	Trilogy Interactive LLC	08/19/2024	\$2,052.00	Hulu Digital Ads: 9/3-10/7 31,569.3 imp
+ Robert W. Ferguson (Bob Ferguson)	2024	Candidate	Screen Strategies Media	07/24/2024	\$33,625.80	Hulu (Chicago, IL) - Digital Ads: 7/29-8/6
+ Adison Richards	2024	Candidate	Tahoma Public Affairs BV	07/23/2024	\$850.00	Hulu (2500 Bway, Santa Monica, CA 904 roll (7/11-8/06, 15,741 Imp)
+ Brian K Bogen (Brian Bogen)	2024	Candidate	Sermo Digital	07/22/2024	\$15,000.00	Hulu ads 7/19-8/6
+ Brian K Bogen (Brian Bogen)	2024	Candidate	Sermo Digital	07/22/2024	\$5,000.00	Hulu Ads 7/29-8/6
+ Robert W. Ferguson (Bob Ferguson)	2024	Candidate	Screen Strategies Media	07/18/2024	\$33,625.80	Hulu (Chicago, IL) - Digital Ads: 7/22-7/2
+ Robert W. Ferguson (Bob Ferguson)	2024	Candidate	Screen Strategies Media	07/10/2024	\$33,625.80	Hulu (Chicago, IL) - Digital Ads: 7/15-7/2
+ Robert W. Ferguson (Bob Ferguson)	2024	Candidate	Screen Strategies Media	06/28/2024	\$33,625.80	Hulu (Chicago, IL) - Digital Ads: 7/8-7/14
+ Defend Washington	2024	Political Committee	Screen Strategies Media	06/20/2024	\$62,000.00	Hulu Ads 6/25-7/2, Xfinity Ads 6/25-7/2
+ Robert W. Ferguson (Bob Ferguson)	2024	Candidate	Screen Strategies Media	06/20/2024	\$36,720.00	Hulu (Chicago, IL) - Digital Ads: 6/24-7/7
+ Adam C. Fortney (Adam Fortney)	2023	Candidate	Sermo Digital	10/25/2023	\$7,000.00	Hulu Ads (Flight: 10/26-11/07)
+ Janelle Cass	2022	Candidate	SERMO DIGITAL	10/28/2022	\$6,555.00	Hulu advertising: 10/28-11/8
+ Julie Anderson	2022	Candidate	SERMO DIGITAL	10/27/2022	\$10,000.00	HULU ads, 169,461 impressions - 10/28

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Emily Randall	2022	Candidate	Ravenna Strategies, LLC	10/13/2022	\$10,000.00	Hulu (Santa Monica, CA) - Online Ads: 1C
+ Spencer W. Hutchins (Spencer Hutchins)	2022	Candidate	FP1 STRATEGIES	10/07/2022	\$20,000.00	HULU: 10/7-11/8
+ Spencer W. Hutchins (Spencer Hutchins)	2022	Candidate	FP1 STRATEGIES	07/22/2022	\$8,000.00	HULU: Digital Ads 7/22 - 8/2
+ Developing a Robust Economy for Washington (Washington State Republican Party) (DREW PAC)	2022	Political Committee	FP1 DIGITAL, LLC	07/07/2022	\$7,499.00	Hulu Streaming Advertising: Support Go
+ Developing a Robust Economy for Washington (Washington State Republican Party) (DREW PAC)	2022	Political Committee	FP1 DIGITAL, LLC	07/07/2022	\$7,499.00	Hulu Streaming Advertising: Support Tag
+ Developing a Robust Economy for Washington (Washington State Republican Party) (DREW PAC)	2022	Political Committee	FP1 DIGITAL, LLC	07/07/2022	\$7,499.00	Hulu Streaming Advertising: Support Tag
+ Developing a Robust Economy for Washington (Washington State Republican Party) (DREW PAC)	2022	Political Committee	FP1 DIGITAL, LLC	07/07/2022	\$7,499.00	Hulu Streaming Advertising: Support Kei
+ Developing a Robust Economy for Washington (Washington State Republican Party) (DREW PAC)	2022	Political Committee	FP1 DIGITAL, LLC	07/07/2022	\$7,499.00	Hulu Streaming Advertising: Support Les

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Bruce A. Harrell	2021	Candidate	Screen Strategies Media	10/22/2021	\$7,012.50	Subvendor: Hulu-TV Advertising 10/26-1
+ Bruce A. Harrell	2021	Candidate	Screen Strategies Media	10/14/2021	\$7,012.50	Subvendor: Hulu-TV Advertising 10/19-1
+ Bruce A. Harrell	2021	Candidate	Screen Strategies Media	10/07/2021	\$7,012.50	Subvendor: Hulu-TV Advertising 10/12-1
+ Bruce A. Harrell	2021	Candidate	Screen Strategies Media	10/04/2021	\$7,012.50	Subvendor: Hulu-TV Advertising 10/4-10
+ Dana Ralph	2021	Candidate	SERMO DIGITAL	09/17/2021	\$11,500.00	Hulu ad flight
+ Essential Workers for Lorena	2021	Political Committee	JOAQUIN ROSS MEDIA	07/30/2021	\$4,800.00	JOAQUIN ROSS MEDIA,BEE MEDIA AD F HULU
+ Colleen C. Echohawk (Colleen Echohawk)	2021	Candidate	Sage Media	07/21/2021	\$5,584.50	Media Advertising: Hulu 7/27-8/03
+ Colleen C. Echohawk (Colleen Echohawk)	2021	Candidate	Sage Media	07/15/2021	\$5,584.50	Media Advertising: Hulu 7/20-7/26
+ James Dow Constantine (JAMES CONSTANTINE)	2021	Candidate	Ravenna Strategies LLC	07/13/2021	\$6,500.00	Hulu: Digital Ads 7/14-8/3
+ Colleen C. Echohawk (Colleen Echohawk)	2021	Candidate	Sage Media	07/08/2021	\$5,584.50	Media Advertising: Hulu 7/13-7/19
+ Colleen C. Echohawk (Colleen Echohawk)	2021	Candidate	Sage Media	07/06/2021	\$5,584.50	Media Advertising: Hulu 7/8-7/12
+ PRICE JOHNSON HELEN C (Helen Price Johnson)	2020	Candidate	CERILLION N4 PARTNERS	10/14/2020	\$1,014.00	HULU DIGITAL ADS 10/6 TO 11/3 CONSI
+ ALICIA J RULE (Alicia Rule)	2020	Candidate	Cerillion N4 Partners	10/09/2020	\$6,500.00	Subvendor: Hulu-OTT advertising; 10/3 t
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	10/04/2020	\$50,000.00	DIGITAL ADVERTISING: LD17/HARRIS/S PANDORA, 10/5-11/3

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	10/04/2020	\$50,000.00	DIGITAL ADVERTISING: LD17/KRAFT/OF 10/5-11/3
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/28/2020	\$55,000.00	DIGITAL ADVERTISING: LD42/SEFZIK/O VIDEO
+ Jay R Inslee (JAY INSLEE)	2020	Candidate	Trilogy Interactive	09/28/2020	\$44,000.00	Hulu: Digital Advertising
+ Mark D. Mullet (MARK MULLET)	2020	Candidate	Winpower Strategies	09/28/2020	\$7,650.00	Digital Ads via Hulu 9/30-11/3 (109,921
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/25/2020	\$54,250.00	DIGITAL ADVERTISING: LD10/PRICE JO PANDORA 9/28-11/3
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/25/2020	\$54,250.00	DIGITAL ADVERTISING: LD10/MUZZALL PANDORA 9/28-11/3
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/25/2020	\$100,000.00	DIGITAL ADVERTISING: LD10/BRUCH/O 9/28-11/3
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/25/2020	\$150,000.00	DIGITAL ADVERTISING: LD28/O'BAN/OF 9/28-11/3
+ NEW DIRECTION PAC	2020	Political Committee	RAVENNA STRATEGIES	09/22/2020	\$25,000.00	DIGITAL ADVERTISING: LD42/RULE/SUF 9/23-11/3
+ Michael Vaska (Michael K. Vaska)	2020	Candidate	Media Plus	07/30/2020	\$5,000.00	Hulu streaming video
+ Approve Prop 1 EvergreenHealth Sponsored by EvergreenHealth Foundation	2019	Political Committee	SERMO DIGITAL	07/16/2019	\$17,165.00	PLACEMENT OF HULU ADVERTISING (HI 15, NY, NY, 10003)
+ OUR WASHINGTON	2012	Political Committee	RISING TIDE INTERACTIVE LLC	10/22/2012	\$104,000.00	ADS- HULU,DSPOLITICAL,YUME,AOL,VALUECL
+ OUR WASHINGTON	2012	Political Committee	RISING TIDE INTERACTIVE LLC	10/11/2012	\$96,314.59	ADS- HULU,DSPOLITICAL,YUME,AOL,VALUECL
+ OUR WASHINGTON	2012	Political Committee	RISING TIDE INTERACTIVE LLC	10/01/2012	\$107,500.00	ONLINE AD- HULU,VALUECLICK,YUME,ADAPTV,BRIGI

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Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description	City
Daniel G Griffey (Dan Griffey)	2020	Candidate	HULU LLC	09/21/2020	\$5,293.92	TV ADVERTISING	CHICAGO
Drew C. MacEwen	2022	Candidate	HULU LLC	09/19/2022	\$11,794.04	TV commercials	CHICAGO
Drew C. MacEwen (DREW MACEWEN)	2020	Candidate	HULU LLC	09/15/2020	\$5,000.02	VIDEO COMMERCIAL FOR OCTOBER	CHICAGO
Jackson Legacy Fund (JLF)	2024	Political Committee	Hulu	07/24/2024	\$1,364.37	Streaming Ads 7/25-8/6 50,532 imp supporting Ritchie	Santa Monica
Kristen B. Wynne (Kristen Wynne)	2023	Candidate	Hulu	10/23/2023	\$7,500.00	Advertising: 10/19 - 11/07	Santa Monica
NEW DIRECTION PAC	2022	Political Committee	HULU	10/18/2022	\$8,500.00	Paid to RAVENNA STRATEGIES. Digital Advertising: LD10/Paul/Support, 10/20-11/8	Santa Monica
NEW DIRECTION PAC	2022	Political Committee	HULU	09/23/2022	\$5,416.01	Paid to SWAY. Digital Advertising x91,807: LD26/Young/Oppose, 9/27-11/8	Santa Monica
NEW DIRECTION PAC	2022	Political Committee	HULU	10/06/2022	\$5,000.00	Paid to RAVENNA STRATEGIES. Digital Advertising x140,000: LD42/Sefzik/Oppose, 10/7-11/8	Santa Monica
NEW DIRECTION PAC	2022	Political Committee	HULU	10/06/2022	\$5,000.00	Paid to RAVENNA STRATEGIES. Digital Advertising x140,000: LD42/Shewmake/Support, 10/7-11/8	Santa Monica
PRICE JOHNSON HELEN C (Helen Price Johnson)	2020	Candidate	HULU	10/19/2020	\$5,766.00	DIGITAL ADS 10/6 TO 11/3	SANTA MONICA

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Complaint Against: Hulu/Disney Streaming/The Walt Disney Company

Submitted: 10/11/24

Notice to Respondent by: 10/21/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 1/9/25 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.¹ 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.

Hulu

Hulu is one of the most prominent streaming media companies currently operating in the United States. Hulu is majority-owned by The Walt Disney Company. Hulu is a large and sophisticated company with access to highly skilled attorneys and compliance advisors.

Over the last several election cycles, there have been numerous political expenditures reportedly having been made to Hulu. See attached.

Violations

On Tuesday, October 8, 2024, I sent an e-mail to the e-mail address listed as being the contact point for the company’s legal team. See attached.

As a Washington State registered voter, I believe that the information contained in commercial advertisers’ books of account is useful because it allows one to determine whether political committees are timely and accurately reporting expenditures/debts/in-kind contributions.

I have not received a response to my request made pursuant to RCW 42.17A.345.

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

WAC 390-18-050(4)(b)(i) requires that the information required to be maintained by commercial advertisers must be provided “[b]y digital transmission, such as email, promptly upon request, but no later than two business days”.

Tuesday was the first business day following the request. Wednesday was the second business day following the request, and Thursday was the third business day following the request.

Conclusion

Because of the rapidly approaching 2024 general election and my desire to view these records, I am unwilling to wait longer to see if the respondent complies with their statutory obligations. I am filing this complaint with the hopes that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

Best,

/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 with a so-called "warning letter".

This complaint is one of hundreds 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

The screenshot shows the Hulu Help Center page. The header includes the Hulu logo, a 'Help Center' button, and navigation links for 'Home', 'Help Topics', and 'Contact Us'. A search bar on the right asks 'How can we help?'. The main content area is titled 'For additional requests, please see below:' and lists several contact options:

- **Press Inquiries** — Find detailed company info on our [Media Info page](#), or contact our [media team](#)
- **Advertisers** — To advertise on Hulu, please visit our [advertising page](#)
- **Content Owners** — To get your video content onto Hulu, please contact our [content team](#)
- **Distribution** — If you are interested in using Hulu content on your site, please contact our [distribution team](#)
- **Privacy Concerns** — Please review our [Privacy Policy](#) or contact our [privacy team](#)
- **Copyright Infringement Claims** — Contact us [here](#)
- **Legal Questions** — Please see our [Terms of Use](#) or contact our [legal team](#)
- **Jobs** — Visit our [Jobs](#) section
- **Verification of Employment** — Please [review these instructions](#) and visit www.VeriSafeJobs.com to request an employment verification.

On the right side, there is a vertical menu with links: 'Viewing', 'Unlimited Screen', 'Hulu Watch Pa', and 'Video Quality'. At the bottom, there is a feedback section with the email 'mailto:hulu.legal@disney.com' and a question 'Did this help answer your question?' with 'Yes' and 'No' buttons.

See link: <https://help.hulu.com/article/hulu-how-to-contact-hulu>

MENU

State of Washington Political Ad Inquiries

If you have any questions regarding political ad reporting for Washington State, please contact politicalads@hulu.com (mailto:politicalads@hulu.com). Please include detailed information about your request.

Did this article answer your question?

Yes

No

Suggested Articles

I subscribe to Hulu (No Ads) but I still see ads

(/article/hulu-ads-no-commercials)

Hulu (No Ads) Exception Shows

(/article/hulu-no-ads-exceptions)

Ads on Hulu

(/article/hulu-ads-on-hulu)

Ads on Hulu.com are freezing and crashing

(/article/hulu-troubleshooting-ads)

I don't like the ads I'm seeing on Hulu

(/article/hulu-ads-concerns)

Using AdBlock and AdBlock Plus with Hulu

(/article/hulu-allowing-adblock-and-adblock-plus)

Feedback



Need more help? (/)

(/contact-us)



(https://help.hulu.com
so=0

We are available for live support
24 hours a day 7 days a week.



Contact us

We're happy to assist you, whenever you need us. Log in to visit our Contact page for further assistance.

Get in Touch (/contact-us)



About Ads (https://info.evidon.com/pub_info/3920?v=1&nt=0&nw=true) Subscriber Agreement (https://hulu.com/subscriber_agreement)
Privacy Policy (<https://privacy.thewaltdisneycompany.com/en/current-privacy-policy/>) Do Not Sell or Share My Personal Information
Your US State Privacy Rights (<https://www.hulu.com/your-us-state-privacy-rights>)

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Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Request (Hulu - 10/8/24)

Mail Delivery Subsystem <mailer-daemon@googlemail.com>
To: cg.edwards53@gmail.com

Mon, Oct 21, 2024 at 3:23 PM

**Message blocked**

Your message to **politicalads@hulu.com** has been blocked.
See technical details below for more information.

The response from the remote server was:

550 5.4.1 Recipient address rejected: Access denied. [CH2PEPF0000009B.namprd02.prod.outlook.com 2024-10-21T22:23:57.803Z 08DCF064935F63C9]

Final-Recipient: rfc822; politicalads@hulu.com

Action: failed

Status: 5.4.1

Remote-MTA: dns; hulu-com.mail.protection.outlook.com. (52.101.194.0, the server for the domain hulu.com.)

Diagnostic-Code: smtp; 550 5.4.1 Recipient address rejected: Access denied. [CH2PEPF0000009B.namprd02.prod.outlook.com 2024-10-21T22:23:57.803Z 08DCF064935F63C9]

Last-Attempt-Date: Mon, 21 Oct 2024 15:23:57 -0700 (PDT)

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

From: Conner Edwards <cg.edwards53@gmail.com>

To: politicalads@hulu.com

Cc:

Bcc:

Date: Mon, 21 Oct 2024 15:23:48 -0700

Subject: Fwd: RCW 42.17A.345 Request (Hulu - 10/8/24)

Hello:

Forwarding this e-mail onto Hulu at the request of the WA State Public Disclosure Commission.

Could someone assist me in inspecting Hulu's commercial advertising books of account pursuant to RCW 42.17A.345?

Best,

Conner Edwards

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

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

Date: Tue, Oct 8, 2024 at 12:04 AM

Subject: RCW 42.17A.345 Request (Hulu - 10/8/24)

To: <hulu.legal@disney.com>

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.

--

Best,

Conner Edwards
(425) 533-1677 cell

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10/21/24, 3:25 PM

Gmail - RCW 42.17A.345 Request (Hulu - 10/8/24)

Best,

Conner Edwards
(425) 533-1677 cell