

Respondent Names
Abigail Lawlor on behalf of Fuse Washington
Complainant Name
Hulu
Complaint Description
<u>Abby Lawlor</u> reported via the portal <i>an hour ago (Fri, 13 Jun 2025 at 3:25 PM)</i> Please see attached letter and exhibits.
What impact does the alleged violation(s) have on the public?
Please see attached letter and exhibits.
List of attached evidence or contact information where evidence may be found
Please see attached letter and exhibits.
List of potential witnesses with contact information to reach them
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.



18 West Mercer Street, Suite 400
Seattle, WA 98119
TEL (800) 238.4231
FAX (206) 378.4132

Abby Lawlor
Associate
DIR (206) 644-6002
Lawlor@workerlaw.com

Submitted via e-mail to: pdcc@pdcc.wa.gov

June 13, 2025

Public Disclosure Commission
711 Capitol Way S, Suite 206
Olympia, WA 98504

Re: Complaint against Hulu
BIL File No.: 6676-002

To Whom It May Concern:

I am writing on behalf of Fuse Washington to file a formal complaint against Hulu for failing to make political advertising records available on request.

On April 10, 2025, Fuse Washington sent an email to hulu.legal@disney.com requesting to inspect records related to political advertising in Washington State, citing RCW 42.17A.345. Fuse Washington specifically requested to inspect records related to any political advertising purchased from Hulu between 1/1/2024 and 11/10/2024 by Majority Strategies of Asheville, NC on behalf of its client, political committee Let's Go Washington (Sponsored by Brian Heywood). Let's Go Washington's reporting to the PDC indicates that Majority Strategies, purchased hundreds of thousands of dollars of political advertising from Hulu on its behalf in the immediate leadup to the 2024 General Election in support of Initiatives 2109, 2117, 2124, and 2066.

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Majority Strategies	11/04/2024	Hulu Ads SUPPORTING #I-2109 \$30,000.00 #I-2117 \$30,000.00 #I-2124 \$30,000.00 #I-2066 \$30,000.00	Asheville	NC	\$120,000.00	View Report
Majority Strategies	10/17/2024	Hulu ads SUPPORTING #I-2109 #2117 #I-2124 #I-2066	Asheville	NC	\$120,000.00	View Report
Majority Strategies	10/09/2024	Programmatic Ads (PreRoll, CTV, HULU, Locality) 10/8-11/5 SUPPORTING #I-2109 \$75,000.00 #2117 \$75,000.00 #I-2124 \$75,000.00 #I-2066 \$75,000.00	Asheville	NC	\$300,000.00	View Report
Majority Strategies	10/01/2024	Programmatic Ads (PreRoll, CTV, HULU, Locality) 9/13-10/1 SUPPORTING #I-2109 \$41,666.67 #2117 \$41,666.67 #I-2124 \$41,666.67 #I-2066 \$41,666.67	Asheville	NC	\$166,666.66	View Report
Majority Strategies	09/25/2024	Programmatic Ads (PreRoll, CTV, HULU, Locality) 9/13-10/1 SUPPORTING #I-2109 \$41,666.67 #2117 \$41,666.67 #I-2124 \$41,666.67 #I-2066 \$41,666.67	Asheville	NC	\$166,666.66	View Report
Majority Strategies	09/17/2024	Programmatic Ads (PreRoll, CTV, HULU, Locality) 9/13-10/1 SUPPORTING #I-2109 \$41,666.67 #2117 \$41,666.67 #I-2124 \$41,666.67 #I-2066 \$41,666.67	Asheville	NC	\$166,666.67	View Report

[Let's Go Washington \(Sponsored by Brian Heywood\) - 2024 | Washington State Public Disclosure Commission \(PDC\)](#)

June 13, 2025

Page 2 of 2

To date, Fuse Washington has received no response to its request. On April 21, 2025, Fuse Washington sent a second email to hulu.legal@disney.com and again received no reply. This correspondence is attached as Exhibit 1. On May 30, 2025, I sent a letter on behalf of Fuse Washington to both hulu.legal@disney.com and politicalads@hulu.com. This correspondence is attached as Exhibit 2. Though Hulu's website designates politicalads@hulu.com as the email address to contact regarding political ad inquiries and reporting for Washington state, see Exhibit 3, my letter was returned as undeliverable to that address. This bounceback is attached as Exhibit 4. There has been no response to date from the hulu.legal@disney.com address.

Hulu's failure to provide political advertising records for public inspection upon request is already the subject of PDC Case No. 161167. Fuse Washington requests that the PDC promptly investigate this additional complaint and ensure that the requested records are made publicly available as soon as possible.

Please do not hesitate to contact us if you have any questions, or if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al' or 'Abby', with a stylized, cursive flourish.

Abby Lawlor

Counsel for Fuse Washington

EXHIBIT 1



Ryan Hollander <ryan@fusewashington.org>

Inspect political advertising records for Let's Go Washington

2 messages

Ryan Hollander <ryan@fusewashington.org>
To: hulu.legal@disney.com

Thu, Apr 10, 2025 at 3:33 PM

Dear Hulu Legal Department:

I'm making a request to inspect your records related to political advertising in Washington State. Under Washington law, commercial advertisers must maintain certain records related to political advertising and make those records available for inspection by members of the public upon request. RCW 42.17A.345.

Specifically, I am seeking to inspect records related to any political advertising purchased from Hulu between 1/1/2024 and 11/10/2024 by Majority Strategies of Asheville, NC on behalf of their client - a political committee named *Let's Go Washington* (*Sponsored by Brian Heywood.*)

Per RCW 42.17A.345(1) records maintained by commercial advertisers for inspection must include "the exact nature and extent of the services rendered," including a copy of the advertisement or communication, the total cost of the advertising, and the dates that the advertising was presented to the public, including the air time and number of spots. See *also* WAC 390-18-050(6)-(7) (further describing the records that must be made available for public inspection).

Please provide these records electronically if possible, and note that records furnished over email must be transmitted promptly upon request and no later than two business days. See WAC 390-18-050(4)(b)(i).

Failure to make records related to political advertising available for public inspection can result in significant civil penalties. See RCW 42.17A.755(3)(b); *State v. Meta Platforms, Inc.*, 33 Wn. App. 2d 138, 194-205 (2024).

Please let me know if I can help clarify anything about my request, and thank you.

--

Ryan Hollander
Strategic Research
Ryan@fusewashington.org



PO Box 4897 | Seattle, WA 98194

[206.420.0133](tel:206.420.0133)

Follow us: [f Facebook](#) | [t Twitter](#) | fusewashington.org

Ryan Hollander <ryan@fusewashington.org>
To: hulu.legal@disney.com

Mon, Apr 21, 2025 at 11:44 AM

Hello, we have not received a reply to this email we sent your legal department on **April 10**.

Please assist:

[Quoted text hidden]

EXHIBIT 2

From: [Elinor Engle](#)
To: politicalads@hulu.com; hulu.legal@disney.com
Cc: [Abby Lawlor](#)
Subject: Hulu / Fuse Washington (BIL File No. 6676-002)
Date: Friday, May 30, 2025 3:43:19 PM
Attachments: [image001.png](#)
[2025 05 30 Ltr from AL to Hulu FINAL with Attachment.pdf](#)

Good afternoon,

Please find attached a letter from Abby Lawlor on behalf of Fuse Washington.

Thank you,
Elinor



ELINOR ENGLE | *Senior Paralegal (she/her)*
DIR: 206.257.6031 | **FAX:** 206.378.4132
18 West Mercer Street, Suite 400, Seattle, WA 98119

This communication is intended for a specific recipient and may be protected by the attorney-client and work-product privilege. If you receive this message in error, please permanently delete it and notify the sender.



18 West Mercer Street, Suite 400
Seattle, WA 98119
TEL (800) 238.4231
FAX (206) 378.4132

Abby Lawlor
Associate Attorney
DIR (206) 644-6002
lawlor@workerlaw.com

May 30, 2025

Hulu
12312 West Olympic Blvd.
Los Angeles, CA 90064
politicalads@hulu.com
hulu.legal@disney.com

Re: Hulu / Fuse Washington
BIL No.: 6676-002

To Whom It May Concern,

I am writing on behalf of my client, Fuse Washington, to request your prompt response to its April 10 request to inspect specific political advertising records for Hulu advertising in support of certain Washington state ballot initiatives. A copy of this request and a subsequent follow-up email sent on April 21 are attached.

Specifically, Fuse Washington is seeking to inspect records related to any political advertising purchased from Hulu between 1/1/2024 and 11/10/2024 by Majority Strategies of Asheville, NC, on behalf of their client, a Washington political committee named “Let’s Go Washington (Sponsored by Brian Heywood).” Records of these purchases as reported to the Washington Public Disclosure Commission (PDC) can be found here:

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Majority Strategies	11/04/2024	Hulu Ads SUPPORTING #I-2109 \$30,000.00 #I-2117 \$30,000.00 #I-2124 \$30,000.00 #I-2066 \$30,000.00	Asheville	NC	\$120,000.00	View Report
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Majority Strategies	09/25/2024	Programmatic Ads (PreRoll, CTV, HULU, Locality) 9/13-10/1 SUPPORTING #I-2109 \$41,666.67 #2117 \$41,666.67 #I-2124 \$41,666.67 #I-2066 \$41,666.67	Asheville	NC	\$166,666.66	View Report
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[Let's Go Washington \(Sponsored by Brian Heywood\) - 2024 | Washington State Public Disclosure Commission \(PDC\).](#)

RCW 42.17A.345 requires that commercial advertisers accepting political advertising during an election campaign must maintain books of account and related materials, and make such records available for public inspection for a period of no less than five years after the date of the applicable election. *See* WAC 390-18-050. A commercial advertiser's failure to make such records available upon request is a violation of the Washington Fair Campaign Practices Act (FCPA) and can result in significant civil penalties. *See* RCW 42.17A.755(3)(b); *State v. Meta Platforms, Inc.*, 33 Wn. App. 2d 138, 194-205 (2024) (review granted) (upholding judgment awarding over \$24 million in civil penalties plus attorney fees and costs to state of Washington for Meta's willful violations of RCW 42.17A.345).

The PDC has already opened a formal investigation related to Hulu's alleged noncompliance with the FCPA. *See* PDC Case No. 161167. If Fuse Washington does not receive the requested records within five business days, it will proceed with filing its own PDC complaint against Hulu.

Please contact me with any questions or concerns at (206) 644-6002.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al' or 'Abby', written in a cursive style.

Abby Lawlor
Counsel for Fuse Washington

Attachment



Ryan Hollander <ryan@fusewashington.org>

Inspect political advertising records for Let's Go Washington

2 messages

Ryan Hollander <ryan@fusewashington.org>
To: hulu.legal@disney.com

Thu, Apr 10, 2025 at 3:33 PM

Dear Hulu Legal Department:

I'm making a request to inspect your records related to political advertising in Washington State. Under Washington law, commercial advertisers must maintain certain records related to political advertising and make those records available for inspection by members of the public upon request. RCW 42.17A.345.

Specifically, I am seeking to inspect records related to any political advertising purchased from Hulu between 1/1/2024 and 11/10/2024 by Majority Strategies of Asheville, NC on behalf of their client - a political committee named *Let's Go Washington* (*Sponsored by Brian Heywood.*)

Per RCW 42.17A.345(1) records maintained by commercial advertisers for inspection must include "the exact nature and extent of the services rendered," including a copy of the advertisement or communication, the total cost of the advertising, and the dates that the advertising was presented to the public, including the air time and number of spots. See *also* WAC 390-18-050(6)-(7) (further describing the records that must be made available for public inspection).

Please provide these records electronically if possible, and note that records furnished over email must be transmitted promptly upon request and no later than two business days. See WAC 390-18-050(4)(b)(i).

Failure to make records related to political advertising available for public inspection can result in significant civil penalties. See RCW 42.17A.755(3)(b); *State v. Meta Platforms, Inc.*, 33 Wn. App. 2d 138, 194-205 (2024).

Please let me know if I can help clarify anything about my request, and thank you.

--

Ryan Hollander
Strategic Research
ryan@fusewashington.org



PO Box 4897 | Seattle, WA 98194

[206.420.0133](tel:206.420.0133)

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Ryan Hollander <ryan@fusewashington.org>
To: hulu.legal@disney.com

Mon, Apr 21, 2025 at 11:44 AM

Hello, we have not received a reply to this email we sent your legal department on **April 10**.

Please assist:

[Quoted text hidden]

EXHIBIT 3



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.com are
freezing and
crashing

(/article/hulu-
troubleshooting-
ads)

Ads on Hulu

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

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





Help Center (/)

[Home \(/\)](#)

[Help Topics](#)

[Contact Us](#)



[\(/article/hulu-ads-concerns\)](/article/hulu-ads-concerns)

[Using AdBlock and AdBlock Plus with Hulu](https://help.hulu.com/article/using-adblock-and-adblock-plus-with-hulu)
(https://help.hul

[\(/article/hulu-allowing-adblock-and-adblock-plus\)](/article/hulu-allowing-adblock-and-adblock-plus)

[\(/contact-us\)](/contact-us)

Need more help?

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



Get in Touch (/contact-us)

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



Give feedback (/feedback)

How can we improve Hulu? Let us know through our feedback form!



Help Center (/)

[Home \(/\)](#)

[Help Topics](#)

[Contact Us](#)



(<https://help.hulu.com/contact-us>)

([/contact-us](#))

[About Ads \(https://info.evidon.com/pub_info/3920?v=1&nt=0&nw=true\)](https://info.evidon.com/pub_info/3920?v=1&nt=0&nw=true)

[Subscriber Agreement \(https://hulu.com/subscriber_agreement\)](https://hulu.com/subscriber_agreement)

[Privacy Policy \(https://privacy.thewaltdisneycompany.com/en/current-privacy-policy/\)](https://privacy.thewaltdisneycompany.com/en/current-privacy-policy/)

[Do Not Sell or Share My Personal Information](#)

[Your US State Privacy Rights \(https://www.hulu.com/your-us-state-privacy-rights\)](https://www.hulu.com/your-us-state-privacy-rights)

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EXHIBIT 4

From: [Mail Delivery System](#)
To: politicalads@hulu.com
Subject: Undeliverable: Hulu / Fuse Washington (BIL File No. 6676-002)
Date: Wednesday, June 11, 2025 2:30:22 PM

This is the PPE Hosted Dispatch mail system.
PPE Hosted tried to deliver your email message,
but was unable to do so for reasons outside our control.
We recommend contacting the person or service responsible for
looking after the recipient domain's email server directly.
The last error message we have available from the recipient's
server is included right below, along with an extract of your
email:

<politicalads@hulu.com>: host
hulu-com.mail.protection.outlook.com[52.101.41.22] said: 550 5.4.1
Recipient address rejected: Access denied. For more information see
[https://urldefense.proofpoint.com/v2/url?](https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_EXOSmtpErrors&d=DwICAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=DoY0jqtWtiKkDwFgH3EiXpQIvhexamIMIpPHqdMquCQ&m=EFmcTGXWmKoOATWxc2x2LfpDKgzoUG3126byYR9ZobEANjYEt94w9VJ2Av0BDGT5&s=g8Fpps injuAiZMSXOf frLWB4s-7pEQLMismj3J8wKgc&e=https://urldefense.proofpoint.com/v2/url?u=http-3A__SJ5PEPF000001F3.namprd05.prod.outlook.com&d=DwICAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=DoY0jqtWtiKkDwFgH3EiXpQIvhexamIMIpPHqdMquCQ&m=EFmcTGXWmKoOATWxc2x2LfpDKgzoUG3126byYR9ZobEANjYEt94w9VJ2Av0BDGT5&s=cJt4FM6AWQOZh7iIA8sAJ7vMOSX4s4D2557EyrYrMGA&e=2025-05-30T22:43:28.938Z 08DD9FC5916734C1)
[https://urldefense.proofpoint.com/v2/url?
u=http-3A__SJ5PEPF000001F3.namprd05.prod.outlook.com&d=DwICAg&c=euGZstcaTDllvimEN8b7jXrwqOf-
v5A_Cdp gnVfiiMM&r=DoY0jqtWtiKkDwFgH3EiXpQIvhexamIMIpPHqdMquCQ&m=EFmcTGXWmKoOATWxc2x2LfpDKg
zoUG3126byYR9ZobEANjYEt94w9VJ2Av0BDGT5&s=cJt4FM6AWQOZh7iIA8sAJ7vMOSX4s4D2557EyrYrMGA&e=
2025-05-30T22:43:28.938Z 08DD9FC5916734C1] (in reply to RCPT TO command)