



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

November 19, 2024

Delivered electronically to [lyris.malajian@siriusxm.com](mailto:lyris.malajian@siriusxm.com)

Subject: Complaint filed by Conner Edwards, PDC Case 159784

Dear Pandora/SiriusXM:

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

As noted in the letter to Conner Edwards, 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.

PDC staff is reminding you about the importance of timely responding to requests for inspection of commercial advertiser books of account as required under RCW 42.17A.345 and WAC 390-18-050 and also the importance of posting information on how to request the company's commercial advertiser books of account.

PDC staff expects that, in the future, you will respond and provide the records in accordance with PDC laws and rules.

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, contact Alice Fiman, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed Alice Fiman*

Alice Fiman  
Compliance Officer

Endorsed by,

*Electronically signed Kim Bradford*

Kim Bradford, Deputy Director  
For Peter Frey Lavalley, Executive Director



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November 19, 2024

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding Pandora/SiriusXM, PDC Case 159784

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Aug. 16, 2024. The complaint alleged Pandora/SiriusXM may have violated RCW 42.17A.345 and WAC 390-18-050 by failing to provide inspection of its commercial advertiser books of account.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response provided by Pandora/SiriusXM; and other relevant information, to determine whether the record supports a finding of one or more violations.

Applicable Laws & Rules

- RCW 42.17A.345 and WAC 390-18-050 require commercial advertisers to make their documents and books of account open for public inspection during normal business hours for five years following the election to which the records pertain. Pursuant to RCW 42.17A.345, the documents and books of account shall specify 1) the names and addresses of persons from whom it 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(3) states that commercial advertisers can provide such information to the requester in person during normal business hours or by email or online publication.

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

- You stated that you sent an email to [press@siriusxm.com](mailto:press@siriusxm.com) on July 1, 2024, but did not receive a response. The email stated: "Per RCW 42.17A.345, I am requesting to view SiriusXM's commercial advertising books of account. This includes, but is not limited to all associated companies, including but not limited to Pandora."
- On Nov. 4, 2024, PDC staff received a call from SiriusXM legal counsel who stated they had just now received information regarding a possible complaint and requested PDC

staff send them your original request. The Respondent noted that your request was sent to an email address not monitored by SiriusXM Media's legal or advertising teams.

- On Nov. 8, 2024, Sirius XM responded to you with records of political advertising placed with it prior to 2024.
- SiriusXM stated that it no longer accepts political advertising for candidates for state, local or judicial office in Washington and was not able to find any records of advertising during the 2024 election cycle.

Based on our findings, staff has determined that, in this instance, failure to respond to a commercial advertiser inspection of the books of account does not amount to a finding of a violation that calls for further investigation.

PDC staff is reminding SiriusXM about the importance of responding timely to requests for inspection of commercial advertiser books of account as required under RCW 42.17A.345 and WAC 390-18-050 and also the importance of posting information on how to request the company's commercial advertiser books of account.

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, contact Alice Fiman, toll-free at 1-877-601-2828 or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

Electronically signed Alice Fiman

Alice Fiman  
Compliance Officer

Endorsed by,

Electronically signed Kim Bradford

Kim Bradford, Deputy Director  
For Peter Frey Lavalley, Executive Director