



**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 • Website: www.pdcc.wa.gov

October 25, 2024

Delivered electronically to harry@spotify.com and adscomplaints@spotify.com

Subject: Complaint filed by Conner Edwards, PDC Case 159786

Dear Spotify,

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed Sept. 13, 2024, with the Public Disclosure Commission (PDC).

As noted in the letter, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director



**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 • Website: www.pdca.wa.gov

October 25, 2024

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding Spotify, PDC Case 159786

Dear Conner Edwards:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed Sept. 13, 2024. The complaint alleged that Spotify, a commercial advertiser, may have violated RCW 42.17A.345 and WAC 390-18-050 for not responding to a request to inspect its books of account.

PDC staff reviewed the allegation listed in the complaint; the information submitted with the complaint, the relevant statute(s) and rules, the response to the complaint, and other relevant information to determine whether the record supports a finding of one or more violations.

Based on this review, staff found the following:

- RCW 42.17A.345 requires commercial advertisers who accept or provide political advertising or electioneering communications to maintain certain records including information about the advertising they sell. These records, called “books of account”, must be open to public inspection during normal business hours during the campaign and for at least five years after the election.
- Based on the evidence in the complaint, candidates for public office reported expenditures to Spotify for political advertising.
- To view Spotify’s books of account, you sent an email sent to office@spotify.com on July 1, 2024.
- Once the company did not respond, you filed a complaint with the PDC.
- The PDC contacted Spotify via phone and Harry Clarke, Associate General Counsel, requested the complaint be sent to him directly.
- PDC staff sent the complaint to Clarke on Sept. 27, 2024.
- In response, the company found a record of the advertising sold in 2019 and provided you the information on September 27, 2024.
- For future inquires of Spotify political advertising, the correct email contact is adscomplaints@spotify.com.

The PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director