

<b>Respondent Names</b>
Monaco Group
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#"><u>Conner Edwards</u></a> reported via the portal <i>(Fri, 18 Apr 2025 at 12:57 PM)</i>  See complaint.
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint & PDC website.
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint & PDC website.
<b>List of potential witnesses with contact information to reach them</b>
See complaint & PDC website.
<b>Certification (Complainant)</b>
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.

**Complaint Against: Monaco Group****Submitted:** 4/18/2025**Notice to Respondent Due By:** 4/28/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 7/17/2025 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.<sup>1</sup> 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.

**Violations**

On January 13, 2025, I e-mailed a request to inspect the books of account for this respondent. I also called the respondent on April 15, 2025, to determine what e-mail address I should send legal requests to. I sent another e-mail request to that address. on April 15, 2025, see attached.

The books of account were not provided to me, in violation of RCW 42.17A.345.

The previous complaint I filed against this respondent was dismissed improperly by PDC staff with the notation that: “no evidence was provided that inspection was refused.” This dismissal was improper because I did include evidence that the inspection had been refused by the respondent’s non-response. This evidence is being resubmitted with this complaint.

In my experience, it is far more common that commercial advertisers refuse the request by simply not responding to the requester. It is relatively rare that commercial advertisers affirmatively deny the requester access to the records. While I sympathize with the desire of PDC staff to minimize their own workload, the agency has a statutory responsibility to enforce the commercial advertiser statute.

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

## **Conclusion**

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.

I am filing this complaint with the hope that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

/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.

This complaint is one of over one thousand complaints 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**



Conner Edwards &lt;cg.edwards53@gmail.com&gt;

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**RCW 42.17A.345 Request ( Monaco Group )**

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

Tue, Apr 15, 2025 at 3:58 PM

To: service@monacogroup.com, "vmonaco@monacogroup.com" &lt;vmonaco@monacogroup.com&gt;, PDC Support &lt;pdcc@pdc.wa.gov&gt;

Hello:

About three months ago, I sent a request to inspect the commercial books of account for your company. I never heard a response.

I just called your company (@ 714-505-5180) and spoke with Judy. She said that the best e-mail address to send legal correspondence to is [VMonaco@monacogroup.com](mailto:VMonaco@monacogroup.com) (Vince Monaco).

Via this e-mail, I am submitting a new request to inspect your commercial advertising books of account.

Per RCW 42.17A.345, I am requesting to view your ( Monaco Group's ) 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.

If you have any questions about this request, you should contact the PDC immediately at (360) 753-1111.

-Conner

On Mon, Jan 13, 2025 at 8:21 PM Conner Edwards <cg.edwards53@gmail.com> wrote:

Hello:

Per RCW 42.17A.345, I am requesting to view your ( Monaco Group's ) 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.

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Best,

Conner Edwards  
(425) 533-1677 cell

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Conner Edwards &lt;cg.edwards53@gmail.com&gt;

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**Re: PDC - File a Formal Complaint - Conner Edwards**

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**PDC Support** <pdcc@pdc.wa.gov>  
Reply-To: PDC Support <pdcc@pdc.wa.gov>  
To: cg.edwards53@gmail.com

Tue, Apr 15, 2025 at 1:44 PM

Delivered electronically to [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: Complaint 165460 regarding Monaco Group

Dear Conner Edwards :

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on Jan. 16, 2025. The complaint alleged that Monaco Group (the "Respondent"), may have violated RCW 42.17A.345 by failing to provide inspection of commercial advertiser books of account.

PDC staff reviewed the allegation(s) and found the following:

- No evidence was provided that inspection was refused.

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) and WAC 390-37-060(1)(a).

If you have questions, you may contact PDC staff at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

Sincerely,

Kim Bradford

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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov>  
1.360.753.1111

On Thu, 16 Jan at 12:08 PM , Conner Edwards <[cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)> wrote:

**Description of Complaint**

See attached complaint.

**Notice to Respondent**

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"I am no longer accepting the things I cannot change. I am changing the things I cannot accept."  
— **Angela Davis**