

2024 Annual Report

**WASHINGTON STATE
EXECUTIVE ETHICS BOARD**

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Background and Leadership

Mission Statement

To promote integrity, confidence and public trust in state government through education, interpretation and enforcement of the Ethics in Public Service Act.

Background

Established in 1995 via statute, the Washington State Executive Ethics Board (the Board) is comprised of five members appointed by the Governor for five-year terms. Two of the five members must be current state employees; one an exempt employee and one a classified employee. One of the remaining three members of the Board is selected from names provided by the State Auditor's Office, one from names provided by the Attorney General's Office and one is a citizen-at-large. Except for initial members and those completing partial terms, members serve a single five-year term. The members play a crucial role in the policy setting and enforcement of the Ethics Act.

Board members as well as staff are dedicated to improving the public's confidence in state government by ensuring that state officers and employees conduct themselves with the highest ethical and moral standards and they conduct the state's business in a manner that advances the public's interest.

Leadership

Jan Jutte (Chair January-September) was appointed by Governor Inslee in November 2019 for a term through September 2024. Jan is a graduate of Saint Martin's College (now Saint Martin's University). Jan retired from the State Auditor's Office in January 2017. She began as a field auditor during Robert Graham's tenure. In addition to working for Robert Graham, she worked for Auditor Brian Sonntag, Auditor Troy Kelley and a few weeks for Auditor Pat McCarthy before retiring. She held many positions in the Office including Acting State Auditor. In her various roles, she was very involved in legal issues in the compliance audits as well as in whistleblower investigations the Office conducted. She has been awarded a lifetime membership in Washington Finance Officers' Association for her contributions to the WFOA, National Performance Review Award from Vice President Al Gore, Special Recognition Award for her commitment to state government transparency and accountability by the National Association of State Auditors, Comptrollers and Treasurers, and 2017 Governor's Award for Leadership in Management.

Kelli Hooke (Vice Chair January -September, Chair October-December) was appointed by Governor Inslee in August 2022 for a term through September 2026. Kelli is an Associate General Counsel, Public Sector Compliance at Cloudflare. She received a bachelor's from the University of Washington, Seattle, a master's from University of Oklahoma, and a JD from Regent University School of Law in Virginia Beach, VA. She is heavily involved in supply chain security risk management, cyber security for government customers, and legal support for the Public Sector Sales team. Kelli is also involved in the American Bar Association's Section on Public Contract Law, to include serving as co-chair of the Commercial Products and Services Committee. She retired from the Army after twenty years of service.

Megan Abel (Vice Chair October-December) was appointed by Governor Inslee in February 2023 for a term of service through September 2027. Megan is a graduate of Washington State University with a bachelor's degree in psychology and currently serves as a Human Resource Manager at the Employment Security Department. Megan has over 20 years of Human Resource experience to include both the private and the public sector. Agencies that Megan has worked for in her career with the State of Washington include Administrative Office of the Courts, General Administration (now Department of Enterprise Services), Department of Fish and Wildlife, Recreation Conservation Office, Office of Administrative Hearings, and the Employment Security Department. Megan received her Professional in Human Resources (PHR) certification from the Society for Human Resource Management (SHRM) in 2005 and has maintained that certification through her extensive state career, both with continued education/training as well as knowledge and learned experiences.

Cameron Comfort was appointed by Governor Inslee in December 2023 for a term of service through September 2028. Cam is a graduate of the University of Washington and the University of Notre Dame Law School. Cam retired from the Office of the Attorney General in May 2023 as a Senior Assistant Attorney General, having served as the Chief of the Revenue and Finance Division for more than 20 years. In that role, his responsibilities included overseeing the division's provision of legal services to its clients, including the Department of Revenue, the Department of Retirement Systems, the Office of the State Treasurer, the Office of Financial Management, the Washington State Investment Board, and the Office of Administrative Hearings. In addition to being a member of the AGO's leadership team, Cam handled numerous office-wide assignments including serving as the lead attorney coordinator on the agency's Fiscal Note Team and serving on the Attorney Exit Interview Team and the Performance Management Committee.

David Hankins was appointed by Governor Inslee in June 2024 to fill an unexpired term through September 2025. David is a Senior Counsel in the Washington State Attorney General's Office and a Section Chief in the Revenue and Finance Division. In 1990, he started his career in the Licensing and Administrative Law Division handling licensing cases and then prosecuting disciplinary cases for the Department of Health's board and commission disciplinary programs. He was the lead prosecutor for the Medical Quality Assurance Commission and also prosecuted disciplinary cases for the Nursing Care Quality Assurance Commission, Board of Pharmacy, Board of Physical Therapy and finally for the Funeral Directors & Embalmers Board and the Cemetery Board. In 2000, he transferred to the Revenue Division and handles a variety of litigation and appeals in defense of the Department of Revenue's tax laws. He also leads a team to enforce the 1998 Tobacco Master Settlement Agreement as it relates to those companies that have not joined the settlement agreement. He is a graduate of Seattle University and earned his law degree from Willamette University College of Law.

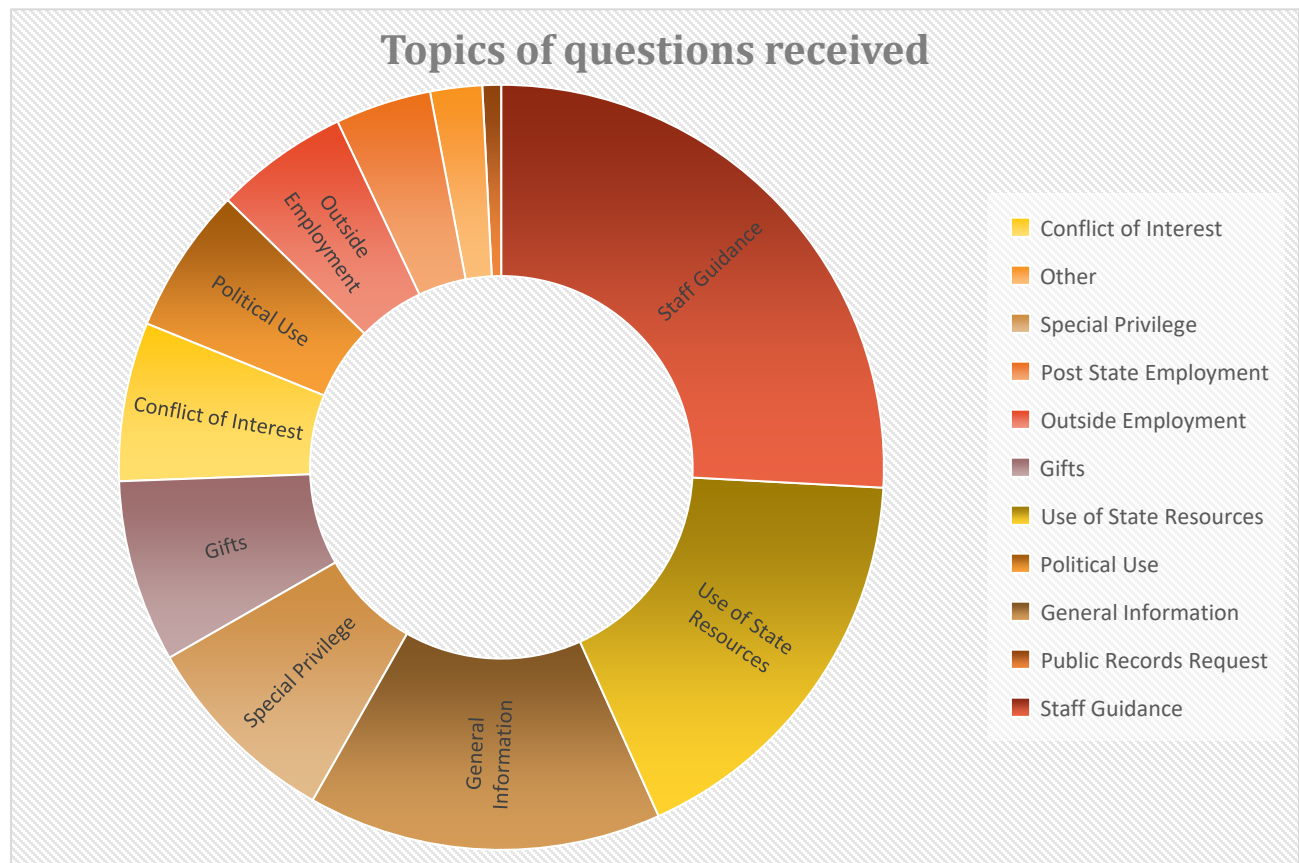
Board staff includes an Executive Director, Administrative Officer and two Senior Digital Forensic Investigators. The Board is an independent agency, but the Board's staff is funded and supported through the Attorney General's Office (AGO).

The Executive Director reports to the AGO's Solicitor General. Board staff complies with all of the AGO's policies and procedures and follows the AGO's Performance Management System in which each staff member's work performance is evaluated on an annual basis against mutually agreed upon performance goals. Board staff is housed in an AGO-leased facility.

Promote Good Government

The Board assists customers—including agency ethics advisors, state employees, elected officials, state college and university employees and the public at large—via e-mail, the phone, or face-to-face meetings. Board staff routinely answer hundreds of queries a year from customers regarding ethical situations and assist them in effectively handling these situations with the goal of educating and assisting rather than enforcement.

During 2024, Board staff answered approximately 1,505 ethics questions both on the telephone and via email. The use of state resources and staff guidance regarding the Ethics in Public Service Act were our top inquiries followed by questions regarding special privilege, gifts, and conflict of interest.



The Board’s website continues to be the main source of information for state agencies and the public at large. The site adapts to screens of all sizes and provides Board customers with real-time information, a calendar of events, electronic forms as well as complaint forms and contact us and public records request forms. The website also contains an active list of agency ethics advisors and policies approved by the Board, which has been helpful for state employees in locating agency specific information.

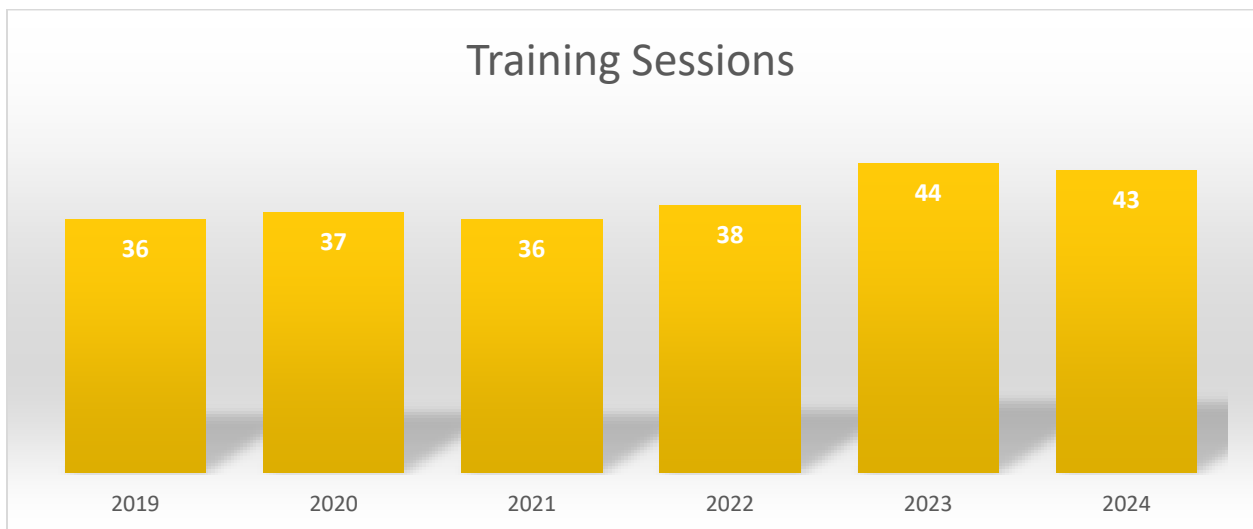
Training

The Ethics in Public Service Act does not currently mandate ethics training but does encourage training of all state employees every thirty-six months and requires all state agencies to designate an ethics advisor. The Board offers free training to any state agency in a variety of ways: a 4-hour in-depth look at the Ethics in Public Service Act, RCW 42.52; a 90-minute refresher course for those employees who already have a good working knowledge of the Act; and Executive Leadership training addressing topics of interest for agency heads and leadership teams. The Board can also provide sessions specifically tailored to the agency’s needs.

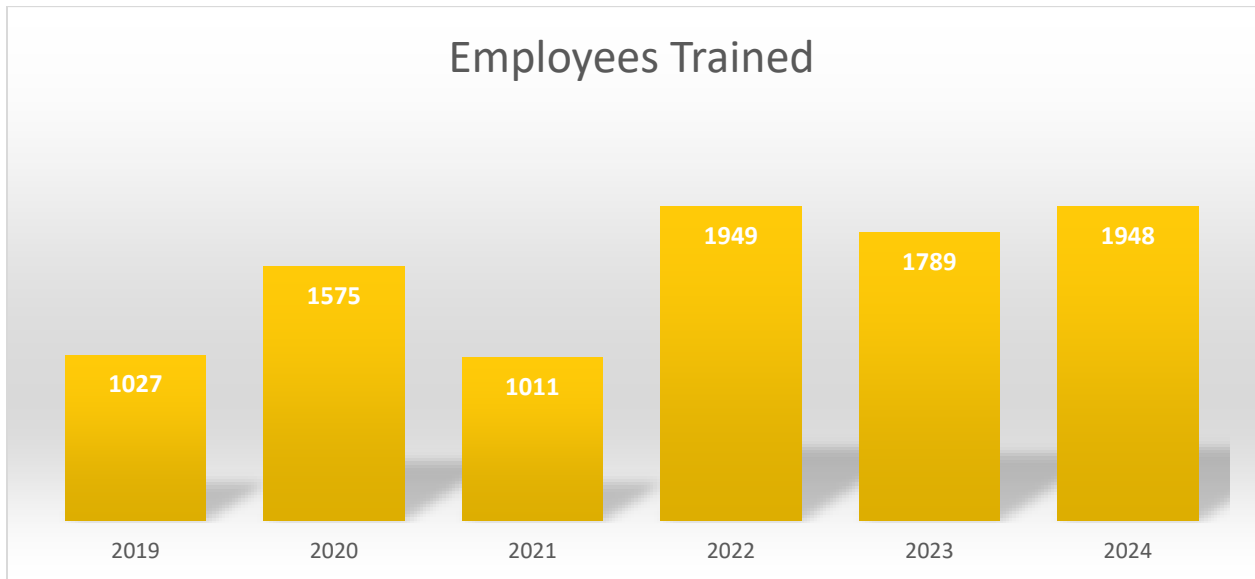
During 2024, Board staff conducted trainings in person and via Zoom, enabling them to reach state agencies, colleges, and universities statewide. The Board’s Executive Director conducts in person and webinar training to Executive Level Management.

Over the past year, Board staff conducted 36 webinar training sessions and conducted five live sessions reaching 1,948 state employees.

Sessions held:



Number of state employees trained:



Ethics Advisor Seminars

In 2024, Board staff continued holding monthly 30-minute seminars specifically for agency ethics advisors. These short seminars focused on a different section of the Ethics in Public Service Act each month and included question and answer time for advisors to share issues and questions they were facing within their own agency.

EEB Newsletter

Board staff published an EEB Newsletter immediately following each Board meeting to inform state agencies, colleges/universities, state employees, and the public of recent Board opinions and enforcement actions. These newsletters are also posted on the ethics website and shared via email with our agency ethics advisors and our listserv.

Outside Employment Contracts

Under WAC 292-110-060, a state officer or employee must receive board approval before entering into, or obtaining a beneficial interest in, a contract or grant with a state agency only if the process for awarding the contract or grant was not open and competitive, or, whenever only one bid or application was received. In 2024, the Board staff reviewed and approved 133 contracts.

Policy Reviews

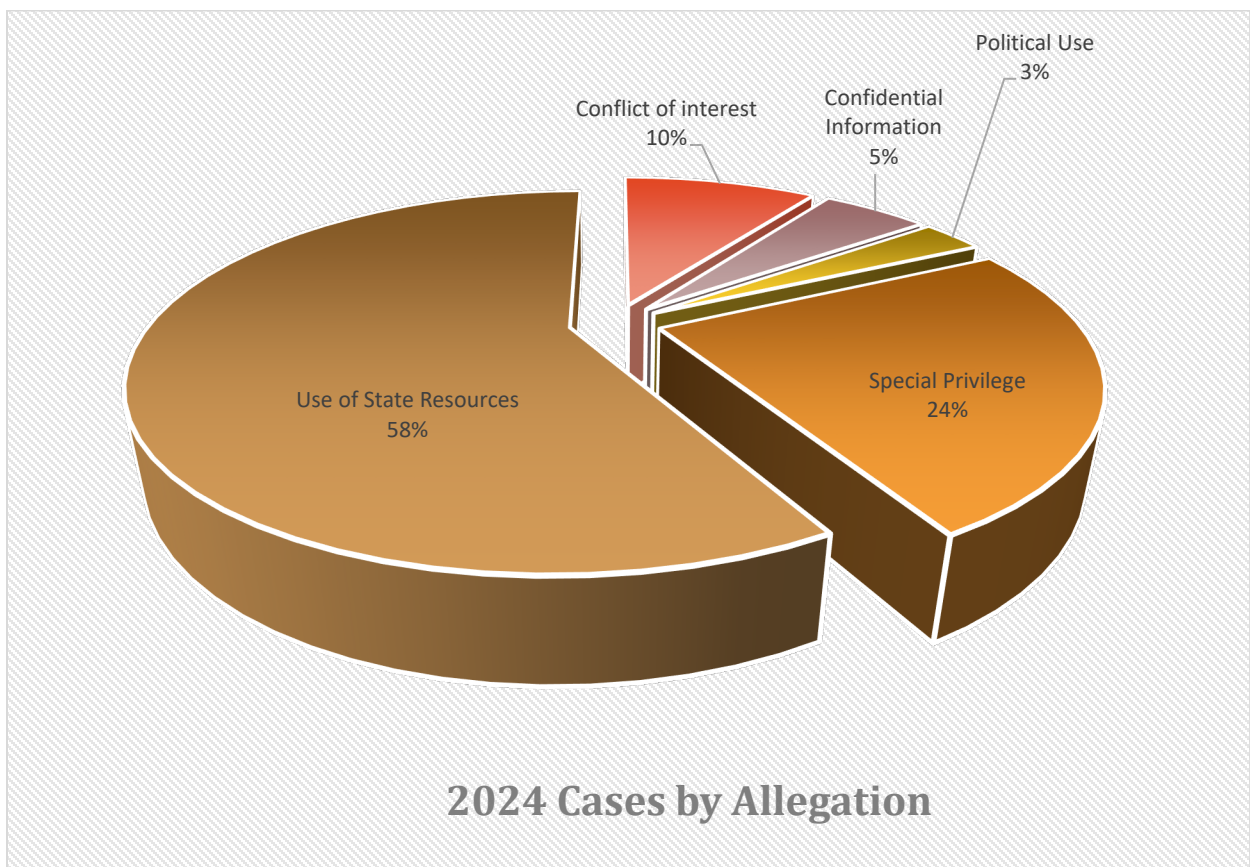
Under RCW 42.52.360(4) and WAC 292-120-035, the Board may review and approve agency policies. When determining an appropriate sanction for violations of the Act, the Board may consider agency policies in effect at the time of the conduct and would likely not impose sanctions for conduct that would violate the Act if the conduct at issue was permitted under a board-approved agency policy, providing “safe harbor” for employees. In 2024, the Board reviewed and approved eight agency policies. Board approved polices are posted on the Board’s website for reference.

Enforcement

Investigations

In 2024, the Board received 397 complaints, opened 94 cases and completed 51 cases. The Board found Reasonable Cause in 24 cases and issued 18 Board Dismissals. Throughout the year, the Board also reviewed four Executive Director Dismissals, heard two requests for reconsideration, settled 16 cases with agreed stipulations, heard two motions for summary judgment, held one enforcement hearing and issued four final orders of Default. In total, the Board levied \$63,300 in monetary penalties. Monies received as payment of these penalties are deposited into the state’s general fund.

The use of state resources for personal gain continues to be the leading allegation for cases accepted for filing in 2024, followed by special privilege and conflict of interest.



Details on the enforcement actions resulting in civil penalties can be found in Attachment 1.

General Information

Budget

Washington’s Executive Ethics Board has a biennial operating budget of \$1,368,173, four staff members and jurisdiction over 75,324 employees in the Executive branch of state government and over 41,000 higher education employees.

Staff:

Kate Reynolds, Executive Director
Ruthann Bryant, Administrative Officer
Justin Cotte, Senior Digital Forensic Investigator
Vacant, Senior Digital Forensic Investigator

Legal Counsel:

Matthew Kernutt, Senior Counsel, Counsel to the Board
Julia Eisentrout, Assistant Attorney General, Counsel to staff and enforcement attorney

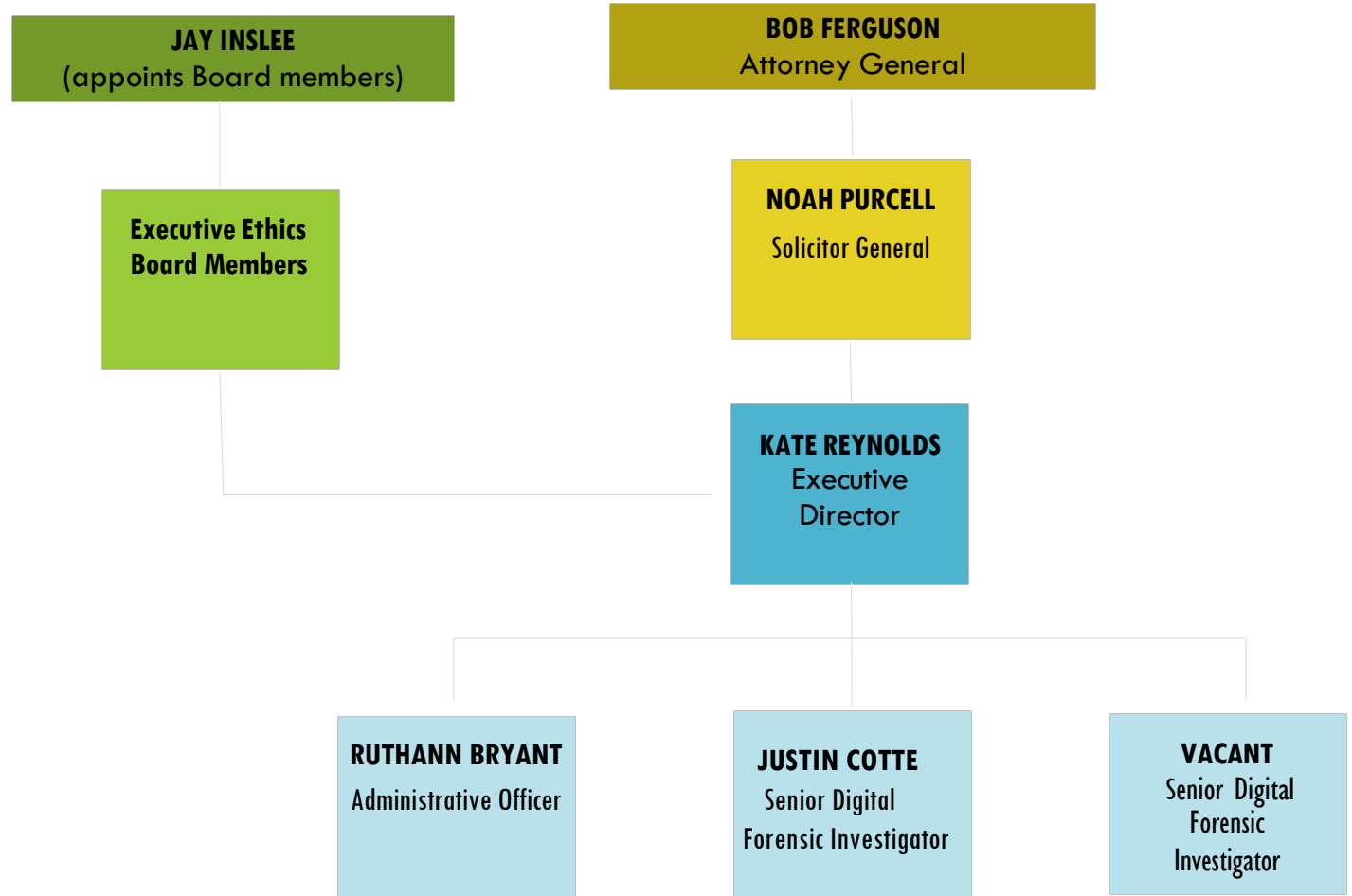
Contact Information

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Telephone: 360-664-0871

Website: www.ethics.wa.gov
Email: ethics@atg.wa.gov

EXECUTIVE ETHICS BOARD ORGANIZATIONAL CHART



SUMMARY OF 2024 ENFORCMENT ACTIONS

The Board accepted stipulated penalties from or imposed penalties on 23 individual state employees as follows:

	Allegation	Violation	Penalty
Employee 1	Correctional Lieutenant with the Department of Corrections extensively browsed the internet visiting sites including YouTube, Amazon, ESPN and social media sites. They also put in for overtime on several days that the investigation revealed they were spending time on the internet for personal use.	RCW 42.52.160	\$6,000 with \$1,000 suspended
Employee 2	Office Assistant 3 with the Department of Corrections used their state computer to browse the internet including travel, real estate, social media and shopping websites.	RCW 42.52.160	\$5,500 with \$1,000 suspended
Employee 3	Brand Inspector 1 with the Department of Agriculture used their state issued MiFi device for personal use, resulting in a high amount of data used.	RCW 42.52.160	\$3,000 with \$1,000 suspended
Employee 4	Communications Consultant with the Health Care Authority used an unauthorized state electric vehicle charging station overnight on three different occasions to charge their personal vehicle.	RCW 42.52.160	\$2,000 with \$750 suspended
Employee 5	IT Application Development – Journey/Web Technical Lead and Application Developer with the Department of Labor and Industries encouraged members of the LNI Wellness 360 Facebook group to join a gym and give them their name. Additionally, they used state resources, work time and the time of other employees to assist their case before the Board.	RCW 42.52.070 and .160	\$2,000
Employee 6	Corrections Officer 2 with the Department of Corrections browsed the internet and had on-going personal use to visit sites such as YouTube, Netflix, online shopping and various sports and news websites.	RCW 42.52.160	\$5,000 with \$1,000 suspended
Employee 7	Correctional Industries Supervisor 2 with the Department of Corrections browsed the internet for non-work-related purposes by visiting news websites, sports sites, YouTube and social media sites.	RCW 42.52.160	\$2,000 with \$1,000 suspended
Employee 8	Corrections Officer 2 with the Department of Corrections used their state email to send over 1,300 personal emails.	RCW 42.52.160	\$3,000
Employee 9	Finance Manager for Bellevue College provided a special privilege to a family	RCW 42.52.070	\$500

SUMMARY OF 2024 ENFORCMENT ACTIONS

	member by giving them advanced notice of a job opening in which they were later hired for.		
Employee 10	Corrections and Custody Officer 2 with the Department of Corrections browsed the internet to include Netflix, YouTube, Amazon and real estate websites and used DOC Teams extensively for personal use.	RCW 42.52.160	\$3,000
Employee 11	Former Commerce Specialist with the Department of Agriculture used their Teams account to contact and harass a fellow state employee.	RCW 42.52.160	\$1,500
Employee 12	A Communication/Theater/Film Instructor at Pierce College used their college email account to send and receive emails with files containing bookmarks that were not work related and reformatted their College computer and re-installed an operating system without authorization to do so.	RCW 42.52.160	\$2,000
Employee 13	A Transportation Engineer with the Department of Transportation browsed the internet to include TikTok, Twitter, personal Google searches, news websites and online shopping.	RCW 42.52.160	\$2,500 with \$1,000 suspended
Employee 14	Corrections Officer 2 with the Department of Corrections browsed the internet to visit social media websites, as well as Ebay, sports and news websites.	RCW 42.52.160	\$2,500 with \$1,000 suspended
Employee 15	Former employee with the Department of Corrections used their state email address to send and receive personal email.	RCW 42.52.160	\$750
Employee 16	Management Analyst 4 with the Department of Licensing used their state email account to conduct business related to a homeowner's Association that they are a board member of.	RCW 42.52.160	\$2,500 with \$1,000 suspended
Employee 17	Senior Administrator of Engagement and Outreach with the Department of Corrections, agreed that they may have violated the Ethics in Public Service Act by using state resources for non-work-related activities. Evidence indicated that Paige Perkinson browsed the internet, visiting sites including Zillow and YouTube, and saved several personal documents and photos on their computer.	RCW 42.52.160	\$750 with \$250 suspended
Employee 18	Former Associate Professor with the University of Washington was found to have violated the Ethics in Public Service Act by using state resources for private benefit and to support and promote the interests of and/or solicit for an outside organization. A large	RCW 42.52.160	\$750

SUMMARY OF 2024 ENFORCMENT ACTIONS

	volume of emails were also received related to news, travel, and political and personal topics.		
Employee 19	Former Unemployment Insurance Specialist 4 with the Employment Security Department agreed they may have violated several sections of the Ethics in Public Service Act when they filed illegitimate claims for themselves, family, friends and acquaintances resulting in approximately \$360,000 worth of fraudulent claims.	RCW 42.52.070 and .160	\$15,000
Employee 20	Corrections and Custody Officer 2 agreed they may have violated the Ethics in Public Service Act by using their state computer to browse the internet vising numerous news websites, ESPN and YouTube.	RCW 42.52.160	\$500 with \$200 suspended
Employee 21	Teacher Education Instructor with Yakima Valley College agreed they may have violated the Ethics in Public Service Act by receiving compensation for outside activities and using their state computer to conduct work related to their outside employment.	RCW 42.52.160	\$300
Employee 22	Former Social Service Specialist 5 with the Department of Social and Health Services agreed they may have violated the Ethics in Public Service Act by using their state email account for personal use to include communication with their spouse, insurance company and to make personal purchases.	RCW 42.52.160	\$750
Employee 23	Former Social Service Specialist 2 with the Department of Social and Health Services agreed they may have violated the Ethics in Public Service Act by using their state cell phone to make over 1,300 personal calls which resulted in overage fees to the state.	RCW 42.52.160	\$1,500