2025 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

Kelli Hooke (Chair) 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) 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.

Mark Rapozo was appointed by Governor Ferguson in April 2025 for a term of service through September 2029. Mark holds a Bachelor of Science in Accounting from Central Washington University and is a Certified Public Accountant. Mark dedicated 39 years to the Office of the Washington State Auditor, where he built a distinguished career in public service. He retired in April 2022 as Assistant Director of Local Audits, having served under four elected State Auditors. In addition, Mark contributed a decade of leadership as Chair of the Washington State Local Government Records Committee from 2002 to 2012.

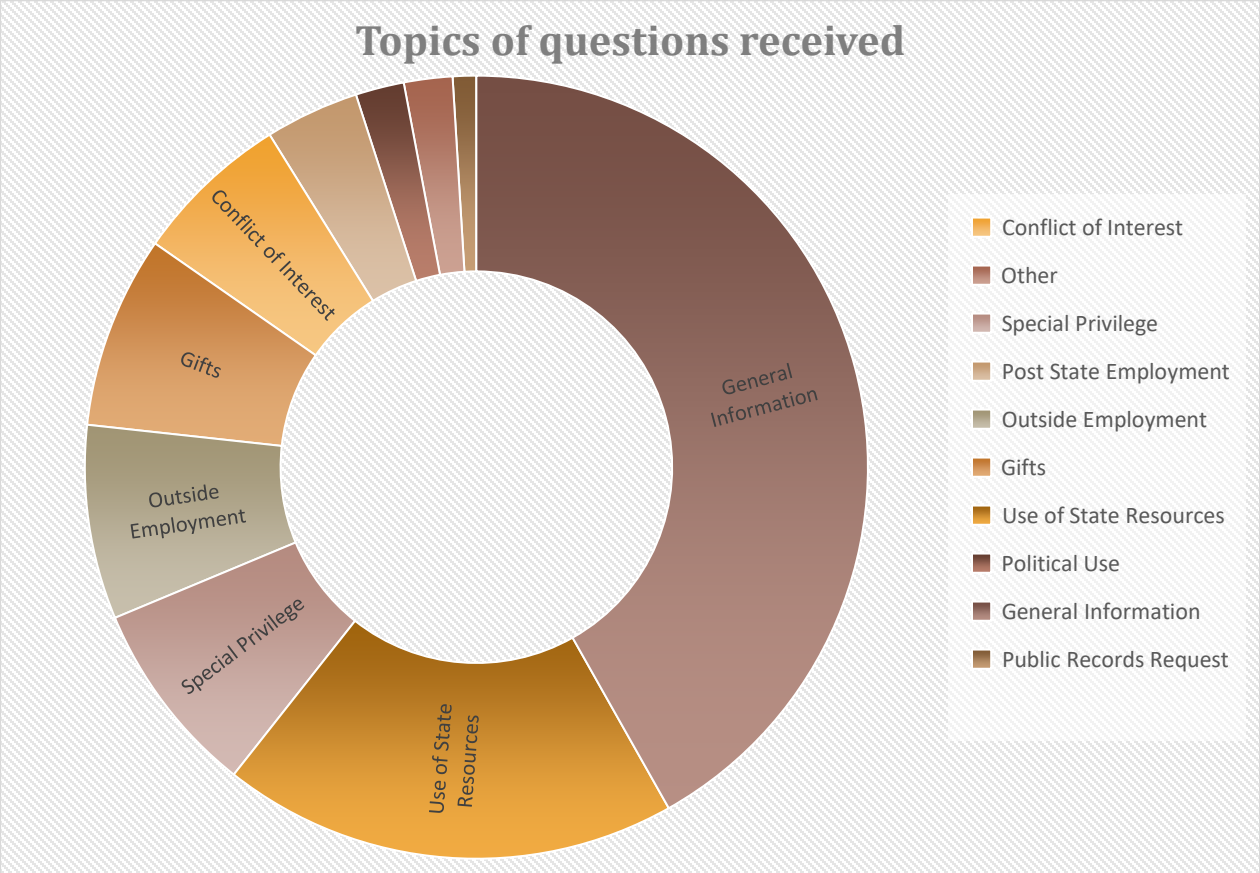
Board staff includes an Executive Director, Administrative Officer and two Senior Digital Forensic Investigators. The Board is an independent agency, but the Board's staff is funded and supported through the Attorney General's Office (AGO).

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 2025, Board staff answered approximately 1,545 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, outside employment and contracting and gifts.



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.

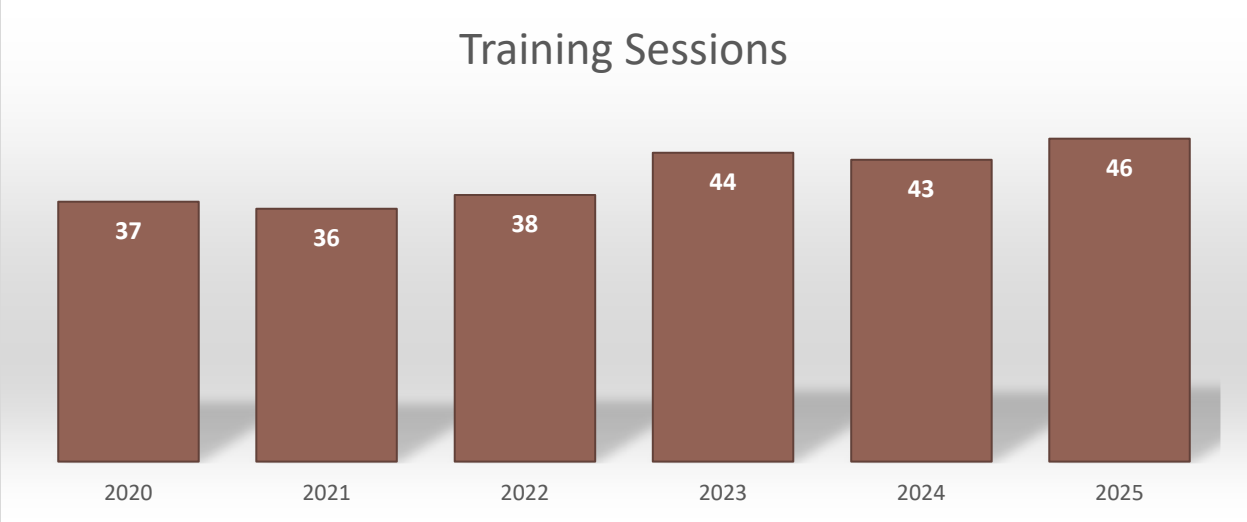
Training

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 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.

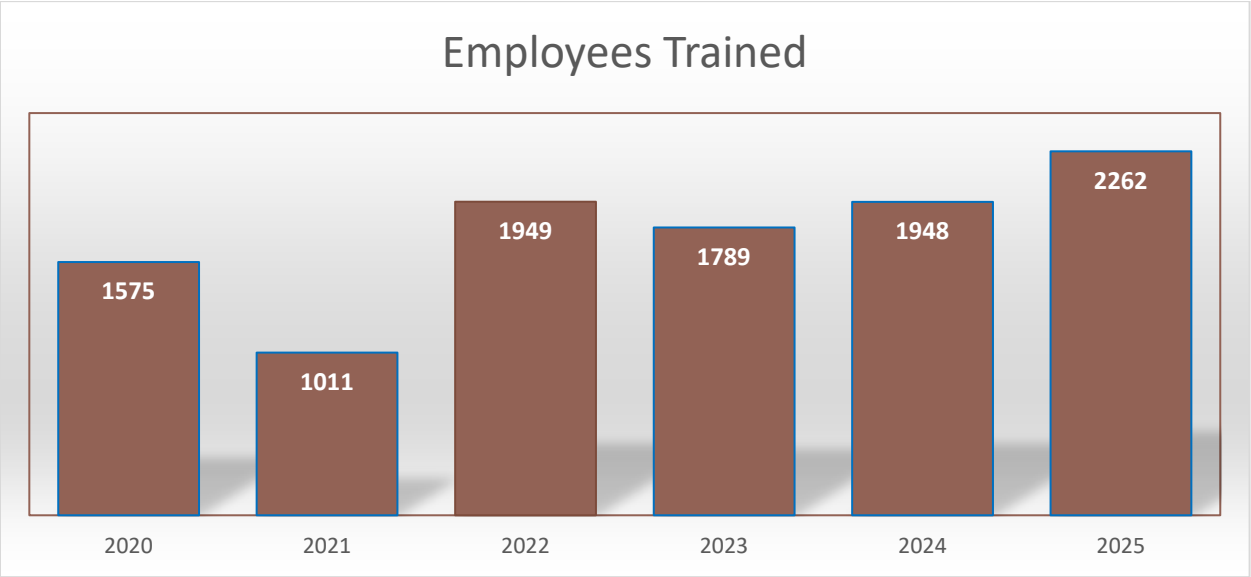
During 2025, Board staff conducted training in person and via Zoom, enabling them to reach state agencies, colleges, and universities statewide. The Board's Executive Director conducts in person and webinar training to Executive Level Management.

Over the past year, Board staff conducted 43 webinar training sessions and conducted three live sessions reaching 2,262 state employees.

Sessions held:



Number of state employees trained:



Ethics Advisor Seminars

In 2025, Board staff continued holding monthly 30-minute seminars specifically for agency ethics advisors and those who support them. 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 2025, the Board staff reviewed and approved 153 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 2025, the Board reviewed and approved eight agency policies. Board approved policies are posted on the Board's website for reference.

Advisory Opinions

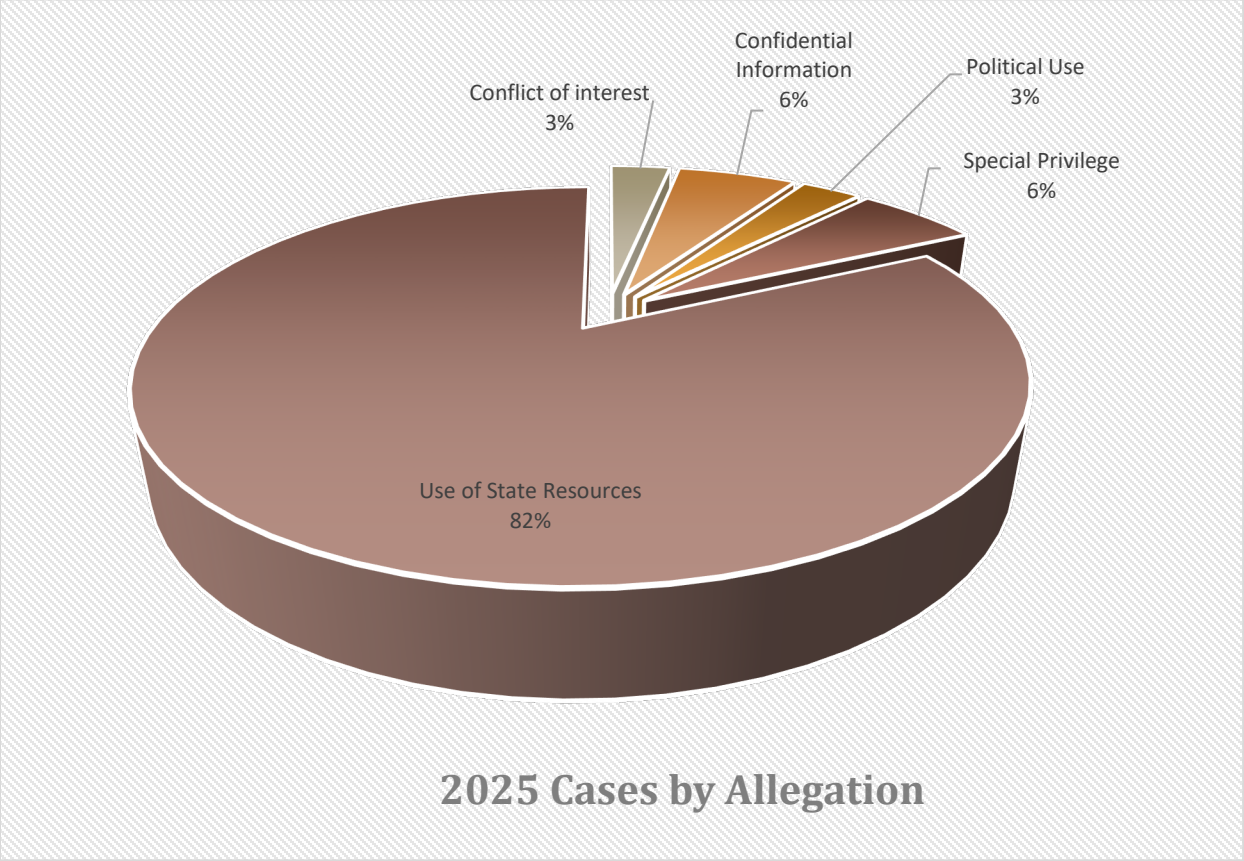
In 2025, the Board issued one new Advisory Opinion, 25-01 Paid Time for Certifications. This advisory opinion provides guidance related to the use of state resources by state employees working to receive a college or educational certificate.

Enforcement

Investigations

In 2025, the Board received 354 complaints, opened 103 cases and completed 55 cases. The Board found Reasonable Cause in 34 cases and issued 21 Board Dismissals. Throughout the year, the Board also reviewed four Executive Director Dismissals, heard one request for reconsideration, settled 14 cases with agreed stipulations, heard two motions for summary judgment and issued 14 Default/Final Orders. In total, the Board levied $111,550 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 2025, followed by special privilege, confidential information 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 $1,358,884, four staff members and jurisdiction over 74,821 employees in the Executive branch of state government and over 30,500 higher education employees.

Staff:

Kate Reynolds, Executive Director
Ruthann Bryant, Administrative Officer
Justin Cotte, Senior Digital Forensic Investigator
Swift Sanchez, 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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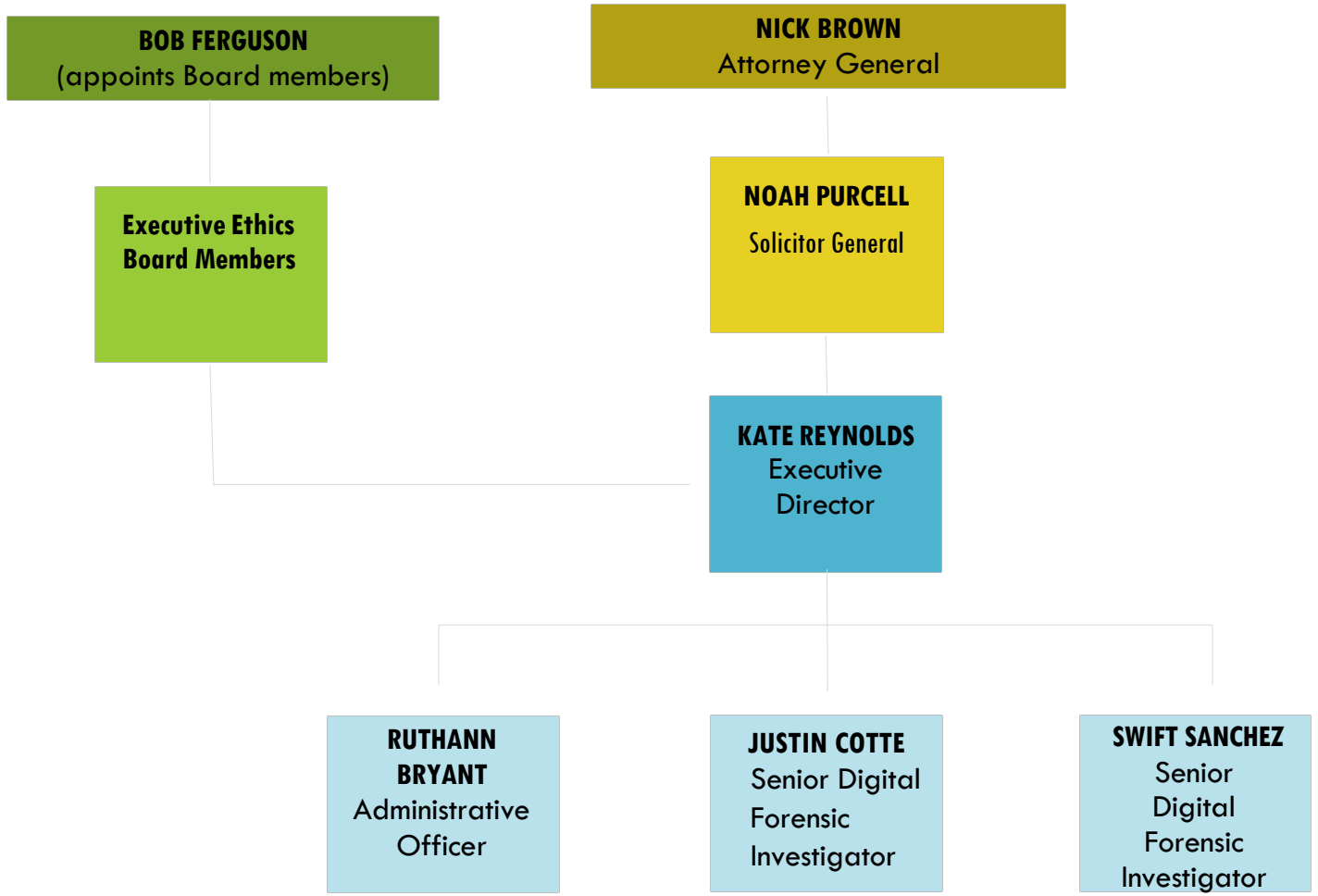
Website:	www.ethics.wa.gov
Email:	ethics@atg.wa.gov

The Board accepted stipulated penalties from or imposed penalties on 30 individual state employees as follows:

	Allegation	Violation	Penalty
Employee 1	Head Baseball Coach with Lower Columbia College rented baseball fields to their outside business at a lower rate than others were charged. They also used state resources for personal benefit and for their outside business.	RCW 42.52.070 and .160	$1,500 with $750 suspended
Employee 2	Worksource Virtual Specialist 4 with the Employment Security Department used state resources for personal benefit. They downloaded and saved several personal documents on their state computer and browsed the internet visiting numerous news, entertainment, real estate and shopping websites and visited two personal email websites.	RCW 42.52.160	$5,000 with $1,000 suspended
Employee 3	Corrections Officer 2 with the Department of Corrections used state resources to browse the internet visiting numerous news, shopping, real estate, YouTube and entertainment websites.	RCW 42.52.160	$2,500
Employee 4	Former Corrections Officer 2 with the Department of Corrections used state resources to access the Jail Booking and Reporting System and looking up individuals not related to his official duties for DOC.	RCW 42.52.050 and .160	$3,500
Employee 5	Former DOSH Standards Program Manager with the Department of Labor and Industries used state time to perform Mayor for the City of McCleary tasks and used their state email to send and receive an extensive amount of non-work-related emails.	RCW 42.52.160	$3,000
Employee 6	Corrections and Custody Officer 3 with the Department of Corrections, used state resources to browse the internet, visiting news, shopping and vacation websites and used their state email for a personal relationship.	RCW 42.52.160	$2,500 with $1,000 suspended
Employee 7	Social Service Specialist 5 with the Department of Children, Youth & Families, used state resources for personal benefit and provided special privileges for themselves and another. Evidence indicated that they parked their personal vehicle in a DCYF Seattle parking garage to attend a Mariner's baseball game and gave their DCYF issued keycard for	RCW 42.52.070 and .160	$2,000 with $1,000 suspended

	building access to their daughter and allowed their daughter and a friend to stay in the building while they waited for a concert later in the evening.		
Employee 8	Associate Superintendent with the Department of Corrections, used their state issued cell phone for personal use. Evidence indicated that 41 percent of all incoming and outgoing text messages over a one-year period were for personal purposes.	RCW 42.52.160	$1,500 with $500 suspended
Employee 9	Corrections Specialist 4 with the Department of Corrections, used state resources for personal benefit by taking home a state vehicle on several occasions without permission.	RCW 42.52.160	$500 with $250 suspended
Employee 10	Former Social Service Specialist 3 with the Department of Corrections, used their state email to send and receive approximately 460 personal email messages over a 14-month period.	RCW 42.52.160	$500
Employee 11	Human Resources Director for the Washington State Investment Board, used their state office to record a video podcast related to their outside business.	RCW 42.52.160	$300 with $150 suspended
Employee 12	Former Unemployment Specialist with the Employment Security Department used state resources for personal benefit. Evidence showed several gaming website bookmarks in their favorites list and numerous visits to shopping, news and their personal Gmail account.	RCW 42.52.160	$2,000
Employee 13	Corrections and Custody Officer 2 with the Department of Corrections used state resources to browse the internet to visit websites including Facebook, Instagram, Amazon and YouTube	RCW 42.52.160	$3,000 with $1,000 suspended
Employee 14	Classification Counselor 2 with the Department of Corrections used their DOC TEAMS account to conduct personal communications with a fellow DOC employee and sent and received over 700 personal emails using their state computer in a nine-month period.	RCW 42.52.160	$1,500 with $500 suspended
Employee 15	Corrections Officer 2 with the Department of Corrections used their DOC TEAMS account to conduct personal communications with a fellow DOC employee.	RCW 42.52.160	$500 with $250 suspended
Employee 16	WorkSource Specialist 4 with the Employment Security Department used state resources for their private benefit and gain. Evidence	RCW 42.52.160	$4,750

	indicated that they had ongoing personal web browsing to include shopping, social media boards and magazines, thousands of personal Google searches and YouTube visits and downloaded several large personal files onto their work computer.		
Employee 17	Sergeant with the Department of Corrections used state resources for their private benefit and gain. Evidence found that they used four different computers and had dozens of personal Google searches as well as frequent and ongoing web visits to include shopping, news, sportsman and travel sites.	RCW 42.52.160	$4,500
Employee 18	Former Corrections Officer 2 with the Department of Corrections used state resources for personal benefit and gain. Evidence indicated that they used their state email to send several personal emails, including an inappropriate email to the Department of Corrections statewide Outlook email distribution list, reaching over 1,000 people and browsed the internet visiting YouTube, ESPN, shopping and streaming websites	RCW 42.52.160	$5,000
Employee 19	Former Pesticide Regulatory Specialist 1 with the Department of Agriculture used state resources for non-work related activities. Evidence indicated that they were working for an outside business while on state time.	RCW 42.52.160	$7,000
Employee 20	Former Medical Assistance Specialist 4 used state resources for personal benefit and gain. Evidence indicated that they did not complete work for 280 hours of a possible 289 working hours during a two-month period.	RCW 42.52.160	$4,000
Employee 21	Former IT Business Analyst-Journey used state resources for private benefit. Evidence indicated they used an extensive amount of time during business hours to work on their project management certification.	RCW 42.52.160	$2,500
Employee 22	Program Support Supervisor 2 sat on an interview panel and did not disclose that their roommate was a candidate.	RCW 42.52.020	$500 with $350 suspended
Employee 23	Licensed Practical Nurse used state resources for personal benefit. Evidence showed ongoing and extensive personal use to include travel, social media, shopping, personal email and personal Google searches.	RCW 42.52.160	$4,000
Employee 24	Former Contract Specialist worked for both the Health Care Authority and the City of Spokane	RCW 42.52.160	$5,000

	at the same times and maintained overlapping work schedules.		
Employee 25	A former Cook used their state issued fuel card on multiple occasions to fill up their personal vehicle.	RCW 42.52.160	$5,000
Employee 26	Former Medical Assistance Specialist 3 used state resources for private benefit or gain. Evidence showed they were not working their full shift and created false meetings in their calendar in order to manipulate their availability status. They also visited non-work related websites to include social media, video game related websites, YouTube and Amazon.	RCW 42.52.160	$5,000
Employee 27	IT Application Development journey sent an email to an LNI distribution list encouraging employees to spend “at least two hours” of the workweek doing things that did not appear to be work related.	RCW 42.52.160	$2,500
Employee 28	Former Management Analyst with the Office of Administrative Hearings. Evidence indicated that they misappropriated funds using the agency credit card to four different businesses they created. Evidence also indicated that they used the agency credit card for personal charges, including gift card purchases and payments for personal cell phone expenses.	RCW 42.52.160	$28,000
Employee 29	Security Officer at the Juvenile Rehabilitation section of Green Hill School with the Department of Children, Youth and Families used state resources for personal use. Evidence indicated that they used their work computer to include streaming music, personal web searches and shopping on Amazon.	RCW 42.52.160	$2,000
Employee 30	Former Director of Tribal Relations with the Department of Natural Resources used state resources for a political campaign. Evidence indicated that they sent an email to several hundred state employees promoting their candidacy for Commissioner of Public Lands in the 2024 election.	RCW 42.52.180	$2,000

EXECUTIVE ETHICS BOARD
ORGANIZATIONAL CHART