

BEFORE THE WASHINGTON STATE
EXECUTIVE ETHICS BOARD

In the Matter of:

██████████

Respondent.

No. 2018-009

STIPULATED FACTS,
CONCLUSIONS OF LAW AND
AGREED ORDER

THIS STIPULATION is entered into by Respondent, ██████████ and Board Staff of the WASHINGTON STATE EXECUTIVE ETHICS BOARD (Board) through KATE REYNOLDS, Executive Director, pursuant to chapter 42.52 RCW, chapter 34.05 RCW, and WAC 292-100-090(1). The following stipulated facts, conclusions of law, and agreed order will be binding upon the parties if fully executed, and if accepted by the Board without modification(s), and will not be binding if rejected by the Board, or if the Respondent does not accept the Board's proposed modification(s), if any, to the stipulation. This stipulation is based on the following:

A. STIPULATED FACTS

1. On May 31, 2017, the State Auditor's Office (SAO) received a whistleblower complaint alleging ██████████ a Social Service Specialist 3 (SSS3) of the Children's Administration Division of Child and Family Services with the Department of Social and Health Services (DSHS), failed to complete child abuse intakes and placed the health and safety of children at risk. Additionally, the whistleblower asserted the subject used state resources for non-work related purposes.
2. On January 22, 2018, The Executive Ethics Board (Board) received an SAO referral alleging ██████████ may have violated the Ethics in Public Service Act by using state resources for private benefit or gain and disclosed confidential information to a person not authorized to receive it.

3. According to DSHS, [REDACTED] has been employed with the DSHS Children's Administration since July 6, 1998 and been in an Intake Specialist position as a SSS3 since January 1, 2012. [REDACTED] was placed on an alternate work assignment effective September 29, 2017, as a result of the allegations made against him.

4. According to the SAO investigative report, during the period of April 15, 2016 through April 15, 2017, [REDACTED] sent and received more than 300 personal emails using his state Outlook email account. The emails included communications regarding utility payments, insurance claims, diet information and email strings with multiple family members.

5. According to the SAO investigative report, during an interview with the SAO, [REDACTED] [REDACTED] acknowledged his personal use of his state email address. He said, "I'm at my desk for eight and a half hours a day, so it's convenient." He added that he did not have internet at home for a couple of years, but had recently switched back to using a personal email account.

6. The SAO also requested [REDACTED] hard drive, but a search of [REDACTED] hard drive for internet use only found data from March 2017 through June 2017.

7. Additionally, [REDACTED] sent an email to his wife containing confidential information. The email with the subject line "abuse" included a picture of an emaciated and bruised toddler and stated, "This is a 4 year old I did an intake on Tuesday!" The SAO said [REDACTED] chose not to respond to their questions regarding this email.

8. Board staff reviewed [REDACTED] email history and located the email with the subject line "abuse." The email was dated June 30, 2016 and was sent by [REDACTED] to his girlfriend's (CK), now wife, personal email address.

9. In a written response to Board staff, [REDACTED] said he has no idea where he got the picture from. He emailed this picture from his state computer only to CK at her private email. He said he

wanted to show CK the kind of child abuse that CPS intake and social workers often experience and have to deal with. He said he only sent one picture with no name, gender or any other identifying information.

10. Board staff was provided a copy of a Notice of Suspension without Pay by DSHS, dated August 29, 2017. The letter notified [REDACTED] that he would be suspended without pay from his position as a SSS3 beginning Tuesday, September 5, 2017 through Monday, September 11, 2017. The basis for discipline was his use of a state computer on June 30, 2016, to send an email to CK that contained a photograph of a four-year-old child for which he had completed the intake process. The letter states that CK is not an authorized recipient of this information and this action was not directly related to his job duties and responsibilities.

11. According to the Notice of Suspension letter, [REDACTED] acknowledged sending an email to CK containing the photograph of a child he processed through intake during an interview with the WSP Detective investigating the allegation. [REDACTED] stated that he did not feel he violated DSHS Administrative Policies or Children's Administration Guidelines. According to the Notice of Suspension letter, [REDACTED] justified his behavior under those policies and procedures by explaining he did not disclose the child's information or any identifying documents and that it was de minimis use of state systems, and it pertained to one of the cases to which he was assigned.

12. Board staff was provided a copy of a letter by DSHS with the Subject "Alternate Assignment," dated September 29, 2017. The letter notified [REDACTED] that effective September 29, 2017, he was placed on alternate assignment at the Division of Child and Family Services as a precautionary step while an investigation is conducted into the allegation of gross misconduct. The letter stated that "During your alternate assignment, your User ID for computer access will be disabled. If you need access to Employees Self Service or other personnel items, please contact your HR Representative." [REDACTED] alternate assignment ended March 14, 2018.

13. [REDACTED] confirmed with Board staff that he returned from his alternate work assignment in March 2018, but went on Labor and Industries (LNI) Time Loss for a work related injury April 2018 and is presently still on Time Loss.

14. According to DSHS, on November 29, 2017, Regional Administrator Jeff Kincaid (Mr. Kincaid) requested the Centralized Investigation Unit (CIU) conduct an administrative investigation on [REDACTED] regarding allegations that he failed to create intakes into the FamLink, the Children's Administration's information management system. This came to light after the investigation by the SAO.

15. In December 2017, based on the SAO report, Deputy Regional Administrator Ron Larson (Mr. Larson) requested a second allegation be added regarding [REDACTED] use of state email for personal purposes.

16. According to the DSHS investigative report, [REDACTED] was interviewed by DSHS CIU Investigator, Susan Danielson (Ms. Danielson), at the DSHS Spokane office on January 3, 2018, regarding the SAO investigation of his use of state email during the period of April 2016 through April 2017. The investigator stated that the SAO found over 300 emails were sent and received by [REDACTED] that did not appear to be related to state business. She said she tried to sort the emails by subject matter and went through the following emails with [REDACTED]. (Board staff reviewed the emails and changed some of the totals listed in the interview.)

17. Between April 15, 2016 and April 15, 2017, [REDACTED] received approximately 25 emails from Avista. He forwarded Avista emails to his wife about 21 times including responses from his wife. [REDACTED] reviewed the emails and stated that these were payment due notices from Avista, which is the utility provider for his home. He said that these were not related to state business, and were personal. He said that he had probably given his state email to the Avista Corporation as a method of contact because, for a time, he did not have email on his phone, and did not have internet access at home.

He said when he received the payment notices he generally forwarded the email to his wife, who paid the bills. He said that he never paid his Avista bills online from his state computer. He said that he later tried several times to contact Avista to have them stop sending the emails to his state email but the company did not respond to his request.

18. [REDACTED] said he does not believe that his use of state email for receiving and forwarding payment notices was out of compliance with state policy, because he believes that it meets the criteria for de minimis use in that it was infrequent, of no cost to the state and did not result in a benefit to him.

19. Between April 15, 2016 and April 15, 2017, [REDACTED] received about 23 emails from Jobs.com. [REDACTED] recalled receiving these emails and said that he does not know why he started receiving them. He suggested that he may have been added to the agency's email list automatically after he applied for a state job through Careers.gov. He said that he did not ask to receive this information. When asked if he had tried to use the "unsubscribe" hyperlink, he said "yeah, have you ever tried that?" and said it didn't work. He said that he believed that this was an acceptable use of state resources because the policy allows employment-seeking activities.

20. Between April 22, 2016 and March 22, 2017, [REDACTED] received about 12 emails from Liberty Mutual confirming payment, and he forwarded about 10 of those emails to CK. [REDACTED] recalled receiving these emails and said they were about mortgage payments due. He said that when he received them, he forwarded them to his wife, who is responsible for paying the bills. He said that he had probably given his state email address as a contact point. He denied making payments online while at work. He believes that this was de minimis use because there was no cost to the state and the emails did not result in a benefit to him.

21. According to the investigative report, [REDACTED] was asked if he had a personal email address. [REDACTED] said that he had a personal email address but for about two years, between 2015 and 2016, he did not have internet access at his home, so he could not access his personal email at home. [REDACTED] said that when his wife moved into his house, they got internet service so he changed his contact information.

22. Between November 2, 2016 and January 17, 2017, [REDACTED] exchanged about 23 emails regarding a claim with Liberty Mutual. [REDACTED] recalled receiving these emails and explained that it was in regards to an auto insurance claim after he was involved in a vehicle accident. He said that he had probably given his state email as a contact. When asked about the reference to scanned materials that he had sent via email, he said he had probably used the printer/scanner in the office to scan any needed materials to his insurance agent. He said that he believed this was of minimal cost to the state and it did not interfere with his work. He added that it was actually of benefit to the state because using the state email and scanner allowed him to remain on the job to complete these tasks, rather than taking time off work.

23. Board staff reviewed the emails and noted there were at least four instances where [REDACTED] scanned documents from a state printer (Ricoh printer) and emailed them to Liberty Mutual.

24. Between December 22, 2016 and February 2, 2017, [REDACTED] exchanged about 29 emails with GEICO regarding rate assessments, insurance quotes and payment confirmation. [REDACTED] recognized the emails and said that they were in regards to negotiations for insurance. He said that he used the state email because he did not have internet at home at the time and this allowed him to complete this business without taking time off work. He said that he did not believe this was for personal gain, and that it was work-related because he is required to have auto insurance for his employment.

25. Board staff reviewed the emails and noted CK was also being forwarded emails from [REDACTED] including sending attachments received from GEICO.

26. Between April 26, 2016 and October 11, 2016 [REDACTED] received eight emails from LinkedIn. [REDACTED] stated that the LinkedIn notices were from his nephew's profile. He said he did not understand how LinkedIn works and is not aware of why or how he started getting these notices. He said they were unsolicited.

27. Between April 22, 2016 and June 2, 2016, [REDACTED] exchanged about nine emails regarding student loan forgiveness. [REDACTED] recalled receiving and sending these emails and did not believe they were inappropriate because they were related to his education. He said that Human Resources (HR) is "supposed to help with student loans" and he has been working with HR to get forgiveness on his student loans, which he has been paying for 19 years.

28. Board staff reviewed the emails and two of the emails were sent by Miesha Phillips at DSHS to [REDACTED] with websites regarding student forgiveness programs for social workers with the subject line "loan info."

29. Between April 2016 and April 2017, [REDACTED] received a variety of credit solicitations. Amazon, Cabela's, Camp Chevrolet, Gilded Lily, Fandango. [REDACTED] reviewed each email individually.

- He said that he did not understand why he received solicitations from Amazon and Cabela's, but at some point, he may have had credit cards with both and identified his state email as a contact.
- About the "Gilded Lily," he said that he may have been added to an email list after he "clicked on a pop-up" about ordering flowers. He denied using the state computer to order flowers.

- [REDACTED] read the email from Camp Chevrolet and said that they must have sent him a credit application when he was in the market for a new vehicle. He admitted that he may have given Camp Chevrolet his state email address, but he did not open anything. When asked about his response to Camp, "sorry it will not open," he said that he may have been looking at vehicles on their website, then said that he wasn't sure why he wrote that.

30. Between August 10, 2016 and August 15, 2016, [REDACTED] exchanged five emails about the retrieval of property from Seattle PD. [REDACTED] said he received these emails from Seattle police after his personal computer was stolen. He said that he was contacted at the state email address after the officer found his business card with his computer and used that to contact him. He provided a copy of his business card that stated his email address is [REDACTED] [REDACTED] stated that he believed this was de minimis use.

31. On December 27, 2016, [REDACTED] exchanged seven emails regarding an upcoming medical procedure. [REDACTED] said that he believed that state policy allows him to do this, and referenced the part of the policy that refers to "health activities."

32. Between June 15, 2016 and June 28, 2016, [REDACTED] exchanged emails with Lisa Johnson (Ms. Johnson), a DSHS employee, regarding performing as a DJ at her daughter's wedding. [REDACTED] [REDACTED] said that these emails were related to a business that he used to own and has turned over to his son. He said that Ms. Johnson had contacted him and he told her to contact him on his personal phone. He said that he did not benefit from this or gain financially.

33. Board staff reviewed the email string between Ms. Johnson and [REDACTED]. The first email was on June 15, 2016 from Ms. Johnson's DSHS email address to [REDACTED]. Ms. Johnson asked [REDACTED] "... Do you still do DJing? Could you tell me about your prices, length of time what equipment a venue would need?" In an email response dated June 28, 2016, [REDACTED] responded by

email stating "I am still doing weddings and events. Tell your daughter to call me if she is still looking for a DJ. Next year I am turning the GigRig to my son Phil. I will give her the best deal and have everything she will need." In another email, later the same day, Ms. Johnson asked for the going rate for wedding and reception for a total of 4 hours. ██████████ responded "It would depend on who she hires. I would charge \$425 for you. Most DJs are \$600 to \$700." Board staff counted a total of five email responses to Ms. Johnson's inquiries by ██████████

34. ██████████ told Board staff that Ms. Johnson contacted him. It was just an inquiry about what she would be paying for a wedding. There was never a formal contract and he didn't perform the wedding for her daughter.

35. Between May 2016 and March 2017, ██████████ exchanged multiple emails with what appear to be family members. After reviewing the emails, ██████████ described the contents about a death in the family, an illness, and other family issues. He said that he received several of the emails when his nephew was placed in CPS care after disclosing abuse. He said that this is a restricted case, but that staff approached him in the office when the incident was reported. ██████████ acknowledged that for a period of time, his extended family used his state email to contact him. He said that when he got internet service at home, he was able to tell his relatives to stop using his state email address.

36. When asked by the investigator when he got internet service, ██████████ said that he got internet service when his present wife moved in with him. He said it was six or seven months prior to their marriage in April 2017.

37. ██████████ was referred to what the DSHS report identified as miscellaneous emails. After reviewing the emails, ██████████ said that he considered each of the following emails to be de minimis use and allowed by policy. According to the investigative report, ██████████ reviewed the policy out loud and said that "brief personal emails are permissible if there is no personal gain and are at

no cost to the state.” Some additional comments specific to each email are listed below. Board staff reviewed the emails and added relevant information in bold.

- April 19, 2016: Subject: Vegas. ██████████ said that his wife sent him prices regarding a trip to Las Vegas.
- April 21, 2016: Subject: Fixed mortgage rates. ██████████ said this was unsolicited. The emails states, “You received this email because you requested information.”
- April 27, 2017: Subject: Insurance Info. It is an exchange of emails between ██████████ and CK regarding insurance quotes for roofing.
- May 6, 2016: Subject: Please be aware. ██████████ forwarded a warning he received from DSHS about a hostile client to CK.
- May 6, 2016: Subject: Oak Harbor.
- June 1-2, 2016: Subject: My Phone. Contains multiple email exchanges between ██████████ and CK about her phone, meeting for dinner, etc.
- July 27, 2016: Subject: Norman, etc. Contains non-state related, retirement information forwarded to CK by ██████████.
- July 27, 2016: Subject: “when I saw you.” Contained attached document, “Poem” from ██████████ to CK.
- August 8, 2016: Subject: Limeade Support. ██████████ did not recognize this email or know what it was about.
- August 10, 2016: Subject: August statement. Contained attachments with questionable charges for BECU statement from CK to ██████████.
- August 22, 2016: Subject: Claim 033374270. Email from Safeco in regards to claim.

- March 24, 2017: Subject: Send me a copy of our bracket please. [REDACTED] clarified that this email did not involve gambling. Email exchange between CK and [REDACTED]. CK attached CBS Sports Bracket Manager document for College® Basketball National Championship.
- March 28, 2017: Subject: Your order has been shipped. [REDACTED] reviewed this email. He said this email was confirmation of an order for medical supplies for his diabetes. He said that it was health-related, so he believed this was allowable. When asked why he received the order confirmation at his state email, he said he must have given this as a contact. When asked if he had ordered these supplies on line, He said he “didn’t think so.” He said he probably used his personal phone.
- April 4, 2017: Subject: Emailing images: [REDACTED] reviewed this email. He said that he had been looking to purchase a tractor and must have been showing a picture of the tractor to his wife. When asked to explain where the picture came from, he initially said that he had probably taken a picture at the dealership and sent it to his wife, but he may have been looking at a website for the tractor dealership.
- April 7, 2017: Subject: Egg diet.

38. According to the DSHS investigative report, Jeff Madsen (Mr. Madsen), the Computer Forensics Investigations Manager with the DSHS HR Division of DSHS, reviewed [REDACTED] hard drive, which was limited to March 2017 through June 2017. Mr. Madsen reviewed [REDACTED] internet use, searching for the following key words, based on his email use: Avista, Amazon, Cabela’s, payment Lakeview Loan Servicing, Summit Funding, Liberty Mutual, Gilded Lily, Primal Health, and Gigrig.

39. Mr. Madsen stated that he found that [REDACTED] had conducted Google searches and visited websites about the following topics: chickens, chicken coop construction, vehicle loans, tractors,

deck construction, utility sheds, beekeeping, U-Haul rental, lawn mowers, Redbox, Washington Inmates¹, movies, store hours for Lowe's and Cabela's, campers, appliances, greenhouses, DNA testing, Pinterest, plumbing supplies and chain saws. Mr. Madsen's report stated "According to his browsing history, he was making payments for his personal bills using state equipment."

- According to the DSHS investigative report, after reviewing the spreadsheet and summarizing his internet use, [REDACTED] was interviewed and he gave the following responses: He has never shared his password.
- In regards to the Washington Inmates and Airway Heights Inmates sites he visited, [REDACTED] [REDACTED] said that he had put money on his brother's inmate account so that his brother could have telephone contact with his own son, who was in foster care at the time. He said that this was work related and the state should reimburse him for this.
- [REDACTED] said that all of the other searches and website visits were not work related and were done when he had "down time." When asked to explain "down time" he said that there are times when there are no phone calls and nothing in the intake queue so he would either read a book or look on the internet.
- In regards to using his state computer for shopping, [REDACTED] admitted that there were times when he "looked at different stuff" when he did not have work to do.
- [REDACTED] denied that he used the computer for financial transactions. He said that the payment confirmations from Avista, U-Haul, loans servicing, or credit card authorizations were confirmations of payments that he either made by telephone, or that his wife made electronically and not on his state computer.

¹ Washington Inmates is a website that allows people to make purchases for individuals who are incarcerated.

40. [REDACTED] told Board staff that may have paid some bills on his state computer, but it wasn't something that would be a normal thing. He said if he did pay bills on his state computer, it would have been on his free time at work. He said his wife normally pays all the bills.

41. [REDACTED] advised Board staff that he was on the internet on his own time researching lawnmowers, chicken coops, that type of thing, but said if you looked at other employee's computers, you would find that they were doing the same thing.

42. DSHS provided Board staff with a copy of a letter to [REDACTED], dated April 25, 2018, Notice of Demotion. The letter notified [REDACTED] that he will be demoted from his position as a SSS3 to a Secretary Senior in the Children's Administration, Division of Child and Family Services, effective May 1, 2018. The letter states that this action is a result of [REDACTED] failure to complete multiple child abuse intakes, which placed the health and safety of children at risk, his use of state resources for non-work related activities, and his failure to be forthright and honest during the investigation process about the payment of personal bills on his state computer.

B. CONCLUSIONS EOF LAW

1. The Ethics in Public Service Act, Chapter 42.52 RCW, prohibits state employees from disclosing confidential information. RCW 42.52.050, states in pertinent parts the following:

(2) No state officer or state employee may make a disclosure of confidential information gained by reason of the officer's or employee's official position or otherwise use the information for his or her personal gain or benefit or the gain or benefit of another, unless the disclosure has been authorized by statute or by the terms of a contract involving (a) the state officer's or state employee's agency and (b) the person or persons who have authority to waive the confidentiality of the information.

(3) No state officer or state employee may disclose confidential information to any person not entitled or authorized to receive the information.

RCW 42.52.050(5) defines "confidential information" as:

(a) specific information, rather than generalized knowledge, that is not available to the general public on request or (b) information made confidential by law.

2. The Ethics in Public Service Act, Chapter 42.52 RCW, prohibits state employees from Use of persons, money or property for private gain. RCW 42.52.160 states:

No state officer or state employee may employ or use any person, money, or property under the officers or employees official control or direction, or in his or her official custody, for the private benefit or gain of the officer, employee or another.

3. Based on the evidence reviewed, [REDACTED] disclosed confidential information in violation of RCW 42.52.050 and used state resources for personal benefit in violation of RCW 42.52.160. [REDACTED] activities do not meet the exceptions for the use of state resources as permitted in WAC 292-110-010.

4. The Board is authorized to impose sanctions for violations to the Ethics Act pursuant to RCW 42.52.360. The Board has set forth criteria in WAC 292-120-030 for imposing sanctions and consideration of any mitigating or aggravating factors.

C. AGGRAVATING AND MITIGATING FACTORS

In determining the appropriateness of the civil penalty, the Board reviewed the criteria in WAC 292-120-030. In the matter at hand, it is an aggravating factor these types of violations significantly reduce the public respect and confidence in state government employees and they were continuous in nature. In the matter at hand, it is a mitigating factor that as a result of the DSHS investigation, [REDACTED] [REDACTED] was demoted from his position as a SSS3 to a Secretary Senior.

D. STIPULATION AND AGREED ORDER

1. Pursuant to chapter 42.52 RCW, the Executive Ethics Board has jurisdiction over [REDACTED] [REDACTED] and over the subject matter of this complaint.
2. Under RCW 34.05.060, the Board can establish procedures for attempting and executing informal settlement of matters in lieu of more formal proceedings under the Administrative Procedures Act, including adjudicative hearings. The Board has established such procedures under WAC 292-100-090.

3. Pursuant to WAC 292-100-090(1), the parties have the authority to resolve this matter under the terms contained herein, subject to Board approval.

4. [REDACTED] agrees that if any or all of the alleged violations were proven at a hearing, the Board may impose sanctions, including a civil penalty under RCW 42.52.480(1)(b) of up to \$5,000, or the greater of three times the economic value of anything received or sought in violation of chapter 42.52 RCW, for each violation found. The Board may also order the payment of costs, including reasonable investigative costs, under RCW 42.52.480(1)(c).

5. [REDACTED] further agrees that the evidence available to the Board is such that the Board may conclude he violated the Ethics in Public Service Act. Therefore, in the interest of seeking an informal and expeditious resolution of this matter, the parties agree to entry of the stipulated findings of fact, conclusions of law and agreed order.

6. [REDACTED] waives the opportunity for a hearing, contingent upon acceptance of this stipulation by the Board, or his acceptance of any modification(s) proposed by the Board, pursuant to the provisions of WAC 292-100-090(2).

7. If the Board accepts this stipulation, the Board agrees to release and discharge [REDACTED] from all further ethics proceedings under chapter 42.52 RCW for any allegations arising out of the facts in this matter, subject to payment of the full amount of the civil penalty due and owing, any other costs imposed, and compliance with all other terms and conditions of the stipulation. [REDACTED] in turn agrees to release and discharge the Board, its officers, agents and employees from all claims, damages, and causes of action arising out of this complaint and this stipulation.

8. If the Board accepts this stipulation, it does not purport to settle any other claims between [REDACTED] and the Washington State Executive Ethics Board, the State of Washington, or other

third party, which may be filed in the future. No other claims of alleged violations are pending against [REDACTED] at this time.

9. If the Board accepts this stipulation, it is enforceable under RCW 34.05.578 and any other applicable statutes or rules.

10. If the Board rejects this stipulation, or if [REDACTED] does not accept the Board's proposed modification(s), if any, this matter will be scheduled for an administrative hearing before the Board. If an administrative hearing is scheduled before the Board, [REDACTED] waives any objection to participation by any Board member at the hearing to whom this stipulation was presented for approval under WAC 292-100-090(2). Further, [REDACTED] understands and agrees that this stipulation as well as information obtained during any settlement discussions between the parties shall not be admitted into evidence during the administrative hearing, unless otherwise agreed by the parties.

11. [REDACTED] agrees to pay a civil penalty in the amount of four-thousand dollars (\$4,000) associated with violations of RCW 42.52. The Board agrees to suspend one-thousand dollars (\$1,000) on the condition that [REDACTED] complies with all terms and conditions of this Stipulation and Order and commits no further violations of RCW 42.52 for a period of two years from the date this agreement is executed

12. The civil penalty in the amount of three-thousand dollars (\$3,000) is payable in full to the Washington State Executive Ethics Board within forty-five (45) days after this stipulation is signed and accepted by the Board, or as otherwise agreed to by the parties.

II. CERTIFICATION

I, [REDACTED], hereby certify that I have read this stipulation in its entirety, that my counsel of record, if any, has fully explained the legal significance and consequence of it. I further certify that I fully understand and agree to all of it, and that it may be presented to the Board without my appearance.

I knowingly and voluntarily waive my right to a hearing in this matter and if the Board accepts the stipulation, I understand that I will receive a signed copy.

[Redacted]

Respondent

3/15/2019

Date

EEB Case NO. 2018-009

Presented by:

Kate Reynolds

KATE REYNOLDS
Executive Director

3/27/19

Date

II. ORDER

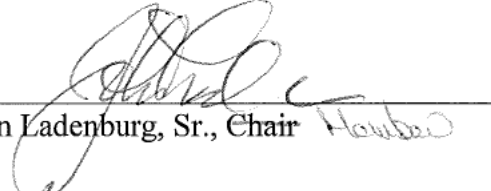
Having reviewed the proposed stipulation, WE, THE STATE OF WASHINGTON EXECUTIVE ETHICS BOARD, pursuant to WAC 292-100-090, HEREBY ORDER that the Stipulation is

✓ ACCEPTED in its entirety;


REJECTED in its entirety;

MODIFIED. This stipulation will become the order of the Board if the Respondent approves* the following modification(s):

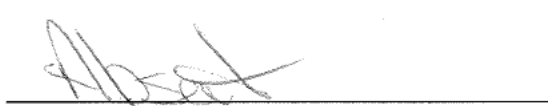
DATED this 10th day of May, 2019



John Ladenburg, Sr., Chair *Howden*




Shirley Battan, Vice-Chair



Lisa Marsh, Member



Anna Dudek Ross, Member



Gerri Davis, Member *Vice Chair*

* I, _____, accept/do not accept (circle one) the proposed modification(s).

_____, Respondent Date