

BEFORE THE WASHINGTON STATE
EXECUTIVE ETHICS BOARD

In the Matter of:

Debra Pagel

Respondent.

No. 2019-045

STIPULATED FACTS,
CONCLUSIONS OF LAW AND
AGREED ORDER

THIS STIPULATION is entered into by Respondent, Debra Pagel 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 November 7, 2019, the Executive Ethics Board (Board) received a referral from the State Auditor's Office (SAO) alleging that Debra Pagel (Ms. Pagel), a Social and Health Program Consultant 3 (SHPC3) with the Department of Social and Health Services (DSHS), may have violated the Ethics in Public Service Act by using state resources for private benefit or gain.

2. According to DSHS, Ms. Pagel was hired by DSHS in November 1987 as a Clerk Typist 3. In early 2004, she started in her current position as a SHPC3, which is the position she presently holds. Her work hours are 8:30 am to 5 pm, Monday through Friday.

3. According to the SAO report, they received a whistleblower complaint alleging Ms. Pagel was arriving late to work every day and not submitting leave. The SAO report states they obtained a copy of the Ms. Pagel's hard drive, email folders, leave submittals, and door entry records. Because Ms. Pagel works in a call center, they also obtained a copy of the call logs showing times her call center telephone was turned on and off. SAO's forensic team extracted an event log from the hard drive that detailed the time the Ms. Pagel logged on and off her computer. Using the event log data, call center data and door entry data, and based on the earliest time in the morning and latest time in the evening, they approximated how many hours the subject was at work each day. Because a computer overwrites data, as does the door entry system, they could review only a limited amount of time for which they had all the data.¹

4. According to the SAO, they provided the data to Ms. Pagel to review. Ms. Pagel said that she would sometimes work through her lunch and after hours to make up time she missed. The SAO credited her the time she said she worked through her lunches. She said at times she would include her breaks in her time away from the office and start her leave 15 minutes after she left the office. For example, if she had a 3 p.m. appointment, she would take her break at 2:45 p.m. and submit a leave slip from 3 to 5 p.m. According to Ms. Pagel's supervisor, this practice is allowable for her, who is not a union member and not subject to certain collective bargaining agreements that forbid such a practice. Based on this, SAO did not count these 15-minute increments as missing leave.

5. According to the SAO, Ms. Pagel said she sometimes worked late to make up her time. In addition to responding to clients by phone, she also responds to client emails. The SAO's

¹ The timeframe reviewed was May 14, 2018 through November 18, 2018. The original complaint was filed November 15, 2018.

review of the call center log did not show any calls that concluded after 5 p.m. In their review of her emails they found only one email sent after hours at 5:06 p.m. The SAO found no evidence to substantiate that she worked past her scheduled hours.

6. According to the SAO, during the 28 weeks of data reviewed, Ms. Pagel:

- Was late to work every day, but one;
- Failed to work 40 hours during any of the 28 weeks;
- Failed to submit sufficient leave to cover 40 hours each week, with the exception of when she was on leave for an entire week; and
- Failed to submit 118.9 hours of leave.

7. According to the SAO, Ms. Pagel's supervisor said she was surprised that someone had complained that Ms. Pagel arrived late to work every day. She said she had heard "little bits" about the situation from another employee, but had advised that person to not "police" Ms. Pagel because that was the supervisor's job.² She said she and Ms. Pagel kept track of her time away from the office and her leave. The supervisor explained that when she received notification of an absence by telephone she made either handwritten or typed notes. She also saved email notifications of absences. At the end of the pay period or when pushing the subject's leave,³ she compared the notes and emails to the leave reports to ensure leave had been submitted for all of the absences.

² Board staff identified the supervisor as Jenny Grayum (Ms. Grayum), Chief of Communications and Community Relations. Her present position is Special Projects for the Director.

³ In a written response to Board staff, Ms. Grayum stated that if a staff person had worked or taken leave (such as annual leave) and had accrued their leave for the month, but it had not "shown up" in the leave tracker system, this could be "pushed through" in the system for them to use the leave they had earned. She indicated that it was her understanding is that it was a logistical / administrative fix as a worker may have earned their leave, but it just had not shown up in the system. However, before that would happen she would confirm the hours absent and worked with the Division's staff person who worked on time and attendance.

8. Board staff requested that Ms. Grayum review the summary of her interview with the SAO. In a written response she said that it is accurate. She said that to clarify further, if it was brought to her attention that a staff member was absent, she would do her best to follow-up as the supervisor and as best appropriate. She said she did not want staff and team members to have to “police” each other.

9. Ms. Grayum went on to say that as the supervisor of the 10 staff in this office, her expectation was that they submit leave requests in advance when planned absences were known so she could ensure they had adequate coverage. In the case of an unplanned absence (calling in sick, etc), staff were expected to call the point of contact as soon as possible (i.e. an administrative support staff or her) and report the unplanned absence. Staff were also expected to submit leave slips as needed when absent. Ms. Grayum said when she was informed of or aware of unplanned absences, she would keep track of that information (via paper notes or electronically) so she could ensure leave slips were properly submitted via the systems’ leave tracker.

10. DSHS provided Board staff with a copy of a letter addressed to Ms. Pagel dated November 13, 2019, with the subject line: Notice of Intent to Discipline (NOI).

11. In the NOI, Babs Roberts (Ms. Roberts), Director of the DSHS Community Services Division, references the whistleblower complaint and the results of the SAO investigation:

A review of your hard drive, email folders, leave requests, phone logs and door card reader records were obtained and reviewed as part of the investigation. Using this information, the investigator reviewed 28 weeks of data and was able to determine how many hours you were at work each day. The following data was provided to you as part of the investigation...The chart below contains the SAO findings:

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Monday, May 14, 2018	7.68	0	.32		None provided
Tuesday, May 15, 2018	7.40	0	.60		None provided
Wednesday, May 16, 2018	5.41	3.0	-.41		None provided
Thursday, May 17, 2018	0	8.0	0		No discrepancy
Friday, May 18, 2018	0	8.0	0		No discrepancy
				= 39.49	
Monday, May 21, 2018	5.72	2.0	.28		None provided
Tuesday, May 22, 2018	7.73	0	.27		None provided
Wednesday, May 23, 2018	6.40	1.0	.60		None provided
Thursday, May 24, 2018		8.0	0		None provided
Friday, May 25, 2018	7.68	0	.32		None provided
				= 38.53	
Monday, May 28, 2018	0	8.0	0		No discrepancy
Tuesday, May 29, 2018	7.33	0	.67		None provided
Wednesday, May 30, 2018	4.93	3.0	.07		None provided
Thursday, May 31, 2018	0	0	8		Forgot to put in leave
Friday, June 1, 2018	6.33		1.67		Forgot to put in leave
				= 29.60	
Monday, June 4, 2018	5.22	0	2.78		Worked through lunch. Forgot to put in leave
Tuesday, June 5, 2018	7.33	0	.67		None provided
Wednesday, June 6, 2018	7.42	0.5	.08		None provided

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Thursday, June 7, 2018	5.53	2.5	-0.03		No discrepancy
Friday, June 8, 2018	7.07	0	.93		Forgot to put in leave
				= 35.6	
Monday, June 11, 2018	7.67	0	.33		None provided
Tuesday, June 12, 2018		8.0	0		No discrepancy
Wednesday, June 13, 2018	7.42	0	.58		None provided
Thursday, June 14, 2018	7.65	0	.35		None provided
Friday, June 15, 2018	5.11	3.1	-.21		No discrepancy
				= 38.94	
Monday, June 18, 2018	7.54	0	.46		None provided
Tuesday, June 19, 2018	5.78	2.0	.22		None provided
Wednesday, June 20, 2018	7.50	0	.50		None provided
Thursday, June 21, 2018	7.44	0	.56		None provided
Friday, June 22, 2018	6.03	2.0	-.03		No discrepancy
				= 38.30	
Monday, June 25, 2018	7.55	0	.45		None provided
Tuesday, June 26, 2018	3.39	4.0	.61		None provided
Wednesday, June 27, 2018	7.57	0	.43		None provided
Thursday, June 28, 2018	4.84	2.7	.46		None provided
Friday, June 29, 2018	7.15	0	.85		None provided
				= 37.19	
Monday, July 2, 2018	6.28	0	1.72		Forgot to put in leave
Tuesday, July 3, 2018	5.72	0	2.28		Forgot to put in leave
Wednesday, July 4, 2018		8.0	0		No discrepancy

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Thursday, July 5, 2018		8.0	0		No discrepancy
Friday, July 6, 2018		8.0	0		No discrepancy
				= 36	
Monday, July 9, 2018	7.77	0	.23		None provided
Tuesday, July 10, 2018	5.87	2.0	.13		None provided
Wednesday, July 11, 2018	7.55	0	.45		None provided
Thursday, July 12, 2018	5.35	2.5	.15		None provided
Friday, July 13, 2018	7.40	0	.60		None provided
				= 38.43	
Monday, July 16, 2018	7.45	0	.55		None provided
Tuesday, July 17, 2018	6.48	1.5	-.03		No discrepancy
Wednesday, July 18, 2018	7.73	0	.27		None provided
Thursday, July 19, 2018	5.60	1.0	1.40		Forgot to put in leave
Friday, July 20, 2018	7.33	0	.67		None provided
				= 37.10	
Monday, July 23, 2018	7.42	0	.58		None provided
Tuesday, July 24, 2018	5.93	2.0	.07		None provided
Wednesday, July 25, 2018	6.93	0	1.07		Forgot to put in leave
Thursday, July 26, 2018	7.78	0	.22		None provided
Friday, July 27, 2018	4.98	2.5	.52		Worked through lunch
				= 37.55	
Monday, July 30, 2018	7.35	0	.65		None provided
Tuesday, July 31, 2018	6.65	0	1.35		Forgot to put in leave
Wednesday, August 1, 2018	7.45	0	.55		None provided

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Thursday, August 23, 2018	7.43	0	.57		None provided
Friday, August 24, 2018		8.0	0		No discrepancy
				= 35.51	
Tuesday, September 4, 2018	0	4.0	4		Planned on taking half day off, must have taken full day
Wednesday, September 5, 2018	7.49	0	.51		None provided
Thursday, September 6, 2018	4.06	0	3.94		Worked through lunch. Added .5 hours.
Friday, September 7, 2018	6.93	0	1.07		None provided
				= 30.48	
Monday, September 10, 2018	7.32	0	.68		None provided
Tuesday, September 11, 2018	5.11	2.0	.89		Forgot to put in leave for morning
Wednesday, September 12, 2018	5.32	0	2.68		Forgot to put in leave
Thursday, September 13, 2018		0	8		Forgot to put in leave
Friday, September 14, 2018	7.02	0	.98		Forgot to put in leave
				= 26.77	
Monday, September 17, 2018	7.60	0	.40		None provided
Tuesday, September 18, 2018		8.0	0		No discrepancy
Wednesday, September 19, 2018	5.62	2.5	-.12		No discrepancy

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Thursday, September 20, 2018	7.27	0	.73		None provided
Friday, September 21, 2018	7.66	0	.34		None provided
				= 38.65	
Monday, September 24, 2018	4.56	3.3	.14		None provided
Tuesday, September 25, 2018	5.64	0	2.36		Forgot to put in leave
Wednesday, September 26, 2018	7.73	0	.27		None provided
Thursday, September 27, 2018	7.41	0	.59		None provided
Friday, September 28, 2018		8.0	0		No discrepancy
				= 36.63	
Monday, October 1, 2018	7.28	0	.72		None provided
Tuesday, October 2, 2018	7.62	0	.38		None provided
Wednesday, October 3, 2018	5.55	0	2.45		Forgot to put in leave
Thursday, October 4, 2018	7.49	0	.51		None provided
Friday, October 5, 2018	5.49	0	2.51		None provided
				= 33.44	
Monday, October 8, 2018	0	0	8		Forgot to put in leave
Tuesday, October 9, 2018	0	0	8		Forgot to put in leave

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Wednesday, October 10, 2018	7.36	0	.64		None provided
Thursday, October 11, 2018	6.10	0	1.9		Forgot to put in leave
Friday, October 12, 2018	5.88	1.5	.62		None provided
				= 20.85	
Monday, October 15, 2018	5.22	0	2.78		Forgot to put in leave
Tuesday, October 16, 2018	7.64	0	.36		None provided
Wednesday, October 17, 2018		8.0	0		No discrepancy
Thursday, October 18, 2018	7.44	0	.56		None provided
Friday, October 19, 2018	7.39	0	.61		None provided
				= 35.68	
Monday, October 22, 2018	7.45	0	.55		None provided
Tuesday, October 23, 2018	5.53	0	2.47		Forgot to put in leave
Wednesday, October 24, 2018	5.29	2.0	.71		None provided
Thursday, October 25, 2018	7.34	0	.66		None provided
Friday, October 26, 2018	7.02	0	.98		Forgot to put in leave
				= 34.63	
Monday, October 29, 2018	7.69	0	.31		None provided

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Tuesday, October 30, 2018	3.93	4.0	.07		None provided
Wednesday, October 31, 2018	5.40	2.0	.60		None provided
Thursday, November 1, 2018	8.00	0	0		DSHS Shared Strengths Workshop. Added 8 hrs. No discrepancy
Friday, November 2, 2018	6.00	0	2		Forgot to put in leave
				= 37.03	
Monday, November 5, 2018	7.38	0	.62		None provided
Tuesday, November 6, 2018		8.0	0		No discrepancy
Wednesday, November 7, 2018	7.52	0	.48		None provided
Thursday, November 8, 2018		8.0	0		No discrepancy
Friday, November 9, 2018		8.0	0		No discrepancy
				= 38.90	
Monday, November 12, 2018		8.0	0		No discrepancy
Tuesday, November 13, 2018	4.43	1.5	2.07		Worked through lunch. no lunch was deducted in original calculation
Wednesday, November 14, 2018	6.78	0	1.22		None provided
Thursday, November 15, 2018	3.55	4.0	.45		None provided
Friday, November 16, 2018	7.97	0	.03		None provided
				= 36.23	

Date	At Work	Leave submitted	Difference unaccounted for	Week total out of 40	Your response
Monday, November 19, 2018	6.68	2.0	-.68		May have submitted too much leave, but works out in the end
Tuesday, November 20, 2018	7.03	0	.97		Forgot to put in leave
Wednesday, November 21, 2018	7.07	0	.93		Forgot to put in leave
Thursday, November 22, 2018		8.0	0		None provided
Friday, November 23, 2018		8.0	0		None provided
				=37.78	

12. The NOI noted that Ms. Pagel had signed an Employee Annual Review Checklist on October 17, 2017 regarding DSHS Administrative Policy 18.64, Standards of Ethical Conduct for Employee's and DSHS Administrative Policy 18.31, Holidays and Leave. The NOI also notes that Ms. Pagel had no disciplinary actions on file.

13. The NOI included the following statements from Ms. Pagel's Performance Evaluation from 2015-2016:

- Debra frequently arrived late, late arrivals varying from minutes to hours.
- Debra's work and attendance have a negative impact on the team.
- This position is expected to adhere to all DSHS, ESA, CSD, and unit requirements for time, leave and attendance.

14. The NOI included the following statements from Ms. Pagel's Performance Evaluation for 2017-2018:

- Meet team expectations such as,
 - Adhering to department policies,

- Submitting leave requests in advance, and when unexpected leave is required, follow team processes to report absences.

15. In a written response from Ms. Pagel to Board staff, she stated that upon receiving the report from the SAO, she compared their findings with her schedule, submitted leave requests, and personal calendar where she tried to keep all her appointments listed to include her Outlook calendar, and emails. She said she was able to locate a couple of dates that were accounted for; however, there were several dates and times that she could not find information for. Her only explanation for this is her forgetfulness.⁴

16. Ms. Pagel stated she never intentionally failed to submit her leave requests in order to misuse time, or to be fraudulent. In the complaint filed, allegations were made that she came to work late every day, one to three hours and never submitted leave slips. She said she agrees she was usually late in the morning, but very seldom one to three hours. Most of the time it was between fifteen to thirty minutes in the morning. She said she kept in contact with her Supervisor, usually advising her that she was on her way and providing an approximate time of when she would arrive.

17. She said she would try to remember to document the time she arrived on her desk calendar. At the end of every pay period, she would make sure all of her leave requests were submitted and then double-checked with her supervisor to make sure their records matched. Her supervisor would either agree or let her know if she needed to submit additional request, which she would follow up and submit. In the complaint filed it stated the individual has approached her supervisor with their concerns. She said her supervisor never expressed to her there was a problem or that she wanted things done differently.

⁴ Board staff confirmed with Ms. Pagel that this information was provided to the SAO and added prior to their final report. She said there would not be anything different to add since then.

18. Ms. Pagel said she has been asked how, as an experienced state employee, she could have done this and that she should have known better. She said she did not do this intentionally and as said earlier she can only attribute this egregious mistake to her memory and forgetfulness. She said she was diagnosed with some medical problems approximately eight to nine years ago and has struggled from time to time, experiencing more difficulties and symptoms over the last four or so years including cognitive problems that can make you fuzzy headed. Ms. Pagel indicated is affects her concentration, her short-term memory and can cause her to not think clearly. She also indicated she can get easily distracted and lose things, including her train of thought, and struggle with conversations, forgetting even what word she was going to say.

19. Ms. Pagel said she knows now that she made a mistake but her actions were truly not done on purpose or intentionally. She indicated this has been an eye opener and learning experience for her in multiple ways. She said she has taken ownership of her mistake and understands there will be consequences.

20. According to the NOI, Ms. Pagel was scheduled to attend a pre-disciplinary meeting for December 2, 2019. Board staff received a copy of a letter from Ms. Pagel dated January 13, 2020, notifying her that she was being demoted to a Public Benefits Specialist 3 in the Economic Service Administration, Community Services Division effective February 1, 2020. Her pay range would be \$4,953, Range 48, Step M, resulting in a \$1,700 reduction in pay per month.

B. CONCLUSIONS OF LAW

1. 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.

WAC 292-110-010 Use of state resources, after April 2016, states, in part:

.....
(3) **Permitted personal use of state resources.** This subsection applies to any use of state resources not included in subsection (2) of this section.

(a) A state officer or employee's use of state resources is de minimis only if each of the following conditions are met:

- (i) There is little or no cost to the state;
- (ii) Any use is brief;
- (iii) Any use occurs infrequently;
- (iv) The use does not interfere with the performance of any state officer's or employee's official duties;
- (v) The use does not compromise the security or integrity of state property, information systems, or software;
- (vi) The use is not for the purpose of conducting an outside business, in furtherance of private employment, or to realize a private financial gain; and
- (vii) The use is not for supporting, promoting the interests of, or soliciting for an outside organization or group.

2. Based on the evidence reviewed, Ms. Pagel used state resources for personal benefit in violation of RCW 42.52.160. Ms. Pagel's activities do not meet the exceptions for the use of state resources as permitted in WAC 292-110-010.

3. 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. It is a mitigating factor that Ms. Pagel was demoted resulting in a \$1,700 reduction in pay per month.

D. STIPULATION AND AGREED ORDER

1. Pursuant to chapter 42.52 RCW, the Executive Ethics Board has jurisdiction over Debra Pagel 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. Debra Pagel 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. Debra Pagel further agrees that the evidence available to the Board is such that the Board may conclude she 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. Debra Pagel waives the opportunity for a hearing, contingent upon acceptance of this stipulation by the Board, or her 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 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. Debra Pagel 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 Debra Pagel 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 Debra Pagel 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 Debra Pagel 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, 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, Debra Pagel 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. Debra Pagel agrees to pay a civil penalty in the amount of three thousand dollars (\$3,000) associated with violations of RCW 42.52. The Board agrees to suspend five hundred dollars (\$500) on the condition that Debra Pagel 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 two thousand five hundred dollars (\$2,500) 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.

I. CERTIFICATION

I, Debra Pagel, 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.


Debra Pagel
Respondent


Date

Presented by:


KATE REYNOLDS
Executive Director


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 13th day of November 2020.

Approved via Virtual Meeting
Shirley Battan, Chair

Approved via Virtual Meeting
Gerri Davis, Vice Chair

Approved via Virtual Meeting
Lisa Marsh, Member

Absent
Anna Dudek-Ross, Member

Approved via Virtual Meeting
Jan Jutte, Member

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

Debra Pagel, Respondent

Date