

BEFORE THE WASHINGTON STATE
EXECUTIVE ETHICS BOARD

In the Matter of:

Kristina Brown
Respondent.

No. 2021-029

STIPULATED FACTS,
CONCLUSIONS OF LAW AND
AGREED ORDER

This stipulation is entered into by Respondent, KRISTINA BROWN, 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 June 21, 2021, the Executive Ethics Board (Board) received a complaint alleging that former Office of the Lieutenant Governor (OLG) employee, Executive Director Kristina Brown (Ms. Brown), may have violated the Ethics in Public Service Act. Among other things, the complaint alleged that Ms. Brown, as an OLG employee, was involved in contract negotiations between OLG and the Washington State Leadership Board (WSLB)¹ and that she had a management role in the contract administration. The complaint alleges Ms. Brown violated the

¹ The Washington State Leadership Board (WSLB) is a 501 (c) 3 organization codified in state law (RCW 43.15.30) that specializes in delivering equitable leadership development programs for the State of Washington.

Ethics in Public Service Act when she accepted employment with the WSLB shortly after leaving employment with the OLG. In addition, the complaint alleged violations of suspicious financial transactions between the OLG and the WSLB related to the transfer of \$18,000 and the disbursement of electronic equipment, e.g., Benchmark's professional e-blast services, as well as headsets, AC adaptors, USB receiver for a keyboard/mouse, and a computer monitor purchase by OLG staff.²

2. In 2018 (SB 5746) and 2020 (HB 2402), the State Legislature updated WSLB's mission to include expanding educational, sports, leadership, and/or employment opportunities for youth, veterans, and people with disabilities in Washington state, specifically naming the Washington World Fellows and Boundless Washington programs. During this time, the Legislature also supported WSLB's programs by establishing some dedicated revenues from specialty license plate sales of the Seattle Seahawks, Mariners, Storm, and Kraken license plates. RCW 43.15.030 provides that the OLG may provide technical and financial assistance to the WSLB where the work of the WSLB aligns with the mission of the OLG.

3. In his written declaration, former Lt. Governor, Cyrus Habib (Mr. Habib) provided the following background information to explain the relationship between his office and the WSLB:

- Promoting college readiness and youth leadership was a priority during his time in office as the Lt. Governor.
- The OLG first developed the Washington World Fellowship as a study abroad and college prep program. The program received support from the state through the sale of certain

² The complaint also alleged violations of the Goods and Services Procurement Law – Public Contracting Rules. Any violation of this law would not be within the jurisdiction of the Board and therefore was not investigated by Board staff except to the extent of Ms. Baker and Ms. Brown's involvement in the establishment and management of the contract.

specialty license plates, and during the last biennium, received funds appropriated by the Legislature for the purpose of operation the Washington World Fellows program.

- Boundless Washington is an outdoor leadership program for junior high and high school students with disabilities in our state. The program receives funding from the sale of certain specialty license.
- The Legislative Youth Advisory Council (LYAC) predates his time in office, but was being operated by the OLG pursuant to a memorandum of understanding with the Office of the Superintendent of Public Instruction at the time he took office. In 2020, the Legislature moved the LYAC into the OLG altogether.
- As the OLG began to develop these programs in 2017, it became clear upon advice from the OLG assigned Assistant Attorney General and others, that it would not be possible for these programs to operate solely out of a government office, owing to liability exposure to the state and the impossibility of obtaining relevant insurance coverage for an agency like the OLG. He approached the WSLB, which at the time was still known as the Association of Washington Generals, about the possibility of partnering with them on the Washington World Fellows Program and later Boundless Washington. The WSLB agreed, and became the operators of those programs, with the OLG providing technical and financial support pursuant to OLG's statutory authority to do so.
- Eventually, the size and scope of these programs became too expansive for OLG to support, and the decision was made to obtain additional legislative funding for the programs. That happened in 2019 as a part of the biennial budget passed that year.
- Following the 2020 Legislative Session, the WSLB Chair and Mr. Habib decide that they should further formalize the partnership between the OLG and the WSLB. They negotiated an agreement whereas the OLG would transfer the funds for these statutory programs to the WSLB in exchange for the WSLB operating all three of the programs.

4. On May 17, 2020, pursuant to RCW 43.15.030, the OLG and WSLB entered into an agreement whereas the OLG and the WSLB would collaborate with each other on the following programs:

- Washington World Fellows (WWF)
- Boundless Washington Program (BW)
- Washington Legislative Youth Advisory Council (LYAC)
- Honors Program
- WSLB Management and Additional Funding

5. Mr. Habib indicted in his declaration that he was the only person from the OLG to negotiate the terms of the agreement. He personally oversaw and approved every provision of the agreement. Mr. Habib indicated that the only other person in the OLG who was involved with the

drafting and otherwise supporting the process was Ms. Hollingshead, who would execute his wishes with respect to the agreement, such as editing drafts and scheduling phone calls.

6. Ms. Brown indicated in her written declaration that she did not participate in the negotiations or execution of the agreement between the OLG and the WSLB.

7. Ms. Brown was initially hired by the OLG for the position of Director of Internal Affairs in May of 2017. In May 2018, she was appointed as Program Director. She was appointed as the Executive Director in mid-May 2019. She served in that position until mid-January 2021.

8. On August 3, 2020, Ms. Brown submitted a letter of interest and resume to the WSLB regarding her interest in applying for the open WSLB Executive Director position.

9. According to Ms. Brown's resume (provided to the WSLB) her job responsibilities with the OLG were:

- Director of External Relation (May 2017 through May 2018)
 - Initiating, drafting, editing, and designing all press releases, official letters, flyers, web materials and media representing the OLG.
 - Responsible for cultivating and managing press relations.
- Program Director (May 2018 through May 2019)
 - Created the OLG's flagship programs including the Washington World Fellows Program, the Compete Washington Program, The Boundless Washington Program, and Compassion Scholars.
 - Designed programming, initiated partnerships, created professional materials, recruited participants, and led legislative efforts to establish and sustain office programs.
 - Led fundraising efforts to cover the program cost by pursuing private partnerships, establishing strategic interagency agreements, and advocating for policies to create long-term funding sources.
- Executive Director (May 2019 through Mid-January 2021)
 - Developing a vision for the office and overseeing its implementation.
 - Training and managing staff.
 - Designing and launching office initiatives, such as the Washington Mask Challenge.
 - Representing the Lieutenant Governor in meeting, conferences, and events.
 - Presenting on behalf of the of the office to external audiences
 - Liaising with other elected officials and agencies.

- Leading the office's legislative portfolio.
10. The letter of interest sent to the WSLB is shown in full below:

8.3.2020

Nickolas Bumpaous
Chair
Washington State Leadership Board

Re: Executive Director for the Washington State leadership Board

Dear Executive Committee members:

It is with great enthusiasm that I submit this letter of interest for the position of the Executive Director for the Washington State Leadership Board. As Executive Director for the Office of Lieutenant Governor Cyrus Habib, I was able to help the Leadership Board grow into a robust non-profit organization administering three flagship programs I developed. I came to this position with a thorough professional understanding of the Leadership Board and years of personal investment in its success. I am confident that this history will enable me to expand the impact of this organization's work and advance its important equity-focused mission.

I first engaged with the WSLB (then the Association of Washington Generals) in 2017 as the Director of External Relations for the Office of the Lt. Governor, where I was working to establish a first-of-its kind, state-led study abroad and college readiness program for underserved high school students. This program, which became the Washington World Fellows program, needed a public-private partnership to solicit private support and more nimbly enter into private contracts. I am proud to have earned the trust of the then-President Mike Flood to establish that early partnership between the Office of the Lt. Governor and the WSLB, a model that led the groundwork for all of our subsequent joint ventures, including Boundless Washington, the Compassion Scholars, and the Legislative Youth Advisory Council. In our first year of partnership, we raised \$110,000 for the first class of Washington World Fellows, primarily through corporate sponsorships. Since then, I have designed, led community engagement and fundraised for each of our programs, which I count among our office's most significant achievements. With this background, I will come into the Executive Director's position with a unique understanding not only of how the WSLB programs run, but also on how they were built – and thus have a realistic sense of how they might grow.

Yet beyond the administration of the WSLB programs, expertise in the administration of the board itself will also be key to the success of its first Executive Director, and here too I am excited to bring my experience to ensure the organization continues to professionalize and evolve. At my first WSLB board

meeting in 2017, the Treasurer briefed the board on its budget of \$27, 290, revenue almost exclusively derived from the Sounders specialty license plates fees. Today the WSLB budget has grown well over tenfold, with a current balance of \$517, 572. This growth is largely due to the legislative changes I have led to expand to board's income from the Seattle Seahawks and Mariners license plates, the execution of a long-term contract with the Lt. Governor's Office, and ongoing private fundraising efforts. In addition to the Seahawks and Mariners license plates bills our office passed, we successfully advocated for the passage of bill to establish the Seattle Storm and National Hockey League license plates, which will provide revenues for the Legislative Youth Advisory program and the Boundless Washington program when they begin accruing funds. I have also been helping draft employee contracts, evaluating insurance policies, and revising bylaws.

Lastly, but perhaps most importantly, my leadership experience has prepared me to guide this organization strategically as it begins a new chapter. In the Lt. Governor's Office, I am responsible for conceiving of new ways we can serve Washingtonians, coming up with concrete strategies for realizing our goals, and then delivering our ideas as programs to real people, often in high-risk situations, in a manner that will hopefully change their lives, can be explained to the press, will be welcomed by donors, and can be shared throughout the state on our very public platform. I have been blessed that the Lt. Governor has trusted me to lead this work with my talented colleague Libby Hollingshead, and have been furthered bless to manage a motivated and brilliant staff in doing so.

These last three years, we have made great strides in refining the WSLB mission, anchoring our programs in state law, and formalizing the board. Our next step needs to be establishing a strategic plan that is both bold and practical to ensure the board can continue providing its enormous value to the State of Washington by strengthening our fundraising, promoting awareness through proactive media and community engagement, and enhance the board's leadership development offerings. I look forward to working on these issues with you.

I come to you with a deep love of the work of this board and a genuine belief in its mission. If selected for this role, I will serve as a careful steward of the programs and a champion for your cause as we find new ways to elevate the board's profile and expand its impact.

Thank you for your consideration. If you have any questions, please do not hesitate to reach out to me at [redacted].

Sincerely,"

Signed Kristina Brown, Executive Director, Office of Lt. Governor Cyrus Habib

11. On August 10, 2020, former Chief of Staff to Lt. Governor Habib, Libby Hollingshead (Ms. Hollingshead) sent an email to WSLB Board Member Amy McKenna with a

cc to Nick Bumpaous. The subject of the email was *Amy McKenna's talking points – Resolution 2020-009* (the Board's resolution to hire an Executive Director). See email below:

Amy,

Below are your talking points for Resolution 2020-009. Nick will introduce the discussion and highlight the job description. He will then turn it over to you to present Kristina (Brown) as a candidate. Please let me know if you would like to discuss this further. I've attached her resume and cover letter.

12. The talking points were for Ms. McKenna to announce at the August 11, 2020, WSLB Board meeting in executive session that the Executive Committee has concluded its search for an Executive Director and was making their unanimous recommendation to hire Ms. Brown and that their recommendation was based in part on the following:

- That it was Ms. Brown's job in the OLG to create the Washington World Fellows, Boundless Washington, and the Compassion Scholarship programs. Which included forging the partnerships to establish them, fundraising to cover program cost, and the hiring and managing staff to ensure they were delivered at a quality level.
- Ms. Brown also brings valuable legislative experience as a former Legislative Analyst for the Attorney General's Office and as the lead in the OLG on legislative advocacy. The bills that created funding for our programs through the Seahawks, Mariners, Storm, and NHL license plates were under her portfolio.

13. After the executive session, a motion was made to hire Ms. Brown, the motion was seconded, and the full Board unanimously approved the hiring of Ms. Brown as the Executive Director. At that time, Ms. Brown verbally accepted the position.

14. On August 11, 2020, Ms. Brown was provided a letter advising her of her appointment as the Executive Director with the WSLB with an effective start date of January 27, 2021.

15. Ms. Brown was the only candidate considered by the WSLB for the position as Executive Director.

16. Board staff asked Ms. Hollingshead³ if she had read Ms. Brown's, talking points, resume, and letter of interest and if she believed them to be an accurate representation of Ms. Brown's work at the OLG. Ms. Hollingshead replied, *"I think her description is generally accurate. As with any cover letter, it focuses on her own accomplishments as opposed to what we achieved as a team and may be a little self-congratulatory. While Kristina was involved with creating the Washington World Fellows and Boundless Washington programs, she did so at the specific direction of the Lt. Governor and as part of a team in the office."*

17. Board staff asked Ms. Hollingshead what was Ms. Brown's involvement in these programs. Ms. Hollingshead replied, *"Kristina worked to create and develop these programs. In terms of program management, I was responsible for operational and budget related duties, while Kristina worked with stakeholders to implement the Lt. Governor's vision."*

18. Board staff asked Ms. Hollingshead what was Ms. Brown's involvement in the creation of legislation that secured funds for the WSLB programs through fees associated with the sale of license plates. Ms. Hollingshead replied, *"Kristina's portfolio included implementing the Lt. Governor's legislative agenda, which meant meeting with legislators and stakeholders and sometimes testifying on bills at the direction of the Lt. Governor."*

19. Ms. Brown's Resume indicates that during the time she was the Program Director in the OLG (May 2018 through May 2019) she created the OLG flagship programs, including the Washington World Fellows program, the Complete Washington Program, the Boundless

³ Ms. Hollingshead statements are from her written response to Board staff received on October 6, 2021.

Washington Program, and Compassion Scholars. Board staff asked Ms. Hollingshead if she believed this to be true and accurate. Ms. Hollingshead replied, *“Generally, yes. These are programs that our team created at the direction of the Lt. Governor. Kristina, as Program Director, played an integral role in the creation and implementation of the programs in the Lt. Governor’s office. The Lt. Governor was very involved with this work. He was the originator of the idea for the programs and provided direction, feedback, and guidance, at every stage. Kristina did the work of implementing his vision, at his direction.”*

20. Ms. Brown’s resume indicates that during the period when she was a Program Director she designed programming, initiated partnerships, created promotional materials, recruited participants, and led legislative efforts to establish and sustain office programs. Board staff asked Ms. Hollingshead if she believed this to be true and accurate. Ms. Hollingshead replied, *“Generally yes, at the direction of the Lt. Governor. As part of her duties in implementing the office programs, she would work with stakeholders to enter into partnerships and create and distribute promotional materials. This was all done in close communication with the Lt. Governor in order to implement his strategy, directives, and messaging around these programs.*

Kristina led the execution of Lt. Governor’s legislative agenda, which included legislation that created dedicated revenue streams for youth leadership programs through partnerships with Seattle Area professional sports teams and their speciality license plate programs. An important exception is that Lt. Governor Habib always made his legislative budget asks to committee chairs directly, rather than sending staff to communicate the request on his behalf. For example, Lt. Governor Habib personally communicated with budget chairs for the office’s 19-21 biennial budget ask, which included funding for the OLG’s educational programs, such as World Fellows and Boundless Washington.”

21. Ms. Brown's resume indicates that during the period when she was a Program Director she led fundraising efforts to cover program cost by pursuing private partnerships, establishing strategic interagency agreements, and advocated for policies to create long-term funding sources. Board staff asked Ms. Hollingshead if she believed Ms. Brown's resume to be true and accurate. Ms. Hollingshead replied, *"Yes. Kristina and I worked on these initiatives at the direction of the Lt. Governor."*

22. Board staff asked Ms. Hollingshead if she had read the "Letter of Interest" Ms. Brown sent to the WSLB and if so did she believe it to be true and accurate as it related to Ms. Brown's involvement in the management of WSLB programs, her efforts to lead legislative changes to expand funding from specialty plate fees, the execution of a long-term contract with the OLG and ongoing private fundraising efforts?? Ms. Hollingshead replied, yes that she had read Ms. Brown's letter of interest and that, yes, she believed it to be true and accurate. She stated, *"Yes. Kristina was an integral part of the creation and implementation of office programs. The Lt. Governor was deeply engaged in this work and Kristina was responsible for acting on his instructions to implement the programs. But to be clear, and as I said in my declaration, Kristina did not participate in the contract negotiations, nor does she take credit for that in her cover letter. In the sentence I believe you are referring to, Kristina explains that the WSLB's budget growth is due to a multitude of factors, including legislative changes, which she takes credit for leading, joint fundraising efforts, and the fact that a contract between the Lt. Governor's Office and the WSLB was formalized. And, although Kristina was the lead staffer in our office for programmatic work related to these programs, I was the office liaison for the AWG/ WSLB until I left the Office of the Lieutenant Governor. I worked with the organization on their budgeting, operations, and long term planning. As Chief of Staff, I also did this work for the office, so I was really the only*

staff member on the team available to staff and support the Lt. Governor in the drafting, negotiations, and implementation of the contract.”

23. The WSLB⁴ indicated, in a response to Board staff, that the WSLB has no knowledge of Ms. Brown being involved on the OLG’s behalf in negotiating the provisions of the agreement. WSLB exclusive point of contact during the negotiation of the agreement was Ms. Hollingshead.

24. The WSLB further indicated in their response that the WSLB is aware that while Ms. Brown was an employee of the OLG she did engage, in some degree, in external fundraising efforts⁵ directed at potential business and corporate donors, as well as WSLB Board Members, to support certain WSLB’s programs including Washington World Fellows, Boundless Washington, and Washington Legislative Youth Advisory Council.

25. The WSLB also indicated in a response to Board staff that the WSLB was aware that the OLG was working to secure specialty license plate-derived fees as an ongoing source for funding for certain WSLB programs as part of the multi-year agreement executed by the WSLB and the OLG on May 17, 2020. However, the WSLB was not aware of any specific role and /or responsibility Ms. Brown may have been assigned by the OLG in regards to securing that funding stream.

⁴ WSLB responses were provided by Attorney Harold A. Malkin, Law Firm Calfo/Eakes.

⁵ WSLB interprets “fundraising efforts” to mean solicitation of donors for financial support for WSLB programs WSLB administer on behalf of the OLG.

B. CONCLUSIONS OF LAW

1. The Ethics in Public Service Act, Chapter 42.52 RCW, restricts former state employees from accepting certain offers of employment upon leaving state service. RCW 42.52.080 states:

(1) No former state officer or state employee may, within a period of one year from the date of termination of state employment, accept employment or receive compensation from an employer if:

- a. The officer or employee, during the two years immediately preceding termination of state employment, was engaged in the negotiation or administration on behalf of the state or agency of one or more contracts with that employer and was in a position to make discretionary decisions affecting the outcome of such negotiation or the nature of such administration;
- b. Such a contract or contracts have a total value of more than ten thousand dollars; and
- c. The duties of the employment with the employer or the activities for which the compensation would be received include fulfilling or implementing, in whole or in part, the provisions of such a contract or contracts or include the supervision or control of actions taken to fulfill or implement, in whole or in part, the provisions of such a contract or contracts. This subsection shall not be construed to prohibit a state officer or state employee from accepting employment with a state employee organization.

(2) No person who has served as a state officer or state employee may, within a period of two years following the termination of state employment, have a direct or indirect beneficial interest in a contract or grant that was expressly authorized or funded by specific legislative or executive action in which the former state officer or state employee participated.

(3) No former state officer or state employee may accept an offer of employment or receive compensation from an employer if the officer or employee knows or has reason to believe that the offer of employment or compensation was intended, in whole or in part, directly or indirectly, to influence the officer or employee or as compensation or reward for the performance or nonperformance of a duty by the officer or employee during the course of state employment.

(4) No former state officer or state employee may accept an offer of employment or receive compensation from an employer if the circumstances would lead a reasonable person

to believe the offer has been made, or compensation given, for the purpose of influencing the performance or nonperformance of duties by the officer or employee during the course of state employment.

(5) No former state officer or state employee may at any time subsequent to his or her state employment assist another person, whether or not for compensation, in any transaction involving the state in which the former state officer or state employee at any time participated during state employment. This subsection shall not be construed to prohibit any employee or officer of a state employee organization from rendering assistance to state officers or state employees in the course of employee organization business.

(6) As used in this section, "employer" means a person as defined in RCW 42.52.010 or any other entity or business that the person owns or in which the person has a controlling interest. For purposes of subsection (1) of this section, the term "employer" does not include a successor organization to the rural development council under chapter 43.31 RCW.

2. Based on the stipulated facts above, Ms. Brown left state service and accepted employment with a non-profit organization in violation of RCW 42.52.080.

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. It is a mitigating factor that Ms. Brown is no longer employed by either the State of Washington or the non-profit organization in question. It is a mitigating factor that her conduct was approved by her supervisor.

D. STIPULATION AND AGREED ORDER

1. Pursuant to chapter 42.52 RCW, the Executive Ethics Board has jurisdiction over Kristina Brown 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. Kristina Brown 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. Kristina Brown further agrees that the evidence available to the Board is such that the Board may conclude they 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. Kristina Brown waives the opportunity for a hearing, contingent upon acceptance of this stipulation by the Board, or their 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 Kristina Brown 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. Kristina Brown 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 Kristina Brown 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 Kristina Brown 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 Kristina Brown 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, Kristina Brown 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, Kristina Brown 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. Kristina Brown agrees to pay a civil penalty in the amount of seven-hundred and fifty dollars (\$750) associated with violations of RCW 42.52.

12. The civil penalty in the amount of seven-hundred and fifty dollars (\$750) 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, Kristina Brown, 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.



KRISTINA BROWN
Respondent

2.6.2022

Date

Presented by:



KATE REYNOLDS
Executive Director

3/11/2022

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 11th day of March, 2022

Approved Virtually
Shirley Battan, Chair

Approved Virtually
Gerri Davis, Vice-Chair

Approved Virtually
Jan Jutte, Member

Approved Virtually
Earl Key, Member

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

Kristina Brown, Respondent Date