

BEFORE THE WASHINGTON STATE
EXECUTIVE ETHICS BOARD

In the Matter of:

Vel Rajagopal

Respondent.

No. 2022-026

STIPULATED FACTS,
CONCLUSIONS OF LAW AND
AGREED ORDER

THIS STIPULATION is entered into by Respondent, Vel Rajagopal 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 August 17, 2022, the Executive Ethics Board (Board) received a referral from the Department of Commerce (COM) alleging that Vel Rajagopal (Mr. Rajagopal), Chief Information Officer of COM, may have violated the Ethics in Public Service Act. The complaint alleged that Mr. Rajagopal violated sections of RCW Chapter 42.52.

2. According to the referral from COM, Mr. Rajagopal, Chief Information Officer, allegedly contracted out information services with a company that he is allegedly part owner of, Drive Godt LLC, and did not disclose his association to COM. COM provided Board staff with a copy of their policy #POL 04-00-00 COMPLYING WITH STATE ETHICS LAW. Section H

states, in pertinent part, “Employees participating in regulatory and contracting activities, also known as Section 4 employees, are subject to stricter limitations under the law. Participating includes any substantial involvement in regulation or contracting decisions and includes not only making or approving decisions, but also providing recommendations, advice, investigation, or similar activities.”

3. According to COM, Mr. Rajagopal was hired as Chief Information Officer on November 16, 2019. His position was made permanent on November 16, 2020.

4. Mr. Rajagopal’s job description and duties were provided by COM. Part of Mr. Rajagopal’s job duties are to oversee the application security policy and methodologies and to oversee and manage contractors hired on application development projects.

5. As part of his duties, Mr. Rajagopal entered into four contracts with Drive Godt LLC on behalf of COM in the amount of approximately \$1.3 million between the dates of May 2021 and July 2022. Vel’s brother, Arogya Nathan Rajagopal (Nathan), started Drive Godt LLC. Mr. Rajagopal maintains that his brother left the company in or around May 2021.

6. According to the Board staff’s research, Drive Godt LLC was incorporated on October 17, 2018. Initially, Arogya Nathan Rajagopal (Nathan) was listed as the company’s executor and governor. Over the years, there were additions of other officers, including, David Horton, Stine Andreassen (Stine), and Vel Rajagopal. Mr. Rajagopal was added in May 2022 and, according to Mr. Rajagopal, his name was removed in June 2022. Mr. Rajagopal maintains listing him as governor was a “mistake made by Drive Godt LLC” and was corrected as soon as it was realized.

7. According to DES, Drive Godt LLC has an active account registered with DES and approved for the Washington state’s Master Contract list. The active account was registered with

DES on April 2, 2019 with the administrator as “Nathan RA.” A phone number and physical address was provided and determined to be owned by Mr. Rajagopal. Mr. Rajagopal maintains that he learned this address was being used by the company only after this investigation was initiated. Mr. Rajagopal also maintains that this was because his brother, who operated the company, was a tenant at the address. Mr. Rajagopal has indicated he did not reside at this address.

8. There was a second inactive account with DES that listed a second property of Mr. Rajagopal’s located at 2225 65th CT SW. Mr. Rajagopal maintains he has no knowledge of the company using his physical addresses in official filings with the state of Washington.

9. As of September 15, 2022, according to the Washington Secretary of State’s website, Drive Godt LLC is listed with registered agent Swapna Hugar (Ms. Hugar) and an address of 301 Union St #21867 Seattle, WA 98111.

10. In reviewing the list of changes made to Drive Godt LLC, as shown on Open Corporates, Ms. Hugar was added between July 23, 2022 and August 30, 2022. Ms. Hugar is presently listed as the company “agent” and Nathan RA is listed as “governor.”

11. Mr. Rajagopal clarified that his brother is Arogya Nathan Rajagopal. There was also an individual named Nathan RA involved with the company. The WA Secretary of State website noted two “governing persons,” Nathan RA and Arogya Nathan. Mr. Rajagopal’s brother was listed as a governing person as of September 13, 2022.

12. According to COM Human Resources (HR), Chief Operating Officer Martin McMurry (Mr. McMurry) emailed Drive Godt LLC (biz@drive-g.org) and issued a letter of notice that all current contracts were going to be suspended. The email was sent on August 30, 2022.

13. Drive Godt LLC’s email response, dated September 9, 2022, stated, *“Thank you Mr. Martin. We are sad to hear that. We will cooperate with your investigation and please note,*

for future correspondence our address is 301 Union St #21867, Seattle, WA – 98111, USA.

Respectfully, Swapna Hugar.”

14. Mr. McMurry immediately responded to Ms. Hugar: *“Good morning, I’m now seeing multiple addresses associated with the company that is different from the address in the contracts and from information we obtained through our contracting and procurement processes. Please let me know who is authorized to speak for the company. It’s unclear to me if that is Nathan (last name?), you, or Stine Andreas – who happens to be listed as the primary contact in our contracts with the company.”*

15. Ms. Hugar replied: *“This is Swapna Hugar. I am the owner of Drive Godt LLC. We had associates – Stine (Business Manager) and Nathan RA (A is for Azhagan, we call him RA). Neither of them own any share in the Company or have any partnership with the Company. On the day the contracts were suspended, I had to let all my staff and contractors go. I will be communicating with you on anything related to our Contracts with you. As a Company we have made a few mistakes out of ignorance and mismanagement. Hence you see multiple addresses. We are working with our legal advisor to help clean the Company organization affairs. For all future correspondence, please use this address: **301, Union St #21867, SMB # 34749, Seattle, WA - 98111.** We will be working with other entities such as OFM to make the address change. Our phone number is the same 604-928-8945 as are our email contacts. I would like to apologize for the confusion caused due to our mismanagement. We will work closely with you to resolve any issue that may arise. Respectfully, Swapna Hugar.”*

16. According to OFM, as of September 13, 2022, Drive Godt LLC was registered to Fishtrap Loop NE, Olympia, WA, Mr. Rajagopal’s property.

17. On September 15, 2022, Board staff emailed Ms. Hugar with a series of follow-up questions on this case.

18. Ms. Hugar immediately responded asking: *"We are wondering what this is about. Is it possible to share more information about this case? Is it related to the Department of Commerce? We will answer the questions you have asked, no problem."*

19. Board staff responded, advising Ms. Hugar there is an ongoing ethics investigation into Mr. Rajagopal. As part of the investigation, questions arose as to ownership of Drive Godt LLC.

20. On September 26, 2022, Ms. Hugar responded to Board staff. In her email, she replied:

"We are sorry for the delay in our response to you. We were waiting on our Legal Advisor.

Here is our response.

In May of this year (2022), we inadvertently added Mr. Vel Rajagopal as a member of our LLC. That was an administrative error on our part. Mr. Vel Rajagopal was neither a partner/member nor an employee/associate of Drive Godt LLC at any point of time. When we realized this error was made, we removed his name from our LLC in the Washington Secretary of State records. We apologize for the confusion caused as a result of this mistake on our part.

Our address has been the PO Box in Olympia for all official correspondence. It was -

PO Box 7032 Olympia WA 98507.

While we were looking for office space in Olympia, we wanted a physical address for our compliance/regulatory mail. We had permission from a renter at the following address to use for our mail -

3228 Fishtrap Loop NE Olympia (address registered with DES). WA 98506.

We are working towards clearing any confusion in this regard.

Our current address for all communications is -

*301 Union St, #21867, SMB #34749,
Seattle, WA - 98111*

Hope this helps.

Respectfully,
Swapna Hugar”

21. On October 31, 2022, Board staff received a written response from the law firm Favros Law on Mr. Rajagopal’s behalf. The letter stated, in part:

“It is Vel’s intention to be transparent and reasonably cooperative in this inquiry. He acknowledges his mistake in not fully recusing himself from the State’s bidding process and contracting with Drive Godt LLC, which, to a reasonable person, could create the appearance of a conflict of interest. See RCW 42.52.020. However, to be clear, and as detailed in this letter, Vel has never had an ownership interest in Drive Godt LLC, he received no gain as a result of Drive Godt LLC’s involvement with the State, and he in no way exerted improper influence in his role with the State to Drive Godt LLC’s benefit.”

“Drive Godt Inc. is a Canadian company and the parent company of Drive Godt LLC. Drive Godt Inc. was started by friends of Vel’s going back to their college days. Vel has from time to time served as an independent contractor with Drive Godt Inc. In that role, Vel has trained Drive Godt Inc. clients mainly in India, and to a lesser extent in Canada, on IT leadership and navigating the complexities of change with IT projects. In 2018, Vel’s brother, Arogya Nathan Rajagopal, decided to be part of Drive Godt Inc. and he started Drive Godt LLC in Washington. Because of Arogya’s business in Washington, he needed a local residence. Vel owns a property located at 3228 Fishtrap Loop Northeast in Olympia, Washington. Vel agreed to rent this property to Arogya. As it turns out, Arogya used this address for business purposes with Drive Godt LLC. Vel does not specifically recall that he discussed this matter with Arogya around the time that it occurred.”

“In 2021, Arogya left Drive Godt LLC. That same year, Drive Godt LLC responded to a solicitation from the Department of Commerce. Vel was the Contracts Coordinator for that solicitation and his job was to forward all responses to the interview panel. That panel would then review, score, and recommend vendors to be brought in for interviews; interview and score those candidates; and then given Vel the final results. Vel did the clerical work for this process, including scheduling interviews and being present at the interviews though he did not ask questions, evaluate, or participate in scoring. Vel would also summarize the final list of selected vendors in an email to Vel’s supervisor, who was the signatory authority. Vel would handle the debriefing with the unsuccessful vendors and he communicated with the successful ones. The State selected Drive Godt LLC through this process. Vel played no role in this process other than as outlined above. He was in no way responsible for the State’s decision to contract with Drive Godt LLC. Vel’s team had a contract limit of \$500,000.00 imposed by the Department of Enterprise Services. When a contract reached that limit, it would then go out to bid again. In August 2021, Vel’s team put out another solicitation for the same contract that Drive Godt LLC previously secured. The State again selected Drive Godt LLC as one of the winners. Again, Vel was in no way responsible for Drive Godt LLC’s retention with the State.”

“The State continued using the resources that Drive Godt LLC brought in the earlier contract. This was for two different initiatives and two contracts were signed with Drive Godt LLC. The resources (personnel/contractors) provided by Drive Godt LLC were very skilled and they reported directly to Vel’s subordinate, Ms. Saylor. Vel was not responsible for the day-to-day supervision, work allocation, and evaluation of the work product of these resources. He would be

briefed periodically by Ms. Saylor as with all vendors. Ms. Saylor would do the verification and allocation for invoices and Vel would approve her work as well as the invoices after allocation on the system. On a few occasions where Ms. Saylor was on vacation or not available, Vel would directly handle these allocations. There was consideration from Vel and Ms. Saylor to potentially hire Drive Godt LLC contractors as full-time employees through the competitive bidding process. In addition, Vel received approval from Drive Godt LLC to hire their contractors on State staff to avoid any non-compete conflicts."

"Vel is also aware that in June 2022, Drive Godt LLC identified him as a company governor in filings with the Secretary of State. This was Drive Godt LLC's mistake. We have enclosed correspondences from the company to that end. To be fully transparent, Vel made the decision in May 2022 to leave employment with the State to work for Drive Godt Inc. This decision was made after Drive Godt LLC secured its contracts with the State. Vel's work for Drive Godt Inc. would have been wholly unrelated to the work that Drive Godt LLC was doing with the State. Vel specifically refused to do any work for Drive Godt Inc. or Drive Godt LLC in the State of Washington. Put another way, Vel's work with Drive Godt Inc. would not have included fulfilling, implementing, supervising, or controlling, in whole or in part, the provisions of any contract Drive Godt LLC had with the State. Vel's transition from the State to Drive Godt Inc. would have been fully compliant with RCW 42.52.080. In agreeing to join Drive Godt Inc., the plan was for Vel to consult with Drive Godt Inc. clients on IT projects implementation, change management with IT projects, to train their teams on operationalizing IT systems and helping Business with adopting the change. Vel would also have worked on expanding the operations of Drive Godt LLC into states other than Washington. Again, Vel's transition to Drive Godt Inc. in no way created the potential for his involvement in contracts he had worked on with the State. Within a week of Vel's decision to leave the State for Drive Godt Inc., Vel had a change of heart for personal reasons and he decided to stay with the State. Unbeknownst to Vel, Drive Godt LLC erroneously submitted paperwork to the state that identified him as a governor. That mistake was corrected in June 2022. Vel only learned of this error with the opening of this inquiry; he was not informed by either Drive Godt Inc. or Drive Godt LLC that this had occurred."

"Vel now realizes and fully acknowledges that he should have recused himself in all respects from the bidding process once Drive Godt LLC became involved, and as to any of that company's work with the State that followed. At the time, Vel did not view his role with the State as one of authority over Drive Godt LLC and he saw only a limited role with Drive Godt LLC, particularly once his brother left the company. Nevertheless, Vel recognizes the optics and the potential for the appearance of a conflict of interest from the perspective of an objective observer."

22. In addition to the letter provided by Mr. Rajagopal's attorney, written correspondence from Ms. Hugar was attached. Ms. Hugar's letter indicated that *"Mr. Vel Rajagopal was never associated with our LLC in any capacity and we realized that on June 8, 2022."*

23. Board staff forwarded the above letter to COM, for their review and response. COM provided Board staff with a written response, which read:

“Agency Response:

RFP Coordination, Description of Work Delegation and Contract Management

Vel was the Request for Proposal (RFP) Coordinator for the ITPS Work Orders, which were tier two contracts under the Department of Enterprise Services (DES) IT Master Contract #08215. Research of the procurement shows that he in fact served in this role, and coordinated the procurement process for the ITPS Work Orders. Evaluations were conducted by other staff, and Vel was not involved in the final scoring of the procurement bids. This was in accordance with agency procurement evaluator instructions and guidance. Two entities submitted bids for these contracts, one of which was Drive Godt LLC. The department was unable to locate the scoring sheets, but were able to obtain the RFP submittal emails to the RFP coordinator (Vel).

There were a total of four ITPS Work Orders under DES Master Contract #08215 with Drive Godt LLC. As is common practice with contractors, the contracted personnel worked closely with Information Services (IS) Applications staff, supervised by the IS Applications Manager in order to ensure projects move to completion. All contracted IT personnel worked alongside Commerce IS Applications staff. Vel did rely on Ms. Saylor for day-to-day supervision of both Applications staff and contractors, as that is a function of her job duties. As the signatory for the "Purchaser" in the work orders, Vel was the contract manager and responsible for the final approval of invoices. In addition to being the contract manager, some of the required duties the Chief Information Officer (CIO) as stated in the position description are as follows:

- *Oversee and manage contractors hired on application development projects.*
- *Manage the IT planning and governance process for the agency.*

While the CIO delegates some functions to staff for the purposes of day-to-day delivery, it is the responsibility of the CIO to execute the above job duties. In particular, and relevant in this instance, is the contract manager of all IT contracts.

There are currently 719 DES Master Contract vendors on the statewide vendor list associated with Master Contract #08215. It is unclear to the department how prospective vendors were discovered, and communicated to about this opportunity. Vel's job duties as RFP Coordinator include documenting discovery of prospective vendors and how opportunities are communicated to them. It is also the specific job of the RFP Coordinator to ensure the procurement process is transparent, organized and documented. In the course of this investigation, the Department found that there was not a central location for all files and artifacts related to the IT procurement in this case.

In accordance with policy 01-01-00 – Developing Review, and Adopting Department Policies and Procedures Commerce employees are required to review and attest to having read specific department policies including but not limited to 04-00-00 - Complying with State Ethics Law and 05-01-09 - Disclosing Outside Employment.

Comment on stated Performance and Complaint Process

Per Commerce agency policy 05-01-05 Reporting Improper Governmental Actions, employees may report suspected improper governmental action to any one of the following entities:

- *Executive Ethics Board (EEB)*
- *Commerce Director*
- *Human Resources Manager*
- *Internal Auditor*
- *State Auditor's Office*

Since an agency employee made a complaint, the department is obligated to ensure the proper handling, referral and investigation of the complaint. The department has disclosed the full nature of the complaint, to include the artifacts associated with the complaint. It is not a choice to withhold any information, and it is not a choice to not act on a complaint per agency policy 05-01-05.

Response to Comments about Hiring Drive Godt LLC Contractors

Lastly, the agency was indeed aware of the possibility of hiring some of the Drive Godt LLC contractors as full time Commerce employees. The hiring of any Commerce employee goes through normal competitive state hiring processes and would be applicable for any potential candidate."

24. In addition to COM's above written response, they provided Board staff with several documents pertaining to both Mr. Rajagopal and Drive Godt LLC throughout the course of this investigation. One document in particular contained several PDF files provided to COM by Drive Godt LLC during the contract procurement process.

25. One of the files was titled *Drive_G_References*. In reviewing that document, Board staff noted that Drive Godt LLC, thru an email sent from Nathan RA on September 9, 2021, listed two professional references: Ms. Uma Nalluri (Senior Architect and Program Manager, Administrative Office of WA Courts) and Mr. Bryce Carlen (Chief Information Officer, Office of the Insurance Commissioner (OIC)).

26. Board staff sent emails, with a list of questions, to both Ms. Nalluri and Mr. Carlen. However, in checking the state database, Board staff noted that Mr. Carlen no longer worked for the Office of the Insurance Commissioner; he is now listed as working for Department of Revenue (DOR).

27. In Mr. Carlen's response to Board staff, he indicated that he was employed with OIC up until September 2021 at which time he took his current role with DOR. Mr. Carlen stated that he has not heard of Drive Godt LLC, until very recently, when he became aware that Mr. Rajagopal's brother Nathan had dealings with the company. Mr. Carlen further indicated that he has known Mr. Rajagopal for roughly 15 years but has only met Nathan "once or twice" while

over for dinner at Mr. Rajagopal's home. Mr. Carlen stated that he was aware of the COM investigation, due to Mr. Rajagopal calling him and informing him when he was placed on administrative leave. Mr. Carlen stated that Mr. Rajagopal did not say much about the investigation, other than he claimed it "had something to do with his brother." Mr. Carlen stated that he had no knowledge that he was listed as a professional reference, nor did he ever give anyone permission to do so. Mr. Carlen also indicated that in addition to personally knowing Mr. Rajagopal, he too served as CIO of COM from 2015-2018.

28. In Ms. Nalluri's response to Board staff, she stated that she worked with Drive Godt LLC as an independent consultant and that she only interacted with "Stine," which she later confirmed was Stine Andreassen, whom she believed to be the "owner." Ms. Nalluri further indicated that no one from Drive Godt LLC asked for her permission to be listed as a reference. Through follow up questions, Ms. Nalluri informed Board staff that she never met "Stine" in person, nor did she ever interact with anyone else from the company. Ms. Nalluri stated she worked as an independent consultant from February 2021 to July 2022. When Board staff initially asked Ms. Nalluri if she knew Mr. Rajagopal, she replied, *"Vel Rajagopal and I have known each other for many years. We were colleagues at Employment Security for about 12 years."*

29. Through further investigation into both Mr. Rajagopal and Ms. Nalluri, Board staff found that they shared a common address listed as a "prior" address of theirs, in Illinois, from the early 2000's. Board staff sent a follow up question to Ms. Nalluri, asking about the address in common and if she in fact had additional ties to Mr. Rajagopal. Ms. Nalluri replied, *"Yes, Vel Rajagopal and I were married for a couple of years back then. Since the separation in 2002 we remained friends."* Board staff asked an additional follow up question asking how she became a

consultant for Drive Godt, LLC and Ms. Nalluri indicated that “*Drive Godt was introduced to me by Arogyanathan Rajagopal. Who is the brother of Vel Rajagopal.*”

30. As of March 20, 2023, Mr. Rajagopal is no longer employed in state service.

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, 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.

And;

RCW 42.52.020 – Activities incompatible with public duties, which states:

No state officer or state employee may have an interest, financial or otherwise, direct or indirect, or engage in a business or transaction or professional activity, or incur

an obligation of any nature, that is in conflict with the proper discharge of the state officer's or state employee's official duties.

and;

RCW 42.52.070 – Special Privileges and exemptions, which states, in part:

Except as required to perform duties within the scope of employment, no state officer or state employee may use his or her position to secure special privileges or exemptions for himself or herself, or his or her spouse, child, parents, or other persons.

2. 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 Vel Rajagopal had significant official, management, or supervisory responsibility.

In the matter at hand, it is a mitigating factor that Mr. Rajagopal was truthful and cooperative in dealing with the board or the board's staff.

D. STIPULATION AND AGREED ORDER

1. Pursuant to chapter 42.52 RCW, the Executive Ethics Board has jurisdiction over Vel Rajagopal 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. Vel Rajagopal 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. Vel Rajagopal 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. Vel Rajagopal 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 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. Vel Rajagopal 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 Vel Rajagopal 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 Vel Rajagopal 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 Vel Rajagopal 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, Vel Rajagopal 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. Vel Rajagopal agrees to pay a civil penalty in the amount of thirty thousand dollars (\$30,000) associated with violations of RCW 42.52.

12. The civil penalty in the amount of thirty thousand dollars (\$30,000) 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.

I. CERTIFICATION

I, Vel Rajagopal, 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.

Vel Rajagopal

October 23, 2023

Vel Rajagopal
Respondent

Date

Presented by:

K. Reynolds

KATE REYNOLDS
Executive Director

11/7/2023

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 17th day of November 2023.

Jan M Jutte
Jan Jutte, Chair

Approved Kelli Hooke
Kelli Hooke, Vice Chair

Shirley Battan
Shirley Battan, Member

Megan Abel
Megan Abel, Member

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

Vel Rajagopal, Respondent

Date