

BEFORE THE WASHINGTON STATE
EXECUTIVE ETHICS BOARD

In the Matter of:

Michelle Blake

Respondent.

No. 2022-031

STIPULATED FACTS,
CONCLUSIONS OF LAW AND
AGREED ORDER

THIS STIPULATION is entered into by Respondent, Michelle Blake 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 September 28, 2022, the Executive Ethics Board (Board) received a complaint from the Department of Employment Security (ESD) alleging that Michelle Blake (Ms. Blake), a former WorkSource Specialist 4 (WS4) at ESD, may have violated the Ethics in Public Service Act by using state resources for private benefit or gain and accessing confidential information for non-work related purposes.

2. According to ESD, Ms. Blake was previously a WS4 with the WorkSource Vancouver office. She worked for the ESD from February 8, 1999 until July 31, 2022. According to ESD, Ms. Blake was an intermittent employee in 1999 and 2000 and had a couple breaks in

service. Ms. Blake resigned from ESD on July 31, 2022 when she accepted another position at Department of Social and Health Services (DSHS) effective August 1, 2022.

3. According to ESD, Ms. Blake used ESD computer resources and time to conduct personal business as well as to send various personal documents for herself and others from ESD computer resources to a personal email account. The documents contained Ms. Blake's Personal Identifying Information (PII) as well as what appears to be, family members and/or friends.

4. According to ESD, on July 29, 2022, Ms. Blake sent an email from her ESD work email to her personal email with the following 12 attachments:¹

- Word document titled, "Fun Dinner Spots." The document contained 11 pages of restaurant contact information within Portland, Oregon.
- PDF document titled, "2021 Fed taxes me which was a 2021 form 1040 completed" for Ms. Blake.
- Word document titled, "JP small claims". This is a letter from Ms. Blake to JP dated September 15, 2020 in which she is demanding repayment of a loan made to the recipient pending legal action.
- PDF document titled, "Small claims court letter – JP." This was a copy of a letter sent to JP dated September 14, 2020.
- PDF document titled "Michelle Blake receipt." This was a receipt for services provided to Michelle Blake by the Waldorf Center for Plastic Surgery in Portland, Oregon
- PDF document titled, "Michelle Blake taxes 2020." This is a federal tax return in the name of Michelle Blake filed via TaxHawk, an internet tax preparations and filing service.
- PDF document titled, "LV 2021 Federal Taxes." This is a federal tax return in the name of LV filed via TaxHawk.²
- PDF document titled, "LV 2021 State Return." This is an Oregon State tax return in the name of LV filed via TaxHawk.
- PDF document titled, "Trey Fed 2020." This is a federal tax return in the name of TJ filed via TaxHawk.

¹ For the purposes of this report, Board staff only used the first and last initials of all individuals mentioned on documents found by ESD and Board staff in Ms. Blake's emails and attached documents.

² According to ESD, ESD Human Resources (HR) records show that Ms. Blake listed LV as an emergency contact up until 2021 indicating a potential personal connection between Ms. Blake and LV.

- PDF document titled, “Trey Fed 2021 OR.” This is an Oregon State tax return in the name of TJ filed via TaxHawk.
- PDF document titled, “Trey Fed 2020.” This is an Oregon State tax return in the name of TJ filed via TaxHawk.

5. According to ESD they also found an email Ms. Blake sent to her personal email address on July 28, 2022 that contained 19 documents. According to ESD, all of the documents appear to be personal documents and are not related to her work. Of the documents, there was a divorce degree for Ms. Blake and JB, a filed court document, facts and findings of a conclusion of law pertaining to her marriage disillusion, as well as resumes and cover letters for JV, JB, BV, LV, and TB and a resume for LSC.³

6. Board staff were provided with the supplemental investigation (SI) conducted by ESD. According to the SI, further research was conducted using the LEXIS/NEXIS Accurint service. The search was conducted using Ms. Blake’s name, Social Security Number (SSN) and addresses in Beaverton, Oregon and Vancouver, Washington.

7. According to the SI, they used the advanced person search option which showed that the persons listed in the emails and attachments were either a relative or associate (by relationship or same address) as Ms. Blake.

8. The conclusion of the SI was that there had been no loss of client PII and all the information contained within the documents attached to the emails sent outside of the agency by Ms. Blake were all of a personal nature, barring the name, address and email belonging to LSC, for which no association could be found. According to the SI, the information belonging to LSC was in a resume including their name, address, email, and a telephone number. According to the

³ Board staff were provided with copies of the 19 attachments.

SI, it was decided, in consultation with the ESD Public Records Manager, not to contact LSC for two reasons:

- The latest date on the resume is 2011 and any loss of PII could not be mitigated at this time.
- Should LSC be contacted, it may jeopardize any further investigation by HR, or the Board, as she may subsequently notify Ms. Blake.

9. According to ESD they did not interview Ms. Blake, because she left the agency.

10. ESD said that all emails are assigned to the supervisor so they can set retention labels. ESD said Ms. Blake's supervisor Colleen Cook (Ms. Cook), the Supervisor for Worksource Vancouver, provided a list of emails that she believes are not work related. Those emails were provided to Board staff.

11. In a written response to Board staff, Ms. Blake said that she did some of the things listed. She said that in retrospect she now can understand how these events could violate policies however, at the time, she did not think she was breaking any rules.

12. Ms. Blake said she has worked for the State of Washington for almost 24 years and has never had a complaint filed against her. She said these incidents occurred during a very stressful and different time, amid the height of the global COVID-19 pandemic. Ms. Blake said she was teleworking from her home residence seven days a week, often for 10–12 hours a day.

13. Ms. Blake said she knows that she used her work computer but did not consciously believe it was wrong because she was using her personal home internet and printer for personal taxes purposes and personal loan documentation.

14. Ms. Blake said she gave a one-month notice to ESD and used every working hour to complete all the year-end requirements and to ensure all vendor bills were paid. Ms. Blake said she was informed that she could not put any documents on a flash drive, so to retain her documents she simply sent them to her personal email.

15. Ms. Blake said that in regard to the documents she sent to her personal email, she did not realize that she was in violation of any company policy. She said that in this case it was due to her being in a hurry to get her work computer cleaned and all of her work transferred to someone else.

16. According to Ms. Blake, she was told she had to be out of the office by 5:00 pm. As a result, she was rushing and was unable to complete all necessary work until 5:20 pm.

17. Ms. Blake said the divorce decree was from 2010 and the resumes were just templates she uses for all of her resumes. She said she only forwarded the ones she knew she could use without using client names. She said there was no PII on any of these templates.

18. According to Ms. Blake, in terms of the client confidentiality job search logs, she said she was following COVID-19 protocol. She made sure to shred all documents she needed to, and the job search logs she printed are all retained within the WorkSource Office in an office file cabinet.

19. Ms. Blake said she did not mean to violate any rules. She said she was not able to print the paper logs to work on them at home, as she does not have a work printer/scanner at home. Ms. Blake said she spoke with her team and supervisor, all of whom were aware that she was sending them to her personal cellular device to print off. As for other documents, Ms. Blake said she would send them to her personal cell phone to make vouchers and pay the vendors.

20. Ms. Blake said she called ESD IT to see if they could help her connect her personal printer/scanner to her computer so she could handle these documents more efficiently. She said they told her she was not able to do it so she continued doing it with her workaround. According to Ms. Blake, her supervisor told her to just try and do it minimally due to her paying for the ink.

21. According to Ms. Blake, after doing this process for about six months, they finally found a scanner for her to use. Ms. Blake said she submitted a ticket to IT for assistance. Ms. Blake said she also used her cell phone to open Google Docs that customers could not send them due to ESD computers blocking them.

22. Ms. Blake said that this was a workaround they had discussed in many meetings. Ms. Blake said her only goal was to assist her customers in becoming self-sufficient. Nothing was gained from these actions except for that.

23. In regards to the medical messages and emails, Ms. Blake said she used her work computer for Employee Assistance Program (EAP) as she was very stressed with COVID-19 and the unemployment work she was doing and had a very hard time coping. These counseling sessions continued for a while. Ms. Blake said her supervisor and administrator were aware of this because she discussed it with them often. Ms. Blake said she was also dealing with some other medical issues and used her work computer to message them as they were not taking in-person appointments.

24. Ms. Blake said she worked from home for the following month teleworking and a phone message or call took less than 30 minutes but an in-person appointment would have taken 3-4 hours with traffic. She said that she was not trying to do anything malicious or for personal benefit by doing this. She thought she was saving time and could get more work done.

25. Ms. Blake said that many of the emails referenced in the complaint were spam and/or junk. During this timeframe she said that many of her colleagues were saying they were receiving lots of spam too. Ms. Blake said she learned from a co-worker in one of their full staff office meetings that they could send them to a junk/spam folder.

26. Ms. Blake said she spent a lot of time sending the spam/junk mail to that folder and then got very busy and did not take the time to continue with this process. Ms. Blake said she would either just delete them when they came or try to move them to junk when she had time. Ms. Blake said that there were times her email box contained over 400 unread emails, and she would just skim them for client emails and ones of importance.

27. Board staff provided Ms. Blake with the list of emails found by Ms. Cook and she provided the following explanation for the emails. Her responses are in bold.⁴

- Court Documents: **I loaned a friend money and he didn't pay it back as promised. It was during COVID when we were home teleworking. I made the court document on my work laptop using my internet after work hours. I then saved it to my computer and sent it to my personal printer to mail off a few days later.**
- Divorce Decree: **My lawyer sent them to me in 2010 or 2011 for final review. I saved them to my computer for review and then replied and sent them back. They have been there since, and I came across them and added them to my list of items I thought I should take off my computer in leaving. (In all honesty I should have just deleted them as they're very old and I have the originals. I just didn't think it through.)**
- Family Resumes and Cover Letters: **I have made lots of resumes and cover letters for many years. I used a lot of them as templates and changed names and info on them. I probably had over 200 resumes and cover letters saved. I review many that come to me as well as save them as I was an employment specialist. When I left, I thought I should take off my templates and those resumes. I was just trying to clean computer up in a hurry in the last couple of hours.**
- Vacation Airport Confirmation: **I sent them to myself to add to my Outlook with the dates so I could put them on the leave calendar at work with the correct dates. I sent them from my personal cell and didn't think that it was wrong.**
- Family's State and Federal Tax Returns: **It was COVID, and I was home teleworking. I did mine, my nephews and sisters' taxes outside of work hours. I used my work laptop and my own personal internet. Saved it so I**

⁴ Comments next to listed emails in parenthesis were made by Ms. Cook.

could print it to my own personal printer. I forgot I had them there and when cleaning up my computer I sent them to myself.

- Information from clients sent to personal email: **This was during COVID. I would get receipts to do clothing, support service and such. I needed to print them so they would be attached to invoices. I would then print them on my own personal printer because I couldn't print from my ESD account. I didn't realize that was wrong and my supervisor was aware I was doing this. Nothing personal was kept. All were shredded if not needed to be saved.**
- Client job logs sent to personal email: **It was COVID, and we were working from home. I would sometimes resize them and send to my personal cell for printing. Then I would either print them or keep a hard copy file for our records. Also, sometimes I would work the job logs and write on them then send to my personal cell phone so I could scan them to my supervisor for audit purposes. None were used for anything but work purposes. No confidential info were on them besides their name and a computer generated JAS number. All job logs that were paper copy were returned to the office and stored in a locked file cabinet. I was never advised this was not a correct procedure.**
- eJAS screens with client information sent to Partners (not aware of any partner (ResCare/Equus) having non- disclosure agreements with ESD): **We as an office have been doing this procedure of sending e-JAS screens to WIOA staff for over 12 years maybe longer. This is how WIOA deems the low-income adult eligible for their programs. They all do partner confidentiality agreements. This is an approved procedure by management. We also sometimes do a paper print out and put in an orange folder with staff initials on it. This is the work practice of our office.**
- Personal emails family & friends: **Every once in a while, I would receive job leads from friends/family or work related questions and possibly confirming a dinner or lunch date.**
- Confirmation of order pick-ups at retailers (not appropriate items as well): **Torrid I am assuming sent me a receipt for clothing pick up. I was not aware they were using my work email as I had everything sent to my personal email/app on my phone. I did delete them and had called customer service a few times to get my email address changed after several online attempts to change it.**
- Emails between work staff (unkind): **No idea what this is pertaining to? I can only think these are regarding our supervisor Colleen Cook and us venting about her not knowing/doing her job?**
- Contract with McMenamins: **I had my 50th Birthday party there and they sent my boyfriend the contract that needed to be signed. He needed it to be reviewed by me before signing and sent it to my work address. He should have**

sent it to my personal one. He didn't realize he couldn't send it to my work email address.

- Doctor appointment notifications: **I had a lot of health issues during COVID. I had video calls with Employee Assistance Program and my Kaiser doctors. This also was easier and quicker since they were not taking in person visits. Then when they could, it was quicker for me to do a message or video call then taking half the day off and driving to Clackamas to my doctor. Also, we were told we weren't supposed to be using our cell phones while doing unemployment work. I just focused on my unemployment work and my work email at the time was the quickest way for me to get messages from my health care team.**
- Discount Tire offers (maybe for clients?): **Received quotes for client tires and then they would send sales as well as Les Schwab and Richey's Tires did. I was the Vendor payee and processed all bills, invoices, and receipts. Nothing was personal.**
- Retail Sales Notices: **I don't know what retailers were emailing me as I got lots of Junk/Spam. I just sent them to trash.**
- Visa Statement from Fibre Federal Credit Union: **Refinanced my house during COVID and pulled up my statement on work computer to print using my personal printer and my internet. It was after work hours. I did give the bank my work number, address and work email for employment verification.**
- Examples of emails where she did shut down automatic notices (to show she knows how to shut down auto notices): **I don't know what these are but I did send most to trash/junk as I didn't have time to shut down. During COVID I was doing UI work and worked 7 days a week with overtime. I was exhausted and when I went back to the office, I had the highest caseload and paid all the bills. I worked ridiculous amounts of hours over my regular time and constantly asked for help as we were drowning as a team. (I do think this is my ex-supervisor retaliating against me for refusing on the last day to sign her last-minute evaluation. It was not correct in one section, and she was very angry I wouldn't sign it. I had asked her to please edit that section and I would then sign it. She kept saying it was a glowing evaluation and to just sign it. When I still refused, she then was very rude to me and didn't talk to me the rest of the day. She waited at her desk until I left the office for my final workday.)**
- Safeway Rewards notifications: **Not sure about this one either, probably junk mail and sent to trash. Safeway is all done on phone app.**
- Notifications of events: **Spam/Junk mail – all probably sent to trash.**
- Macy's Rewards notifications: **Spam/Junk mail – all probably sent to trash.**

- Walgreen's Rewards notifications: **Spam/Junk mail – all probably sent to trash.**
- Kaiser Permanente message from health care team: **Lots of health issues management was aware I was going through and preferred I not take the time off. I was slammed with unemployment work, and they didn't want anyone taking time off. Then when I was back in the office, I had foot surgery and worked from home with the health issues and received some alerts about messages I would get in my phone app. During COVID I used it as my backup email.**
- Mt. St. Helen's volunteer Info: **Spam/Junk mail.**
- Budget Rental Car Notifications: **Junk/spam mail.**
- Dick Hannah Service Center Emails: **Junk/spam email or could have been client estimates?**
- Travelocity emails: **Spam/Junk mail.**
- Basketball Camp emails: **Junk/spam email – Could have been a resource for clients?**
- Henry's Fantasy Draft emails: **No idea, Junk/spam email.**
- Oak's Park Event emails: **No idea, Junk/spam email – could have been a resource for family?**
- Appointment confirmations for after hour dinners: **Maybe 2-3x a year I would get an Outlook invite from my colleague to make a dinner engagement. This was mostly for her use as she is upper management and has a lot of appointments/meetings. She would add to her calendar and then send me the accept or deny vote.**

28. Ms. Blake said that she has learned a lot from this process and said it would not happen again.

29. Board staff requested a copy of Ms. Blake's work email history and an image of her work computer from ESD. Board staff were provided with the emails in a PST format for the

period of July 22, 2019 through September 29, 2022 and a forensic image of Ms. Blake's work computer.⁵ A review of Ms. Blake's work email history revealed the following:

30. Board staff found approximately 106 emails sent to Ms. Blake's ESD work email addresses at ESD, MBlake@ESD.WA.Gov and michelle.blake@esd.wa.gov from Torrid.com between December 5, 2020 and September 29, 2022. Ms. Blake forwarded two of those emails from her work email address to her personal email address on July 27, 2021 and September 22, 2021. Board staff searched the internet for Torrid.com and found that Torrid is an online store selling women's clothing.

31. Board staff found approximately 101 emails sent to Ms. Blake's ESD work email address from various advertisers including Walgreens, Safeway and State Farm. Board staff found no evidence she responded to or forwarded those emails.

32. Board staff found approximately 34 emails sent or received from Ms. Blake's ESD work email from Ms. Blake's personal icloud.com account between September 30, 2020 and July 29, 2022. Board staff located the two emails and attachments referenced in the ESD investigation.

33. Board staff also found an email thread starting at 3:36 pm on January 6, 2021 and ending at 4:34 pm with the subject line, PUD. The emails contained four links for Clark Public Utilities. The emails included communications with a representative from Midamericamortgage.com and appeared to be regarding the purchase of a home.

34. Board staff found approximately 16 emails sent or received from Ms. Blake's ESD work email to Ms. Blake's personal yahoo.com account between October 6, 2020 and July 20, 2022. Those emails included:

⁵ Board staff processed the PST file and computer hard drive on a Forensic Recovery of Evidence Device (FRED) using the Magnet Axion Digital Investigation Platform to acquire and analyze the PST file and computer hard drive.

- An email sent from Ms. Blake's work email address on October 6, 2020, confirming Ms. Blake's order from BigLots for a Lane Home Solutions Pasadena Gray Ottoman.
- An email sent to Ms. Blake's work email address on April 12, 2021, confirming Ms. Blake's order from priceline.com, congratulating and confirming her purchase of a flight to and from Honolulu, Hawaii her and another person.

35. Board staff reviewed Ms. Blake's work computer history and found the documents referenced by the ESD complaint/investigation stored on her computer. Board also found the following document:

- A Word document titled credit.doc, which lists Ms. Blake's bank accounts including account numbers, bills due and the minimum payment.
- Board staff also found that on February 22, 2021, Ms. Blake visited the TaxHawk website. It is unclear what she did while on the website.

36. Board staff found no other evidence that Ms. Blake was using her work computer for personal use.

B. CONCLUSIONS OF 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.

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.

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. In the matter at hand, there are no mitigating factors.

D. STIPULATION AND AGREED ORDER

1. Pursuant to chapter 42.52 RCW, the Executive Ethics Board has jurisdiction over Michelle Blake 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. Michelle Blake 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. Michelle Blake 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. Michelle Blake 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. Michelle Blake 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 Michelle Blake 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 Michelle Blake 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 Michelle Blake 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, Michelle Blake 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. Michelle Blake agrees to pay a civil penalty in the amount of three-thousand-five-hundred dollars (\$3,500) associated with violations of RCW 42.52. The Board agrees to suspend one-thousand dollars (\$1,000) on the condition that Michelle Blake 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

13. 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, Michelle Blake, 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.

Michelle Blake 2/4/23
Michelle Blake Respondent Date

KATE REYNOLDS 2/28/2023
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 10th day of March 2023.

Approved Vibeally
Shirley Battan, Chair

Approved Vibeally
Jan Jutte, Vice Chair

Abel
Earl Key, Member

Approved Vibeally
Kelli Hooke, Member

Approved Vibeally
Megan Abel, Member

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

Michelle Blake, Respondent Date