

BEFORE THE WASHINGTON STATE  
EXECUTIVE ETHICS BOARD

In the Matter of:

Kevin Glover

Respondent.

No. 2023-085

STIPULATED FACTS,  
CONCLUSIONS OF LAW AND  
AGREED ORDER

THIS STIPULATION is entered into by Respondent, Kevin Glover 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 October 17, 2023, the Executive Ethics Board (Board) received a complaint alleging that Kevin Glover, an employee of the Washington State Department of Corrections (DOC), may have violated the Ethics in Public Service Act. The complaint alleged that Kevin Glover violated RCW Chapter 42.52, by using state resources for non-work related activities.

2. According to the complaint, Kevin Glover allegedly used their DOC assigned vehicle for personal use, by taking it home without permission on several occasions between the dates of June 16, 2021 and November 17, 2023. As such, the complaint alleged Kevin Glover is causing an unnecessary burden on the state by using state gas.

3. According to DOC, Kevin Glover was hired on November 26, 2013, as a Community Corrections Officer 2, non-permanent position. On June 1, 2015, Kevin Glover's position became permanent. On July 1, 2019, Kevin Glover was promoted to a Corrections Specialist 4 and still maintains that position.<sup>1</sup>

4. As part of this investigation, Board staff obtained a copy of a finalized DOC investigative report (IR). According to the IR, Kevin Glover is currently assigned as a Housing Specialist for Region 2, which covers several counties including Chelan, Douglas, Kittitas, Yakima, Klickitat, Benton, Franklin, Adams, Colombia, and Walla Walla. As part of their normal duties, they often travel across several counties to conduct regular field visits to DOC offices, Reentry Centers, Prisons, and transitional houses across those regions.

5. As part of their assigned duties, Kevin Glover often spends several hours per day travelling, often leaving early in the morning and being on the road for most of their workday. To effectively conduct their duties, Kevin Glover was assigned a state vehicle for day use.

6. As part of the DOC investigation, they interviewed Kevin Glover's direct supervisor Amanda Lease, Housing Program Administrator. According to Amanda Lease, they encourage their housing specialists to connect with vendors virtually or via the phone, especially when road conditions are unsafe. Amanda Lease further stated that Kevin Glover conducts more in-person visits than what is required and spends more time in the field than any other DOC housing specialist.

---

<sup>1</sup> Kevin Glover maintains that their *actual* hire date was October 21, 2013, and they were promoted to a Corrections Specialist 4 on June 15, 2015.

7. Due to Kevin Glover complaining of their large caseload, Amanda Lease assigned four of Kevin Glover's assigned counties to another housing specialist. Kevin Glover attempted to take those counties back, but Amanda Lease denied that request.

8. Lastly, Amanda Lease informed DOC investigators that they have attempted to help Kevin Glover develop better workload and time management practices to help reduce their need to travel. When asked if Kevin Glover was given permission to take their DOC assigned vehicle home, Amanda Lease stated they have never given Kevin Glover permission to take their state vehicle home, and that it is not common practice for housing specialists to take state vehicles home. Amanda Lease further explained that if staff wanted to take a state vehicle home, they were to ask Amanda Lease in advance for permission, at which time Amanda Lease would seek final approval from their senior administrator.

9. As part of the DOC investigation, they additionally interviewed Kevin Glover's former supervisor Jacob Bezanson, Corrections Specialist 4. According to Jacob Bezanson, they encouraged housing specialists to go out into the field as much as possible as they didn't want them to "sit in the office." Jacob Bezanson further described that Kevin Glover had the greatest amount of space to cover due to the size of counties on their caseload and the fact the sites were spread far out.

10. Jacob Bezanson stated they were "not aware" if Kevin Glover had taken their state vehicle home, while under their supervision however, Jacob Bezanson further explained that it was not common practice for staff in their unit to take state vehicles home. Lastly, Jacob Bezanson stated they had a "few conversations" with their staff about taking vehicles home. Jacob Bezanson instructed staff that if they wanted to take a vehicle home, they were required to make a formal request which would be reviewed by the senior administrator.

11. As part of the DOC investigation, Kevin Glover was interviewed about these allegations. According to the DOC investigation, Kevin Glover allegedly claimed that between June 16, 2021, and November 17, 2023, they had taken the state vehicle home to their personal residence and would sometimes leave it parked overnight. Kevin Glover further informed DOC that would typically occur “one or two nights per week” and would only occur when they had a full travel schedule the following workday. Kevin Glover denied ever using the state vehicle for personal use, merely for work activities.

12. After being notified of the finding of reasonable cause, Kevin Glover maintains they did not provide those dates to DOC, rather they advised they took the vehicle home on occasion between the dates of June 19, 2023 and November 3, 2023.

13. According to Kevin Glover, they were not aware that taking a state vehicle home was not allowed, and further “believed” they had previously discussed taking a vehicle home either with Amanda Lease or Jacob Bezanson.

14. Kevin Glover informed DOC they believed that by taking the state vehicle home, it would be more time efficient and convenient, based on them having to travel early the next morning. Kevin Glover believed that by fueling/charging the state vehicle the day prior and then leaving it parked at their personal residence,<sup>2</sup> they could start their day by going directly to their field sites, which would save potentially 30 minutes by not having to drive into the office to swap their personal vehicle out for a work vehicle.

15. According to DOC, Kevin Glover’s personal residence is 4.3 miles each way and a 10-minute commute, according to Google maps, from their assigned DOC office. According to

---

<sup>2</sup> In Kevin Glover’s interview, they claimed they charged the state vehicle at various field sites and not at their own residence, as it was “too expensive.”

vehicle logs and Kevin Glover's own admittance, DOC noted forty-eight (48) instances when Kevin Glover kept a DOC vehicle parked at their personal residence. Based on the total number of instances and mileage saved by not having to commute to and from their assigned DOC office, Kevin Glover saved 412.8 miles that would have normally gone onto their personal vehicle.

16. After being notified of the reasonable cause finding, Kevin Glover disputed the DOC findings of 48 instances totaling 412.8 miles. Kevin Glover maintains that the vehicle logs would show that the DOC findings were not accurate. According to DOC, Kevin Glover did not always fill out logs as required; therefore, the exact numbers are not fully known, DOC's finding of 412.8 miles was a "conservative estimate."

17. Based on the above information, DOC issued Kevin Glover a letter of reprimand (LOR) on March 6, 2024. According to the LOR, DOC did not believe that there was an economical or advantageous benefit to the state by Kevin Glover bringing a state vehicle home. DOC instructed Kevin Glover to review and abide by DOC Policy 230.550 (Vehicle Use), and DOC Policy 800.010 (Ethics). Lastly, DOC informed Kevin Glover that any further misconduct may result in further disciplinary action, up to and including dismissal.

## **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.

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. 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 Kevin Glover 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. Kevin Glover 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. Kevin Glover 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. Kevin Glover 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. Kevin Glover 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 Kevin Glover 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 Kevin Glover 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 Kevin Glover 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, Kevin Glover 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, Kevin Glover 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.

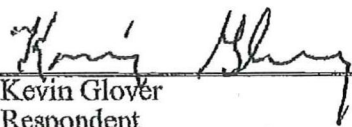
11. Kevin Glover agrees to pay a civil penalty in the amount of five hundred dollars (\$500) associated with violations of RCW 42.52. The Board agrees to suspend two hundred fifty dollars (\$250) on the condition that Kevin Glover complies with all terms and conditions of this Stipulation and Order and commits no further violations of RCW 42.52 for a period of two years from the date this agreement is executed.

12. The civil penalty in the amount of two hundred fifty dollars (\$250) 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.

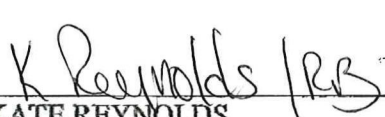


**I. CERTIFICATION**

I, Kevin Glover, 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.

 \_\_\_\_\_ 03/10/25  
Kevin Glover Date  
Respondent

Presented by:

 \_\_\_\_\_ 3/14/25  
KATE REYNOLDS Date  
Executive Director

**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 14<sup>th</sup> day of March 2025.

  
\_\_\_\_\_  
Kelli Hooke, Chair

  
\_\_\_\_\_  
Megan Abel, Vice Chair

  
\_\_\_\_\_  
Jan Jutte, Member

  
\_\_\_\_\_  
Cam Comfort, Member

  
\_\_\_\_\_  
David Hankins, Member

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

\_\_\_\_\_  
Kevin Glover, Respondent

\_\_\_\_\_  
Date