

1 **BEFORE THE WASHINGTON STATE**
2 **EXECUTIVE ETHICS BOARD**

3 In the Matter of:

4 Rachael Shaeffer,

5 Respondent
6 _____

EEB Case No. 2023-093

**ORDER OF DEFAULT AND
FINAL ORDER**

7
8 **I. PROCEDURAL HISTORY**

9 On November 27, 2023, the Executive Ethics Board (Board) received a complaint
10 alleging that Rachael Shaeffer, an employee of the Washington State Department of Corrections
11 (DOC), may have violated the Ethics in Public Service Act. The complaint alleged that Rachael
12 Shaeffer violated RCW Chapter 42.52, by using state resources for non-work related activities.

13 On May 9th, 2025, The Board found reasonable cause to believe that violation(s) of RCW
14 42.52 had been committed and the penalty may be greater than \$500. On May 12, 2025, notification
15 of the Reasonable Cause Determination was deposited in the United States mail, both first-class and
16 certified, to Rachael Shaeffer at their home address on record, 221 E Country Club Dr. Allyn, WA
17 98524. The first-class mailing was not returned by the USPS.

18 According to USPS, the certified letter was returned to sender as “unclaimed” and “unable
19 to forward” on June 9, 2025. Rachael Shaeffer failed to respond to the notice.

20 **II. FINDINGS OF FACT**

21 1. According to the complaint, Rachael Shaeffer allegedly used DOC internet for
22 personal use at work. The complaint specifically noted that Rachael Shaeffer “shops on Amazon,
23 reads books on Amazon, and looks at realtor sites to view homes to purchase.” The complaint
24 further alleged that Rachael Shaeffer has “bragged about watching movies on Netflix or Amazon
25 Prime while working.”
26

2. In Rachael Shaeffer's written response to Board staff, they stated, "[t]he information that you were sent is inaccurate. I am not lazy, and I do not neglect my duties."

(sic)

3. According to DOC, Rachael Shaeffer was hired on April 12, 2020, as a Licensed Practical Nurse 2 (LPN2) and is presently still in that position.

4. As part of this investigation, Board staff obtained a forensic image of Rachael Shaeffer's DOC computer. Using Magnet Axion forensics software, Board staff processed and reviewed the contents. Upon review, Board staff located ongoing and excessive personal use between the dates of March 4, 2023 and December 7, 2023, including:

- Saved login credentials for a personal MSN email address, Sozoschoolministry, and Amazon
- Saved credit card credentials
- Several Google searches, personal in nature, including Kitsap Humane Society, wood flooring, leo's photography, top bug out bag items, underground bunkers for sale, homemade bread recipe, air plant jellyfish planters, etc.
- The following personal web browsing:

March 4, 2023

Amazon (books viewed)

March 9, 2023

Kitsap Humane website

Amazon personal searches

Adopt a Pet

Amazon (books viewed)

Indeed.com (non-state jobs viewed)

Fusionmedstaff.com (job searches)

March 10, 2023

Amazon (books viewed)

Amazon (personal searches)

March 11, 2023

Amazon (books viewed)

Amazon (personal searches)

March 18, 2023

Mamaknowsglutenfree.com (food recipes)

Personal google searches

Makeandtakes.com (recipes)

Pagingfunmums.com (parenting website/blog)

1 **March 24, 2023**
Amazon (books viewed)
2 Msn (personal news stories viewed)
3 **March 26, 2023**
Indeed.com (jobs viewed)¹
Amazon (books viewed)
4 **April 1, 2023**
Personal google searches
5 MSN (personal news stories viewed)
Amazon (personal searches)
6 Upward.careers (jobs viewed)
TikTok
7 Walmart.com
8 **April 7, 2023**
TikTok
YouTube music videos watched
9 Personal google searches
10 **April 18, 2023**
Disney plus account accessed
11 **April 21, 2023**
Twitter
12 **April 22, 2023**
Match.com (dating website)
YouTube
13 Indeed.com
Amazon (books viewed)
14 Amazon (personal items viewed)
15 **April 24, 2023**
YouTube
Amazon (books viewed)
16 Amazon (personal items viewed)
17 **April 25, 2023**
Amazon (personal items viewed)
18 **April 27, 2023**
MSN (personal news stories viewed)
Expedia.com (flights searched)
19 Avis.com (rental cars searched)
Thrifty.com
20 Hertz.com
Budget.com
21 Flydulles.com (DC airport viewed)
22 **April 28, 2023**
YouTube
MSN (personal news stories viewed)
23 **April 30, 2023**
Indeed.com
24 Google flights searched
Expedia.com
25 Alaskaair.com

26 ¹ While some jobs did appear to be WA state jobs, others were not state government jobs.

1 MSN (personal news stories viewed)
 Venmo account login
 2 Bestfriends.com (pet adoption site)
May 1, 2023
 3 YouTube
 MSN (personal news stories viewed)
 4 **May 6, 2023**
 Sozo.churchcenter.com
 5 MSN (personal news stories viewed)
 Rentalcars.com
 6 Bing.com (car rentals)
 Priceline.com
 7 Zillow.com (homes viewed)
 Yachtworld.com (boats viewed)
 8 Boattrader.com
 Boats.com
 9 Seattleyachts.com
May 8, 2023
 10 Sozo.churchcenter.com
 Amazon (personal items viewed)
 11 MSN (personal news stories viewed)
 TikTok
 12 Personal google searches
May 13, 2023
 13 Personal google searches
 MSN (personal news stories viewed)
 14 Chewy.com (online pet store)
 Sozo.churchcenter.com
 15 Christianbook.com
May 15, 2023
 16 MSN (personal news stories viewed)
 YouTube
 17 Sozo.churchcenter.com
 Amazon (personal items viewed)
 18 **May 16, 2023**
 MSN (personal news stories viewed)
 19 Amazon (personal items viewed)
May 22, 2023
 20 MSN (personal news stories viewed)
 Personal google searches
 21 Hertz.com
 Budget.com
 22 Seattlecraigslist.org
 Portlandcraigslist.org
 23 **May 23, 2023**
 Personal google searches
 24 Marketplace.akc.org (dog website)
 Doxaminidachshunds.com
 25 MSN (personal news stories viewed)
 Petfinder.com
 26 Google travel flights searched

1 Thrifty.com
 Avis.com
 2 Budget.com
 Zillow.com
 3 **May 25, 2023**
 MSN (personal news stories viewed)
 4 Evergreendoxdachshunds.com
 Puppyspot.com
 5 Uptownpuppies.com
 Personal google searches
 6 Premierpups.com
 Petcurious.com
 7 Mcmillansdoxies.com
 Tacoma.americanlisted.com (pets)
 8 Seattle.americanlisted.com
May 26, 2023
 9 MSN (personal news stories viewed)
May 27, 2023
 10 MSN (personal news stories viewed)
 Homes.com
 11 Personal google searches
 Petclassifieds.com
 12 Puppies.com
 Seattlecraigslist.org
 13 Olympiccraigslist.org
 Abbotsfordcraigslist.org
 14 Indianapoliscraigslist.org
 Kitsap Humane Society
 15 Kitsappets.com
 Oregonhumane.com
 16 Dogs.oodle.com
 Adoptapet.com
 17 Preimerpups.com
 Facebook
 18 Petcurious.com
 Marketplace.akc.org
 19 Puppylandwa.com
 Minidappledachshund.com
 20 Trustedpuppies.com
 Petfinder.com
 21 Gooddog.com
 Longdox.com
 22 **June 1, 2023**
 MSN (personal news stories viewed)
 23 Indeed.com
 Personal google searches
 24 **June 2, 2023**
 Amazon (personal items viewed)
 25 MSN (personal news stories viewed)
June 3, 2023
 26 YouTube

1 Thekitchenmagpie.com
 Personal google searches
 2 **June 7, 2023**
 Airbnb.com (home rentals viewed)
 3 Amazon (books viewed and personal items viewed)
June 8, 2023
 4 Personal google searches
 Google flights searched
 5 Amazon (books viewed and personal items viewed)
June 14, 2023
 6 Shelterluv.com
 Hsmcwa.org (pets viewed)
 7 MSN (personal news stories viewed)
June 15, 2023
 8 YouTube
 Budget.com (reservations viewed)
 9 Indeed.com
 Twitter
 10 MSN (personal news stories viewed)
June 21, 2023
 11 Amazon (personal items viewed)
July 13, 2023
 12 Personal google searches
 MSN (personal news stories viewed)
 13 Amazon (personal items and books viewed)
July 19, 2023
 14 MSN (personal news stories viewed)
 Indeed.com
 15 **July 20, 2023**
 Personal google searches
 16 Amazon (books viewed)
July 27, 2023
 17 MSN (personal news stories viewed)
 Uhaul.com
 18 Personal google searches
 Indeed.com
 19 Amazon (books viewed)
July 29, 2023
 20 YouTube
August 3, 2023
 21 Personal google searches
 Northmasonsdwa.sites (child school supplies viewed)
 22 Indeed.com
 Amazon (books viewed)
 23 **August 7, 2023**
 Amazon (books viewed)
 24 MSN (personal news articles viewed)
August 9, 2023
 25 MSN (personal news articles viewed)
 Albertsons.com (food order placed)
 26 Amazon (books viewed)

1 **August 14, 2023**
 2 Personal google searches
 3 Pointedkitchen.com
 4 MSN (personal news stories viewed)
 5 Moneypail.com (movie reviews)
 6 Amazon (personal items viewed)
 7 **August 16, 2023**
 8 Amazon (books viewed, twin bed mattress)
 9 Sozonw.org (Church website)
 10 **August 26, 2023**
 11 MSN (personal news articles viewed)
 12 Amazon (books viewed)
 13 **August 27, 2023**
 14 Amazon Kindle account accessed
 15 **August 28, 2023**
 16 Amazon Kindle account accessed
 17 **August 29, 2023**
 18 Amazon Kindle account accessed
 19 **August 30, 2023**
 20 MSN (personal news articles viewed)
 21 Amazon Kindle account accessed
 22 **September 4, 2023**
 23 Amazon (personal items viewed)
 24 **September 7, 2023**
 25 MSN (personal news stories viewed)
 26 Offerup.com (personal items viewed)
 Amazon (personal items viewed)
September 12, 13, 19, 20, 26 2023
 Amazon Kindle account accessed
 MSN (personal news stories viewed)
 Sozoschoolministry.com
October 7, 2023
 MSN (personal news articles viewed)
 Amazon Kindle account accessed
 Amazon.com (personal items viewed)
 Indeed.com – job postings viewed; resume accessed
October 12, 2023
 Indeed.com – job postings viewed
 Amazon.com (personal items viewed)
 Groundzeroshelters.com
 Landsearch.com (WA Properties with bunkers searched and viewed)
 MSN (personal news articles viewed)
 Christiannews.net
October 13, 2023
 MSN (personal news articles viewed)
 Amazon.com (personal items viewed)
 Greatwolf.com (dining/stay packages viewed)
October 14, 2023
 MSN (personal news articles viewed)
 Sportsnewsman.com
 Plentifulearth.com

October 16, 2023

Daringgourmet.com (food recipes)
Sozonw.org (Church website)
MSN (personal news articles viewed)
Emilyswoofpack.com (in home boarding/doggy day care)
Amazon.com (personal items viewed)

October 27, 2023

MSN (personal news articles viewed)
Sozoschoolministry/YouTube
Amazon Kindle account accessed

October 31, 2023

YouTube
Amazon (personal items viewed)

November 1, 2023

MSN (personal news articles viewed)
Amazon Kindle account accessed

November 2, 2023

Amazon.com (personal items viewed)

November 6, 2023

Indeed.com (job viewed)
MSN (personal news articles viewed)
Leosphotography.com (photo order placed)
Amazon.com (personal items viewed)

November 7, 2023

Kitsap-humane.org

November 9, 2023

Foragerchef.com (recipes viewed)

November 11, 2023

Amazon kindle account accessed
MSN (personal news articles viewed)

November 13, 2023

MSN (personal news articles viewed)
Amazon.com (personal items viewed)

November 16, 2023

Amazon.com (personal items viewed)

November 17, 2023

Amazon.com (personal items viewed)
MSN (personal news articles viewed)

December 4, 2023

Amazon (personal items viewed)

CONCLUSIONS OF LAW

1. The Board has jurisdiction to hear this matter pursuant to RCW 42.52.360(1), which authorizes the Board to enforce the Ethics in Public Service Act, chapter 42.52 RCW, with respect to employees in the executive branch of state government. The Board has jurisdiction over Rachael Shaeffer, whose actions occurred while they were a state employee.

2. Based on the evidence reviewed, Rachael Shaeffer has used state resources for their private benefit or gain in violation of RCW 42.52.160. Rachael Shaeffer's activities do not meet the exceptions for the use of state resources as permitted in WAC 292-110-010.

RCW 42.52.160(1) – Use of persons, money, or property for private gain, states:

No state officer or state employee may employ or use any person, money, or property under the officer's or employee's official control or direction, or in his or her official custody, for the private benefit or gain of the officer, employee, or another.

Under 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.

4. In determining the appropriateness of the civil penalty, the criteria in WAC 292-120-030 have been reviewed.

III. ORDER OF DEFAULT AND FINAL ORDER

Based on the foregoing, the Board:

FINDS the Respondent, Rachael Shaeffer, failed to file a response and/or request a hearing within 30 days after proper service of the Board's reasonable cause determination in this matter and after proper service of notice of the right to request an adjudicative hearing.

1 CONCLUDES that the Respondent, Rachael Shaeffer, is in default under the provisions of
2 RCW 34.05.440(1) and WAC 292-100-060(3).

3 IT IS ORDERED that pursuant to RCW 34.05.440(1) and WAC 292-100-060(3) the Board
4 may proceed to resolve this case without further notice to, or hearing for the benefit of, Respondent
5 Rachael Shaeffer.

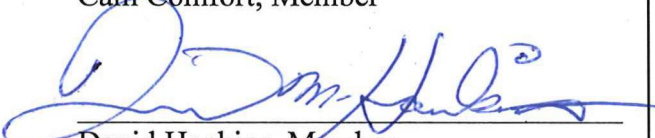
6 IT IS HEREBY FURTHER ORDERED Respondent Rachael Shaeffer is liable for and
7 shall pay a civil penalty of four thousand dollars (\$4,000). The payment shall be made to the
8 Executive Ethics Board within forty-five (45) days of this Order.

9 DATED this 12th day of September 2025.

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11 Kelli Hooke, Chair


Cam Comfort, Member

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13 Megan Abel, Vice Chair


David Hankins, Member

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15 Mark Rapozo, Member
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Any party may ask the Executive Ethics Board to reconsider a Final Order. The request must be in writing and must include the specific grounds or reasons for the request. The request must be delivered to Board office within 10 days after the postmark date of this order.

The Respondent is not required to ask the Board to reconsider the Final Order before seeking judicial review by a superior court. RCW 34.05.470.

A Final Order issued by the Executive Ethics Board is subject to judicial review under the Administrative Procedure Act, chapter 34.05 RCW. See RCW 42.52.440. The procedures are provided in RCW 34.05.510 - .598.

A petition for review must set forth:

- (1) The name and mailing address of the petitioner;
- (2) The name and mailing address of the petitioner's attorney, if any;
- (3) The name and mailing address of the agency whose action is at issue;
- (4) Identification of the agency action at issue, together with a duplicate copy, summary, or brief description of the agency action;
- (5) Identification of persons who were parties in any adjudicative proceedings that led to the agency action;

- 1 (6) Facts to demonstrate that the petitioner is entitled to obtain judicial review;
2 (7) The petitioner's reasons for believing that relief should be granted; and
3 (8) A request for relief, specifying the type and extent of relief requested.
4 RCW 34.05.546.

5 **ENFORCEMENT OF FINAL ORDERS**

6 If there is no timely request for reconsideration, this is the Final Order of the Board. The
7 Respondent is legally obligated to pay any penalty assessed.

8 The Board will seek to enforce a Final Order in superior court and recover legal costs
9 and attorney's fees if the penalty remains unpaid and no petition for judicial review has been
10 timely filed under chapter 34.05 RCW. This action will be taken without further order by the
11 Board.