



Published at the direction of the

LEGISLATIVE ETHICS BOARD

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2025 ANNUAL REPORT WASHINGTON STATE LEGISLATIVE ETHICS BOARD

ETHICS BOARD MISSION STATEMENT

To fairly administer the Ethics in Public Service Act (Act)¹ and to always be aware of the long-term effects that Board decisions may have on the legislative branch of government and the public trust.

To emphasize training and the utilization of ethics advisers so that, whenever possible, ethics questions may be addressed in an educational rather than a confrontational setting.

BACKGROUND

Established in 1994 by statute, the Washington state Legislative Ethics Board (Board) is composed of nine members. Four members are current legislators selected by their caucuses and appointed by either the President of the Senate or the Speaker of the House. Four members are citizens who are selected by the Governor from a list of three individuals submitted by each of the four caucuses. The fifth citizen member is selected by at least three of the four citizen members. The chair must be a citizen member. Legislative members serve two-year terms and can be reappointed; citizen members serve one five-year term and cannot be reappointed. All members serve until their successors are appointed.

¹ RCW 42.52.*et seq*

MEMBERS

Laurie Dolan was appointed by the Senate Democratic Caucus on January 13, 2025 as a citizen member. She is a former member of the House of Representatives where she represented the 22nd legislative district from 2017-2023. Ms. Dolan is a former educator and served for four years as the Director of the Policy Office under then-Governor Chris Gregoire. She has a bachelor's degree from the University of Washington and a Master's Degree and a Ph.D. from Gonzaga University. As a House member, Ms. Dolan served as a member of the Legislative Ethics Board.

Sen. Chris Gildon was appointed by the Senate Republican Caucus in January 2023. He is a current member of the Senate representing the 25th legislative district located in the Puyallup area. Prior to his election to the Senate, Sen. Gildon served in the House of Representatives from 2019-2021. Sen. Gildon is a 23 year veteran Army officer and currently holds the position of Deputy Leader for the Republican Caucus. Sen. Gildon earned a bachelor's degree in political science from the University of Texas, complemented by a master's degree in public administration from Webster University and a master's in strategic security studies from the National Defense University.

Rep. David Hackney was appointed by the House Democratic Caucus in January 2023. Rep. Hackney has represented the 11th legislative district since 2020. He is currently vice-chair of the Capital Budget Committee and also serves on the Consumer Protection & Business & Transportation Committees. Rep. Hackney received his undergraduate degree from Cornell University and his law degree and an MPA from Harvard University.

Larry Hoff, Chair, was selected by the House Republican Caucus as a citizen member in April 2023. He was previously a member of the House of Representatives representing the 18th legislative district. Rep. Hoff received his undergraduate degree in Accounting from the University of North Dakota. He retired from the credit union industry in 2017 after serving as CEO for several credit unions. As a House member, Mr. Hoff served on the Legislative Ethics Board.

Sen. Jamie Pedersen was appointed by the Senate Democratic Caucus in 2014. Sen. Pedersen represents the 43rd legislative district (central Seattle). He was elected to the House of Representatives in 2006 and was appointed to the state Senate in 2013 and has served since that time. Sen. Pedersen has been a member of the Legislative Ethics Board since 2008, representing the House Democratic Caucus from 2008-2013 before moving to the Senate. Sen. Pedersen received both his undergraduate and law degrees from Yale University. He currently serves as the Senate Majority Leader.

Pam Tajima Praeger was selected by the other citizen members as the 5th citizen member. Ms. Praeger served as President of Spokane Falls Community College from 2011-2012. She also previously served in a variety of other

professional positions with the College for more than 30 years. Ms. Praeger has served on various boards and commissions, including a stint as Chair of the Commission on Judicial Conduct. She received her undergraduate degree from Pacific Oaks College and her Master's Degree from the University of Idaho.

Jessica Roberts was selected by the House Democratic Caucus as a citizen member and appointed to the Board by the Governor on March 25, 2025. She is currently an associate with the Davis Wright Tremaine law firm and previously served as an intern for the Muckleshoot Indian Tribe's Office of the Tribal Attorney. Ms. Roberts received her undergraduate degree from the University of Notre Dame, a Master of Arts degree from Harvard University and her law degree from Seattle University.

Rep. Mike Steele was appointed by the House Republican Caucus in January 2023. Rep. Steele has represented the 12th legislative district which includes parts of Chelan, Douglas, King and Snohomish counties since 2017. Rep. serves on the House Capital Budget, Education and Rules Committees. He is currently employed as the Executive Director for the Lake Chelan Chamber of Commerce. He received degrees in business administration and political science from Pacific Lutheran University.

Lynda Wilson was selected by the Senate Republican caucus as a citizen member and appointed to the Board by the Governor on March 25, 2025. She is a former member of both the House of Representatives and the state Senate representing the 17th legislative district. She served in the House from 2015-2017 and in the Senate from January 2017 to January 2025. She has an extensive background in the banking industry and is a co-owner of a family-owned manufacturing business in the Vancouver area.

STAFF

The Board employs one Board counsel who investigates complaints filed with the Board; drafts complaint opinions, advisory opinions, and ethics alerts; trains on ethics issues; and provides guidance to legislators and legislative staff on ethics issues. The Board counsel also staffs the bi-monthly meetings of the Board.

Current Board counsel, Jennifer Strus, has served in this capacity since June of 2018. Ms. Strus also served as Senior Coordinator/Counsel with the Senate staffing various committees for 15 years; served five years as the Assistant Secretary for the Children's Administration in DSHS; and has served as budget counsel for the Office of Financial Management and as an Assistant Attorney General. Ms. Strus received her undergraduate degree from Illinois State University and her law degree from Washburn University of Topeka School of Law.

BOARD AUTHORITY

Pursuant to RCW 42.52.320, the Board is required to develop educational materials, issue advisory opinions, adopt rules or policies governing the conduct of the board's business; investigate, hear and determine complaints filed by any person or on the board's own motion; and impose sanctions when reasonable cause is found to believe the Act was violated.

2025 BOARD MEETINGS

Pursuant to Legislative Ethics Board Rule 1.A., a quorum for transaction of board business consists of a majority of the members. This quorum must include not less than a majority of citizen members. The Board met on the following dates in 2025:

February 21, 2025
March 31, 2025
May 5, 2025
June 16, 2025
July 14, 2025
September 8, 2025
October 15, 2025
December 8, 2025

BOARD RESPONSIBILITIES

INFORMAL ADVICE

There are four designated ethics advisers for the legislature: House counsel; both Senate counsels; and the Board counsel. These advisers meet on a regular basis to discuss ethical issues that have arisen to ensure that they are providing consistent advice. Board counsel routinely responds to several hundred queries (some of which come from the other ethics advisers) per year from legislators, legislative staff, lobbyists and the general public regarding ethical situations.

In 2025, Board counsel was involved in providing guidance in over 478 ethics inquiries, on the telephone, virtually and through email. The most frequent topics of inquiry involved the following areas: campaigns (RCW 42.52.180);

use of state resources (RCW 42.52.160); gifts (RCW 42.52.150); and conflict of interest (RCW 42.52.020). The following breakdown² shows the numbers of inquiries by topic areas:

▪ Definitions (gifts) (RCW 42.52.010)	5 inquiries
▪ Conflict of interest (RCW 42.52.020)	67inquiries
▪ Special Privileges (RCW 42.52.070)	7 inquiries
▪ Confidentiality (RCW 42.52.050)	2 inquiries
▪ State resources (RCW 42.52.160)	283 inquiries
▪ Campaign (RCW 42.52.180)	63 inquiries
▪ Mailing restrictions (RCW 42.52.185)	5 inquiries
▪ Gifts (RCW 42.52.150/.140)	32 inquiries
▪ General information	6 inquiries
▪ Employment after leaving (RCW 42.52.080)	0 inquiries
▪ No money for legislative advice or assistance (RCW 42.52.110)	0 inquiries
▪ Honoraria (RCW 42.52.130)	1 inquiry
▪ Jurisdiction of the Board (RCW 42.52.320)	5 inquiries
▪ Citizen-legislature principle (RCW 42.52.330)	0 inquiries
▪ Compensation for outside activities (RCW 42.52.120)	5 inquiries
▪ Authority of the Executive Ethics Board (.360)	0 inquiries
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▪ Board Rules	3 inquiries
▪ Raising campaign funds (RCW 42.17A)	1 inquiry
▪ Letters of recommendation or congratulations (RCW 42.52.187)	19 inquiries
▪ State Constitution	1 inquiry
▪ Legislative Nexus (RCW 42.52.175)	2 inquiries
▪ Political activities of Board members (RCW 42.52.380)	1 inquiry

TRAINING

The Act does not require ethics training but does encourage training of all state employees, which includes legislators and legislative staff, every 36 months. The Act does require all state agencies (including the legislature) to designate ethics advisers. The legislature has designated the following persons as ethics advisers: House counsel; both Senate counsels; and Board counsel.

² A number of inquiries involved more than one area of the Ethics Act; hence, the total number of topics addressed in the inquiries exceeds the total number of inquiries.

Both the House and Senate and some legislative agencies require ethics training for new employees and new legislative members on a regular basis. Board counsel participates in developing and providing those trainings. In 2025, Board counsel participated in approximately 8 ethics trainings.

ETHICS MANUAL

The Board publishes the *Legislative Ethics Manual*, which is updated annually. It is available electronically on the Board's website as well as in hard copy. The *Manual* contains a summary of new cases decided by the Board the previous year, a question-and-answer section about the most frequently asked about areas of the Act, the complete Ethics in Public Service Act (RCW 42.52) and the Board's Administrative Rules.

OUTSIDE EMPLOYMENT OR GRANT CONTRACTS WITH STATE AGENCIES

Under RCW 42.52.120 and Board Rule 8 F., a legislator or legislative employee must submit to the Board all contracts, grants or employment situations requiring Board approval.³ The Board has designated forms that must be completed when submitting a contract,⁴ grant or employment situation for approval. A legislator or legislative employee must receive Board approval before entering into or obtaining a beneficial (financial) interest in a contract or grant with a state agency only if the process for awarding the contract or grant was not open and competitive, or whenever only one bid or application was received by the state agency letting the contract.

The Board also requires that legislative employees and legislators inform the Board by submitting the proper form for Board approval if their spouse or registered domestic partner works for or has a contract with a state agency. The purpose of this submission is to ensure there is no conflict of interest between the official duties of the employee or legislator and the duties of the spouse or domestic partner. In 2025, the Board reviewed 21 total submissions.

ADVISORY OPINIONS

Under Board Rule 1.L. requests for advisory opinions may be made by any legislator, legislative staff, or board member. The board also may issue an advisory opinion on its own motion. Requests for an advisory opinion may be made by other persons but only about the application of the Act to them.

Requests must be stated in the hypothetical unless the request is specifically about the requester's own conduct. The request must provide sufficient information for the board to be able to issue an opinion. Advisory opinions will not be issued on facts that have already occurred.

³ There are two forms: one for employment with a state agency and one for contracts and grants with state agencies.

⁴ The Board substantially revised the form to be completed for a contract or grant with a state agency. The form now asks for additional information to assist the Board in better determining whether there is a conflict of interest.

The Board will not issue an advisory opinion unless the Board is unanimous in its decision to issue the opinion. Unless confidentiality is waived, the identity of the requester will be known only to the chair and Board counsel. The Board will either issue an advisory opinion or notify the requester that the request is denied and the reasons for the denial.

The Board issued 3 advisory opinions during 2025.

The Advisory Opinion 25 – 01 request asked whether it was a violation of the Ethics Act to use public resources to produce or print items identifying members that are not traditionally produced for a legislator’s use. The Board determined that the production of items traditionally produced for members creates a presumption that such items fall within the “normal and regular” exception to the prohibition against the use of state resources for campaign purposes under RCW 42.52.180.

The Advisory Opinion 25- 02 request asked whether it would be a conflict of interest for legislative staff to “like” a caucus social media post. The Board stated that it would be considered lobbying to “like” a social media post because to do so indicates that the person is supporting the legislative content of the post.

Advisory Opinion 25 – 03, submitted on the Board’s own motion, determined that the phrase “letter of recommendation” as used in RCW 42.52.187 was intended to apply in more situations than just those involving employment.

ETHICS ALERTS

The Board will occasionally issue ethics alerts on topics that do not warrant an advisory opinion but about which the Board would like the information quickly available to legislators and legislative staff. In 2025, the Board issued one *Ethics Alerts*. This Alert, issued in June 2025, summarized the pertinent provisions of ESSB 5143, the bill amending the Ethics Act.

COMPLAINTS

Under Board Rule 1.B. anyone can file an ethics complaint with the Board and the Board can initiate a complaint. No complaint can be anonymous. For every complaint filed with the Board, Board counsel determines whether the Board has both personal and subject matter jurisdiction to address the complaint. For those complaints where there is an obvious lack of personal or subject matter jurisdiction Board counsel has the authority to dismiss them. If Board counsel dismisses a complaint, the Complainant has the right to request the Board to review any dismissal made by Board counsel. The complaints over which the Board has jurisdiction are fully investigated and the results provided to the Board through a report prepared by Board counsel. The Board debates the complaint in executive session and once a decision is made, the Board issues a written opinion which is posted on its website and made available to the public.

In 2025, the Board resolved the following complaints:

Allegation	Statute(s) Implicated	Result
Complaint alleged the Act was violated when a legislator fell asleep during a legislative committee hearing.	RCW 42.52.020	No reasonable cause – complaint dismissed
Complaint alleged legislator used her official position to gain an advantage in small claims court against her previous landlord.	RCW 42.52.070	No reasonable cause found – complaint dismissed.
Complaint alleged Act was violated that Complainant was blocked from a legislator’s official social media account.	Washington state Constitution	No subject matter jurisdiction
Complaint alleged Act violated because legislator was both a city council member as well as a state legislator.	RCW 42.52..020	No reasonable cause found – complaint dismissed
Complaint alleged Act violated when a legislator, who is a committee chair and the co-owner of a car dealership, did not advance a bill dealing with car dealerships because she did not have sufficient votes to move the bill out of the committee?	RCW 42.52.020	No reasonable cause – complaint dismissed
Fifteen complaints filed against the same legislator all alleging he posted demeaning and insulting comments about various people on his personal social media account.	RCW 42.52.320	No subject matter jurisdiction – Staff dismissal
Complaint alleged Act violated when caucus staff posted items about legislator’s personal preferences that were not related to their legislative work.	RCW 42.52.160 & .180	Reasonable cause found – no penalty imposed.
Complaint alleged Act violated when caucus communications staff posted content to official social media accounts without leadership approval or knowledge.	RCW 42.52.020	No reasonable cause – complaint dismissed
Complaint alleged Act violated because legislator’s outside employment conflicted with her official legislative duties	RCW 42.52.020	No reasonable cause – complaint dismissed
Complaint alleged that Act was violated when legislative staff issued a campaign press release using state resources.	RCW 42.52.180	No reasonable cause – complaint dismissed
Complaint alleged Act violated when legislator posted a video made by legislative staff on his personal social media account which also included campaign material.	RCW 42.52.180	Reasonable cause found - \$500 fine with \$250 suspended pending no further ethics violations
Two complaints alleged Act violated when legislator commented on his personal social media account comparing far left extremists to a cancerous tumor needing to be removed.	RCW 42.52.320	No subject matter jurisdiction – Staff dismissal of both complaints
Complaint alleged legislator violated the Act by not responding to the various contacts made by a constituent.	RCW 42.52.320	No subject matter jurisdiction – staff dismissal
Complaint alleged an out of state legislator violated the Act.	RCW 42.52.320	No personal jurisdiction – staff dismissal
Three complaints alleged the Act was violated when a legislator posted inflammatory, partisan and campaign	RCW 42.52.320	No subject matter jurisdiction – staff dismissal

Allegation	Statute(s) Implicated	Result
content on his person social media account and on the social media account of one of the state parties.		
Complaint alleged the Act was violated when legislator introduced legislation that was remotely related to her outside employment.	RCW 42.52.020	No reasonable cause – complaint dismissed
Complaint alleged the Act was violated by a separate state agency.	RCW 42.52.320	No personal jurisdiction – staff dismissal
Complaint alleged the Act was violated by an attorney who is not a legislator and by the bar association.	RCW 42.52.320	No personal jurisdiction – staff dismissal