



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

June 26, 2019

Delivered electronically to Doug Ericksen at “[doug@senatorericksen.com](mailto:doug@senatorericksen.com)”

Subject: Complaint filed by Andrew Saturn, PDC Case 50328

Dear Senator Ericksen:

Below is a copy of an electronic letter sent to Andrew Saturn concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Saturn, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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June 26, 2019

Delivered electronically to Andrew Saturn at "saturn@gmail.com"

Subject: Complaint regarding Doug Ericksen, PDC Case 50328

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 10, 2019. Your complaint alleged that Doug Ericksen, a Senator in Legislative District 42, may have violated: (1) RCW 42.17A.600 and WAC 390-20-143 for failure to register Pac Rim Bridges, LLC as a lobbyist firm; and (2) RCW 42.17A.600 for failure to register himself as a lobbyist with Pac Rim Bridges, LLC.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; and the response(s) provided by Senator Ericksen and Jay Rodne in a related case (PDC Case 50329), to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Doug Ericksen is an incumbent Washington State Senator in Legislative District 42 after being elected in 2010 and previously served as a State Representative in the same district.
- On November 28, 2017, Pac Rim Bridges, LLC registered as a Washington Limited Liability Company and identified Doug Ericksen and Jay Rodne as individual governors of the entity.
- According to information provided by Mr. Rodne in response to a separate but related complaint, in March 2019, Pac Rim Bridges, LLC entered into a Consulting Services Agreement with the Kingdom of Cambodia which focused on federal issues in Washington D.C. to help improve relations between the United States and the Kingdom of Cambodia.
- The complaint included a copy of a Registration Statement Pursuant to the Foreign Agents Registration Act describing the specific services of Pac Rim including meetings with federal and state level officials promoting cultural exchanges, trade and investment between the USA and the Kingdom of Cambodia, and legislation promoting improved relations.
- RCW 42.17A.005(33) defines "lobbying" as attempting to influence the passage or defeat of any legislation by the legislature of the state of Washington, or the adoption or rejection of any rule, standard, rate or other legislative enactment of any state agency. A "lobbyist" as defined in RCW 42.17A.005(34), includes any person who lobbies.
- RCW 42.17A.600 requires a lobbyist to register before lobbying, or within thirty days after being employed as a lobbyist, whichever occurs first and describes the specific

details required to be disclosed on the registration, including the identity of the lobbyist's employer, compensation and subjects to be lobbied.

- In his response, Senator Ericksen stated that Pac Rim Bridges, LLC is not conducting any business in the state of Washington and "will not be engaged in any attempt to influence that passage or defeat of any legislation in Washington State."
- Staff requested Senator Ericksen to describe any affirmative steps he would take to separate his duties as a state senator from issues involving interests to Cambodia that may arise in the state legislature. Senator Ericksen confirmed that he is "...not aware of any issues involving the interests of Cambodia that could arise in the Washington State Legislature" and indicated that no steps needed to be taken at this point.

The written responses from Senator Ericksen and Jay Rodne, confirm that Pac Rim Bridges, LLC and its two named governors, do not meet the statutory definition of a lobbyist and that neither Pac Rim nor Senator Ericksen have engaged in lobbying activities that would require registration with the PDC.

Based on these findings staff has determined that, in this instance, no evidence supports a finding of an actual violation warranting further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Senator Doug Ericksen