



**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 Jay Rodne at "jay\_rodne@comcast.net"

Subject: Complaint filed by Andrew Saturn, PDC Case 50329

Dear Mr. Rodne:

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



**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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcca.wa.gov](http://www.pdcca.wa.gov)**

June 26, 2019

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

Subject: Complaint regarding Jay Rodne, PDC Case 50329

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 Jay Rodne 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 Jay Rodne and Senator Doug Ericksen in a related case (PDC Case 50328), to determine whether the record supports a finding of one or more violations.

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

- On November 28, 2017, Pac Rim Bridges, LLC registered as a Washington Limited Liability Company and identified Jay Rodne and Doug Ericksen as individual governors of the entity.
- The complaint included a copy of a Registration Statement Pursuant to the Foreign Agents Registration Act describing the specific services of Pac Rim Bridges 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, Mr. Rodne stated that 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.
- Mr. Rodne stated that "To date, Pac Rim Bridges does not conduct any work in Washington State (nor any other state) and at this time, all work is focused in Washington

DC and in Cambodia.” He confirmed that Pac Rim, Senator Ericksen and himself, do not “lobby” in Washington State, and are not “lobbyists”.

- In regard to a related complaint, 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. Mr. Rodne further confirmed that since the work being conducted by Pac Rim Brides is related to federal issues, that neither he nor Senator Ericksen anticipate any conflicts between Pac Rim Bridges’ work and Senator Ericksen’s capacity as a Washington State Senator.

The written responses from Jay Rodne and Senator Doug Ericksen, 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 Mr. Rodne 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 Lavallee  
Executive Director

cc: Jay Rodne