

Jay rodne replied,8 days ago  
to: "'PDC Support'" <pdcc@pdcc.wa.gov>

Ms. Hansen, please let this email serve as my supplemental response:

1. On or about March 25, 2019, Pac Rim entered into a Consulting Services Agreement ("Agreement") with the Kingdom of Cambodia. Under the terms of the Agreement, the work of Pac Rim is focused on federal issues in Washington D.C. by helping to improve relations between the United States and the Kingdom of Cambodia.
2. In accordance with federal law, Pac Rim Bridges, LLC, Jay Rodne and Doug Ericksen properly filed as agents of a foreign government under the Foreign Agents Registration Act ("FARA") of 1938, as amended, 22 U.S.C. § 611 et seq.
3. RCW 42.17A.005(33) defines "Lobby" and "Lobbying" in pertinent part 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 under the state administrative procedure act, chapter 34.05 RCW". A "lobbyist" is defined as "any person who lobbies either in his or her own or another's behalf." See RCW 42.17A.005(34). A "lobbyist's employer" is defined as "the person or persons by whom a lobbyist is employed and all persons by whom he or she is compensated for acting as a lobbyist." See RCW 42.17A.005(35).
4. Pac Rim, Jay Rodne and Doug Ericksen do not "lobby" in Washington State as that term is defined pursuant to RCW 42.17A.005(33). Moreover, neither Doug Ericksen nor Jay Rodne do any "lobbying" work in Washington State, they receive no compensation as a result thereof, and they are not "lobbyists" as that term is defined under RCW 42.17A.005(34). 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. The issues that Pac Rim Bridges, LLC is focused on involve federal issues between the United States and the Kingdom of Cambodia and in improving relations between our two countries. Because these are federal issues, we do not anticipate any conflicts between Pac Rim Bridges' work and Sen. Ericksen's capacity as a Washington State Senator.
5. Because Pac Rim's consulting work is focused on federal issues in connection with helping to improve relations between the United States and the Kingdom of Cambodia, all respondents have properly filed under FARA as required by federal law.
6. Because Pac Rim, Doug Ericksen and Jay Rodne do no "lobbying" work in the state of Washington as that term is defined under Washington law (see RCW 42.17A.005(33)-(35), there is no requirement for any of the respondents to file as lobbyists in Washington State under RCW 42.17A.600 or RCW 42.17A.615.
7. For these reasons, the Complaint filed by Mr. Andrew Saturn is without merit and should be accordingly dismissed with prejudice.

Kind regards,  
Jay Rodne