



**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.pdca.wa.gov](http://www.pdca.wa.gov)**

October 28, 2019

Delivered electronically to "swcollin@uw.edu"

Subject: Complaint filed by Cody Hart, PDC Case 58010

Dear Steve Collins:

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

As noted in the letter to Cody Hart, 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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October 28, 2019

Delivered electronically to "codycrh@gmail.com"

Subject: Complaint regarding Steve Collins, PDC Case 58010

Dear Cody Hart:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 30, 2019. The complaint alleged that Steve Collins (Respondent), a public employee for the University of Washington Bothell (UWB) may have violated RCW 42.17A.635 for indirectly lobbying the legislature outside of authorized channels for public agency lobbying; and RCW 42.17A.640 for failure to report a grass roots lobbying campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; and the response provided by the Respondent, to determine whether the record supports a finding of one or more violations.

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

- The complaint provided evidence of a series of emails from Ken Fuller at the Department of Licensing soliciting support for Senate Bill 5443 (2019), encouraging recipients to contact members of the legislature to voice their support, as well as to encourage other people within their networks to likewise contact members of the legislature to voice their support.
- The Respondent states in the response to the allegations that at all times relevant to the complaint, *"I was on sabbatical from the University of Washington Bothell (UWB), where I am a tenured Associate Professor. My sabbatical was effective for the academic year 2018-19, and I officially resumed full-time faculty status at the start of the 2019-20 academic year in September."*
- The Respondent's official duties do not include advocating in support or opposition to legislation, and the UWB did not take an official position on Senate Bill 5443 (2019).
- The complaint provided evidence of an April 9, 2019 email from the Respondent to Ken Fuller and others from a personal email, which stated, *"I'm contacting you from my personal email so as not to infringe UW policies with respect to lobbying...I called and left a message with Committee Chair Ormsby per your request yesterday, and this morning sent email messages (see below) to every legislator on the committee. Also passed along your message to the WSPE Executive Committee."*
- Though the Respondent was on sabbatical from UWB at the time of the activity, the Respondent accessed an email account owned and operated by UWB to receive instructions from Ken Fuller.

- The Respondent contacted members of the legislature in the personal capacity of President of the Washington Society of Professional Engineers (WSPE), and solicited other members of WSPE to contact members of the legislature to support Senate Bill 5443 (2019).
- The Respondent made a good-faith effort to avoid the direct or indirect expenditure of public funds to support or oppose legislation, by contacting members of the legislature and the public from personal emails and phones, rather than those of UWB.
- No evidence was presented by the complaint to suggest that expenditures exceeding \$1,000 were made to support a grass roots lobbying campaign, as provided by RCW 42.17A.640, and the response to the complaint indicates, *“I spent no personal funds, even riding with someone else to Olympia for AELC Day.”*

Based on our findings staff has determined that, in this instance, insufficient evidence supports a finding of a violation that warrants 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Steve Collins