#### Seattle Ethics and Elections Commission Special Meeting

#### April 18, 2019

A special meeting of the Seattle Ethics and Elections Commission convened on April 18, 2019 in Room 4080 of the Seattle Municipal Tower, 700 Fifth Avenue. Commission Chair Brendan Donckers called the meeting to order at 4:01 p.m. Commissioners Eileen Norton, Nick Brown, Bruce Carter, Susan Taylor and Richard Shordt were present. Vice Chair Hardeep Singh Rekhi joined at 4:02 p.m. Executive Director Wayne Barnett was joined by staff members René LeBeau, Annie Tran, Polly Grow, and Chrissy Courtney. The Director introduced Tomica Ransaw, the new temporary campaign finance auditor to the Commission. The Director and Chair welcomed the newest Commissioner, Richard Shordt. Assistant City Attorneys Jeff Slayton and Gary Smith were also in attendance.

#### 1) Public Comment

Alex Tsimerman, Marguerite Richard, Michael Fuller, and Omari Tahir-Garrett all made public comment.

#### **Action Items**

### 2) March 6, 2019 regular meeting minutes

Commissioner Brown moved to approve the minutes as drafted, seconded by Commissioner Taylor, with no discussion. The minutes were approved by a vote of 5-0. Commissioners Norton and Shordt abstained because they did not attend the March meeting.

#### 3) Appeal of dismissal in Case No. 19-1-0206-1

Mr. Dick Falkenbury is the appellant in the dismissal in Case No. 19-1-0206-1, which is regarding a complaint against former Councilmember Rob Johnson for taking a position with the National Hockey League (NHL) before leaving the City Council.

Commissioner Norton disclosed that she had worked previously with Dick Falkenbury and Chair Donckers disclosed he used to play high school basketball with Rob Johnson's younger brother.

The Director said that Mr. Johnson asked to meet with him in later November 2018 and informed the Director that he had received an overture from the NHL regarding a job in which he was interested. The Director advised Mr. Johnson to not participate in any City matters in which the team had a financial interest. There is no evidence that Mr. Johnson disregarded the Director's advice.

Commissioner Carter said that his recollection was that if someone in a public position was involved in negotiations with an entity, they would be expected to recuse themselves from deciding matters related to that entity. The Director confirmed that yes, if a person is pursuing employment or negotiating employment, whether city employee or councilmember, that person cannot participate in matters in which the employer or potential employer has any interest. Under I-122, for three years after leaving the City Council Rob Johnson cannot lobby the City Council, and he cannot participate or assist with a matter he participated in for two years after leaving the City Council even if no lobbying is involved.

Mr. Falkenbury offered that there is no timeline on an ethics complaint and believes it is insufficient for the Director to ask the subject whether they committed a crime. Mr. Falkenbury

said that the Seattle Ethics and Elections Commission (SEEC) could ask Mr. Johnson to provide his emails, and his phone records, and this would not be onerous. Mr. Falkenbury commented that he did not believe the SEEC was going to find a smoking gun due to the lessons of Watergate. Mr. Falkenbury said there won't be a meeting where Mr. Johnson says I will do this for you in return for this job. Mr. Falkenbury asserted his position that this isn't a smoking gun situation, the whole thing is smoking. Mr. Falkenbury indicated that he filed his complaint so late because he felt certain that someone else would make the complaint before him because everyone knows this is so bad. Mr. Falkenbury offered that the SEEC might notice something in the negotiations or in the contract. Mr. Falkenbury referenced Paul Allen giving the City of Seattle land for a park, and noted that part of the contract was a requirement that the city build a \$20 million pedestrian bridge, and wondered if Mr. Johnson had also sought such a clause in the contract with the NHL. Mr. Falkenbury said we don't know if Mr. Johnson has included such a clause, but we asked him if he violated the law, and he assured us he hadn't. Mr. Falkenbury said that he doesn't think that is due diligence, or even diligence.

The Chair asked if there were any questions for Mr. Falkenbury. Commissioner Carter thanked Mr. Falkenbury for his long-standing engagement and asked which of the laws that the Director outlined at the beginning of the meeting he believed Mr. Johnson had violated. Mr. Falkenbury said he doesn't care, this is not a matter about the law, this is a moral crime. Mr. Falkenbury said that he believes the SEEC is a bully pulpit, and that they could go before Mr. Johnson and ask him as a political moral example, to withdraw from that job and go out and seek other work. Mr. Falkenbury noted that he can't believe that Mr. Johnson can't find another job.

The Chair asked if there were any other questions from the commissioners.

Commissioner Norton offered a factual correction that Mr. Allen gave 25 million dollars to a private organization, and the city was not involved in that purchase.

Public comment was then offered by Steve Wilkins, long-time resident and homeowner, and active in the University District. Mr. Wilkins said that when told that pursuant to SMC 4.16.020 that Mr. Johnson did not use a public office for personal gain because the city council unanimously passed the NHL deal it left a lot of unanswered questions in his head. Mr. Wilkins indicated there is a visible problem that Mr. Johnson worked on transportation and zoning committees and then quit and went directly to the NHL for a paid position. Mr. Wilkins wanted to know if the position was advertised, whether Mr. Johnson applied for the position, and how many people applied for the position. Mr. Wilkins averred that there is federal law that if you are using public money, then you have to advertise a position. Mr. Wilkins said he was respectfully asking the SEEC to reconsider the ruling regarding Mr. Johnson's use of a public office for private gain, and to enforce the violations that it seems to him Mr. Johnson committed.

The Chair asked if there were any questions for Mr. Wilkins. There were no questions from the commission. The Chair asked the Director if he had anything else to offer or if the commission should discuss the matter. The Director said that he believed the commission should discuss, but did offer that this was a matter of law, regardless of political moral concerns, and the matter before the commission was to determine whether Mr. Johnson should be investigated further or whether the Director's dismissal of the complaint was on a rational basis.

Assistant City Attorney Gary Smith offered that the review of the decision is based on Rule 4 and the commission should determine whether the Executive Director had a rational basis for the decision and the commission shall only reverse or amend a decision if there is no rational basis for the decision. The Chair then asked for a clarification regarding the evidentiary standard that would be appropriate, and Attorney Smith said there was a preponderance of the evidence standard to determine whether a violation has occurred.

Commissioner Brown asked the Director what standards he used to determine whether further investigations were necessary, noting that he understood Mr. Falkenbury's point that there is a reliance upon Mr. Johnson's denial and transparency on Mr. Johnson's behalf. The Director indicated that he would need some evidence or reasonable cause to believe that a violation occurred in order to warrant further investigations. The Director noted that he thinks it is not only Mr. Johnson's assertion that there was no wrongdoing, but that the timing of events, and the discussion with Mr. Johnson indicated that he had been asked about the job after he said publicly that he was not going to continue being a councilmember.

Commissioner Norton said that she is not advocating for changing the Director's determination, but she does believe that there is an issue of appearance. Mr. Johnson announced in January that he accepted the NHL position but didn't leave his City Council office until April. Commissioner Norton stated during that time Mr. Johnson was serving two masters and while she does not know that there is anything the SEEC can do about it, it does have a problematic appearance. Commissioner Norton is not interested in overturning the Director's decision, but did want to offer her opinion because in past instances when someone was accepting a new position in a similar situation, they gave two weeks' notice to clean shop and move on.

Commissioner Taylor offered that Mr. Falkenbury's complaint is really centered more around the idea that the NHL job offer was a bribe, and offered to him to influence his approach. Commissioner Taylor asked Mr. Falkenbury that if he does not believe that there will be a

smoking gun found, but that the SEEC should look at emails, whether there was any evidence that he could provide.

Mr. Falkenbury stated that the Seattle City Council and its individual members have a history of communicating things through email that one would not expect. Mr. Falkenbury stated that he is not saying that he knows for a fact there was bribery, but there are two parts to his complaint. One part of the complaint is that there was no due diligence in investigating the situation, and Mr. Falkenbury stated that he did not believe asking the person if they violated the law was not due diligence, and there is a history of dishonesty and the emails could be requested.

Commissioner Brown asked whether Mr. Falkenbury had considered making a public disclosure request for the emails of Mr. Johnson. Mr. Falkenbury said no, he has had problems filing requests and it's not his job to discover evidence. Mr. Falkenbury said he's talking about due process and he wants this to be delved into further. There is a presumption of innocence, of course, but it looks terrible, and Mr. Falkenbury thinks the SEEC could ask for further investigation. Mr. Falkenbury asserted that the situation looks so bad, that it must be a reward for whatever Mr. Johnson might have done, perhaps in getting the unanimous passage. Mr. Falkenbury stated that in the City of Seattle there is tremendous pressure to be unanimous.

The Chair tells Mr. Falkenbury that the issue he is struggling with here is what is the appropriate level of investigative response when there is a complaint that does not provide probable cause or some basis to believe that there was something wrong. The Chair noted that the Mr. Falkenbury candidly admits that he does not know of any quid pro quo, so the struggle is whether the situation meets the burden of evidence that indicates that there is a deeper investigation warranted. The Chair asked if there was a way of looking at what has happened here that is not improper. There is a plausible argument that when Mr. Johnson decided not to

run for office again, he was given a job in an industry that he openly loved and supported. Given those two factors, the Chair has a difficulty in investigating further. Mr. Falkenbury's response is that the SEEC should dust for fingerprints, check the emails, and phone records. Mr. Falkenbury noted that there is another troubling aspect to this; that sports teams notoriously do not care for transportation to their games, and he suggested that hiring Mr. Johnson due to his transportation background was suspicious.

The Chair asked Mr. Falkenbury if he believes that the examples of other councilmembers in the past have had issues with emails, and that other sports teams have not cared about transportation, are a basis for investigating Mr. Johnson. Mr. Falkenbury assented that he does believe that these other issues are a relevant basis for investigating Mr. Johnson further.

The Chair asked if there were any further questions, and Commissioner Carter questioned that he understands the appearance of impropriety being raised by Mr. Falkenbury, and now that there is a complaint, should there be further investigation. Commissioner Carter said that he would not be troubled by extending the investigation into emails or public records from publicly available information. The Director noted that this would set a precedent, and the next time someone makes a plausible complaint, then the precedent set here would indicate that requesting emails would be the result of any plausible complaint. The Chair stated that it is the burden of the complainant to offer evidence to warrant an investigation, and the Chair does agree it looks questionable, but is that enough.

The Chair asked if anyone would like to make a motion. Commissioner Taylor noted if there is a standard of rational basis, it is not to ask whether he might have done it. Commissioner Norton says that she doesn't believe it is the role of the commission to go on fishing expedition,

and if there is no evidence and that it does make sense to her for the team to have hired a transportation expert giving the known issues with the arena formerly known as the Key Arena. Commissioner Norton stated that without more evidence she would accept the Director's decision.

Mr. Wilkins brings up that he is disturbed that he does not have the ability to go and find out whether Mr. Johnson was just given the job or whether he applied for it or whether other candidates were interviewed. Commissioner Norton points out that the NHL sports team is not the one building the arena and is not a public entity and is not receiving public money. Commissioner Brown motioned to approve the dismissal, Commissioner Norton seconded, the commission voted in the affirmative unanimously.

# \*) Request for reporting modification

**Faye Chess** 

Andrea Chin

Adam Eisenberg

# Ed McKenna

There are four reporting modifications from sitting judges that have approved requests from the Public Disclosure Commission (PDC) who do not want their private addresses released. The Director noted that the PDC has already approved these requested and under the rules where there has been a request that has been approved by the PDC, the SEEC is authorized to approve on the same terms without a hearing. The Chair asked the Director if these were just residential addresses that the judges did not want released and the Director affirmed that understanding.

Commissioner Norton moved that requested reporting modifications be approved and Vice-Chair Rehki seconded the motion. The Chair noted that there are some explanations that are more specific than others and asked whether the PDC requires a certain level of specificity. The Director offered that judges generally are not held to a specific detail standard but noted that an elected official such as a Mayor would bear a higher burden. Since sitting judges are responsible for sentencing, which are adversarial they are generally approved. The motion passed unanimously to grant the reporting modification approval to all four judges.

#### **Discussion Items**

#### 4) Dismissal of Case Nos. 19-1-0108-1 and 19-1-0305-1

There were two complaints brought against Councilmember Kshama Sawant, which were investigated, and the Director found no violation. There is no appeal for either case, so these cases are simply presented for discussion.

The Chair asked if a dismissal without an appeal is a dismissal without prejudice. Attorney Smith said they don't use the same terminology, but in effect it is the same, this is more of a prosecutorial matter. In theory someone could file a new complaint, which if there was an appeal, would justify the commission in exercising their judgment. The Chair said that upon his reading of the code there is not a right for a third party to appeal, only the complainant may appeal and asked if the commission would like a discussion for hypothetical purposes. Commissioner Carter says that this is more of a sunshine state and he believes this is up to the voters and the citizens. No further discussion was had by commission and the Chair moved to the next agenda item.

## 5) Restricting job discussions for City Councilmembers

The Director said that this item was to see if the Commission would like to the opportunity to take some action or entertain some legislative action that would make taking a job or job discussions while an active City Councilmember illegal. The Director noted there are other examples of prior councilmembers finding themselves unhappy with their jobs on council and moving to other positions.

Commissioner Brown asked if the City and State standards were equivalent on postpublic employment. The Director offered that they are close, but that I-122 with the three year bar on lobbying for the City, has no counterpart in State law. Also, there is a provision in state law with a lifetime bar instead of a two year transaction prohibition, which is construed fairly narrowly. It used to be a one year prohibition for the City, and the commission extended it to two years in 2009. Commissioner Brown asked if there were existing prohibitions around councilmembers taking positions where the councilmember would be involved in the transactions that were similar to the transactions in their new positions.

Commissioner Carter said that he believes the lobbying provision is one thing, but is there also a provision prohibiting Mr. Johnson from coming to the council with his NHL hat on, and communicating with the council? The Director says that they 2-year ban applies to something specific in the past, not something new. If it was something new, Mr. Johnson could notcommunicate within one year to the Council, but he could communicate immediately with another city agency.

Commissioner Shordt asked how this pertains to job offers and contemporaneous employment if you are an elected city councilperson. The Director said the law is that once you

are seeking employment or negotiating for employment with an employer, you cannot participate in any matter in which that employer entity has a financial interest. Commissioner Shordt clarified that there was no bar on being employed while you are city councilperson. The Director confirmed that there was no bar but offered that recusal is required when considering or seeking employment. Commissioner Brown asked for clarification on whether there is a standard for considering or seeking employment. The Director offered that once someone has reciprocal interest, then negotiation is instigated, but if there is an offer and it is simply rejected that is not considered negotiation.

Assistant City Attorney Jeff Slayton offered that there is a legal standing of the doctrine of incompatible offices, and frequently there are several legislators who hold two jobs because the part time legislative positions require someone to have another job, so this is an amorphous definition, but it comes into play when it is two public positions that are being held. For example, a person cannot both be the director of a public department and also a public auditor that would be expected to audit the department they direct without being in violation of the doctrine of incompatible offices.

The Chair asked if there was a constitutional implication to the right to a job or which amendment covers this function. The Director said that he believes they are related to the freedom of travel, and that you cannot have harsh non-compete laws, and that same principal animates the local law, where a private employer cannot bar someone from taking a job. Commissioner Norton offered the example that you cannot condition a job on living in the City of Seattle, and the Director noted that the SEEC should be mindful of those laws when crafting any post-employment restrictions. Commissioner Carter asked what the limit on the lobbying currently was for someone who has left their public position. The Director clarified that it is

three years that the lobbying is prohibited. Commissioner Carter says that he believes there is an issue with seemliness, where it may not be officially lobbying, but is an issue of appearance.

Commissioner Rehki asked if he was correct in saying there is no prohibition on a situation where for example, T-Mobile can come to the commission and have a matter adjudicated in front of the commission and then one of the commissioners could go work for that company immediately. The Director confirms that is correct, there is no prohibition on a commissioner taking the job with T-Mobile and doing something else unrelated to the situation that was adjudicated in front of the commissioner. Attorney Slayton also noted that there was a prohibition for a city employee to work on the matter that was adjudicated, or taking confidential information and disclosing that information. The Director also noted that there is a requirement dealing with Requests for Proposals (RFP) that prohibits a city employee from both preparing an RFP and then assisting an entity in preparing their proposal.

Commissioner Brown asked whether there were any exit obligations on Mr. Johnson to disclose his intent to take the position with the NHL team. The Director said no, Mr. Johnson was not required to disclose that information. The Chair wondered whether it was worth considering a positive requirement that a councilmember be required to share the communication information from a job search upon leaving the office. Vice-Chair Rehki offered negotiations could be very private, and it could be difficult to argue that all that information be disclosed. Commissioner Rehki also noted that it was troubling that there are no provisions in code that cover scenarios when there is an appearance of conflict. Attorney Slayton offered that there is a provision in the code that says if you are using your official position that would appear to a reasonable person to be enhancing yourself but not in the interest of the city, and there are enough facts to warrant an appearance issue then there is not just a requirement of a quid pro

quo, but there is no temporal language around that provision. Commissioner Norton says that she could see a scenario where a commissioner takes a position that doesn't start until the day after leaving office, so at what point in the timeline does the offer of the position become concerning in regards to not serving two masters, because it can be problematic. Commissioner Rehki says the timeline is that the vote in September and then in November there is an announcement of leaving office, and not saying that there was any impropriety with Mr. Johnson, but it does not appear that there is a good rule or regulation that addresses this situation. Attorney Slayton offered there is another rule that says if you have already accepted the job and it could appear to a reasonable person having knowledge of all the circumstances that your judgement is impaired, then that is an appearance problem, and it can be cured by public disclosure of the situation, as a sunshine rule. For an elected official, it is required that the Director of the SEEC be notified, and the Director noted that you are covered under A1 and sunshine isn't enough, the elected official cannot participate in any matter in which the new employer has a financial interest. Commissioner Norton says that she believes it is a very narrow focus when it is limited to financial interest only, and the new employer may have more than a financial interest, which means that now we are at the appearance issue again, but how would you prove it.

Commissioner Shordt asks whether Mr. Johnson had reciprocated would he have had an obligation to disclose that he had been approached by the NHL at that point? The Director said no, Mr. Johnson did not have an obligation to disclose this, but if there is a financial interest involved, then he was prohibited from any action. Commissioner Shordt asked if a public employee, but not an elected official, had reciprocated then would the employee be required to disclose that information. The Director said that no, the city employee would just be prohibited from working on any matter in which the intended employer had a financial interest. Attorney

Slayton noted that the Director was correct that if there is a financial interest then no amount of sunshine or disclosure can wipe that away, there is simply a prohibition. But if it was something else that might look bad, but there is no financial interest, then that type of situation can be addressed through a disclosure. Commissioner Brown says that as a general matter he is less sympathetic to those elected individuals, but if you are a government employee with a narrow focus, and you need another job, then the sunshine and the disclosure is important, but he is hesitant to limiting Joe Public Employee on employment options. Commissioner Shordt says that he agrees with Commissioner Brown and believes there may be more strongly worded or additional actions required from an sitting and elected position holder that wouldn't need to be applied to a city employee. The Chair wondered how much of an imposition is appropriate, and that what is intriguing to him about Mr. Falkenbury's proposition is the question of how much of the public's burden is it to investigate which could potentially curb the incentive to abuse your position to get an offer because at least some of those negotiations would be subject to disclosure. The Chair asked if there was any further discussion, there was none.

## 6) Lobbying law

The Director provided a chart of comparisons with Los Angeles and San Francisco, and expenditure lobbying is a term for grass roots lobbying in San Francisco, but right now in Seattle, there is no registration required for such grass roots lobbying, if there is no direct lobbying. On some level is this a first amendment right, but there have been legislative activities where the people who are interested in grass roots lobbying are the ones who are lobbied. Commissioner Norton says that she could organize her entire neighborhood to send emails to an elected official, but without any funding, this would not be considered lobbying. Commissioner

Norton said she was struggling with grass roots lobbyists who pay their people to lobby in a grass roots way.

Attorney Slayton said that he reads San Francisco's law slightly differently, Commissioner Norton believes that this could be a very broad definition, the expenditure of \$2,500 or more could be to solicit, pay field workers, or get billboards. The Director offered that if a cola company was to pay for a billboard that says call your councilmember and say that you don't want a tax on your beverages, the billboards would not be prohibited and no registration would be required because it would not currently meet the definition for lobbying. Commissioner Carter asked if it was well disclosed who was paying for the soda tax, and the Director said that he believed so, but it was just meant to be an example. The Director also noted that grass roots lobbying is regulated at the state level by Washington State, but at the city level it is not regulated. The Chair says that it seems like there is a line and there is some interesting language around reducing or waiving registration fees for different types of entity, such as a 501c(3) or a 501c(4) organization. The Director offered that this could diminish the amount of money that the commission would be able to take in if such reduced fees were available, and he would leave to the lawyers to determine whether there were any statutory issues with different tiers of fees. The Director communicated with Los Angeles and San Francisco counterpart directors and their laws do vary greatly from the state laws.

The Director notes that San Francisco has an outright ban on lobbying an official that one helped elect and Los Angeles has a reporting requirement for political consultants, but the last time that was reported was in 2017 and it was less than ten thousand dollars. Commissioner Norton says that seems like a level of compliance that would not cost anything to implement, and the Director confirmed, yes that could just be an additional reporting requirement. The

commissioners would like to see the Washington State law regarding expenditures. The Chair would also like to understand if there is any constitutional issue with separating the nonprofits from the commercial agencies in terms of fees that are leveled. Commissioner Carter asked if the nonprofit organizations are exempt from the reporting requirements, and the Director said, no, the nonprofit organizations have the same reporting requirements. The Chair thinks that the commission can look at this further and get some more information as requested and then have a discussion at the next meeting for setting possible parameters.

#### 7) I-122 report

Democracy Voucher Program Manager René LeBeau offered some number comparisons from 2017 to now. In 2017 there were 26 candidates, and in 2015 when all the districts were open there were 49 candidates. Currently there are 57 candidates and 47 of them are participating in the Democracy Voucher Program. 15 candidates are qualified and receiving funds and 10 more are pending qualification. At this time in 2017 there were only 3 qualified candidates. In 2017 at this time 7,500 vouchers had been processed and now we have 42,000 vouchers, which is half of the entire years processing for 2017. Commissioner Norton asked how many vouchers were mailed. Program Manager LeBeau answered that 463,000 were in the initial mailing and two mailing updates as people register. There has also been a large increase in applications from those who are not registered voters as well. A lot of that activity is coming from the community based organizations contracting work.

Commissioner Norton asked if there were numbers from where the vouchers are being used. Program Manager LeBeau offered that the vouchers are coming from all over the city. Commissioner Carter asked if the applicant had to be 18 at the time of the election, or if they have to be 18 at the time of application? The applicants need to be 18 at the time of the application to receive the vouchers. Program Manager LeBeau is anticipating a possible spike in voucher use in July, based on the data from 2017. The online portal has been up and running for about a month, and it is available in 15 languages and currently 5,000 vouchers have been used online, which represents about 1,300 people.

Commissioner Carter asked if there could be some numbers in finding out how many languages are being used for the Democracy Voucher Program and the Chair asked for a comparison if possible, of prior year language usage to current. Program Manager LeBeau said she could provide those numbers. Commissioner Taylor asked if there were any problems so far and Program Manager LeBeau offered that learning to troubleshoot the portal usage is a challenge, and the technical support aspect has been difficult, and we hope to get some sort of quick troubleshooting resolution.

Commissioner Taylor asked if the developers were helping, and Ms. LeBeau said that they were, but we need to get away from paying developer rates for desk support. Annie Tran has been a big help in supporting portal users, and in troubleshooting the issues. Seattle IT is also gearing up to support the system in future. The Chair asked if there were any problems with the candidates, and Program Manager LeBeau said no, the candidates are fairly well trained, and that Chrissy Courtney has been a help in coordinating the candidate documents and communicating with them particular issues. Polly Grow offered that there was a candidate released from the program. Commissioner Taylor praised the good work of the program.

The Chair asked for clarification as to what was the criteria for release. The Director answered that the language was material, and the 2017 definition was material, and the condition is now inadvertent and minor, so the Director felt comfortable releasing the candidate and the commission agreed with the release.

#### 8) Executive Director's report

#### a) 2019 workplan

The Director offered his work plan for 2019 and Commissioner Brown thanked him for the effort in terms of creating a guidepost for the commission in evaluating future performance. Commissioner Carter offered that it has been a long time since there was work on the whistleblower section, and asked if there has been any action. The Director offered that there has been a lot of action, but there haven't been any cases where someone truly warranted whistleblower protection based on the circumstances. Commissioner Carter said it might be helpful in future to get an idea of where the resources are going, and asked that if there is tracking on the issues and whether that would be hard. The Director said that tracking among many different activities could be a difficulty, but he will do his best to provide that to the Commission. The Chair noted that if there were any revisions to the work plan, those could be offered to the Director separately.

# b) **FIS update**

As of the meeting time, 99% of those required to file a financial interest statement; had filed. We anticipate 100% compliance by the next meeting.

The Chair offered that May 14th the Democracy Voucher Program will be with the Washington State Supreme Court. The Supreme Court additional briefings will be emailed to the commissioners.

The April 18, 2019 special meeting adjourned at 5:44 p.m.