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**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

ON THE PETITION OF THE
UNIVERSITY OF WASHINGTON
FOR DECLARATORY OPINIONS,

DECLARATORY ORDER 15

On April 20, 1999, the Public Disclosure Commission conducted a hearing on the Petition of the University of Washington For Declaratory Opinions on the following three questions:

1. Whether any and all contact with legislators necessarily falls within the definition of "lobbying" under RCW 42.17.190;
2. Whether the use of gift monies or discretionary funds belonging to the University constitutes the expenditure of "public funds" for purposes of RCW 42.17.190;
3. Whether the gift prohibition contained in RCW 42.17.190 stands alone, that is, whether gifts may be made to legislators when no lobbying occurs.

PDC staff asked the Commission to address whether the gift prohibition in RCW 42.17.190(3) applies when there is no attempt to influence or otherwise discuss pending or possible "legislation" as defined by RCW 42.17.020(26).

The parties to this proceeding were the University of Washington and the staff of the Public Disclosure Commission. The University was represented by Special Assistant Attorney General James Frush, Senior Assistant Attorney General Christine Hughes, and Special Assistant Attorney General Dianne Conway. Public Disclosure Commission Staff was represented by

1 Assistant Attorney General Stephen T. Reinmuth. The parties submitted legal arguments in
2 written briefs and in oral argument. Written public comments were received from ten sources.

3 FACTS

4 The facts upon which this Order is based are contained in the attached 1) Stipulations; 2)
5 transcribed oral stipulations (pp. 1-4); 3) transcribed testimony (pp. 5-8); and exhibit list.

6 DECLARATORY ORDERS

7 1. Lobbying under RCW 42.17.190 occurs when the person making the
8 communication to an elected official, or officer or employee of any agency, intends to influence
9 in a material way the adoption or rejection of specific proposed or reasonably anticipated bills,
10 resolutions, motions, amendments, nominations, and other like matters before the state
11 legislature.

12 Analysis

13 The University, as a state agency, has contacts with elected officials, or officers or
14 employees of other agencies, at a variety of events and functions. The facts show that these
15 contacts may occur with or without an intent or attempt to discuss or influence legislation that is
16 either proposed or can be reasonably anticipated. The Commission concludes that "lobbying"
17 within the meaning of RCW 42.17.190(3) and (5) does not occur, unless the University
18 representative who makes the communication to an elected official, or officer or employee of an
19 agency, intends to influence the adoption or rejection of specific proposed legislation or
20 reasonably anticipated legislation. "Legislation" means bills, resolutions, motions, amendments,
21 nominations, and other like matters before the state legislature. However, the communication
22 with the elected official, or agency officer or employee, may constitute "lobbying" under RCW
23 42.17.190(3) and (5) even though influencing legislation is not the primary intent of the
24 communication.
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1 agencies are required by RCW 42.17.190(5)(d)(v)(B) to report the expenditure of discretionary
2 funds, regardless of the source of those funds.

3 In light of the authorities referred to above, and the University's accounting practices, the
4 Commission concludes that discretionary gift funds, and returns on those funds, do not constitute
5 "public funds" within the meaning of RCW 42.17.190(3) and (5).

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8 3. The gift prohibition contained in RCW 42.17.190(3) applies when lobbying
9 occurs within a reasonable period of time before or after receipt of the gift.

10 Analysis

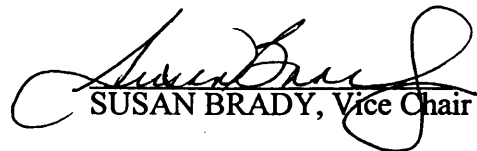
11 The Commission rejects the argument that a gift is prohibited by RCW 42.17.190(3) only
12 when simultaneous lobbying occurs. The donor's intent in giving the gift may be to influence
13 legislative action or inaction, even if the gift giving is separated in time from lobbying.


14 On the other hand, the Commission does not agree with the staff position that the
15 University is prohibited under RCW 42.17.190(3) from giving a gift.

16
17 This written binding declaratory order was adopted by the Commission on June 29th,
18 1999.

19 WASHINGTON STATE PUBLIC
20 DISCLOSURE COMMISSION

21 
22 RONDA CAHILL, Chair

23 
24 SUSAN BRADY, Vice Chair

25 
26 RON MEYERS, Secretary



GARY MAEHARA, Member

EXHIBIT LIST

1. Memorandum from Karen Zaugg, Assistant to the President, to Christine Hughes, Senior Assistant Attorney General, dated April 17, 1995, requesting advice on the impact of the state ethics law, RCW 42.52, on state officials who attend football games as guests of the President's Office.
2. Memorandum from Christine Hughes, Senior Assistant Attorney General, to Karen Zaugg, Assistant to the President, dated May 9, 1995, concluding as follows. First, that the state ethics law prohibits a state officer or employer from extending or accepting an invitation to the President's Box at football games, if the invitation could reasonably be expected to influence the performance of official duties by the recipient of the invitation. Second, that if there is no actual influence or reasonable expectation of influence on the recipient, that the invitation does not violate the ethics law.
3. Ten page list of University of Washington discretionary funds, with name and account number for each fund.
4. Packet of documents showing expenses related to President Richard L. McCormick's Annual Address to the University Community on October 6, 1998, and related reception, paid for out of the President's Endowment Fund.

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

ON THE PETITION OF THE UNIVERSITY
OF WASHINGTON FOR DECLARATORY
OPINIONS

NO. 99-15
STIPULATIONS

The University of Washington and the staff of the Public Disclosure Commission, through their respective counsel, stipulate and agree to the following:

1. If called to testify, Bob Edie, Vice President for University Relations, and Sheral Burkey, Associate Vice President for University Relations, would testify to the following: The University interacts with state legislators through a variety of contacts and for a variety of purposes. Rarely outside of face-to-face lobbying in Olympia is a contact made with a state legislator with the primary intent of influencing the adoption or rejection of proposed or anticipated legislation. More frequently, contacts are made with legislators for other purposes, including but not limited to: showcasing University programs, providing information concerning University programs, community outreach, education, and participation with the University as an active member of the state community.

2. Events and functions at which University staff may come in contact with state legislators or members of the executive branch include, but are not limited to: school or

1 department dinners, community days, visiting committee and advisory board meetings,
2 commencement ceremonies, cultural events, ribbon cuttings for physical facilities, sporting
3 events, seminars, educational events (some sponsored with other Universities), and alumni
4 functions.

5
6 3. The University of Washington invites members of the Senate Ways and Means
7 Committee, Senate Rules Committee, Senate Higher Education Committee, House Education
8 Committee, House Higher Education Committee, House Appropriations Committee, House Rules
9 Committee, and House Budget Committee to attend one at-home Husky football game during the
10 football season. In total, over the whole season, approximately 27 Senators and 39
11 Representatives are invited. Senators and Representatives who attend sit in the President's Box
12 and are invited to a complimentary brunch along with all other guests in the President's Box. The
13 President's Box at Husky Stadium seats 140 people and is full every game. On average, between
14 2 and 11 legislators and elected state executive officials are guests in the President's Box during a
15 single football game. The University of Washington has invited community leaders and friends
16 of the University to attend a complimentary brunch and sit in the President's box at Husky
17 football games for over 30 years.

18
19 4. If called to testify, State Senator Jeannette Wood would testify to the following: I
20 believe I was invited by the University of Washington to the brunch and football games because I
21 was on the Senate Higher Education Committee. I never felt that anybody from the University
22 was "putting the arm on" me. The University comes to Olympia for that.

23
24 5. If called to testify, State Representative Tom Huff would testify to the following:
25 No direct request from the University of Washington occurred at football games. I assumed that
26

1 somewhere along the line there would be a specific discussion of issues in Olympia by University
2 lobbyists.

3 6. If called to testify, State Senator Sid Snyder would testify to the following: I don't
4 think attending a football game and sitting in the president's box is going to have any effect or
5 influence on any legislator's vote on issues related to the University of Washington.

6 7. If called to testify, Norm Arkans, associate Vice President and Executive Director
7 of University Relations would testify to the following: The costs associated with hosting guests
8 are charged to a budget called the University Support Fund, comprised of gifts designated by
9 donors for discretionary use by the University. In the recent past, the University Support Fund
10 has spent approximately \$41,000 per year for hosting all guests at football games.

11 8. If called to testify, Bob Edie, Vice President for University Relations, would
12 testify to the following: In my memory, the University of Washington has hired contract
13 lobbyists on only two occasions. Their compensation and expenses were reported to the Public
14 Disclosure Commission. The University almost exclusively uses University employees for
15 lobbying activities. Roughly 100 bills are monitored by the University each legislative session,
16 and the University position is demanded by the legislature on 30 to 50 bills during each
17 legislative session. The University focuses its lobbying activities in Olympia during legislative
18 sessions. Approximately two full-time University employees devote approximately 50% of their
19 time to lobbying during legislative sessions. A third full-time employee devotes approximately
20 5% of her time to lobbying during the legislative session. Their presence in Olympia is
21 supplemented by Regents, alumni, and other friends of the University who are also present in
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1 Olympia to lobby. As required, these activities, and their related expenses, are fully reported to
2 the Public Disclosure Commission by the University.

3 9. If called to testify, Gary "Max" Whisler, Director of Audits for the University of
4 Washington, would testify to the following: The University of Washington Regents accept,
5 invest, and spend gifts pursuant to statutory authority (RCW § 28B.20.130). University staff
6 prepare budgets, which are submitted to the Regents for approval. Pursuant to approval of the
7 budgets, those funds are thereafter distributed.

9 10. If called to testify, Max Whisler would testify to the following: The Uniform
10 Management of Institutional Funds Act (RCW §§ 24.44.010 - .900) also governs the management
11 of funds by the University.

12 11. If called to testify, Max Whisler would testify to the following: The University
13 revenues by source for Fiscal Year 1998 (7/1/97-6/30/98) are as follows:

15	Discretionary Gifts	\$ 9 million
16	Other Non-Discretionary Gifts	\$ 32 million
17	State Appropriations	\$ 290 million
18	Other Current Funds Revenue	\$1.416 billion
19		-----
20	Total FY 98 Current Fund Rev.s	\$1.747 billion

21
22 12. If called to testify, Max Whisler would testify to the following: Accounting at
23 public colleges and universities is governed by a hierarchy of uniform minimum standards of and
24 guidelines to financial accounting and reporting set out in generally accepted accounting
25 principles (GAAP). This governance is mandated by State of Washington policies, regulations,
26

1 and procedures implemented by the Office of Financial Management and are contained in its
2 Policies, Regulations and Procedures manual ("OFM Manual"). In accordance with the OFM
3 Manual, statements and interpretations of the Governmental Accounting Standards Board
4 (GASB), including prior statements of the National Council on Governmental Accounting
5 (NCGA), as adopted by the GASB, are the leading authority on what constitutes GAAP for state
6 agencies.

7
8 13. If called to testify, Max Whisler would testify to the following: The University's
9 private gifts and their incomes are administered as an "accounting entity" with self-balancing
10 accounts which are segregated for the purpose of carrying out the specific activities authorized by
11 the individual donors. Pursuant to GASB guidelines for administration, the University is directed
12 to organize and operate on a fund basis. A fund is defined as a fiscal and accounting entity with a
13 self-balancing set of accounts recording cash and other financial resources, together with all
14 related liabilities and residual equities or balances, and charges therein, which are segregated for
15 the purpose of carrying on specific activities or attaining certain objectives in accordance with
16 special regulations, restrictions, or limitations.

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18 14. If called to testify, Max Whisler would testify to the following: The University
19 uses three types of funds: appropriated state funds, local funds (which are generated by activities
20 of the University and includes such items as tuition, fees collected through the medical center,
21 etc.) and gift funds. The gift funds are further divided into endowments, scholarships, and
22 discretionary gift funds. The discretionary gift funds are accounted for within the "special
23 revenue" fund category. This fund category also includes the University's federal grants and
24 contracts, which are non-state funds. All of these funds, including appropriated state funds, gift
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1 and local funds, are accounted for on a fund basis pursuant to all applicable regulations and
2 accounting standards.

3 15. If called to testify, Max Whisler would testify to the following: Under long-
4 established accounting principles, if a government agency accounts for or tracks funds separately,
5 they are separate funds even if physically commingled. Pursuant to the OFM Manual, all that is
6 required is that each fund be accounted for in a separate, self-balancing set of accounts. These
7 requirements refer only to the identification of accounts or funds and do not extend to the
8 physical segregation of assets or liabilities. Under these accounting guidelines and restrictions, it
9 is not necessary to have separate bank accounts for each fund unless required by law.
10

11 16. If called to testify, Max Whisler would testify to the following: The regulations
12 issued by the Office of Financial Management pursuant to state law recognize that state agencies
13 may hold gift funds not subject to the restrictions placed on state appropriated funds.
14

15 17. If called to testify, Max Whisler would testify to the following: The OFM manual
16 permits the establishment of accounts outside the State Treasury.

17 18. If called to testify, Max Whisler would testify to the following: The University is
18 audited every year by both the State Auditor and KPMG, LLP, and, to my knowledge, there has
19 never been an audit exception or comment on its adherence to accounting standards.
20

21 19. If called to testify, Max Whisler would testify to the following: All discretionary
22 funds have an account in the University of Washington accounting system. The accounting
23 system keeps track of monies expended out of the president's support fund. The discretionary
24 fund operating policy requires the deposit of discretionary fund revenues in University of
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1 Washington bank accounts which are invested or disbursed through normal procedures,
2 appropriately recorded, and separately accounted for in University ledger accounts.

3 20. If called to testify, Max Whisler would testify to the following: All discretionary
4 funds of the University are disbursed through the use of normal University forms (for example,
5 purchase requisitions, travel expense vouchers, invoice vouchers, etc.) and are accompanied by
6 receipts or vendor invoices. They must be approved by the appropriate vice president or dean
7 accountable for the expenditure of such funds.
8

9 21. If called to testify, Max Whisler would testify to the following: Most University
10 funds, including discretionary funds used for hosting, are deposited in the University's main
11 account at Seafirst Bank, Metropolitan Banking Unit.

12 22. If called to testify, Max Whisler would testify to the following: In my opinion, the
13 use of independent foundations by state universities and other public institutions to receive gift
14 monies inappropriately cloaks what should be a open process subject to the highest level of
15 scrutiny. Foundations are exempt from the rigorous auditing oversight applied to public
16 institutions such as the University of Washington. When private gifts are held in foundations
17 rather than in separate self-balancing accounts within the institution, they are: a) not subject to
18 audit by the State Auditor nor the University's internal auditor or CPA firm; b) not subject to state
19 and University financial, procurement or operating controls; c) not subject to fiscally sound
20 investment oversight; d) not subject to public reporting of financial information, e) not subject to
21 public records act, or open meetings act to the same extent they would be if processed through the
22 University; f) activity of "booster groups" including those for athletics, would be outside
23 "institutional control" creating risk of NCAA sanctions; and g) full access to operations by the
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1 public would not be possible. The University could request donors to direct their gifts to the
2 private foundation or in some cases even transfer current gift funds upon donor approval. This
3 would allow the University to continue discretionary use the private gifts as the donors intended,
4 but would destroy the "public oversight" of the current method.

5
6 23. On or about December 1, 1978, Assistant Attorney General Sally G. Tenney wrote
7 to Senior Assistant Attorney General Richard Montecucco, stating that funds from "private
8 sources" are not subject to the limitations of Article VIII, Section 5 of the State Constitution with
9 regard to the investing of those funds.

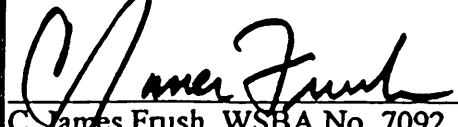
10 24. If called to testify, Hunter Simpson would testify to the following: I make
11 contributions to the University of Washington which, pursuant to my direction, are placed in the
12 University's discretionary account. These are my private monies. Even when received by the
13 University, I still consider them private funds. My primary motivation in making these
14 contributions, in the fashion in which they are made, is to ensure that the University has at its
15 disposal funds which can be used in for matters for which public funds may not be used. If
16 anyone considered these funds to be "public funds" or subject to restrictions placed on public
17 funds, I would no longer make the contributions.

18
19 25. The Attorney General's Education Division Deskbook (Jan. 1994) notes that,
20 unlike state colleges and universities, foundations are not bound by constitutional provisions or
21 rules of the Office of Financial Management, or subject to oversight by the Higher Education
22 Personnel Board, the State Board for Community and Technical Colleges, the Department of
23 General Administration, the Public Disclosure Commission, the Human Rights Commission, and
24 the Office for Civil Rights.
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DATED this 15th day of April, 1999.

UNIVERSITY OF WASHINGTON


C. James Frush, WSBA No. 7092
Special Assistant Attorney General

PUBLIC DISCLOSURE COMMISSION
ENFORCEMENT STAFF

 4/16/99
Stephen T. Reinmuth, WSBA No. 18343
Assistant Attorney General

CJF/cr [20594-00001]

**PDC Special Commission Meeting
Declaratory Order Hearing
University of Washington**

April 20, 1999

Tape 1, side A (picking up)

FRUSH:I also believe that there are, in addition to the written stipulations which we've entered into between the parties, that Mr. Reinmuth has a few more unwritten stipulations he wishes to propose this morning. Perhaps we can address these, those two points before I begin making my more organized remarks.

CHAIR: Okay.

REINMUTH: Probably most appropriate, Madame Chair, and members of the commission, is to start with the proposed stipulations. We worked together very cooperatively to reach the stipulated facts that you have before you, in total about eleven pages. Those are the factual foundations of the University's petition and was something that ?? read and should feel free to ask questions about and consult throughout these proceedings. The three additions that we would propose are, first, a stipulation regarding a season ticket offering by the University. My understanding is that the University is prepared to stipulate that season tickets are routinely offered to the Governor, the Lt. Governor and the Speaker of the House, as three elected officials who are not legislators, and it's also my understanding that the University will stipulate that none of those officials accept those invitations. And, I should clarify that the season tickets are actually to the Husky football games.

FRUSH: Let me clarify the stipulation, if I might, Commissioner Cahill. Obviously, in light of, of the self imposed restriction on, on University activities last season no invitations were extended to anybody that's in the legislative or executive branch. The only information we have that we investigated at Mr. Reinmuth's request was for the previous season, and I have suspicion that the Governor, at least from what I've seen in newspaper accounts, is at the Apple Cup fairly regularly, particularly when it's played in Seattle, so, at least for the season, last season at which these season tickets were offered, at that time, during that season neither the Lt. Governor, the Governor, nor the Speaker took advantage of them and that's to the extent that I have any knowledge that I can stipulate on behalf of the University.

REINMUTH: And staff has so stipulated except that it's an oral stipulation...

CHAIR: So, so what do...

REINMUTH: ...we also haven't had to write it down for you.

CHAIR: Okay, that's fine.

REINMUTH: ?? The second matter relates to interest income. Obviously, by the briefing and arguments that we make today you'll hear a lot about the use of the University's support fund and other funds that are comprised largely of ?? donated to the University. Staff felt that it was important to, and Mr. Frush obviously felt that it was important on behalf of the University to explain the concept, and you'll hear a lot of information, and Mr. Whistler's available for questions regarding the University's accounting structure. It's important, also, we think, to understand that there is donated money that goes into these funds that is also interest income on the donated money and my understanding is that the University is prepared

PDC Special Commission Meeting

April 20, 1999

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to stipulate that, at least in 1996, there was a transfer of \$150,000 in interest income on gifted income to the University support fund which is used for a lot of purposes, one of which is hosting the football games.

FRUSH:

We agree, although you'll hear me talk about the relevance of that later, but, at least, it is a fact that there was money transferred back three years, over three years ago, in that amount to a fund that, among other purposes, is used to pay for football. And I should say it's not used to pay for football, it's used to host approximately 140 individuals in the president's box at each game, somewhere between two and ten of which may be members of the legislative branch. One should not get the impression that it's, that it's all used to host legislators and members of the executive branch.

REINMUTH:

The third stipulation is one I'm going to ask Mr. Frush to present to make sure that I don't mischaracterize, which I wouldn't do intentionally, but I know that there was a conversation with Mr. Eide that I want to make sure is presented accurately. It deals with relationship building by the University. Jim, maybe it's best if you present that?

FRUSH:

Yes, and perhaps Mr. Eide can interrupt me if I misspeak. Essentially, this, this in, this relates to, and, again, I'll talk about the relevance of this later, but it, it relates to the invitations extended to members of the executive and legislative branch for Husky football games. Mr. Eide, if he testified, would testify that they are extended for several reasons. One of which is that the, particularly the legislators who are invited are members of the greater university community and it's an opportunity to participate in a university activity. Also, it is for relationship building and that relates not only to any relationships that may relate to the issues of, of legislation

but, also, to request information and all, many types of communications that occur between legislators and, and members of the University, particularly the University Relations Office. The examples Mr. Eide would give would be the sort of thing where a legislator calls up and inquires about a constituent who is having particular problems with either admission or fee structure or some other issue, or a legislator who might call up and, and find out, want to find out about, because, say, there was a salmon recovery program going on in their district down in Grays Harbor county, they'd want to know what ability the, the school forestry or fisheries might have to be involved in that. So, that's the type of relationship building that, that, that provides legislators the avenues by which to contact the University and, possibly, at some point there, there may be some other communications. Mr. Eide would also testify that if those communications were primarily intended to influence the adoption or rejection of legislation he would consider them lobbying and he would report them. That's basically what Mr. Eide would testify to.

REINMUTH: And the staff would stipulate to that, as well.

CHAIR??: Thank you.

REINMUTH: Thank you for entertaining those oral stipulations. I know it's more difficult to track those and we wanted to make sure that you used the hearing time today as efficiently as possible.

CHAIR: Correct.

Tape 2, side A (picking up)

FRUSH: Before I make the remarks about public funds I'm, want to respond to one of Commissioner Meyers' questions about what, what percentage we spend on this. I'm going to ask Mr. Eide just to address the commission, if I may, in that regard.

CHAIR: Sure.

EIDE: Commission members, in response to...

CHAIR: Oh, excuse me...

EIDE: I'm sorry.

CHAIR: ...Mr. Eide. Gary, would you put Mr. Eide under oath, please?

MAEHARA: Swear him in.

CHAIR: Yes.

MAEHARA: Do you solemnly swear or affirm the testimony you are about to give ?? shall be the truth, the whole truth and nothing but the truth, so help you?

EIDE: I do.

CHAIR: If you would state your name for the record?

EIDE: My name's Robert Eide. I'm the Vice President for University Relations at the University of Washington.

CHAIR: Thank you.

EIDE: In response to the earlier question from Commissioner Meyers about the different, the estimated costs and attendance, I believe was the question, on hosted activities, I can speak for the University Relations Unit at the University. I can't speak, obviously, for all the schools and colleges and the various activities that they would engage in. Very briefly, there are

three types of hosting activities that, I think, encompass the majority of what we do. One, which I would call 'widely attended events' of which legislators may be in attendance. A second would be 'educational or community briefings' and a third would be 'athletic or cultural events'. With regard to the first, while they are not as popular as when we have 70,000 people in Husky Stadium, there are some very popular, widely attended events that take place at the University that we invite legislators to. Let me give you a couple of examples. We have an Education Opportunity Program dinner every year which honors and celebrates that program which deals with minority students at the University. That's usually attended by about a thousand people and in attendance at a, at a program like that we might have a dozen or more legislators. So, at that type of event and, and part of my answer to Commissioner Meyers' question is that it depends on the type of event but, at that type of event it, it's clearly less than one percent of the people in attendance that would be elected officials of any type. We, we often have at an event like that the, the Mayor of Seattle or others in attendance, as well. A second example would be our Visiting Committee day which we host every year where we have over 600 volunteers from the community who attend, on behalf of all the schools and colleges at the University. The President makes a speech at noon time and we have a hosted lunch for all in attendance. We usually have a few legislators that attend that event but, again, it is less than one percent. Probably less than half of one percent that attend that particular event. And then we also have an event like Commencement which is a huge event. We have moved that event outside now, as some of you may know, and, and it, we had about a third of Husky Stadium filled for that

PDC Special Commission Meeting

April 20, 1999

Page 7 of 8

event. We often have legislators who have a son or daughter or a grandchild who is graduating and, in that instance, we host them to a luncheon during the course of the day to celebrate the graduation of their relative. So those are three examples of widely attended events where it's a, it's a very small fraction of the people in attendance. With regard to educational and community briefings, recently cited by counsel was the faculty field tour which we're going to have our second year this year where we put 35 to 40 new faculty members in a bus. We take them around the state so they will learn about the state in which they are coming to. Most of our faculty come from outside the state and we take them to various parts of the state so that they can learn about the geography and the politics and the culture of Washington so that they can better serve our students. It was a very popular event in that it was widely reported last year and it was very popular among the new faculty. In the course of that event we hold a luncheon or a dinner in various parts of the state and, in that instance, again, it's a small portion of the people in attendance who are legislators but I, then the percentage would go up to, perhaps, five or ten percent of the people at a hosted event who would be legislators in a particular location. A second example of an educational briefing would be, every year we do a briefing in Tacoma when the legislature is not in session, as we do in Bothell, our new campuses, where we invite the legislators from the ?? area, from the various districts, to come learn about the development of the new campus which there is keen interest in and we usually have a hosted lunch for that event. In those instances legislators might be as many as ten or twenty percent of the people in attendance because they are very popular, new developments that those legislators

want to be well informed about. Lastly, with athletic and cultural events, you already have the numbers, I think, on the, on the football program where there are less than ten percent of the people in attendance at any given brunch who are elected officials. We also have lectures and cultural events where, usually, it's only one or two legislators that will express an interest in that kind of activity so, in that instance, again, it's less than one percent. So, I hope that answers the question and it depends on the type of event that we're doing, and, obviously, the interest level of legislators. With regard to the dollar amount, I almost hate to make a guess because we would have to go back and pull apart these different events and try to figure out what portion of that would be assigned to legislators but I would gather it's, it, it's certainly less than ten percent and I would imagine less than five percent when we looked up the whole array of activities that we involve legislators in.

MEYERS:

Thank you.