



Document Request 02/09/2026

Steven Rhine <aircraftdelivery.net@gmail.com>
To: Leslie Johnson <principal@lsjpcounsel.com>

Tue, Sep 1, 2026 at 8:23 AM

Counsel, You have directed me to send you communications regarding King Electrical Mfg in your email dated 08/24/2026.

I believe this is outside the scope of your representation but I am relying on that you will forward this to King Electrical Manufacturing.

Because violations of Washington's RCW 19.415 are legally treated as unfair or deceptive trade practices under Washington's Consumer Protection Act (RCW 19.86), your client is engaging in ongoing statutory violations. I am sure that you have or will consult your client on Washington states RCW 19.415 and Other States **Right to Repair Laws** that they are obligated to comply with as well.

My Request is as follows, Repair documents (Schematics & Firmware) King Electrical Manufacturing "Hoot" products (TH-1251TY-A-V0-2110 and Subsequent Revisions) manufactured from July 1, 2021, to the present.

I have not made my complaint to the AG yet on this matter yet I was hoping king electrical manufacturing would come into compliance with the law. I will not announce when I do but it will happen soon.

Attached in the prior ag complaint on the atm0z should be in the evidence packet from the lower court record also.

I am forwarding you the prior request that was made to King Electrical Manufacturing company on Feb 9th 2026.

This is the subject of the other non related matter showing a pattern of non compliance with Washington and other states right to repair laws.

Right to Repair laws have passed in many states and there are many more with pending legislation.

King electrical Manufacturing continued non-compliance with Washington States right to repair law RCW 19.415 (Hoot)

My Hoot Thermostat Document and Tool Request Under 19.415 on 02/09/2026 Was Denied (E-mail Attached).

Yes, This Item Was Manufactured After July 01 2021, I am the Owner of at least 1 (Hoot), Item is Used for Personal and Household Use.

1. Coverage trigger RCW 19.415.020 (1) (a)

The core obligation: an original manufacturer must make available to any independent repair provider or owner, on fair and reasonable terms, any parts, tools, and documentation intended for the diagnosis, maintenance, or repair of digital electronic products and parts that are first manufactured, embedded in or attached to the product in order to function; is tangible personal property; is generally used for personal, family, or household purposes; and is sold, used, or supplied in Washington 180 days or more after the product was first manufactured and 180 days or more after the product was first sold or used in Washington. My Hoot Thermostat confirmed post-7/1/2021 manufacture date by dates printed on the PCB at the time of manufacture (Images) satisfies this directly.

2. "Digital electronic product" RCW 19.415.010 (4)

The Hoot thermostat to fit this definition. The product: depends, in whole or in part, on digital electronics, such as a microprocessor or microcontroller, embedded in or attached to the product in order to function; is tangible personal property; is generally used for personal, family, or household purposes; and is sold, used, or supplied in Washington 180 days or more after the product was first manufactured and 180 days or more after the product was first sold or used in Washington.

3. "Owner" RCW 19.415.010 (11)

"Owner" means an individual or business that owns or leases digital electronic products purchased or used in this state. My stated ownership satisfies this.

4. "Original manufacturer" RCW 19.415.010 (10)

An individual or business that, in the normal course of business, is engaged in the business of selling, leasing, or otherwise supplying new digital electronic products manufactured by or on behalf of itself, to any individual or business. King Electrical fits this as the manufacturer of the Hoot product line.

5. What must be provided "Documentation," "Part," "Tool" definitions, RCW 19.415.010 (5), (12), (15)

Documentation covers any manual, maintenance procedures, functional and wiring diagrams, reporting output, service code description, circuit board schematics, security code, password, training material, troubleshooting information, list of required tools, parts list, or other guidance or information that enables a person to diagnose, maintain, repair, or update a digital electronic product

6. "Fair and reasonable terms" RCW 19.415.010 (6)

For documentation specifically: the documentation is made available at no charge, except that, when the documentation is requested in physical printed form, a charge may be included for the reasonable actual costs of preparing and sending the copy. Tools are likewise made available by the manufacturer at no charge and without imposing impediments to access or use of the tools to diagnose, maintain, or repair and enable full functionality of the product

7. King itself is the "authorized repair provider" RCW 19.415.010 (1)

An original manufacturer who offers the services of diagnosis, maintenance, or repair of its own digital electronic products shall be considered an authorized repair provider with respect to such products, but only in instances where the original manufacturer does not have an arrangement with an authorized repair provider covering such products.

8. Exemptions RCW 19.415.040

A Smart Thermostat is Not an Exempted Item.

Specific Exemptions in the Law:

Motor vehicles (cars, trucks, motorcycles, automotive ECUs)

Medical devices (except mobility devices covered under a different law)

Public safety communications equipment (law enforcement, 911, emergency systems)

Video game consoles and similar consumer entertainment systems

Industrial, commercial, or off-road equipment (Tractors, ATV, Farm Machinery)

Utility infrastructure equipment (Including: transformers, power meters and other grid equipment)

Products where the manufacturer no longer sells the *part or tool* (Parts and Fixtures Only, Does Not Include Documents or Software)

Products not first sold or first used in Washington on or after July 1, 2021

Household Thermostats do not have an exemption under Washington State's Right to Repair Law (RCW 19.415) King Electrical Mfg has not provided me with an acceptable exemption to deny the parts, tools (software/firmware), and documents.

9. King Claims trade Secrets Trade secret carve out is narrow, not absolute RCW 19.415.040 (1)

Nothing in this chapter shall be construed to require an original manufacturer to divulge a trade secret to an independent repair provider, except as necessary to provide parts, tools, and documentation on fair and reasonable terms.

Some of the facts..

King Electrical Mfg Asserts these were not Manufactured after July 1 2021 (Attached Reply) the evidence doesn't support that. (Designed Vs Manufactured are 2 Different things)

King tries to argue the Hoot's design predates July 1, 2021 (e.g., "this platform was designed prior to June 2020, so it's not covered"), that's not the statutory test and doesn't help them rcw 19.415.020(1)(a) keys off when the specific product/parts were **first manufactured**, not when the underlying design work occurred. A pre 2021 design running on a post 2021-manufactured unit still satisfies the coverage trigger, because the statute asks about manufacture date, not design date.

"Manufactured" is the operative term in the statute

Used in 19.415.010(4)(d) and 19.415.020(1)(a) as established. Ordinary meaning: the date a *physical unit* was produced/assembled, an event tied to a specific serial number, date code, or production batch. This is what actually gates coverage under 19.415.020(1)(a)'s July 1, 2021 threshold.

If a term is defined in statute, that statutory definition must be used, and undefined terms are given their plain and ordinary meaning; meanings of non-technical statutory terms may be discerned from their dictionary definitions. This comes from *United States v. Hoffman*, 154 Wn.2d 730, 741 (2005), and is reaffirmed in *Columbia Riverkeeper v. Port of Vancouver USA*, 188 Wn.2d 421, 435 (2017) both cited by the AG's office itself.

Timeline

- **September 11 2025** on a Recorded call Brad Wilson an officer was made aware of RCW 19.415 and that it will become effective Jan 1 2026 agreed to comply with the law on the disabling of the Atmoz thermostats. So corporate officers are aware of the law.
- **October 31 2025:** after filing a small claims case 25S000586 in Clark County WA Brad Wilson made available schematics of one model of atmoz but not the firmware. Partially fulfilling his promise
- **November 19 2025:** WA ATG acknowledge the complaint on disabling the thermostats and notified king electrical manufacturing ATG File #: 705973
- **January 5th 2026:** Right to Repair Request Sent to King Electrical MFG
- **January 7th 2026:** King Electric Management / Personnel Jeffry Borgida Appeared in a Small Claims Case # 25S000586 in Clark County WA with Acknowledgement under oath of RCW 19.415 Washington States Right to Repair law and is not complying with the law in that matter which is under appeal in Superior Court.
- **February 9, 2026:** Rhine Labs / Steven Rhine submits a written RCW 19.415 request to King Electric for repair documentation, schematics, parts lists, and firmware for the "Hoot" product line manufactured July 1, 2021 to present, transmitted to multiple King Electric personnel including Jeffry Borgida, Brad Wilson, Dean Wilson, and RJ Wilson.
- **February 12, 2026:** Jeffry Borgida responds on behalf of King Electric, denying the request and stating that "the 'Hoot' products that you reference were first manufactured on behalf of King Electric on or before June 2020 and was first sold by King Electric in August 2020," and that these referenced products are therefore outside RCW 19.415's July 1, 2021 applicability threshold.

Evidence:

- The first unit inspected, model TH-1251TY-A-V0-2110, bears a silk screen printed date code of "2150" on the PCB, barcode label "K902-B" / serial "22100022". Read in year-week (YYWW) format (the only interpretation consistent with a valid calendar date, since "50" cannot represent a two-digit year without describing a date decades in the future), this code denotes the 50th week of 2021 (approximately December 2021).
- A second, independently-serialized unit, Mr. Rhine's Personal Device also model TH-1251TY-A-V0-2110, barcode label "K901-B" / serial "21430113," remains in Complainant's physical possession and is available for inspection. Its PCB bears a printed date code of "2132," denoting the 32nd week of 2021 (approximately August 2021) in the same YYWW format.
- The board also bears the model revision marking "V0-2110." Read in the same YYWW convention, this denotes the 10th week of 2021, most likely a **design or engineering-revision date** rather than a manufacture date. Even taken as a design-revision date rather than a manufacture date, this marking independently refutes King Electric's claimed June 2020 manufacture date: a unit cannot be manufactured to a hardware revision that had not yet been designed, so no unit bearing revision "V0-2110" could have been produced before roughly March 2021, regardless of when an earlier design or product concept may have existed.
- Both Hoot units also bear a separate, removable traceability barcode label whose leading four digits independently encode a year-week date distinct from the PCB silkscreen codes. On the first unit (label "K902-B"), serial "22100022" decodes as year 2022, week 10 (March). On the second unit (label "K901-B"), serial "21430113" decodes as year 2021, week 43 (October). These barcode-encoded dates do not precisely match the corresponding PCB

silkscreen date codes on the same units, which is unsurprising if the two markings record different production stages (e.g., component/PCB fabrication versus final assembly, testing, or serialization), but critically, none of the four independent date markings across the two units predates the statutory cutoff of July 1 2021, and two of them (the barcode date codes) postdate it.

- The "2150" and "2132" PCB silkscreen date codes and the "V0-2110" revision code are printed directly on the physical circuit boards themselves (not on a removable label), making them original manufacturing markings that could not have been altered or reprinted after the fact as they were done at the time they were first manufactured. The barcode serialization codes are printed on manufacturer-applied labels affixed to the boards, which is standard practice for lot/traceability barcodes and does not diminish their evidentiary value as King Electric's own production records.

Regards,
Steven Rhine
[503-475-3347](tel:503-475-3347)

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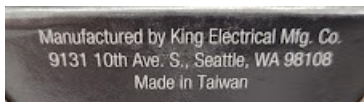
5 attachments



King Hoot TH-1251TY-A-V0-2110(4).jpg
293K



King Hoot TH-1251TY-A-V0-2110-C.jpg
1147K



Mfg By King.jpg
426K

 **King Reply - Document Request 02_09_2026.pdf**
199K

 **King Electric Mfg AG Complaint 10.30.2025.pdf**
63K