

1 EXPEDITE
2 No Hearing Set
3 Hearing is Set
4 Date:
5 Time:

FILED

001 27 2017

Superior Court
Linda Myers Enlow
Thurston County Clerk

EX PARTE

7 STATE OF WASHINGTON
8 THURSTON COUNTY SUPERIOR COURT

9 STATE OF WASHINGTON,
10 Plaintiff,
11 v.
12 PIERCE COUNTY DEMOCRATIC
13 CENTRAL COMMITTEE, a Washington
14 registered political committee,
15 Defendant.

NO. 17-2-04616-34
STIPULATION AND AGREED
JUDGMENT

15 JUDGMENT SUMMARY (RCW 4.64.030)

- 16 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
17 B. JUDGMENT DEBTOR: PIERCE COUNTY DEMOCRATIC CENTRAL
18 COMMITTEE, a Washington registered political
19 committee
20 C. PRINCIPAL JUDGMENT: \$31,780 with \$15,890 suspended for a period of 4 years
21 contingent on no findings of violations of RCW 42.17A
22 committed during the period of suspension
23 D. INTEREST: No prejudgment interest is owed. Principal judgment
24 amount(s) due and owing shall not bear interest unless
25 the principal judgment is unpaid by the due date specified
26 herein
E. COSTS AND FEES: \$5,000 in attorney fees; \$1,500 in investigation costs,
and \$240 in court costs
F. ATTORNEYS FOR JUDGMENT CREDITOR ROBERT W. FERGUSON, Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General

STIPULATION AND AGREED
JUDGMENT

ATTORNEY GENERAL OF WASHINGTON
Campaign Finance Unit
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

COPY

1 G. ATTORNEY FOR EVELYN FIELDING LOPEZ, WSBA No. 18900
2 JUDGMENT DEBTOR LOPEZ LAW PLLC

3 STIPULATION

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the
5 Defendant, PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington
6 registered political committee, desiring to resolve all claims arising out of the State's
7 complaint, hereby enter into the following stipulation:

8 1. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay
9 the State within 30 days of the date of entry of this Judgment an assessed civil penalty in
10 the amount of \$31,780 with one-half suspended for four years, for its violations of RCW
11 42.17A for failing to timely disclose contribution and expenditure reports for election years
12 2015, 2016, and through the date of this agreement for 2017.

13 2. The parties agree that \$15,890 of the assessed civil penalty will be suspended based on the
14 following terms and conditions:

15 a. The suspension will be in effect for four years from the date of execution of the
16 Judgment. During the period of suspension, Defendant PIERCE COUNTY
17 DEMOCRATIC CENTRAL COMMITTEE agrees that it will not violate any
18 provision of RCW 42.17A.

19 b. In the event Defendant PIERCE COUNTY DEMOCRATIC CENTRAL
20 COMMITTEE is found by the Public Disclosure Commission or a court to have
21 committed a violation of RCW 42.17A during the suspension period, the suspended
22 penalty of \$15,890 will immediately become due and payable within 30 days of
23 such finding without further intervention of the Court.

24 c. If Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is not
25 found to have committed violations of RCW 42.17A by the Public Disclosure
26

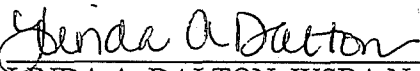
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Commission or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside.


- 3. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the State the total amount of \$5,000.00 as attorney fees, \$240 in court costs, and \$1,500 in investigation costs in this action.
- 4. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the State the unsuspended portion of the civil penalty (\$15,890) and fees and costs (\$6,740) in installments of \$3,000 on January 1 and July 1 each year starting in 2018 until paid in full. Failure to timely make any installment will result in the remainder of the unpaid portion to be due within 30 days of the missed installment.

DATED this 25th day of October, 2017.

ROBERT W. FERGUSON
Attorney General


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
Attorneys for Plaintiff

LOPEZ LAW PLLC


EVELYN FIELDING LOPEZ, WSBA No. 18900
Attorney for Defendant

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General and LINDA A. DALTON, Senior Assistant Attorney General, and Defendant, PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE appearing through its attorney, EVELYN FIELDING LOPEZ, apprised the Court of their agreement to the entry of this judgment for the purpose of settling and compromising this action brought under RCW 42.17A. The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised in the premises, it is hereby **ORDERED** as follows:

1. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$31,780 payable to the State of Washington.
2. The amount of \$15,890 of the assessed penalty is hereby suspended upon Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE's compliance with the following court-ordered conditions:
 - a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees that it will not violate any provision of RCW 42.17A.
 - b. In the event Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$15,890 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is not
2 found to have committed violations of RCW 42.17A by the Public Disclosure
3 Commission or a court for conduct during the suspension period, then the suspended
4 portion of the penalty will be set aside.

5 3. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay to the
6 State of Washington the amount of \$5,000.00 as attorney fees, \$240 in court costs, and
7 \$1,500 in costs of investigation as authorized under RCW 42.17A.765.

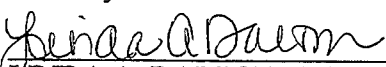
8 4. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay the
9 State the unsuspended portion of the civil penalty (\$15,890) and fees and costs (\$6,740) in
10 installments of \$3,000 each on January 1 and July 1 each year starting on January 1, 2018
11 until paid in full. Failure to timely make any installment shall result in the remainder of the
12 unpaid portion to be due within 30 days of the missed installment.

13 DONE IN OPEN COURT this 27 day of October, 2017
14 CHRISTOPHER LANESE

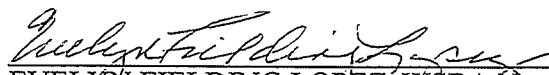
15 _____
JUDGE CHRIS LANESE

16 Presented by:

17 ROBERT W. FERGUSON
18 Attorney General

19 
20 LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
Attorneys for Plaintiff

21 Approved as to Form:

22 
23 EVELYN FIELDING LOPEZ, WSBA No. 18900
24 Lopez Law PLLC
Attorney for Defendant

25
26 STIPULATION AND AGREED
JUDGMENT