

FILED

JUN 29 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

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EXPEDITE
 No Hearing Set
 Trial is Set
Date: Monday, March 25, 2019
Time: 8:30 a.m.
Judge James J. Dixon

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

EX PARTE

STATE OF WASHINGTON,

Plaintiff,

v.

KING COUNTY DEMOCRATIC
CENTRAL COMMITTEE, a
Washington non-profit corporation,

Defendant.

NO. 17-2-02836-34

STIPULATION AND AGREED
JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: KING COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington non-profit corporation
- C. PRINCIPAL JUDGMENT: \$24,055 with \$12,027.50 suspended for a period of 4 years days contingent on no findings of violations of the law committed during the period of suspension
- D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and owing shall not bear interest unless the principal judgment is unpaid by the due date specified herein
- E. COSTS AND FEES: \$10,000 in reasonable attorney fees; \$2,502 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
KELLY R. HARMON, WSBA No. 22498
Assistant Attorney General

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2 G. ATTORNEY FOR LAURA EWAN, WSBA No. 45201
3 JUDGMENT DEBTOR Schwerin Campbell Barnard Iglitzin & Lavitt LLP

4 **STIPULATION**

5 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the
6 Defendant, KING COUNTY DEMOCRATIC CENTRAL COMMITTEE, desiring to resolve
7 all claims arising out of the State's First Amended Complaint and the related citizen action
8 notices filed through the date of this Stipulation, hereby enter into the following stipulation:

- 9 1. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the
10 State an assessed civil penalty in the amount of \$24,055 for its violations of RCW 42.17A
11 for failing to report contributions received and expenditures made, failure to timely deposit
12 contributions received and independent expenditures made in 2016, and failure to file
13 expenditure reports with sufficient detail in 2016 and 2017.
- 14 2. The parties agree that \$12,027.50 of the assessed civil penalty will be suspended based on
15 the following terms and conditions:
- 16 a. The suspension will be in effect for four years from the date of execution of the
17 Judgment. During the period of suspension, Defendant KING COUNTY DEMOCRATIC
18 CENTRAL COMMITTEE, agrees that it will not violate any provision of RCW 42.17A.
- 19 b. In the event Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE is
20 found by the Public Disclosure Commission or a court to have committed a violation of
21 RCW 42.17A during the suspension period, the suspended penalty of \$12,027.50 will
22 immediately become due and payable within 30 days of such finding without further
23 intervention of the Court.
- 24 c. If Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE is not found
25 to have committed violations of RCW 42.17A by the Public Disclosure Commission or a
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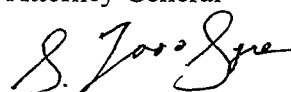
1 court during the suspension period, then the suspended portion of the penalty will be set
2 aside.

3 3. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the
4 State the total amount of \$12,742 as reasonable attorney fees, court costs, and costs of
5 investigation in this action.

6 4. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the
7 State the unsuspended portion of the civil penalty (\$12,027.50) and fees and costs
8 (\$12,742) as follows: \$1,000 payable by August 1, and then installments of \$4,000 on
9 January 1 and July 1 each year starting on January 1, 2019 until paid in full. The failure to
10 timely make any installment will result in the remainder of the unpaid portion to be due
11 within 30 days of the missed installment.

12 DATED this 27th day of June, 2018.

13 ROBERT W. FERGUSON
14 Attorney General

15  BAR NO. 23203
FOR LINDA DALTON

16 LINDA A. DALTON, WSBA No. 15467


17 Senior Assistant Attorney General

18 KELLY R. HARMON, WSBA No. 22498

Assistant Attorney General

Attorneys for State of Washington

19 SCHWERIN CAMPBELL BARNARD
20 IGLITZIN & LAVITT LLP

21 
22 LAURA EWAN, WSBA No. 45201

Attorney for Defendant

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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, LINDA A. DALTON, Senior Assistant Attorney General, and KELLY R. HARMON, Assistant Attorney General, and Defendant, KING COUNTY DEMOCRATIC CENTRAL COMMITTEE, appearing through its attorney, LAURA EWAN, 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, hereby ORDERS as follows:

1. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$24,055 payable to the State of Washington.
2. The amount of \$12,027.50 of the assessed penalty is hereby suspended upon Defendant, KING 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 KING COUNTY DEMOCRATIC CENTRAL COMMITTEE shall not violate any provision of RCW 42.17A.
 - b. In the event Defendant KING 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 \$12,027 shall be immediately due and payable within 30 days of such finding without further Court intervention.

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

5 3. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay the
6 State the total amount of \$12,742 as reasonable attorney fees, court costs, and costs of
7 investigation in this action.

8 4. Defendant KING COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay the
9 State the unsuspended portion of the civil penalty (\$12,027.50) and fees and costs
10 (\$12,742) as follows: \$1,000 payable by August 1, and then installments of \$4,000 on
11 January 1 and July 1 each year starting on January 1, 2019 until paid in full. The failure to
12 timely make any installment shall result in the remainder of the unpaid portion to be due
13 within 30 days of the missed installment without further intervention of this Court.

14 DONE IN OPEN COURT this 29 day of June, 2018.

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17 _____
18 JUDGE JAMES J. DIXON

18 PRESENTED BY:

19 ROBERT W. FERGUSON

20 Attorney General

WSBA No. 23203

FOR LINDA DALTON

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22 _____
23 KELLY R. HARMON, WSBA No. 22498

24 Assistant Attorney General


25 LINDA A. DALTON, WSBA No. 15467

26 Senior Assistant Attorney General

Attorneys for State of Washington

SCHWERIN CAMPBELL BARNARD

IGLITZIN & LAVITT LLP

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28 _____
29 LAURA EWAN, WSBA No. 45201

Attorney for Defendant