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EX PARTE

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

KELSEY HULSE, individually, and
FRIENDS OF KELSEY HULSE, a
candidate authorized political
committee,

Defendants.

NO. 17-2-00848-34

STIPULATION AND AGREED
JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee
- C. PRINCIPAL JUDGMENT: \$1,030.00 with \$515.00 suspended for a period of 4 years 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: \$1,890.00 as attorney fees, costs of investigation and trial
- F. ATTORNEYS FOR JUDGMENT CREDITOR: Office of the Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General



1 WALTER M. SMITH, WSBA No. 46695
2 Assistant Attorney General

3 G. ATTORNEY FOR TAKI FLEVARIS, WSBA No. 42555
4 JUDGMENT DEBTOR Pacifica Law Group LLP

5 **STIPULATION**

6 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
7 Defendants, KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate
8 authorized political committee, desiring to resolve all claims arising out of the State's
9 complaint, hereby enter into the following stipulation:

- 10 1. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
11 candidate authorized political committee, agree to pay an assessed civil penalty in the
12 amount of \$1,030.00 for their violations of RCW 42.17A for failing to timely disclose
13 debts incurred for campaign videos.
- 14 2. The parties agree that \$515.00 of the assessed civil penalty will be suspended based on the
15 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, Defendants KELSEY HULSE,
18 individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political
19 committee, agree that they will not violate any provision of RCW 42.17A.
- 20 b. In the event Defendants KELSEY HULSE, individually, and FRIENDS OF
21 KELSEY HULSE, a candidate authorized political committee, are found by the
22 Public Disclosure Commission or a court to have committed a violation of RCW
23 42.17A during the suspension period, the suspended penalty of \$515.00 will
24 immediately become due and payable within 30 days of such finding without
25 further intervention of the Court.
26

1 c. If Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY
2 HULSE, a candidate authorized political committee, are not found to have
3 committed violations of RCW 42.17A by the Public Disclosure Commission or a
4 court for conduct during the suspension period, then the suspended portion of the
5 penalty will be set aside.

6 3. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
7 candidate authorized political committee, agree to pay the State the total amount of
8 \$1,890.00 as attorney fees, court costs, and costs of investigation in this action.

9 4. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
10 candidate authorized political committee, agree to pay the State the unsuspended portion of
11 the civil penalty (\$515.00) and fees and costs (\$1,890.00) within 12 months from the date
12 of the entry of the Judgment.

13 DATED this 2nd day of March, 2017.

14 ROBERT W. FERGUSON
15 Attorney General

16 

17 LINDA A. DALTON, WSBA No. 15467
18 Senior Assistant Attorney General
19 WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff

20 PACIFICA LAW GROUP LLP

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22 TAKI FLEVARIS, WSBA No. 42555
23 Attorneys 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, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and WALTER M. SMITH, Assistant Attorney General, and Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, appearing through their attorney, TAKI FLEVARIS, PACIFICA LAW GROUP LLP, 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. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, are hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$1,030.00 payable to the State of Washington.
2. The amount of \$515.00 of the assessed penalty is hereby suspended upon Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE's, a candidate authorized political committee, 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, Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee agree that they will not violate any provision of RCW 42.17A.
 - b. In the event Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee are found by the Public Disclosure

1 Commission or a court to have committed a violation of RCW 42.17A during the
2 suspension period, the suspended penalty of \$515.00 will immediately become due and
3 payable within 30 days of such finding without further intervention of the Court.

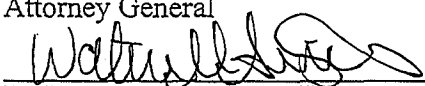
4 c. If Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
5 candidate authorized political committee are not found to have committed violations of
6 RCW 42.17A by the Public Disclosure Commission or a court for conduct during the
7 suspension period, then the suspended portion of the penalty will be set aside.

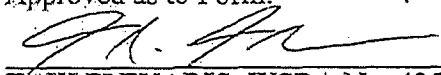
8 3. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
9 candidate authorized political committee, shall pay the State the total amount of \$1,890.00
10 as attorney fees, court costs, and costs of investigation in this action.

11 4. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
12 candidate authorized political committee, shall pay the State the unsuspended portion of the
13 civil penalty (\$515.00) and fees and costs (\$1,890.00) within 12 months from the date of
14 the entry of the Judgment.

15 DONE IN OPEN COURT this 3rd day of March, 2017.

16
17 REBEKAH ZINN
Judge COURT COMMISSIONER

18 Presented by:
19 ROBERT W. FERGUSON
Attorney General
20 
21 LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
22 WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
23 Attorneys for Plaintiff State of Washington

24 Approved as to Form:

25 TAKI FLEVARIS, WSBA No. 42555
PACIFICA LAW GROUP LLP
26 Attorneys for Defendant