

1 EXPEDITE
2 No Hearing Set
3 Trial is Set
4 Date: Monday, July 9, 2018
5 Time: 8:30 a.m.
6 Judge Christopher Lanese

FILED

JUN 15 2010

Superior Court
Linda Myhre Ertow
Thurston County Clerk

7 **STATE OF WASHINGTON**
8 **THURSTON COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 THURSTON COUNTY
13 DEMOCRATIC CENTRAL
14 COMMITTEE, a Washington nonprofit
15 corporation,

16 Defendant.

NO. 17-2-00972-34

STIPULATION AND AGREED
JUDGMENT

EX PARTE

17 **JUDGMENT SUMMARY (RCW 4.64.030)**

- 18 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 19 B. JUDGMENT DEBTOR: THURSTON COUNTY DEMOCRATIC CENTRAL
20 COMMITTEE, a Washington nonprofit corporation
- 21 C. PRINCIPAL JUDGMENT: \$16,686 with \$8,343 suspended for a period of four years
22 contingent on no findings of violations of the law
23 committed during the period of suspension as described
24 in the Stipulation and Judgment below
- 25 D. INTEREST: No prejudgment interest is owed. Principal judgment
26 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: \$8,000 as attorneys fees, \$240 as court costs, and \$2,500
as costs of investigation
- F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON
Attorney General
LINDA A. DALTON, WSBA No. 15467

STIPULATION AND
AGREED JUDGMENT

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

1 Senior Assistant Attorney General
2 S. TODD SIPE, WSBA No. 23203
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 Defendant, THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
8 Washington nonprofit corporation, desiring to resolve all claims arising out of the State's Third
9 Amended Complaint and made in citizen action notices received by the Attorney General's
10 Office since January 3, 2017 to the execution of the Stipulation, hereby enter into the following
11 stipulation:

- 12 1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
13 Washington nonprofit corporation, agrees to pay an assessed civil penalty in the amount of
14 \$16,686 for the violations of RCW 42.17A outlined in the State's Third Amended
15 Complaint.
- 16 2. The parties agree that \$8,343 of the assessed civil penalty will be suspended based on the
17 following terms and conditions:
- 18 a. The suspension will be in effect for four years from the date of execution of the
19 Judgment. During the period of suspension, Defendant THURSTON COUNTY
20 DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation,
21 agrees that it will comply with RCW 42.17A.
- 22 b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL
23 COMMITTEE, a Washington nonprofit corporation, is found by the Public Disclosure
24 Commission following an adjudicative proceeding or a court to have committed a
25 violation of RCW 42.17A during the suspension period, the suspended penalty of
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\$8,343 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission following an adjudicative proceeding or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside without further intervention of the Court.

3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, agrees to pay the State the total amount of \$10,740 as reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500) in this action.

4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, agrees to pay the State the unsuspended portion of the civil penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15, and then installments of \$1500 on December 1 and June 1 each year starting on December 1, 2018 until paid in full. In the absence of extenuating circumstances, the 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 14 day of June, 2018.

ROBERT W. FERGUSON
Attorney General

PACIFICA LAW GROUP LLP



LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff

TAKI FLEVARIS, WSBA No. 42555
Attorneys for Defendants

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 S. TODD SIPE, Assistant Attorney General, and Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, appearing through its attorney, TAKI FLEVARIS of the 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, hereby ORDERS as follows:

1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, is hereby assessed a civil penalty in the amount of \$16,686 payable to the State of Washington for its violations of the provisions of RCW 42.17A as outlined in the Stipulation.
2. The amount of \$8,343 of the assessed penalty is hereby suspended upon Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation'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 THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation shall comply with RCW 42.17A.
 - b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation is found by the Public Disclosure Commission following an adjudicative proceeding or a court to have committed a violation of RCW 42.17A, the suspended penalty of \$8,343 shall immediately become

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due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission following an adjudicative proceeding or a court for conduct during the suspension period, then the suspended portion of the penalty shall be set aside without further intervention of the Court.

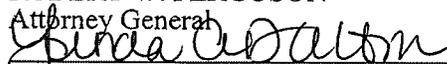
3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, shall pay the State the total amount of \$10,740 as reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500) in this action.

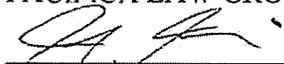
4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, shall pay the State the unsuspended portion of the civil penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15, 2018, and then installments of \$1,500 on December 1 and June 1 each year starting on December 1, 2018 until paid in full. In the absence of extenuating circumstances, the failure to timely make any installment shall result in the remainder of the unpaid portion to be due within 30 days of the missed installment.

DONE IN OPEN COURT this 15 day of June, 2018.

CHRISTOPHER LANESE

JUDGE CHRISTOPHER LANESE

Presented by:
ROBERT W. FERGUSON
Attorney General

LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff State of Washington

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TAKI FLEVARIS, WSBA No. 42555
Attorneys for Defendant