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STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

TIM EYMAN, *et al.*,

Defendants.

NO. 17-2-01546-34

JUDGMENT AGAINST TIM EYMAN
AND TIM EYMAN, WATCHDOG
FOR TAXPAYERS LLC ~~[PROPOSED]~~

JD

I. JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff STATE OF WASHINGTON.
- B. JUDGMENT DEBTORS: TIMOTHY D. EYMAN, an individual, and TIM EYMAN, WATCHDOG FOR TAXPAYERS LLC, a Washington limited liability company, jointly and severally.
- C. PRINCIPAL JUDGMENT: \$2,601,502.81 as to TIMOTHY D. EYMAN, individually, and \$10,000.00 as to TIMOTHY D. EYMAN and TIM EYMAN, WATCHDOG FOR TAXPAYERS LLC, jointly and severally.
- D. COSTS AND FEES: As to Defendants TIMOTHY D. EYMAN and TIM EYMAN, WATCHDOG FOR TAXPAYERS LLC, jointly and severally, combined reasonable attorneys' fees totaling \$2,795,198.58 and costs totaling \$96,468.44 incurred by the State related to the investigation and litigation of this matter.

1 E. INTEREST: No prejudgment interest is owed. Interest will accrue on
2 principal judgment amounts at 12% per year starting
30 days from the date of this judgment.

3 F. ATTORNEYS FOR ROBERT W. FERGUSON, Attorney General
4 JUDGMENT CREDITOR: ERIC S. NEWMAN, WSBA #31521
Chief Litigation Counsel – Antitrust Division
5 S. TODD SIPE, WSBA #23203
6 PAUL M. CRISALLI, WSBA #40681
Assistant Attorneys General

7 G. ATTORNEYS FOR RICHARD B. SANDERS, WSBA #2813
8 JUDGMENT DEBTORS: SETH S. GOODSTEIN, WSBA #45091
CAROLYN A. LAKE, WSBA #13980
9 GOODSTEIN LAW GROUP

10 II. JUDGMENT

11 THIS MATTER came before the Court for trial on November 16, 17, and 18, 2020, as
12 well as on December 14, 15, 16, and 17, 2020, and January 7 and January 21, 2021. Plaintiff
13 State of Washington appeared by and through its counsel, ROBERT W. FERGUSON,
14 Attorney General, ERIC S. NEWMAN, Chief Litigation Counsel - Antitrust Division,
15 S. TODD SIPE, Assistant Attorney General, and PAUL M. CRISALLI, Assistant Attorney
16 General. Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC appeared by
17 and through their counsel RICHARD B. SANDERS and SETH S. GOODSTEIN. The Court,
18 having considered the testimonial and documentary evidence presented at trial, and having heard
19 the arguments of the parties through counsel, and being otherwise fully advised in the premises,
20 now therefore enters the following judgment.
21

22 A. Findings of Fact

23 The Findings of Fact entered by this Court on February 10, 2021, in this matter are hereby
24 incorporated into this judgment by reference.
25
26

1 **B. Conclusions of Law**

2 The Conclusions of Law entered by this Court on February 10, 2021, in this matter are
3 hereby incorporated into this judgment by reference.

4 **C. Counterclaims**

5 Defendants' counterclaims are dismissed with prejudice.

6 **D. Civil Penalties**

7 Defendant Timothy D. Eyman, shall be, and hereby is assessed a civil penalty, under the
8 provisions of RCW 42.17A, as described and supported in this Court's Findings of Fact and
9 Conclusions of Law, entered in this matter on February 10, 2021, in the amount of
10 \$2,601,502.81.
11

12 Defendant Tim Eyman, Watchdog for Taxpayers LLC, shall be, and hereby is assessed
13 a civil penalty, under the provisions of RCW 42.17A, as described and supported in this Court's
14 Findings of Fact and Conclusions of Law, entered in this matter on February 10, 2021, in the
15 amount of \$10,000.00, and Defendants Timothy D. Eyman and Tim Eyman, Watchdog for
16 Taxpayers LLC, shall be jointly and severally liable for that amount, as this Court previously
17 found that Defendant Timothy D. Eyman failed to observe the corporate form of
18 Defendant Tim Eyman, Watchdog for Taxpayers, LLC.
19

20 Defendants, Timothy D. Eyman, individually, and Tim Eyman, Watchdog for Taxpayers
21 LLC, shall be jointly and severally liable for, and hereby are assessed, costs incurred by the State
22 in the investigation and litigation of this matter in the amount of \$96,468.44 and reasonable
23 attorneys' fees incurred by the State in the investigation and litigation of this matter in the amount
24 of \$2,795,198.58, as supported by the State's fee petition and supporting documents.
25
26

1 Defendants shall be jointly and severally liable for post-judgment interest in the amount
2 of 12% per annum.

3 **E. Payment and Enforcement**

4 Civil penalties, fees, and costs under this Judgment shall be due and payable in full
5 immediately in the form of a valid check paid to the order of the "State of Washington." Payment
6 shall be sent to the Complex Litigation Division, Attention: Eric Newman, 7141 Cleanwater
7 Drive SW, PO Box 40111, Olympia, Washington, 98504-0111, or as the parties otherwise agree
8 in writing.
9

10 **III. INJUNCTION**

11 The terms of the injunction entered in this matter by this Court in its Findings of Fact and
12 Conclusions of Law on February 10, 2021, are hereby incorporated by reference. The Attorney
13 General has the authority to bring this action under RCW 42.17A ("Fair Campaign Practices
14 Act"), and an injunction is appropriate under that chapter. For the purposes of effectuating the
15 injunction entered in this matter, the Court has jurisdiction over the parties and the subject matter
16 herein, as well as the implementation, enforcement, and performance of the terms included in
17 this injunction.
18

19 A violation of this injunction constitutes a violation RCW 42.17A.750(i), which is
20 subject to a penalty of up to \$10,000 for each violation in addition to such other remedies as
21 allowed by law.
22

23 **IV. ENFORCEMENT**

24 This Court maintains jurisdiction over this matter for the purposes of enforcing
25 compliance with the terms of this judgment and the injunction previously entered in this matter.
26

1 Representatives of the Office of the Attorney General shall be permitted, upon reasonable notice
2 to Defendants in compliance with the Civil Rules to conduct limited discovery, including
3 obtaining access to all records or documents under the control of the Defendants, at reasonable
4 intervals to monitor compliance with the terms of this judgment and the injunction previously
5 entered. Any disputes over the scope or enforcement of discovery shall be decided by this Court
6 consistent with the Civil Rules.
7

8 IT IS SO ORDERED.

JD 9 DONE ~~IN OPEN COURT~~ this 16 day of April 2021.

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11 
12 _____
13 JUDGE JAMES J. DIXON

14 Presented by:

15 ROBERT W. FERGUSON
16 Attorney General

17 s/ Eric S. Newman

18 ERIC S. NEWMAN, WSBA #31521
19 Chief Litigation Counsel, Antitrust Division
20 S. TODD SIPE, WSBA #23203
21 PAUL M. CRISALLI, WSBA #40681
22 Assistant Attorneys General
23 *Attorneys for Plaintiff State of Washington*
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STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

TIM EYMAN, *et al.*,

Defendants.

NO. 17-2-01546-34

ORDER GRANTING PLAINTIFF
STATE OF WASHINGTON'S FEE
PETITION AGAINST DEFENDANTS
TIM EYMAN AND TIM EYMAN,
WATCHDOG FOR TAXPAYERS LLC

~~[PROPOSED]~~

JD

THIS MATTER came on for hearing before the Court on Friday, April 16, 2021, on Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC. This matter was heard without oral argument.

The Court considered the records and pleadings in this case, including but not limited to:

1. Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (filed March 11, 2021);
2. First Declaration of Tony Perkins in Support of Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (filed March 11, 2021);
3. Second Declaration of Tony Perkins in Support of Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibits (filed March 11, 2021);
4. Declaration of Eric S. Newman in Support of Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibits (filed March 11, 2021);

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- 5. Declaration of S. Todd Sipe in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed March 11, 2021);
- 6. Declaration of Paul M. Crisalli in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed March 11, 2021);
- 7. Declaration of Linda A. Dalton in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed March 11, 2021);
- 8. Declaration of Jeffrey T. Sprung in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed March 11, 2021);
- 9. Declaration of Lisa Boggess in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed March 11, 2021);
- 10. Defendant Eyman’s Motion to Continue Presentation of Judgment and for Expedited Ruling [and] Preliminary Response to Notice of Presentment of Judgment and Attorney’s Fee Petition (filed March 16, 2021);
- 11. Declaration of Tim Eyman, with exhibits (filed March 16, 2021);
- 12. Plaintiff State of Washington’s Reply in Support of Its Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (filed March 17, 2021);
- 13. Third Declaration of Tony Perkins in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (filed March 17, 2021);
- 14. Defendant Eyman’s Combined Response to Presentment of Judgment and Attorney’s Fee Petition (filed April 9, 2021);
- 15. Declaration of Seth Goodstein, with exhibits (filed April 9, 2021);
- 16. Declaration of Tim Eyman, with exhibits (filed April 9, 2021);
- 17. Exhibits [to Declaration of Seth Goodstein] (filed April 12, 2021)
- 18. Plaintiff State of Washington’s Second Reply in Support of Its Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC (filed April 14, 2021);
- 19. Second Declaration of Eric S. Newman in Support of Plaintiff State of Washington’s Fee Petition Against Defendants Tim Eyman and Tim Eyman, Watchdog for Taxpayers LLC, with exhibit (filed April 14, 2021);

~~20.~~ _____;

and
 20 The prior pleadings, briefing, and evidence filed in this case, including all of the discovery and contempt motions, their supporting declarations, and their supporting documents.

JD

1 Accordingly, now, therefore, it is hereby ORDERED that:

2 1. Plaintiff State of Washington's Fee Petition Against Defendants Tim Eyman and
3 Tim Eyman, Watchdog for Taxpayers LLC is **GRANTED**.

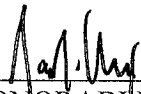
4 2. This Court finds that the fees and costs totaling **\$2,891,667.02**, as delineated
5 below are reasonable and necessary to achieving the State's successful result and are hereby
6 awarded to the State and will be entered into the Judgment Against Defendant Tim Eyman and
7 Tim Eyman, Watchdog for Taxpayers LLC.

9 a. Litigation Fees: \$2,795,198.58

10 b. Litigation Costs: \$91,337.37

11 c. Investigation Costs: \$5,131.07

12 DATED this 16 day of April 2021.

13
14 
15 _____
THE HONORABLE JAMES J. DIXON

16 PRESENTED BY:

17 ROBERT W. FERGUSON
18 Attorney General

19 s/ Eric S. Newman

20 ERIC S. NEWMAN, WSBA #31521
21 Chief Litigation Counsel, Antitrust Division
22 S. TODD SIPE, WSBA #23203
23 PAUL M. CRISALLI, WSBA #40681
24 Assistant Attorneys General
25 *Attorneys for Plaintiff State of Washington*
26