

FILED

MAR 14 2017

Superior Court
Linda Myhre Enlow
Thurston County Clerk

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 17-2-00847-34

Plaintiff,

STIPULATION AND AGREED
JUDGMENT

v.

FRANK CHOPP, individually, and
CITIZENS FOR FRANK CHOPP, a
candidate authorized committee,

Defendants.

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee
- C. PRINCIPAL JUDGMENT: \$3,480 with \$1,740 suspended for a period of 4 years contingent on no findings of violations of RCW 42.17A 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: \$3,400 as attorney fees and \$1,329.78 as 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
WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General

STIPULATION AND
AGREED JUDGMENT

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

1 G. ATTORNEY FOR BEN STAFFORD, WSBA No. 39849
2 JUDGMENT DEBTOR Perkins Coie LLP

3 STIPULATION

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
5 Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate
6 authorized committee, desiring to resolve all claims arising out of the State's complaint, hereby
7 enter into the following stipulation:

- 8 1. Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a
9 candidate authorized committee, agree to pay an assessed civil penalty in the amount of
10 \$3,480 for their violations of RCW 42.17A for failing to timely disclose contributions
11 received, expenditures made, and debts incurred/orders placed for the 2016 Chopp
12 campaign for state representative.
- 13 2. The parties agree that \$1,740 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, Defendants FRANK CHOPP,
17 individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized
18 committee, agree that they will not violate any provision of RCW 42.17A.
- 19 b. In the event Defendants FRANK CHOPP, individually, and CITIZENS FOR
20 FRANK CHOPP, a candidate authorized committee, are found by the Public
21 Disclosure Commission or a court to have committed a violation of RCW 42.17A
22 during the suspension period, the suspended penalty of \$1,740 will immediately
23 become due and payable within 30 days of such finding without further intervention
24 of the Court.
- 25
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1 c. If Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK
2 CHOPP, a candidate authorized committee, are not found to have committed
3 violations of RCW 42.17A by the Public Disclosure Commission or a court for
4 conduct during the suspension period, then the suspended portion of the penalty
5 will be set aside.

6 3. Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a
7 candidate authorized committee, agree to pay the State the total amount of \$4,729.78 as
8 attorney fees, court costs, and costs of investigation in this action.

9 4. Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a
10 candidate authorized committee, agree to pay the State the unsuspended portion of the civil
11 penalty (\$1,740) and fees and costs (\$4,729.78) within 30 days from the date of the entry of
12 the Judgment.

13 DATED this 13th day of March, 2017.

14 OFFICE OF THE ATTORNEY GENERAL

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16 LINDA A. DALTON, WSBA No. 15467

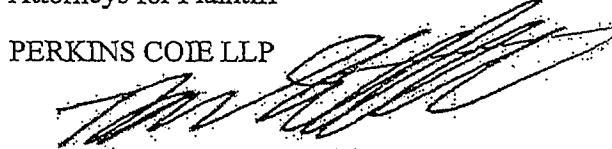
17 Senior Assistant Attorney General

18 WALTER M. SMITH, WSBA No. 46695

19 Assistant Attorney General

20 Attorneys for Plaintiff

21 PERKINS COIE LLP

22 
23 BEN STAFFFORD, WSBA No. 39849

24 Attorneys for Defendants
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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, LINDA A. DALTON, Senior Assistant Attorney General, and WALTER M. SMITH, Assistant Attorney General, and Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, appearing through their attorney, BEN STAFFORD, PERKINS COIE 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 FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, are hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$3,480 payable to the State of Washington for their violations of RCW 42.17A for failing to timely disclose contributions received, expenditures made, and debts incurred/orders placed for the 2016 Chopp campaign for state representative.
2. The amount of \$1,740 of the assessed penalty is hereby suspended upon Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized 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, Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, agree that they will not violate any provision of RCW 42.17A.

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b. In the event Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, are 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 \$1,740 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, are not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside.

3. Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, shall pay the State the total amount of \$4,729.78 as attorney fees, court costs, and costs of investigation in this action.

4. Defendants FRANK CHOPP, individually, and CITIZENS FOR FRANK CHOPP, a candidate authorized committee, shall pay the State the unsuspended portion of the civil penalty (\$1,740) and fees and costs (\$4,729.78) within 30 days from the date of the entry of the Judgment.

DONE IN OPEN COURT this 14 day of March, 2017.

REBEKAH ZINN
COURT COMMISSIONER

Judge

Presented by:
OFFICE OF THE ATTORNEY GENERAL
Linda A. Dalton
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff State of Washington.

Approved as to Form: BEN STAFFORD
BEN STAFFORD, WSBA No. 39849
PERKINS COIE LLP
Attorneys for Defendant