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SEP 22 2017

Superior Court
Linda Myhre Enlow
Thurston County Clerk

- EXPEDITE
- No Hearing Set
- Hearing is Set

Date:

Time:

Judge John C. Skinder

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 17-2-04408-34

Plaintiff,

STIPULATION AND AGREED
JUDGMENT

v.

WASHINGTON & NORTHERN
IDAHO DISTRICT COUNCIL OF
LABORERS PAC, a Washington
registered political committee,

Defendant.

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee
- C. PRINCIPAL JUDGMENT: \$30,695 with \$15,347.50 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: \$4,000 as attorney fees, \$1,375 as costs of investigation, \$240 as costs of trial
- F. ATTORNEYS FOR JUDGMENT CREDITOR: Office of the Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior 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 DANIELLE FRANCO-MALONE, WSBA No. 40979
2 JUDGMENT DEBTOR Schwerin Campbell Barnard Iglitzin & Lavitt LLP

3 STIPULATION

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
5 Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
6 PAC, a Washington registered political committee, desiring to resolve all claims arising out of
7 the State's complaint, hereby enter into the following stipulation:

8 1. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF
9 LABORERS PAC, a Washington registered political committee, agrees to pay an assessed
10 civil penalty in the amount of \$30,695 for violations of RCW 42.17A for failing to timely
11 disclose contributions received and expenditures made during calendar years 2014, 2015,
12 2016 and 2017.

13 2. The parties agree that \$15,347.50 of the assessed civil penalty (one-half) will be suspended
14 based on the 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, Defendant WASHINGTON &
17 NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington
18 registered political committee, agrees that it will not violate any provision of RCW
19 42.17A.

20 b. In the event Defendant WASHINGTON & NORTHERN IDAHO DISTRICT
21 COUNCIL OF LABORERS PAC, a Washington registered political committee, is
22 found by the Public Disclosure Commission or a court to have committed a violation of
23 RCW 42.17A during the suspension period, the suspended penalty of \$15,347.50 will
24 immediately become due and payable within 30 days of such finding without further
25 intervention of the Court.
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c. If Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct occurring during the suspension period, then the suspended portion of the penalty will be set aside.

d. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, agrees that it will 1) ensure that all its staff receive annual training from the Public Disclosure Commission on the disclosure reporting procedures under state law, and 2) certify by December 31 of each year during the suspension period that its staff has been trained, that each committee disclosure report has been reviewed by two committee staff, and that its executive board has reviewed the filings during its bi-monthly meetings. Said certifications shall be directed to the Office of the Attorney General, Campaign Finance Unit Chief and the Executive Director of the Public Disclosure Commission.

3. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, agrees to pay the State the total amount of \$5,615 as attorney fees (\$4,000), court costs (\$240), and costs of investigation (\$1,375) in this action.

4. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, agrees to pay the State the unsuspended portion of the civil penalty (\$15,347.50) and fees and costs (\$5,615) within

1 30 days from the date of the entry of the Judgment.

2 DATED this 19 day of September, 2017.

3 ROBERT W. FERGUSON
4 ATTORNEY GENERAL

SCHWERIN CAMPBELL BARNARD
IGLITZIN & LAVITT LLP

5 Linda A Dalton
6 LINDA A. DALTON, WSBA No. 15467
7 Senior Assistant Attorney General
8 Attorneys for Plaintiff

Danielle Franco-Malone
DANIELLE FRANCO-MALONE, WSBA No. 40979
Attorneys for Defendant WASHINGTON &
NORTHERN IDAHO DISTRICT COUNCIL
OF LABORERS PAC, a Washington registered
political committee

9
10 **JUDGMENT**

11 THIS MATTER came on regularly before the undersigned judge of the above-entitled
12 Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record,
13 LINDA A. DALTON, Senior Assistant Attorney General, and Defendant WASHINGTON &
14 NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered
15 political committee, apprised the Court of their agreement to the entry of this judgment for the
16 purpose of settling and compromising this action brought under RCW 42.17A. The Court,
17 having reviewed the records and files herein, and having found the settlement to be a just and
18 proper resolution of this matter, and being otherwise fully advised in the premises, hereby
19 ORDERS as follows:

- 20 1. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF
21 LABORERS PAC, a Washington registered political committee, is hereby assessed a civil
22 penalty, under the provisions of RCW 42.17A, in the amount of \$30,695 payable to the
23 State of Washington for violations of RCW 42.17A for failing to timely disclose
24 contributions received and expenditures made during calendar years 2014, 2015, 2016 and
25 2017.
26

1 2. The amount of \$15,347.50 of the assessed penalty is hereby suspended upon Defendant
2 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC's
3 compliance with the following court-ordered conditions:

4 a. The suspension will be in effect for four years from the date of execution of the
5 Judgment. During the period of suspension, Defendant WASHINGTON &
6 NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington
7 registered political committee, agree that it will not violate any provision of RCW
8 42.17A.

9 b. In the event Defendant WASHINGTON & NORTHERN IDAHO DISTRICT
10 COUNCIL OF LABORERS PAC, a Washington registered political committee, is
11 found by the Public Disclosure Commission or a court to have committed a violation of
12 RCW 42.17A during the suspension period, the suspended penalty of \$15,347.50 shall
13 immediately become due and payable within 30 days of such finding without further
14 intervention of the Court.

15 c. If Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF
16 LABORERS PAC, a Washington registered political committee, is not found to have
17 committed violations of RCW 42.17A by the Public Disclosure Commission or a court
18 for conduct during the suspension period, then the suspended portion of the penalty
19 shall be set aside.

20 d. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF
21 LABORERS PAC, a Washington registered political committee, shall 1) ensure that all
22 its staff receive annual training from the Public Disclosure Commission on the
23 disclosure reporting procedures under state law, and 2) certify by December 31 of each
24 year during the suspension period that its staff has been trained, that each committee
25 disclosure report has been reviewed by two committee staff, and that its executive
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board has reviewed the filings during its bi-monthly meetings. Said certifications shall be directed to the Office of the Attorney General, Campaign Finance Unit Chief and the Executive Director of the Public Disclosure Commission.

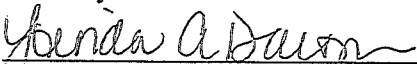
3. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, shall pay the State the total amount of \$5,615 as attorney fees (\$4,000), court costs (\$240), and costs of investigation (\$1,375) in this action.

4. Defendant WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, a Washington registered political committee, shall pay the State the unsuspended portion of the civil penalty (\$15,347.50), reasonable attorneys fees (\$4,000), and assessed costs (\$1,615) within 30 days from the date of the entry of the Judgment.

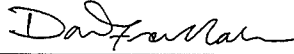
DONE IN OPEN COURT this ____ day of September, 2017.
JOHN C. SKINDER

JOHN SKINDER, Judge

Presented by:

ROBERT W. FERGUSON
Attorney General

LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
Attorneys for Plaintiff

Approved as to form, notice of presentation
Waived:

SCHWERIN CAMPBELL BARNARD IGLITZIN
& LAVITT LLP

DANIELLE FRANCO-MALONE, WSBA No. 40979
Attorneys for Defendant WASHINGTON &
NORTHERN IDAHO DISTRICT COUNCIL
OF LABORERS PAC, a Washington registered political committee