

FILED

APR 20 2019

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

EXPEDITE  
 No Hearing Set  
 Trial is Set  
Date: April 22, 2019  
Time: 8:30 a.m.  
The Honorable John C. Skinder

STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,  
  
Plaintiff,  
  
v.  
  
SAN JUAN COUNTY DEMOCRATS,  
a Washington registered political  
committee,  
  
Defendant.

NO. 17-2-03876-34

STIPULATION AND AGREED  
JUDGMENT

EX PARTE

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: SAN JUAN COUNTY DEMOCRATS, a Washington registered political committee
- C. PRINCIPAL JUDGMENT: \$8,220 with \$4,110 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: \$4,000 as reasonable attorney fees, \$645 in investigation costs, and \$240 in court costs
- F. ATTORNEYS FOR JUDGMENT CREDITOR: Office of the Attorney General, State of Washington  
LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
KELLY R. HARMON, WSBA No. 22498  
Assistant Attorney General

1 G. ATTORNEY FOR LAURA EWAN, WSBA No. 45201  
2 JUDGMENT DEBTOR: Schwerin Campbell Barnard Iglitzin & Lavitt LLP

3 STIPULATION

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the  
5 Defendant, SAN JUAN COUNTY DEMOCRATS, a Washington registered political committee,  
6 desiring to resolve all claims arising out of the State's complaint, hereby enter into the following  
7 stipulation:

- 8 1. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State an assessed civil  
9 penalty in the amount of \$8,220 for its violations of RCW 42.17A for failing to report  
10 contributions received, expenditures made and debts and obligations incurred in 2016.
- 11 2. The parties agree that \$4,110 of the assessed civil penalty will be suspended based on the  
12 following terms and conditions:
- 13 a. The suspension will be in effect for four years from the date of execution of the  
14 Judgment. During the period of suspension, Defendant, SAN JUAN COUNTY  
15 DEMOCRATS agrees that it will not violate any provision of RCW 42.17A.
- 16 b. In the event Defendant SAN JUAN COUNTY DEMOCRATS is found by the Public  
17 Disclosure Commission or a court to have committed a violation of RCW 42.17A  
18 during the suspension period, the suspended penalty of \$4,110 will immediately  
19 become due and payable within 30 days of such finding without further intervention  
20 of the Court.
- 21 c. If Defendant SAN JUAN COUNTY DEMOCRATS is not found to have committed  
22 violations of RCW 42.17A by the Public Disclosure Commission or a court for  
23 conduct occurring during the suspension period, then the suspended portion of the  
24 penalty will be set aside.
- 25  
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- 1 3. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State the total amount  
2 of \$4,885 as reasonable attorney fees (\$4,000), court costs (\$240), and costs of investigation  
3 (\$645) in this action.
- 4 4. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State the unsuspended  
5 portion of the civil penalty (\$4,110) and fees and costs (\$4,885) within 30 days from the date  
6 of the entry of the Judgment.

7 DATED this 19 day of April, 2018.

8 OFFICE OF THE ATTORNEY GENERAL  
9 STATE OF WASHINGTON

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11 LINDA A. DALTON, WSBA No. 15467  
12 Senior Assistant Attorney General  
13 KELLY R. HARMON, WSBA No. 22498  
14 Assistant Attorney General  
15 Attorneys for State of Washington

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17 LAURA EWAN, WSBA No. 45201  
18 Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
19 Attorney for Defendant  
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1 **JUDGMENT**

2 THIS MATTER came on regularly before the undersigned judge of the above-entitled  
3 Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of  
4 record, LINDA A. DALTON, Senior Assistant Attorney General, and KELLY R. HARMON,  
5 Assistant Attorney General, and Defendant, SAN JUAN COUNTY DEMOCRATS, a  
6 Washington registered political committee, appearing through its attorney, LAURA EWAN,  
7 apprised the Court of their agreement to the entry of this judgment for the purpose of settling  
8 and compromising this action brought under RCW 42.17A. The Court, having reviewed the  
9 records and files herein, and having found the settlement to be a just and proper resolution of  
10 this matter, and being otherwise fully advised in the premises, it is hereby ORDERED as  
11 follows:

- 12 1. Defendant SAN JUAN COUNTY DEMOCRATS is hereby assessed a civil penalty, under  
13 the provisions of RCW 42.17A, in the amount of \$8,220 payable to the State of  
14 Washington.
- 15 2. The amount of \$4,110 of the assessed penalty is hereby suspended upon Defendant SAN  
16 JUAN COUNTY DEMOCRATS' compliance with the following court-ordered conditions:
- 17 a. The suspension shall be in effect for four years from the date of execution of the  
18 Judgment. During the period of suspension, Defendant SAN JUAN COUNTY  
19 DEMOCRATS agrees that it will not violate any provision of RCW 42.17A.
- 20 b. In the event Defendant SAN JUAN COUNTY DEMOCRATS is 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 \$4,110 shall be immediately due  
23 and payable within 30 days of such finding without further intervention of the Court.
- 24 c. If Defendant SAN JUAN COUNTY DEMOCRATS is not found to have committed  
25 violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct  
26

1 occurring during the suspension period, then the suspended portion of the penalty shall  
2 be set aside.

3 3. Defendant SAN JUAN COUNTY DEMOCRATS shall pay the State the total amount of  
4 \$4,885 as reasonable attorney fees (\$4,000), court costs (\$240), and costs of investigation  
5 (\$645) in this action.

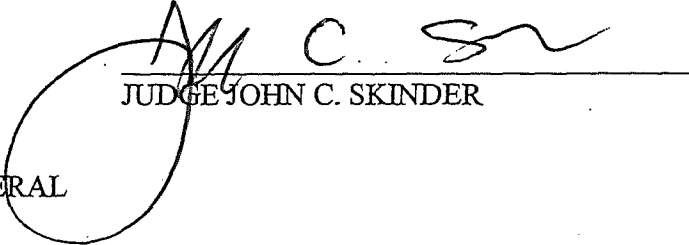
6 4. Defendant SAN JUAN COUNTY DEMOCRATS shall pay the State the unsuspended  
7 portion of the civil penalty (\$4,110) and fees and costs (\$4,885) within 30 days from the  
8 date of the entry of the Judgment.

9 DONE IN OPEN COURT this 20<sup>th</sup> day of April, 2018.

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JUDGE JOHN C. SKINDER

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PRESENTED BY:  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF WASHINGTON

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LINDA A. DALTON, WSBA No. 15467

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Senior Assistant Attorney General  
KELLY R. HARMON, WSBA No. 22498

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Assistant Attorney General  
Attorneys for State of Washington

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LAURA EWAN, WSBA No. 45201  
Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
Attorney for Defendant

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