

**FILED**

JAN 29 2016

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

NO. 15-2-01825-3

Plaintiff,

STIPULATION AND AGREED  
JUDGMENT

v.

SEIU 775; and SEIU 775 QUALITY  
CARE COMMITTEE,

Defendants.

**JUDGMENT SUMMARY (RCW 4.64.030)**

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTORS: SEIU 775; and SEIU 775 QUALITY CARE COMMITTEE
- C. PRINCIPAL JUDGMENT: \$26,250 with \$6,562.50 suspended for a period of 4 years contingent on no further violations of the law during the period of suspension for Defendant SEIU 775 and \$6,000 with \$1,500 suspended for a period of 4 years contingent on no further violations of the law during the period of suspension for Defendant SEIU 775 Quality Care Committee
- 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: \$15,240 as attorney fees and court costs  
\$4,316.50 in investigation costs
- F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON  
Attorney General

STIPULATION AND  
AGREED JUDGMENT

ATTORNEY GENERAL OF WASHINGTON  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 664-9006

**COPY**

LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
CHAD C STANDIFER, WSBA No. 29724  
Assistant Attorney General

G. ATTORNEY FOR JUDGMENT DEBTOR DMITRI IGLITZIN, WSBA No. 17673  
Schwerin Campbell Barnard Iglitzin & Lavitt, LLP

**STIPULATION**

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON, (STATE) and the Defendants, SEIU 775 and SEIU 775 QUALITY CARE COMMITTEE, being desirous of resolving all claims arising out of the State's complaint, hereby enter into the following stipulation:

**A. Defendant SEIU 775**

1. Defendant SEIU 775 agrees to pay an assessed civil penalty in the amount of \$26,250 for its violations of RCW 42.17A by failing to properly report contributions it made to Defendant SEIU 775 QUALITY CARE COMMITTEE and failing to report the value of in-kind services and administrative costs it provided to Defendant SEIU 775 QUALITY CARE COMMITTEE, each of which should have been reported on its Lobbyist Employer Reports.

2. The parties agree that \$6,562.50 of the assessed civil penalty will be suspended based on the following terms and 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 SEIU 775 agrees that it will not violate any provision of RCW 42.17A. In the event Defendant SEIU 775 is found to have committed any violation of RCW 42.17A during the suspension period, the suspended penalty of \$6,562.50 will immediately become due and payable without further intervention of the Court. If, after four years, Defendant SEIU 775 has no violations of RCW 42.17A, then the suspended portion of the penalty will be set aside.

1 b. Defendant SEIU 775 agrees to work with the staff of the Public Disclosure  
2 Commission to bring its lobbyist employer contribution reports (either Forms L2 or  
3 L3c) current and to file amended five (5) annual lobbyist employer reports (Form  
4 L3) which were due no later than the last day of February in the years 2011-2015 no  
5 later than 90 days from the date of the entry of the Judgment.

6 3. Defendant SEIU 775 agrees to pay the State the unsuspended portion of the civil penalty  
7 (\$19,687.50) within 30 days of the date of entry of the Judgment.

8 4. Defendant SEIU 775 agrees to pay, in a separate transmittal, the State the total amount of  
9 \$19,556.50 as attorney fees, court costs, and costs of investigation in this action, this  
10 amount to be paid within 30 days of the date of entry of the Judgment.

11 **B. Defendant SEIU 775 QUALITY CARE COMMITTEE**

12 5. Defendant SEIU 775 QUALITY CARE COMMITTEE agrees to pay the State an assessed  
13 civil penalty in the amount of \$6,000 for its violations of RCW 42.17A by failing to  
14 properly report the value of in-kind services and administrative costs it received from  
15 Defendant SEIU 775.

16 6. The parties agree that \$1,500 of the assessed civil penalty will be suspended based on the  
17 following terms and conditions:

18 c. The suspension will be in effect for four years from the date of execution of the  
19 Judgment. During the period of suspension, Defendant SEIU 775 QUALITY  
20 CARE COMMITTEE agrees that it will not violate any provision of RCW 42.17A.  
21 In the event Defendant SEIU 775 QUALITY CARE COMMITTEE is found to  
22 have committed any violation of RCW 42.17A during the suspension period, the  
23 suspended penalty of \$1,500 will immediately become due and payable without  
24 further intervention of the Court. If, after four years, Defendant SEIU 775  
25  
26

1 further intervention of the Court. If, after four years, Defendant SEIU 775  
2 QUALITY CARE COMMITTEE has no violations of RCW 42.17A, then the  
3 suspended portion of the penalty will be set aside

4 d. Defendant SEIU 775 QUALITY CARE COMMITTEE agrees to work with the  
5 staff of the Public Disclosure Commission to bring its contribution reports current  
6 no later than 90 days from the date of the entry of the Judgment.

7 7. Defendant SEIU 775 QUALITY CARE COMMITTEE agrees to pay the State the  
8 unsuspended portion of the civil penalty (\$4,500) within 30 days of the date of entry of the  
9 Judgment.

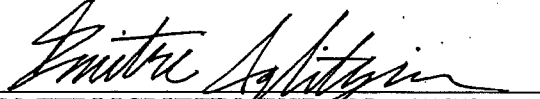
10 DATED this 28 day of January, 2016.

11 ROBERT W. FERGUSON  
12 Attorney General

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14 LINDA A. DALTON, WSBA No. 15467  
15 Senior Assistant Attorney General

16 CHAD C. STANDIFER, WSBA No. 29724  
17 Assistant Attorney General  
18 Attorneys for Plaintiff

19 

20 DMITRI IGLITZIN, WSBA No. 17673  
21 Schwerin Campbell Barnard Iglitzin & Lavitt, LLP  
22 Attorney for Defendants

### 23 JUDGMENT

24 THIS MATTER came on regularly before the undersigned judge of the above-entitled  
25 Court. The Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record,  
26 ROBERT W. FERGUSON, Attorney General, and LINDA A. DALTON, Senior Assistant  
Attorney General, and CHAD C. STANDIFER, Assistant Attorney General and Defendants,  
SEIU 775 and SEIU 775 QUALITY CARE COMMITTEE, appearing through their attorney,  
DMITRI IGLITZIN, apprised the Court of their agreement to the entry of this judgment for the

1 having reviewed the records and files herein, and having found the settlement to be a just and  
2 proper resolution of this matter, and being otherwise fully advised in the premises, now,  
3 therefore, it is hereby

4 ORDERED that Defendant, SEIU 775, hereby is assessed a civil penalty, under the  
5 provisions of RCW 42.17A, in the amount of \$26,250 payable to the State of Washington. It is  
6 further

7 ORDERED that the amount of \$6,562.50 of the assessed penalty is hereby suspended  
8 upon Defendant SEIU 775's compliance with the following court-ordered conditions:

- 9 a. The suspension shall be in effect for four years from the date of this judgment,  
10 during which time Defendant SEIU 775 shall not violate any provision of RCW  
11 42.17A. In the event Defendant SEIU 775 is found to have committed any violation  
12 of RCW 42.17A during the suspended period, the suspended penalty of \$6,562.50 is  
13 immediately due and payable without any further intervention of the Court. If, after  
14 four years, Defendant SEIU 775 has no violations of RCW 42.17A, then the  
15 suspended portion of the penalty will be set aside.
- 16 b. Defendant SEIU 775 shall work with the staff of the Public Disclosure Commission  
17 to bring its lobbyist employer contribution reports (either Forms L2 or L3c) current  
18 and shall file amended five (5) annual lobbyist employer reports (Form L3) which  
19 were due no later than the last day of February in the years 2011-2015 no later than  
20 90 days from the date of the entry of the Judgment.

21 It is further

22 ORDERED that Defendant SEIU 775 shall pay to the State of Washington the  
23 unsuspended portion of the assessed civil penalty (\$19,687.50) within 30 days of the entry of  
24 this Judgment. It is further

1 ORDERED that Defendant SEIU 775 QUALITY CARE COMMITTEE hereby is  
2 assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$6,000  
3 payable to the State of Washington. It is further

4 ORDERED that the amount of \$1,500 of the Defendant SEIU 775 QUALITY CARE  
5 COMMITTEE's assessed penalty is hereby suspended upon Defendant SEIU 775 QUALITY  
6 CARE COMMITTEE's compliance with the following court-ordered conditions:

- 7 a. The suspension shall be in effect for four years from the date of this judgment,  
8 during which time Defendant SEIU 775 QUALITY CARE COMMITTEE shall not  
9 violate any provision of RCW 42.17A. In the event Defendant SEIU 775  
10 QUALITY CARE COMMITTEE is found to have committed any violation of  
11 RCW 42.17A during the suspended period, the suspended penalty of \$1,500 is  
12 immediately due and payable without any further intervention of the Court. If, after  
13 four years, Defendant SEIU 775 QUALITY CARE COMMITTEE has no  
14 violations of RCW 42.17A, then the suspended portion of the penalty will be set  
15 aside.
- 16 b. Defendant SEIU 775 QUALITY CARE COMMITTEE shall work with the staff of  
17 the Public Disclosure Commission to bring its contribution reports current no later  
18 than 90 days from the date of the entry of the Judgment.

19 It is further

20 ORDERED that Defendant SEIU 775 QUALITY CARE COMMITTEE shall pay to  
21 the State of Washington the unsuspended portion of the assessed civil penalty (\$4,500) within  
22 30 days of the entry of this Judgment. It is further

23 ORDERED that Defendant SEIU 775 shall pay to the State of Washington by separate  
24 transmittal, the amount of \$15,240 as attorney fees and court costs and \$4,316.50 as costs of  
25 investigation as authorized under RCW 42.17A.765.  
26

1 DONE IN OPEN COURT this 29 day of January, 2016.

2  
3 ANNE HIRSCH

4 The Honorable ANNE HIRSCH, Judge

5 Presented by:

6 ROBERT W. FERGUSON  
7 Attorney General

8   
9 LINDA A. DALTON, WSBA No. 15467

10 Senior Assistant Attorney General  
11 CHAD C. STANDIFER, WSBA No. 29724  
12 Assistant Attorney General  
13 Attorneys for Plaintiff

14 Approved as to Form:

15   
16 DMITRI IGLITZIN, WSBA No. 17673

17 Schwerin Campbell Barnard Iglitzin & Lavitt, LLP  
18 Attorney for Defendants  
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