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EXPEDITE
 No Hearing Set
 Trial is Set
Date: Monday, May 6, 2019
Time: 8:30 a.m.
Judge John C. Skinder

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION
LEADERSHIP COUNCIL 14, AKA
SEIU WASHINGTON STATE
COUNCIL,

Defendant.

NO. 17-2-04061-34 **EX PARTE**

STIPULATION AND AGREED
JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: SERVICE EMPLOYEES INTERNATIONAL UNION
LEADERSHIP COUNCIL 14, AKA SEIU
WASHINGTON STATE COUNCIL
- C. PRINCIPAL JUDGMENT: \$233,205 with \$104,942.25 suspended for a period of
four 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: \$16,079.85 as attorneys' fees, \$1,981 as costs of
investigation, \$240 as costs of trial

1 F. ATTORNEYS FOR Office of the Attorney General
2 JUDGMENT CREDITOR S. TODD SIPE, WSBA No. 32203
Senior Assistant Attorney General

3 G. ATTORNEY FOR DANIELLE FRANCO-MALONE, WSBA No. 40979
4 JUDGMENT DEBTOR Schwerin Campbell Barnard Iglitzin & Lavitt LLP

5
6 STIPULATION

7 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
8 Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LEADERSHIP COUNCIL
9 14, AKA SEIU WASHINGTON STATE COUNCIL (SEIU Council 14) desiring to resolve all
10 claims arising out of the State's complaint, hereby enter into the following stipulation:

- 11 1. Defendant SEIU Council 14 agrees to pay an assessed civil penalty in the amount of
12 \$233,205.00 for violations of RCW 42.17A for failing to timely register as a political
13 committee; failing to identify a treasurer; and for failing to timely disclose contributions
14 received and expenditures made during calendar years 2014 and 2016.
- 15 2. The parties agree that \$104,942.25 of the assessed civil penalty (45%) will be suspended
16 based on the following terms and conditions:
- 17 a. The suspension will be in effect for four years from the date of execution of the Judgment.
18 During the period of suspension, Defendant SEIU Council 14, agrees that it will not
19 violate any provision of RCW 42.17A.
- 20 b. In the event Defendant SEIU Council 14 is found by the Public Disclosure Commission
21 or a court to have committed a violation of RCW 42.17A with the exception of a
22 Commission determination of a technical correction or remedial violation during the
23 suspension period, the suspended penalty of \$104,942.25 will immediately become due
24 and payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendant SEIU Council 14 is not found to have committed violations of RCW 42.17A
2 by the Public Disclosure Commission or a court for conduct occurring during the
3 suspension period, then the suspended portion of the penalty will be set aside.

4 d. Defendant SEIU Council 14 agrees that it will file the C-1pc form and all C-3 and C-4
5 reports with the Public Disclosure Commission for 2014 and 2016 that a political
6 committee would be required to file within thirty days of the entry of the judgment. The
7 last required C-4 report shall be marked as a final report to note the dissolution of the
8 committee.

9 3. Defendant SEIU Council 14 agrees to pay the State the amount of \$16,079.85 as attorneys'
10 fees, court costs of \$240, and costs of investigation of \$1,981 in this action.

11 4. Defendant SEIU Council 14 agrees to pay the State the unsuspended portion of the civil
12 penalty (\$128,262.75) and fees and costs (\$18,300.85) within 30 days from the date of the
13 entry of the Judgment.

14 ROBERT W. FERGUSON
15 ATTORNEY GENERAL

16 

2-14-2019

17 S. TODD SIPE, WSBA No. 23203
18 Senior Assistant Attorney General
Attorneys for Plaintiff

DATED

19 SCHWERIN CAMPBELL IGLITZIN & LAVITT LLP

20 

02/14/2019

21 DANIELLE FRANCO-MALONE,
22 WSBA No. 40979
Attorneys for Defendant

DATED

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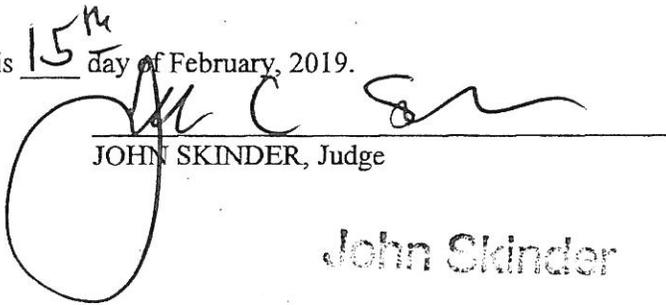
JUDGMENT

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 Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LEADERSHIP COUNCIL 14, AKA SEIU WASHINGTON STATE COUNCIL (SEIU Council 14) 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. Defendant SEIU Council 14 shall pay a civil penalty, under the provisions of RCW 42.17A, in the amount of \$233,205.00 payable to the State of Washington for violations of RCW 42.17A for failing to timely disclose contributions received and expenditures made during calendar years 2014 and 2016.
2. The amount of \$104,942.25 of the assessed penalty is hereby suspended upon Defendant SEIU Council 14'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, Defendant SEIU Council 14 shall not violate any provision of RCW 42.17A.
 - b. In the event Defendant SEIU Council 14 is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A with the exception of a Commission determination of a technical correction or remedial violation during the suspension period, the suspended penalty of \$104,942.25 shall immediately become due and payable within 30 days of such finding without further intervention of the Court.

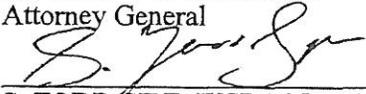
- 1 c. If Defendant SEIU Council 14 is not found to have committed violations of RCW 42.17A
2 by the Public Disclosure Commission or a court for conduct during the suspension
3 period, then the suspended portion of the penalty shall be set aside.
4
5 d. Defendant SEIU Council 14 shall file the C-1pc form and all C-3, and C-4 reports with
6 the Public Disclosure Commission for 2014 an 2016 that a political committee would be
7 required to file along with a closing report within thirty days of the entry of the judgment.
8
9 3. Defendant SEIU Council 14 shall pay the State the amount of \$16,079.85 as attorneys' fees,
10 court costs of \$240, and costs of investigation of \$1,981 in this action.
11
12 4. Defendant SEIU Council 14 shall pay the State the unsuspended portion of the civil penalty
13 \$128,262.75 and the fees and costs totaling \$18,300.85 within 30 days from the date of the
14 entry of the Judgment.

15 DONE IN OPEN COURT this 15th day of February, 2019.

16 
17 JOHN SKINDER, Judge

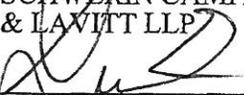
18 Presented by:

19 ROBERT W. FERGUSON
20 Attorney General

21 
22 S. TODD SIPE, WSBA No. 23203
23 Assistant Attorney General
24 Attorneys for Plaintiff

25 *And*

26 SCHWERIN CAMPBELL BARNARD IGLITZIN
& LAVITT LLP

 *for DFM*
DANIELLE FRANCO-MALONE, WSBA No. 40979
Attorneys for Defendant