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7 **STATE OF WASHINGTON**  
**THURSTON COUNTY SUPERIOR COURT**

8 STATE OF WASHINGTON,

NO. 15-2-01923-3

9 Plaintiff,

STIPULATION AND AGREED  
JUDGMENT

10 v.

11 SERVICE EMPLOYEES  
12 INTERNATIONAL UNION LOCAL  
13 925; AND SEIU LOCAL 925 PUBLIC  
SERVICE PAC,

14 Defendants.

15 **JUDGMENT SUMMARY (RCW 4.64.030)**

- 16 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 17 B. JUDGMENT DEBTORS: SERVICE EMPLOYEES INTERNATIONAL UNION  
18 LOCAL 925; AND SEIU LOCAL 925 PUBLIC  
SERVICE PAC
- 19 C. PRINCIPAL JUDGMENT: \$27,793 with \$6,948.25 suspended for a period of 4  
20 years contingent on no further violations of the law  
21 during the period of suspension for Defendant  
SERVICE EMPLOYEES INTERNATIONAL UNION  
22 LOCAL 925 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 LOCAL 925 PUBLIC SERVICE PAC
- 23 D. INTEREST: No prejudgment interest is owed. Principal judgment  
24 amount(s) due and owing shall not bear interest unless  
25 the principal judgment is unpaid by the due date specified  
herein
- 26 E. COSTS AND FEES: \$7,240 as attorney fees and court costs

1 \$3,630.93 in investigation costs

2 F. ATTORNEYS FOR  
3 JUDGMENT CREDITOR

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

5 G. ATTORNEY FOR  
6 JUDGMENT DEBTOR

ROBERT H. LAVITT, WSBA No. 27758  
Schwerin Campbell Barnard Iglitzin & Lavitt, LLP

7 **STIPULATION**

8 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON, (STATE) and the  
9 Defendants, SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 and SEIU  
10 LOCAL 925 PUBLIC SERVICE PAC, being desirous of resolving all claims arising out of the  
11 State's complaint, hereby enter into the following stipulation:

12 **A. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925**

13 1. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 agrees to  
14 pay an assessed civil penalty in the amount of \$27,793 for its violations of RCW 42.17A by  
15 failing to properly report contributions it made to Defendant SEIU LOCAL 925 PUBLIC  
16 SERVICE PAC and failing to report the value of in-kind services and administrative costs  
17 it provided to Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC, each of which  
18 should have been reported on its Lobbyist Employer Reports.

19 2. The parties agree that \$6,948.25 of the assessed civil penalty will be suspended based on  
20 the following terms and conditions:

21 a. The suspension will be in effect for four years from the date of execution of the  
22 Judgment. During the period of suspension, Defendant SERVICE EMPLOYEES  
23 INTERNATIONAL UNION LOCAL 925 agrees that it will not violate any  
24 provision of RCW 42.17A. In the event Defendant SERVICE EMPLOYEES  
25 INTERNATIONAL UNION LOCAL 925 is found to have committed any violation  
26

1 of RCW 42.17A during the suspension period, the suspended penalty of \$6,948.25  
2 will immediately become due and payable without further intervention of the Court.  
3 If, after four years, Defendant SERVICE EMPLOYEES INTERNATIONAL  
4 UNION LOCAL 925 has no violations of RCW 42.17A, then the suspended portion  
5 of the penalty will be set aside.

6 b. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925  
7 agrees to work with the staff of the Public Disclosure Commission to bring its  
8 lobbyist employer contribution reports (either Forms L2 or L3c) current and to file  
9 amended five (5) annual lobbyist employer reports (Form L3) which were due no  
10 later than the last day of February in the years 2011-2015 no later than 90 days from  
11 the date of the entry of the Judgment.

12 3. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 agrees to  
13 pay the State the unsuspended portion of the civil penalty (\$20,884.75) within 60 days of  
14 the date of entry of the Judgment.

15 4. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 agrees to  
16 pay, in a separate transmittal, the State the total amount of \$10,870.93 as attorney fees,  
17 court costs, and costs of investigation in this action, this amount to be paid within 60 days  
18 of the date of entry of the Judgment.

19  
20 **B. Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC**

21 5. Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC agrees to pay the State an assessed  
22 civil penalty in the amount of \$6,000 for its violations of RCW 42.17A by failing to  
23 properly report the value of in-kind services and administrative costs it received from  
24 Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925.

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


1 c. The suspension will be in effect for four years from the date of execution of the  
2 Judgment. During the period of suspension, Defendant SEIU LOCAL 925 PUBLIC  
3 SERVICE PAC agrees that it will not violate any provision of RCW 42.17A. In the  
4 event Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC is found to have  
5 committed any violation of RCW 42.17A during the suspension period, the  
6 suspended penalty of \$1,500 will immediately become due and payable without  
7 further intervention of the Court. If, after four years, Defendant SEIU LOCAL 925  
8 PUBLIC SERVICE PAC has no violations of RCW 42.17A, then the suspended  
9 portion of the penalty will be set aside.

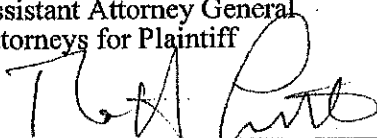
10 d. Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC agrees to work with the  
11 staff of the Public Disclosure Commission to bring its contribution reports current  
12 no later than 90 days from the date of the entry of the Judgment.

13 7. Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC agrees to pay the State the  
14 unsuspended portion of the civil penalty (\$4,500) within 60 days of the date of entry of the  
15 Judgment.

16 DATED this 29 day of January, 2016.

17 ROBERT W. FERGUSON  
18 Attorney General

19   
20 LINDA A. DALTON, WSBA No. 15467  
21 Senior Assistant Attorney General  
22 CHAD C. STANDIFER, WSBA No. 29724  
23 Assistant Attorney General  
24 Attorneys for Plaintiff

25   
26 ROBERT H. LAVITT, WSBA No. 27758  
Schwerin Campbell Barnard Iglitzin & Lavitt, LLP  
Attorney for Defendants

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**JUDGMENT**

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. The Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, and LINDA A. DALTON, Senior Assistant Attorney General, and CHAD C. STANDIFER, Assistant Attorney General and Defendants, SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 and SEIU LOCAL 925 PUBLIC SERVICE PAC, appearing through their attorney, ROBERT H. LAVITT, 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, now, therefore, it is hereby

ORDERED that Defendant, SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925, hereby is assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$27,793 payable to the State of Washington. It is further

ORDERED that the amount of \$6,948.25 of the assessed penalty is hereby suspended upon Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925's compliance with the following court-ordered conditions:

- a. The suspension shall be in effect for four years from the date of this judgment, during which time Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 shall not violate any provision of RCW 42.17A. In the event Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 is found to have committed any violation of RCW 42.17A during the suspended period, the suspended penalty of \$6,948.25 is immediately due and payable without any further intervention of the Court. If, after four years, Defendant SERVICE

1 EMPLOYEES INTERNATIONAL UNION LOCAL 925 has no violations of RCW  
2 42.17A, then the suspended portion of the penalty will be set aside.

- 3 b. Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925  
4 shall work with the staff of the Public Disclosure Commission to bring its lobbyist  
5 employer contribution reports (either Forms L2 or L3c) current and shall file  
6 amended five (5) annual lobbyist employer reports (Form L3) which were due no  
7 later than the last day of February in the years 2011-2015 no later than 90 days from  
8 the date of the entry of the Judgment.

9 It is further

10 ORDERED that Defendant SERVICE EMPLOYEES INTERNATIONAL UNION  
11 LOCAL 925 shall pay to the State of Washington the unsuspended portion of the assessed civil  
12 penalty (\$20,884.75) within 60 days of the entry of this Judgment. It is further

13 ORDERED that Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC hereby is  
14 assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$6,000  
15 payable to the State of Washington. It is further

16 ORDERED that the amount of \$1,500 of the Defendant SEIU LOCAL 925 PUBLIC  
17 SERVICE PAC's assessed penalty is hereby suspended upon Defendant SEIU LOCAL 925  
18 PUBLIC SERVICE PAC's compliance with the following court-ordered conditions:

- 19 a. The suspension shall be in effect for four years from the date of this judgment,  
20 during which time Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC shall not  
21 violate any provision of RCW 42.17A. In the event Defendant SEIU LOCAL 925  
22 PUBLIC SERVICE PAC is found to have committed any violation of RCW 42.17A  
23 during the suspended period, the suspended penalty of \$1,500 is immediately due  
24 and payable without any further intervention of the Court. If, after four years,  
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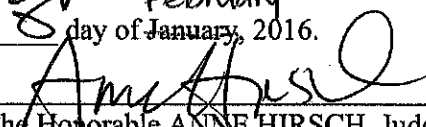
Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC has no violations of RCW 42.17A, then the suspended portion of the penalty will be set aside.

b. Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC shall work with the staff of the Public Disclosure Commission to bring its contribution reports current no later than 90 days from the date of the entry of the Judgment.

It is further

ORDERED that Defendant SEIU LOCAL 925 PUBLIC SERVICE PAC shall pay to the State of Washington the unsuspended portion of the assessed civil penalty (\$4,500) within 60 days of the entry of this Judgment. It is further

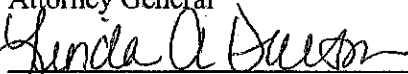
ORDERED that Defendant SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925 shall pay to the State of Washington by separate transmittal, the amount of \$7,240 as attorney fees and court costs and \$3,630.93 as costs of investigation as authorized under RCW 42.17A.765.

*ex parte*  
DONE ~~IN OPEN COURT~~ this 8 day of ~~January~~ <sup>February</sup>, 2016.  
  
The Honorable ANNE HIRSCH, Judge

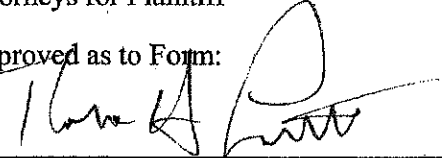
*AM*

Presented by:

ROBERT W. FERGUSON  
Attorney General

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

Approved as to Form:

  
ROBERT H. LAVITT, WSBA No. 27758  
Schwerin Campbell Barnard Iglitzin & Lavitt, LLP  
Attorney for Defendants