

**FILED**

SEP 22 2016

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

NO. 16-2-00484-34

Plaintiff,

STIPULATION AND AGREED  
JUDGMENT

v.

WASHINGTON STATE LABOR  
COUNCIL,

Defendant.

**EX PARTE**

**JUDGMENT SUMMARY (RCW 4.64.030)**

- A. JUDGMENT CREDITOR: STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: WASHINGTON STATE LABOR COUNCIL
- C. PRINCIPAL JUDGMENT: \$18,500 as a civil penalty under RCW 42.17A with \$9,250 suspended for a period of four (4) years contingent on no further violations of the law during the period of suspension payable to the State of Washington
- D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and owing shall not bear interest unless the principal judgment is not paid within thirty (30) days of the date of Judgment
- E. COSTS AND FEES: \$5,240 as attorney fees and court costs payable to the State of Washington Office of the Attorney General \$2,132 in investigation costs payable to the State of Washington Public Disclosure Commission

- 1 F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON  
Attorney General  
2 LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
3 CHAD C. STANDIFER, WSBA No. 29724  
Assistant Attorney General  
4  
5 G. ATTORNEY FOR JUDGMENT DEBTOR: DMITRI L. IGLITZIN, WSBA No. 17673  
Schwerin Campbell Barnard Iglitzin & Lavitt LLP

6 STIPULATION

7 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON, and the  
8 Defendant, WASHINGTON STATE LABOR COUNCIL, being desirous of resolving all  
9 claims arising out of the State's complaint, hereby enter into the following stipulation:

- 10 1. Defendant WASHINGTON STATE LABOR COUNCIL agrees to pay the STATE OF  
11 WASHINGTON an assessed civil penalty in the amount of \$18,500 for its violations of  
12 RCW 42.17A for failing to timely and properly lobbyist employer annual and contribution  
13 disclosure reports.  
14 2. The parties agree that \$9,250 of the assessed civil penalty will be suspended based on the  
15 following terms and conditions:  
16 a. The suspension will be in effect for four years from the date of execution of the  
17 Judgment. During the period of suspension, Defendant WASHINGTON STATE  
18 LABOR COUNCIL agrees that it will not violate any provision of RCW 42.17A. In  
19 the event Defendant WASHINGTON STATE LABOR COUNCIL is found to have  
20 committed any violation of RCW 42.17A during the suspension period, the  
21 suspended penalty of \$9,250 will immediately become due and payable without  
22 further intervention of the Court. If, after four years, Defendant WASHINGTON  
23 STATE LABOR COUNCIL has no violations of RCW 42.17A, then the suspended  
24 portion of the penalty will be set aside.  
25  
26

- 1 b. Defendant WASHINGTON STATE LABOR COUNCIL agrees to work with the  
2 staff of the Public Disclosure Commission to bring its lobbyist employer annual and  
3 contribution disclosure reports current no later than ninety (90) days from the date  
4 of the entry of the Judgment.
- 5 3. Defendant WASHINGTON STATE LABOR COUNCIL agrees to pay the State of  
6 Washington Office of the Attorney General \$5,240 as reasonable attorneys' fees and court  
7 costs pursuant to RCW 42.17A.765 (5).
- 8 4. Defendant WASHINGTON STATE LABOR COUNCIL agrees to pay the State of  
9 Washington Public Disclosure Commission \$2,132 as costs of investigation pursuant to  
10 RCW 42.17A.765 (5).
- 11 5. Defendant WASHINGTON STATE LABOR COUNCIL agrees to pay the State the  
12 unsuspended portion of the civil penalty as well as the costs and attorneys' fees (\$16,622)  
13 in six (6) equal monthly payments commencing on the first day of the month following the  
14 date of entry of the Judgment.

15 DATED this 23<sup>rd</sup> day of September, 2016.

16 ROBERT W. FERGUSON  
17 Attorney General

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

23   
24 DMITRI L. IGLITZIN, WSBA No. 17673  
25 Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
26 Attorney for Defendant

**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,

1 ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant  
2 Attorney General, and CHAD C. STANDIFER, Assistant Attorney General, and the  
3 Defendant, WASHINGTON STATE LABOR COUNCIL, appearing through its attorney,  
4 DMITRI L. IGLITZIN, apprised the Court of their agreement to the entry of this judgment for  
5 the purpose of settling and compromising this action brought under RCW 42.17A. The Court,  
6 having reviewed the records and files herein, and having found the settlement to be a just and  
7 proper resolution of this matter, and being otherwise fully advised in the premises, now,  
8 therefore, it is hereby

9 ORDERED that Defendant, WASHINGTON STATE LABOR COUNCIL, is assessed  
10 a civil penalty, under the provisions of RCW 42.17A, in the amount of \$18,500 payable to the  
11 State of Washington. It is further

12 ORDERED that the amount of \$9,250 of the assessed penalty is hereby suspended upon  
13 Defendant WASHINGTON STATE LABOR COUNCIL's compliance with the following  
14 court-ordered conditions:

- 15 a. The suspension shall be in effect for four (4) years from the date of the Judgment,  
16 during which time Defendant WASHINGTON STATE LABOR COUNCIL shall  
17 not violate any provision of RCW 42.17A. In the event Defendant WASHINGTON  
18 STATE LABOR COUNCIL is found to have committed any violation of RCW  
19 42.17A during the suspended period, the suspended penalty of \$9,250 is  
20 immediately due and payable without any further intervention of the Court. If, after  
21 four (4) years, Defendant WASHINGTON STATE LABOR COUNCIL has no  
22 violations of RCW 42.17A, then the suspended portion of the penalty will be set  
23 aside.
- 24 b. Defendant WASHINGTON STATE LABOR COUNCIL shall work with the staff  
25 of the Public Disclosure Commission to bring its lobbyist employer annual and  
26

1 contribution disclosure reports current no later than ninety (90) days from the date  
2 of the entry of the Judgment.

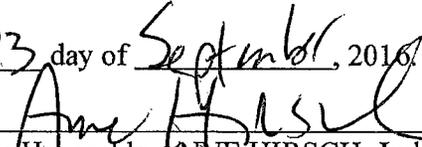
3 It is furthered

4 ORDERED that Defendant WASHINGTON STATE LABOR COUNCIL shall pay to  
5 the STATE OF WASHINGTON OFFICE OF THE ATTORNEY GENERAL the amount of  
6 \$5,240 as attorney fees and court costs as authorized under RCW 42.17A.765. It is further

7 ORDERED that Defendant WASHINGTON STATE LABOR COUNCIL shall pay to  
8 the STATE OF WASHINGTON PUBLIC DISCLOSURE COMMISSION the amount of  
9 \$2,132 as costs of investigation as authorized under RCW 42.17A.765. It is further

10 ORDERED that the unsuspended portion of the assessed penalty, the attorneys' fees  
11 and court costs, and the costs of investigation in the total amount of \$16,622 shall be paid in  
12 six (6) equal monthly payments commencing on the first day of the month following the date  
13 of entry of the Judgment.

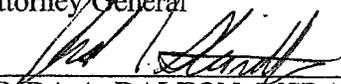
14 DONE IN OPEN COURT this 23 day of September, 2016

15   
16 The Honorable ANNE HIRSCH, Judge

16 Presented by:

17 ROBERT W. FERGUSON  
18 Attorney General

ANNE HIRSCH

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

22 Approved as to Form:

23   
24 DMITRI L. IGLITZIN, WSBA No. 17673  
25 Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
26 Attorney for Defendant