

EXPEDITE
 No hearing is set.
 Hearing is set:
 Date:
 Time:
 Judge/Calendar: _____

IN THE SUPERIOR COURT OF WASHINGTON
FOR THE COUNTY OF THURSTON

THE STATE OF WASHINGTON ex rel.
GLEN MORGAN,

No. 17-2-02568-34

Plaintiff

STIPULATION AND AGREED
JUDGMENT

v.

PEOPLE FOR THURSTON COUNTY –
THURSTON-LEWIS-MASON LABOR
COUNCIL SPONSOR (a political committee),
and JAY MANNING (Chair).

EX PARTE

Defendant

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, The State of Washington
- B. JUDGMENT DEBTOR: JAY MANNING, and PEOPLE FOR THURSTON COUNTY – THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR, a political committee.
- C. PRINCIPAL JUDGMENT: \$5000, with \$4000 suspended for a period of four years contingent on findings of violations of the law committed during the period of suspension.

1 D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and
2 owing shall not bear interest unless the principal judgment is unpaid by the due date
3 specified herein.

4 E. COSTS AND FEES: \$7000 as attorney fees, \$240 as court costs, \$2400 as investigation
5 costs.

6 F. ATTORNEY FOR JUDGMENT CREDITOR: JUSTIN KOVER, WSBA #51117
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8 G. ATTORNEY FOR JUDGMENT DEBTOR: LAURA EWAN, WSBA #45201; DMITRI
9 IGLITZIN, WSBA #17673

10 STIPULATION

11 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON ex rel. GLEN
12 MORGAN, and the Defendants, JAY MANNING, and PEOPLE FOR THURSTON COUNTY –
13 THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR, a political committee, being
14 desirous of resolving all claims arising out of the Plaintiff's complaint, hereby enter into the
15 following stipulation:

- 16 1. Defendants agree to pay to the State of Washington an assessed civil penalty in the
17 amount of \$5000 for their violations of RCW 42.17A as described in the complaint.
- 18 2. The parties agree that \$4000 of the assessed civil penalty will be suspended based on the
19 following terms and conditions:
 - 20 a. The suspension will be in effect for four years from the date of execution of the
21 Judgment. During the suspension, Defendants agree that they will not violate any
22 provision of RCW 42.17A.
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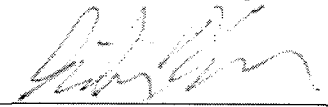
1 b. In the event one or both of the Defendants are found by the Public Disclosure
2 Commission or a court to have committed a violation of RCW 42.17A during the
3 suspension period, the suspended penalty of \$4000 will immediately become payable
4 within 30 days of such finding without further intervention of the Court.


5 c. If Defendants are not found to have committed violations of RCW 42.17 by the
6 Public Disclosure Commission or a court for conduct during the suspension period,
7 then the suspended portion of the penalty shall be set aside.

8
9 3. Defendants agree to pay the State the unsuspended portion of the civil penalty (\$1000)
10 within 30 days of the date of entry of the Judgment.

11 4. Defendants agree to pay, in a separate transmittal, the total amount of \$9640 as attorney
12 fees, court costs, and costs of investigation to Kover Law, PLLC on behalf of the
13 Plaintiff, this amount to be paid within 30 days of the date of entry of the Judgment.

14 DATED this 17th day of August, 2017

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17 _____
JUSTIN KOVER, WSBA #51117
Attorney for Plaintiff

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LAURA EWAN, WSBA #45201
Attorney for Defendants

21 **JUDGMENT**

22 THIS MATTER came on regularly before the undersigned judge of the above-
23 entitled Court. The Plaintiff, STATE OF WASHINGTON ex rel. GLEN MORGAN,
24 appearing through its attorney of record, JUSTIN KOVER, and Defendants, JAY

1 MANNING and PEOPLE FOR THURSTON COUNTY – THURSTON-LEWIS-
2 MASON LABOR COUNCIL SPONSOR, appearing through their attorneys, LAURA
3 EWAN and DMITRI IGLITZIN, apprised the Court of their agreement to the entry of
4 this judgment for the purpose of settling and compromising this action brought under
5 RCW 42.17A. The Court, having reviewed the records and files herein, and having
6 found the settlement to be a just and proper resolution of this matter, and being otherwise
7 fully advised in the premises, now, therefore, hereby

8 ORDERS that Defendants, JAY MANNING and PEOPLE FOR THURSTON
9 COUNTY – THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR, are hereby
10 assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$5000
11 payable to the State of Washington. The Court further

12 ORDERS that the amount of \$4000 of the assessed penalty is hereby suspended
13 upon Defendants JAY MANNING and PEOPLE FOR THURSTON COUNTY –
14 THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR’s compliance with the
15 following court-ordered conditions:

- 16 a. The suspension will be in effect for four years from the date of execution of the
17 Judgment. During the suspension, Defendants agree that they will not violate any
18 provision of RCW 42.17A.
- 19 b. In the event one or both of the Defendants are found by the Public Disclosure
20 Commission or a court to have committed a violation of RCW 42.17A during the
21 suspension period, the suspended penalty of \$4000 will immediately become
22 payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendants are not found to have committed violations of RCW 42.17 by the
2 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 It is further

5 ORDERED that Defendants JAY MANNING and PEOPLE FOR THURSTON
6 COUNTY – THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR shall pay to the
7 State of Washington the unsuspended portion of the assessed civil penalty (\$1000) within 30
8 days of the entry of this Judgment. It is further

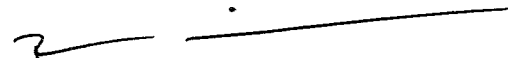
9 ORDERED that Defendants JAY MANNING and PEOPLE FOR THURSTON
10 COUNTY – THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR shall pay, in a
11 separate transmittal, the total amount of \$9640 as attorney fees, court costs, and costs of
12 investigation to Kover Law, PLLC on behalf of the Plaintiff, this amount to be paid within 30
13 days of the date of entry of the Judgment.

14 DONE IN OPEN COURT this 24th day of August, 2017.

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17 Presented by:

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20 JUSTIN KOVER, WSBA #51117

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23 The Honorable Judge JOHN SKINDER, Presiding
24 COURT COMMISSIONER
Approved as to form: REBEKAH ZINN
COURT COMMISSIONER

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26 
27 LAURA EWAN, WSBA #45201