

FILED

JAN 31 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
(if filing within 5 court days of hearing)
☒ No Hearing is set:
Date: _____
Time: _____
Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

STATE OF WASHINGTON *ex rel.*
GLEN MORGAN,

Plaintiff,

vs.

MONICA STONIER (a candidate), and
VOTE MONICA STONIER (a candidate
authorized committee),

Defendants.

No. 17-2-06579-34

STIPULATION AND JUDGMENT
[Proposed] FOR CIVIL PENALTIES,
ATTORNEYS' FEES AND COSTS

Ex Parte

COPY

JUDGMENT SUMMARY

Judgment Creditor:	State of Washington
Attorneys for Judgment Creditor:	Angus Lee, Angus Lee Law Firm PLLC
Judgment Debtors:	Monica Stonier and Vote Monica Stonier
Attorneys for Judgment Debtor:	Walter Smith, Smith & Dietrich Law Offices PLLC
Amount of Civil Penalties:	\$2,900, with \$1,450 suspended for a period of 2 years contingent on no findings of violations of RCW 42.17A committed during the period of suspension
Amount of Attorneys' Fees:	\$3,000
Amount of Costs:	\$315
Total Principal Judgment Amount:	\$4,765.00

No interest shall accrue on the amounts awarded in this Judgment provided the Defendants comply with their duties to pay the amounts and by the deadlines stated in the Court's Judgment, below.

STIPULATION AND JUDGMENT [Proposed] - 1

Smith & Dietrich Law Offices PLLC
400 Union Ave SE, Suite 200
Olympia WA 98501

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STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (State), acting through the Relator, GLEN MORGAN, and Defendants MONICA STONIER and VOTE MONICA STONIER, desiring to resolve any and all claims arising out of the Plaintiff's Complaint, hereby enter into the following stipulation:

1. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay an assessed civil penalty in the amount of \$2,900.00 for failing to timely and properly report contributions received and expenditures made as required by Chapter 42.17A RCW.

2. The Parties agree that one half of the assessed civil penalty (\$1,450) will be suspended based on the following terms and conditions:

a. The suspension will be effective for two years from the date of entry of this Judgment. During the period of suspension, Defendants MONICA STONIER and VOTE MONICA STONIER agree that they will not violate any provision of Chapter 42.17A RCW.

b. In the event Defendants MONICA STONIER or VOTE MONICA STONIER are found by the Public Disclosure Commission or a court to have committed one or more substantial violations of Chapter 42.17A RCW, as defined in this paragraph, during the suspension period, the suspended penalty of \$1,450 will immediately become due and payable within 30 days of such finding without further intervention of the Court. For purposes of this stipulation and judgment, the term "substantial violations" includes any of the following: a) six (6) or more distinct instances of failing to file required campaign finance disclosure reports by 14 days after their respective due dates; b) engaging in any concealment of reportable activity as defined in RCW 42.17A.435; or c) engaging in any intentional violation of the campaign finance disclosure laws.

1 c. If Defendants are not found to have committed one or more substantial violations,
2 as defined in paragraph 2(b), above, of Chapter 42.17A RCW by the Public Disclosure
3 Commission or a court for conduct during the suspension period, then the suspended portion of
4 the penalty will be set aside.

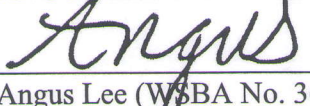
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6 3. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
7 to counsel for the Plaintiff the total amount of \$3,315.00 in full satisfaction of the State and the
8 Relator's attorneys' fees and costs in this action. Payment for Plaintiff's attorney fees and costs
9 will be delivered by check made out to the Angus Lee Law Firm PLLC, and delivered to the firm
10 at 9105A NE Highway 99, Suite 200, Vancouver 98665.

11
12 4. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
13 the State the unsuspended portion of the civil penalty (\$1,450.00) by check made out to the State
14 of Washington, and delivered to Campaign Finance Unit at the Washington Attorney General's
15 Office, 1125 Washington Street Southeast, in the city of Olympia.

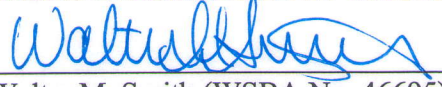
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17 5. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
18 the State the unsuspended portion of the civil penalty (\$1,450) and pay to Relator attorney fees
19 and costs (\$3,315), with the payment to Relator's counsel due within thirty days of the date this
20 Judgment is entered, and the payments to the State due by December 31, 2019.

21 Dated this 30th day of January, 2018.

22
23 ANGUS LEE LAW FIRM, PLLC

24 
25 Angus Lee (WSBA No. 36473)
26 angus@angusleelaw.com
27 9105A NE Highway 99, Suite 200
28 Vancouver, WA 98665
Phone: (360) 635-6464
Counsel for Plaintiff

SMITH & DIETRICH LAW OFFICES PLLC


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Counsel for Defendants

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JUDGMENT

This matter came before the Court regularly for a hearing on the parties' Stipulation and Proposed Judgment. Plaintiff, STATE OF WASHINGTON, acting through GLEN MORGAN, Relator, and appearing through counsel of record, ANGUS LEE, of the Angus Lee Law Firm, PLLC, and Defendants MONICA STONIER and VOTE MONICA STONIER, appearing through counsel of record, WALTER SMITH of Smith & Dietrich Law Offices, PLLC, apprised the Court of their agreement to entry of judgment for the purpose of settling and compromising this action brought under Chapter 42.17A RCW. The Court, having reviewed the record before it, and having found the settlement of the Parties to be a just and proper resolution of this matter, hereby ORDERS as follows:

1. Defendants MONICA STONIER and VOTE MONICA STONIER are hereby assessed a civil penalty in the amount of \$2,900.00 for failing to timely and properly report contributions received and expenditures made as required under Chapter 42.17A RCW.

2. The amount of \$1,450.00 of the assessed civil penalty is hereby suspended based on Defendants MONICA STONIER and VOTE MONICA STONIER's compliance with the following Court-ordered terms and conditions:

a. The suspension will be effective for two years from the date of entry of this Judgment. During the period of suspension, Defendants MONICA STONIER and VOTE MONICA STONIER will not commit any substantial violation of Chapter 42.17A RCW as defined in this Judgment.

b. In the event Defendants MONICA STONIER or VOTE MONICA STONIER are found by the Public Disclosure Commission or a court to have committed one or more substantial violations of Chapter 42.17A RCW during the suspension period, the suspended penalty of

1 \$1,450 will immediately become due and payable within 30 days of such finding without further
2 intervention of the Court. For purposes of this Judgment, the term "substantial violations"
3 includes any of the following: a) six (6) or more distinct instances of failing to file required
4 campaign finance disclosure reports by 14 days after their respective due dates; b) engaging in
5 any concealment of reportable activity as defined in RCW 42.17A.435; or c) engaging in any
6 intentional violation of the campaign finance disclosure laws.
7

8 c. If Defendants MONICA STONIER and VOTE MONICA STONIER are not
9 found to have committed one or more substantial violations, as defined in paragraph 2(b), above,
10 of Chapter 42.17A RCW by the Public Disclosure Commission or a court for conduct during the
11 suspension period, then the suspended portion of the penalty will be set aside.
12

13 3. Defendants MONICA STONIER and VOTE MONICA STONIER are ordered to
14 pay to counsel for the Plaintiff, the Angus Lee Law Firm, PLLC, the total amount of \$3,315.00
15 in full satisfaction of the Plaintiff's attorneys' fees and costs in this action, with such amount to
16 be paid by check delivered to Relator's counsel within thirty days of the date this Judgment is
17 entered. Payment for Plaintiff's attorney fees and costs will be delivered by check made out to
18 the Angus Lee Law Firm, PLLC, and delivered to the firm at 9105A NE Highway 99, Suite 200,
19 Vancouver, WA 98665.
20

21 4. Defendants MONICA STONIER and VOTE MONICA STONIER are ordered to
22 pay the State the unsuspended portion of the civil penalty (\$1,450.00) by no later than December
23 31, 2019. Payment will be made by check made out to the State of Washington, and delivered to
24 the Campaign Finance Unit at the Washington Attorney General's Office, 1125 Washington
25 Street Southeast, in the city of Olympia.
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