

☐ EXPEDITE
☒ No hearing set
☐ Hearing is set

Date: _____

Time: _____

Judge/Calendar: Hon.

THURSTON COUNTY SUPERIOR COURT
IN AND FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON ex rel. GLEN
MORGAN,

PLAINTIFF,

vs.

KATHERINE STOLZ (a political
candidate),

DEFENDANT.

No. 17-2-05915-34

**STIPULATION AND AGREED
JUDGMENT**

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: KATHERINE STOLZ, a Washington registered political candidate
- C. PRINCIPAL JUDGMENT: \$10,000 with \$9,000 suspended for a period of four (4) 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: \$3,500 in attorney fees, \$240 in court costs
- F. ATTORNEYS FOR JUDGMENT CREDITOR: Office of the Attorney General

1 G. ATTORNEY FOR JUDGMENT DANIELLE FRANCO-MALONE
2 DEBTOR

3 **STIPULATION**

4 The parties to this stipulation, Plaintiff STATE OF WASHINGTON ex rel. GLEN
5 MORGAN (STATE), and Defendant, KATHERINE STOLZ, a Washington registered political
6 candidate, desiring to resolve all claims arising out of the State's complaint, hereby enter the
7 following stipulation:
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9 1. Defendant KATHERINE STOLZ, agrees to file all outstanding C3s and C4s with the
10 Public Disclosure Commission (PDC) within 90 days of the date of entry of this stipulation and
11 agreed judgement.

12 2. Defendant KATHERINE STOLZ, agrees to watch completely the video "PDC |
13 Campaign finance rules for candidates and political committees" (available at
14 <https://www.youtube.com/watch?v=WfI6NZ76vdY>), and "PDC | How to use ORCA for
15 campaign finance reporting" (available at <https://www.youtube.com/watch?v=nLsOIMT9CDc>),
16 within 90 days of the date of entry of this stipulation and judgement, and also to provide
17 plaintiff with a signed certification attesting to the fact that she has watched both videos
18 completely. Said certification must be provided within 90 days of the date of entry of this
19 stipulation and judgement.

20 3. Defendant KATHERINE STOLZ, agrees to pay an assessed civil penalty to the State in
21 the amount of \$10,000 for violations of RCW 42.17A during calendar year 2016.

22 4. The parties agree the \$9,000 of the assessed civil penalty (90%) will be suspended based
23 on the following terms and conditions:

24 a. The suspension will be in effect for four years from the date of execution of the
25 Judgment. During the period of suspension, Defendant KATHERINE STOLZ, agrees that it
26 will not violate any provision of RCW 42.17A.

27 b. In the event Defendant KATHERINE STOLZ, is found by the Public Disclosure
28 Commission or a court to have committed more than a de minimis violation of RCW 42.17A
29 during the suspension period, the suspended penalty of \$9,000 will immediately become due
30 and payable within 30 days of such finding without further intervention of the Court.

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

4 d. In the event Defendant KATHERINE STOLZ, fails to pay any portion of the
5 unsuspended civil penalty, fees, or costs, the suspended penalty of \$9,000 will immediately
6 become due and payable within 30 days of such finding without further intervention of the
7 Court.

8 e. In the event Defendant KATHERINE STOLZ, fails to comply with her
9 obligations under section one (1) and two (2) above, the suspended penalty of \$9,000 will
10 immediately become due and payable within 30 days of such finding without further
11 intervention of the Court.


12 5. Defendant KATHERINE STOLZ, agrees to pay the State the unsuspended portion of the
13 civil penalty (\$1,000) within 60 days from the date of entry of the Judgment.

14 6. Defendant KATHERINE STOLZ agrees to pay by separate transmittal \$3,500 in
15 attorney fees and \$240 in court costs for a total amount of fees and costs of \$3,740 in this action
16 to Plaintiff's counsel, the ANGUS LEE LAW FIRM, within 60 days of the date of entry of this
17 judgment.

18 DATED this _____ day of December, 2017.

19 ANGUS LEE LAW FIRM, PLLC

Schwerin Campbell Barnard Iglitzin & Lavitt
20 LLP

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22 _____
23 D. ANGUS LEE
24 WSBA No. 36473
25 Attorney for Plaintiff

26 _____
27 DANIELLE FRANCO-MALONE
28 WSBA No. 40979
29 Attorneys for Defendant Katherine Stolz
30

JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON EX REL. GLEN MORGAN (STATE), appearing through its attorney of record, D. ANGUS LEE, and Defendant KATHERINE STOLZ, a political committee, appearing through its attorney DANIELLE FRANCO-MALONE, apprised the Court of their agreement to the entry 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 KATHERINE STOLZ, is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$10,000 payable to the State of Washington for violations of RCW 42.17A for failing to timely disclose contributions received and expenditures made during calendar year 2016.

2. The amount of \$9,000 of the assessed penalty is hereby suspended upon Defendant KATHERINE STOLZ'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 KATHERINE STOLZ, agrees that it will not violate any provision of RCW 42.17A.

b. In the event Defendant KATHERINE STOLZ, is found by the Public Disclosure Commission or a court to have committed a more than a de minimis violation of RCW 42.17A during the suspension period, the suspended penalty of \$9,000 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

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

d. If Defendant KATHERINE STOLZ, fails to pay any portion of the unsuspended civil penalty, fees, or costs, the suspended penalty of \$9,000 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

e. If Defendant KATHERINE STOLZ, fails to comply with her obligations under section one (1) and two (2) of the above stipulation, the suspended penalty of \$9,000 will

1 immediately become due and payable within 30 days of such finding without further
2 intervention of the Court.

3 3. Defendant KATHERINE STOLZ, shall pay the State the unsuspended portion of the
4 civil penalty (\$1,000) within 60 days from the date of entry of the Judgment.

5 4. Defendant KATHERINE STOLZ, shall pay Plaintiff's counsel, the ANGUS LEE LAW
6 FIRM, \$3,500 in attorney fees and \$240 in court costs for a total amount of fees and costs of
7 \$3,750 within 60 days from the date of entry of the Judgment.

8 DONE IN OPEN COURT this _____ day of _____, 20____.

9
10 _____
The Honorable Judge


11 Presented by:

12 Approved as to form, notice of presentation
waived:

13 Schwerin Campbell Barnard Iglitzin &
14 Lavitt LLP

ANGUS LEE LAW FIRM, PLLC

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17 DANIELLE FRANCO-MALONE
WSBA No. 40979

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20 D. ANGUS LEE, WSBA No. 36473
21 Attorney for Plaintiff
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