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

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IN THE SUPERIOR COURT OF WASHINGTON
FOR THE COUNTY OF THURSTON

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EX PARTE

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THE STATE OF WASHINGTON ex rel.
GLEN MORGAN,

No. 17-2-06761-34

11

Plaintiff

STIPULATION AND AGREED
JUDGMENT

v.

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KAREN FRASER (a candidate), KAREN
FRASER FOR LT. GOVERNOR (a political
committee).

PC leak's Action

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Defendant

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JUDGMENT SUMMARY (RCW 4.64.030)

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- A. JUDGMENT CREDITOR: Plaintiff, The State of Washington
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- B. JUDGMENT DEBTOR: KAREN FRASER, and KAREN FRASER FOR LT.
GOVERNOR, a political committee.

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C. PRINCIPAL JUDGMENT: \$6000.00, with \$5000.00 suspended for a period of two
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.
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5 E. COSTS AND FEES: \$3375 as attorney fees, \$325 as court costs, \$1500 as investigation
6 costs.

7 F. ATTORNEY FOR JUDGMENT CREDITOR: JUSTIN KOVER, WSBA #51117

8 G. ATTORNEY FOR JUDGMENT DEBTOR: EDWARD E. YOUNGLOVE, WSBA
9 #5873

10 **STIPULATION**


11 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON ex rel. GLEN
12 MORGAN, and the Defendants, KAREN FRASER, and KAREN FRASER FOR LT.
13 GOVERNOR, a political committee, being desirous of resolving all claims arising out of the
14 Plaintiff's complaint, hereby enter into the following stipulation:


- 15 1. Defendants agree to pay to the State of Washington an assessed civil penalty in the
16 amount of \$6000.00 for their violations of RCW 42.17A as described in the complaint.
- 17 2. Defendants admit to all allegations alleged in the complaint in this case as unintentional
18 violations of RCW 42.17A.
- 19 3. The parties agree that \$5000.00 of the assessed civil penalty will be suspended based on
20 the following terms and conditions:
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- 1 a. The suspension will be in effect for two years from the date of execution of the
2 Judgment. During the suspension, Defendants agree that they will not violate any
3 provision of RCW 42.17A.
- 4 b. In the event one or both of the Defendants are found by the Public Disclosure
5 Commission or a court to have committed one or more substantial violations, as
6 described in this paragraph, of RCW 42.17A during the suspension period, the
7 suspended penalty of \$5000.00 will immediately become payable within 30 days of
8 such finding without further intervention of the Court. For the purposes of this
9 stipulation and judgment, the term “substantial violations” means, 1) six (6) or more
10 distinct instances of failing to report required campaign finance disclosure reports
11 within 14 days, or 2) engaging in any concealment of reportable activity as defined in
12 RCW 42.17A.435, or 3) engaging in any intentional violations of RCW 42.17A or
13 any other campaign finance law.
- 14 c. If Defendants are not found to have committed violations of RCW 42.17 by the
15 Public Disclosure Commission or a court for conduct during the suspension period,
16 then the suspended portion of the penalty shall be set aside.
- 17 4. Defendants agree to pay the State the unsuspended portion of the civil penalty (\$1000.00)
18 within 30 days of the date of entry of the Judgment.
- 19 5. Defendants agree to pay, in a separate transmittal, the total amount of \$5200.00 as
20 attorney fees, court costs, and costs of investigation to Kover Law, PLLC on behalf of the
21 Plaintiff, this amount to be paid within 30 days of the date of entry of the Judgment.
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1 6. Defendant FRASER agrees to return \$16,272.23 to the political committee KAREN
2 FRASER FOR LT. GOVERNOR, or to the Washington State Democratic Party Central
3 Committee, or to a political committee in such manner which shall comply with RCW
4 42.17A.

5 DATED this 27 day of February, 2018

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7 JUSTIN KOVER, WSBA #51117
8 Attorney for Plaintiff

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10 EDWARD E. YOUNGLOVE, WSBA #5873
11 Attorney for Defendants

12 **JUDGMENT**

13 THIS MATTER came on regularly before the undersigned judge of the above-
14 entitled Court. The Plaintiff, STATE OF WASHINGTON ex rel. GLEN MORGAN,
15 appearing through its attorney of record, JUSTIN KOVER, and Defendants, KAREN
16 FRASER and KAREN FRASER FOR LT. GOVERNOR, appearing through their
17 attorney, EDWARD E. YOUNGLOVE, apprised the Court of their agreement to the
18 entry of this judgment for the purpose of settling and compromising this action brought
19 under RCW 42.17A. The Court, having reviewed the records and files herein, and having
20 found the settlement to be a just and proper resolution of this matter, and being otherwise
21 fully advised in the premises, now, therefore, hereby

22 ORDERS that Defendants, KAREN FRASER and KAREN FRASER FOR LT.
23 GOVERNOR, are hereby assessed a civil penalty, under the provisions of RCW 42.17A,
24 in the amount of \$6000 payable to the State of Washington. The Court further

1 ORDERS that Defendant KAREN FRASER shall return \$16,272.23 to the
2 political committee KAREN FRASER FOR LT. GOVERNOR, or to the Washington
3 State Democratic Party Central Committee, or to a political committee in such manner
4 which shall comply with RCW 42.17A. The Court further

5 ORDERS that the amount of \$5000.00 of the assessed penalty is hereby
6 suspended upon Defendants KAREN FRASER and KAREN FRASER FOR LT.

7 GOVERNOR's compliance with the following court-ordered conditions:

- 8 a. The suspension will be in effect for two years from the date of execution of the
9 Judgment. During the suspension, Defendants agree that they will not commit
10 any substantial violations of any provision of RCW 42.17A.
- 11 b. In the event one or both of the Defendants are found by the Public Disclosure
12 Commission or a court to have committed one or more substantial violations, as
13 described in this paragraph, of RCW 42.17A during the suspension period, the
14 suspended penalty of \$5000.00 will immediately become payable within 30 days
15 of such finding without further intervention of the Court. For the purposes of this
16 stipulation and judgment, the term "substantial violations" means, 1) six (6) or
17 more distinct instances of failing to report required campaign finance disclosure
18 reports within 14 days, or 2) engaging in any concealment of reportable activity as
19 defined in RCW 42.17A.435, or 3) engaging in any intentional violations of RCW
20 42.17A or any other campaign finance law.
- 21 c. If Defendants are not found to have committed substantial violations of RCW
22 42.17 by the Public Disclosure Commission or a court for conduct during the
23 suspension period, then the suspended portion of the penalty shall be set aside.

1 It is further

2 ORDERED that Defendants KAREN FRASER and KAREN FRASER FOR LT.

3 GOVERNOR shall pay to the State of Washington the unsuspended portion of the assessed civil
4 penalty (\$1000.00) within 30 days of the entry of this Judgment. It is further

5 ORDERED that Defendants KAREN FRASER and KAREN FRASER FOR LT.

6 GOVERNOR shall pay, in a separate transmittal, the total amount of \$5200.00 as attorney fees,
7 court costs, and costs of investigation to Justin Kover on behalf of the Plaintiff, this amount to be
8 paid within 30 days of the date of entry of the Judgment. *case and strike all hearings* **(RZ)**

9 DONE IN OPEN COURT this 28th day of Feb., 2018.

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~~The Honorable Judge CHRIS LANESE, Presiding~~
REBEKAH ZINN

Approved as to form: COURT COMMISSIONER

13 Presented by:

14 
15 JUSTIN KOVER, WSBA #51117



EDWARD E. YOUNGLOVE, WSBA #5873

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