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FILED  
SUPERIOR COURT  
THURSTON COUNTY, WASH.

18 APR 20 AM 10:44

Linda Myhre Enlow  
Thurston County Clerk

1 ☐ EXPEDITE  
2 ☒ No Hearing Set  
3 ☒ Trial is Set  
4 Date: April 22, 2019  
5 Time: 8:30 a.m.  
6 The Honorable John C. Skinder

7 STATE OF WASHINGTON  
8 THURSTON COUNTY SUPERIOR COURT

9 STATE OF WASHINGTON,

NO. 17-2-03876-34

10 Plaintiff,

STIPULATION AND AGREED  
JUDGMENT

11 v.

EX PARTE

12 SAN JUAN COUNTY DEMOCRATS,  
13 a Washington registered political  
committee,

14 Defendant.

15 JUDGMENT SUMMARY (RCW 4.64.030)

- 16 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON  
17 B. JUDGMENT DEBTOR: SAN JUAN COUNTY DEMOCRATS, a Washington  
registered political committee  
18 C. PRINCIPAL JUDGMENT: \$8,220 with \$4,110 suspended for a period of 4 years  
19 contingent on no findings of violations of the law  
committed during the period of suspension  
20 D. INTEREST: No prejudgment interest is owed. Principal judgment  
21 amount(s) due and owing shall not bear interest unless  
the principal judgment is unpaid by the due date specified  
22 herein  
23 E. COSTS AND FEES: \$4,000 as reasonable attorney fees, \$645 in investigation  
costs, and \$240 in court costs  
24 F. ATTORNEYS FOR  
25 JUDGMENT CREDITOR: Office of the Attorney General, State of Washington  
LINDA A. DALTON, WSBA No. 15467  
26 Senior Assistant Attorney General  
KELLY R. HARMON, WSBA No. 22498  
Assistant Attorney General

STIPULATION AND  
AGREED JUDGMENT

1 G. ATTORNEY FOR LAURA EWAN, WSBA No. 45201  
2 JUDGMENT DEBTOR: Schwerin Campbell Barnard Iglitzin & Lavitt LLP

3 **STIPULATION**

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the  
5 Defendant, SAN JUAN COUNTY DEMOCRATS, a Washington registered political committee,  
6 desiring to resolve all claims arising out of the State's complaint, hereby enter into the following  
7 stipulation:

- 8 1. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State an assessed civil  
9 penalty in the amount of \$8,220 for its violations of RCW 42.17A for failing to report  
10 contributions received, expenditures made and debts and obligations incurred in 2016.  
11 2. The parties agree that \$4,110 of the assessed civil penalty will be suspended based on the  
12 following terms and conditions:


- 13 a. The suspension will be in effect for four years from the date of execution of the  
14 Judgment. During the period of suspension, Defendant, SAN JUAN COUNTY  
15 DEMOCRATS agrees that it will not violate any provision of RCW 42.17A.  
16 b. In the event Defendant SAN JUAN COUNTY DEMOCRATS is found by the Public  
17 Disclosure Commission or a court to have committed a violation of RCW 42.17A  
18 during the suspension period, the suspended penalty of \$4,110 will immediately  
19 become due and payable within 30 days of such finding without further intervention  
20 of the Court.  
21 c. If Defendant SAN JUAN COUNTY DEMOCRATS is not found to have committed  
22 violations of RCW 42.17A by the Public Disclosure Commission or a court for  
23 conduct occurring during the suspension period, then the suspended portion of the  
24 penalty will be set aside.

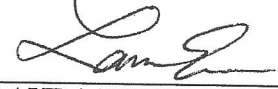
1 3. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State the total amount  
2 of \$4,885 as reasonable attorney fees (\$4,000), court costs (\$240), and costs of investigation  
3 (\$645) in this action.

4 4. Defendant SAN JUAN COUNTY DEMOCRATS agrees to pay the State the unsuspended  
5 portion of the civil penalty (\$4,110) and fees and costs (\$4,885) within 30 days from the date  
6 of the entry of the Judgment.

7 DATED this 19 day of April, 2018.

8 OFFICE OF THE ATTORNEY GENERAL  
9 STATE OF WASHINGTON

10   
11 LINDA A. DALTON, WSBA No. 15467  
12 Senior Assistant Attorney General  
13 KELLY R. HARMON, WSBA No. 22498  
14 Assistant Attorney General  
15 Attorneys for State of Washington

16   
17 LAURA EWAN, WSBA No. 45201  
18 Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
19 Attorney for Defendant  
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**JUDGMENT**

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of record, LINDA A. DALTON, Senior Assistant Attorney General, and KELLY R. HARMON, Assistant Attorney General, and Defendant, SAN JUAN COUNTY DEMOCRATS, a Washington registered political committee, appearing through its attorney, LAURA EWAN, apprised the Court of their agreement to the entry of this 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, it is hereby ORDERED as follows:

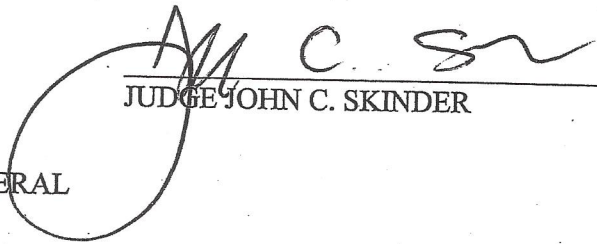
1. Defendant SAN JUAN COUNTY DEMOCRATS is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$8,220 payable to the State of Washington.
2. The amount of \$4,110 of the assessed penalty is hereby suspended upon Defendant SAN JUAN COUNTY DEMOCRATS' compliance with the following court-ordered conditions:
  - a. The suspension shall be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendant SAN JUAN COUNTY DEMOCRATS agrees that it will not violate any provision of RCW 42.17A.
  - b. In the event Defendant SAN JUAN COUNTY DEMOCRATS is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$4,110 shall be immediately due and payable within 30 days of such finding without further intervention of the Court.
  - c. If Defendant SAN JUAN COUNTY DEMOCRATS is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct

1 occurring during the suspension period, then the suspended portion of the penalty shall  
2 be set aside.


3 3. Defendant SAN JUAN COUNTY DEMOCRATS shall pay the State the total amount of  
4 \$4,885 as reasonable attorney fees (\$4,000), court costs (\$240), and costs of investigation  
5 (\$645) in this action.


6 4. Defendant SAN JUAN COUNTY DEMOCRATS shall pay the State the unsuspended  
7 portion of the civil penalty (\$4,110) and fees and costs (\$4,885) within 30 days from the  
8 date of the entry of the Judgment.

9 DONE IN OPEN COURT this 20<sup>th</sup> day of April, 2018.

10  
11   
12 JUDGE JOHN C. SKINDER

13 PRESENTED BY:  
14 OFFICE OF THE ATTORNEY GENERAL  
15 STATE OF WASHINGTON

16   
17 LINDA A. DALTON, WSBA No. 15467  
18 Senior Assistant Attorney General  
19 KELLY R. HARMON, WSBA No. 22498  
20 Assistant Attorney General  
21 Attorneys for State of Washington

22   
23 LAURA EWAN, WSBA No. 45201  
24 Schwerin Campbell Barnard Iglitzin & Lavitt LLP  
25 Attorney for Defendant  
26