

FILED

Jan 27 2019

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

1  EXPEDITE  
2  No Hearing Set  
3  Trial is Set  
4 Date: Monday January 14, 2019  
5 Time: 8:30 a.m.  
6 Judge James J. Dixon

7 STATE OF WASHINGTON  
8 THURSTON COUNTY SUPERIOR COURT

9 STATE OF WASHINGTON,  
10 Plaintiff,  
11 v.  
12 JARED KARSTETTER,  
13 Defendant.

NO. 17-2-04616-34

STIPULATION AND AGREED  
JUDGMENT

EX PARTE

14 JUDGMENT SUMMARY (RCW 4.64.030)

- 15 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 16 B. JUDGMENT DEBTOR: JARED C. KARSTETTER, JR.
- 17 C. PRINCIPAL JUDGMENT: \$16,165 with \$9,700 suspended for a period of 4 years  
18 contingent on no findings of violations of RCW 42.17A  
committed during the period of suspension
- 19 D. INTEREST: No prejudgment interest is owed. Principal judgment  
20 amount(s) due and owing shall not bear interest unless  
21 the principal judgment is unpaid by the due date specified  
22 herein
- 23 E. COSTS AND FEES: \$15,000 in reasonable attorney fees, costs of investigation  
24 and court costs
- 25 F. ATTORNEYS FOR OFFICE OF THE ATTORNEY GENERAL, STATE OF WASHINGTON  
26 JUDGMENT CREDITOR: LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General
- G. ATTORNEY FOR JEFFREY P. DOWNER, WSBA No. 12625  
JUDGMENT DEBTOR: LEE SMART, P.S., Inc.

STIPULATION AND AGREED  
JUDGMENT

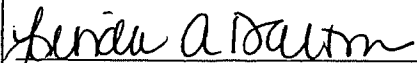
ATTORNEY GENERAL OF WASHINGTON  
Campaign Finance Unit  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200



- 1 4. Defendant JARED C. KARSTETTER, JR. agrees to cooperate with any investigation  
2 conducted under RCW 42.17A, including any involving the King County Corrections  
3 Guild, to the extent such cooperation is consistent with his obligations under the  
4 Washington Rules of Professional Conduct or any other applicable authority.
- 5 5. Defendant JARED C. KARSTETTER, JR. agrees to pay the State the total amount of  
6 \$15,000 as reasonable attorney fees, court costs, and investigation costs in this action.
- 7 6. Defendant JARED C. KARSTETTER, JR. agrees to pay the State the unsuspended portion  
8 of the civil penalty (\$6,465) and fees and costs (\$15,000) within 30 days of the entry of the  
9 Judgment in this case.
- 10 7. The parties agree that Defendant JARED C. KARSTETTER, JR.'s violations of  
11 RCW 42.17A do not require proof of his intent to violate the law.


12 DATED this 26 day of July, 2018.

13 OFFICE OF THE ATTORNEY GENERAL  
14 STATE OF WASHINGTON

15 

16 LINDA A. DALTON, WSBA No. 15467  
17 Senior Assistant Attorney General  
18 S. TODD SIPE, WSBA No. 23203  
19 Assistant Attorney General  
20 Attorneys for Plaintiff State of Washington

21 LEE SMART, P.S., INC.

22 

23 JEFFREY P. DOWNER, WSBA No. 12625  
24 Attorney for Defendant Karstetter  
25  
26

1 **JUDGMENT**

2 THIS MATTER came on regularly before the undersigned judge of the above-entitled  
3 Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of  
4 record, LINDA A. DALTON, Senior Assistant Attorney General and S. TODD SIPE,  
5 Assistant Attorney General, and Defendant, JARED C. KARSTETTER, JR. appearing through  
6 his attorney, JEFFREY P. DOWNER, Lee Smart P.S., Inc., apprised the Court of their  
7 agreement to the entry of this judgment for the purpose of settling and compromising this  
8 action brought under RCW 42.17A. The Court, having reviewed the records and files herein,  
9 and having found the settlement to be a just and proper resolution of this matter, and being  
10 otherwise fully advised in the premises, it is hereby **ORDERED** as follows:

- 11 1. Defendant JARED C. KARSTETTER, JR. is hereby assessed a civil penalty under the  
12 provisions of RCW 42.17A in the amount of \$16,165 payable to the State of Washington.
- 13 2. The amount of \$9,700 of the assessed penalty is hereby suspended upon Defendant JARED  
14 C. KARSTETTER, JR.'s compliance with the following court-ordered conditions:
- 15 a. The suspension will be in effect for four years from the date of execution of the  
16 Judgment. During the period of suspension, JARED C. KARSTETTER, JR. will not  
17 violate any provision of RCW 42.17A.
- 18 b. In the event Defendant JARED C. KARSTETTER, JR. is found by the Public  
19 Disclosure Commission or a court to have committed a violation of RCW 42.17A  
20 occurring during the suspension period, the suspended penalty of \$9,700 will  
21 immediately become due and payable within 30 days of such finding without further  
22 intervention of the Court.
- 23 c. If Defendant JARED C. KARSTETTER, JR. is not found to have committed violations  
24 of RCW 42.17A by the Public Disclosure Commission or a court for conduct occurring  
25 during the suspension period, then the suspended portion of the penalty will be set  
26 aside.

1 3. Defendant JARED C. KARSTETTER, JR. shall, prior to participating in or giving any  
2 advice concerning the financing of campaigns, ensure that he has familiarized himself with  
3 the provisions of RCW 42.17A and seek guidance and input from the Public Disclosure  
4 Commission staff.

5 4. Defendant JARED C. KARSTETTER, JR. shall cooperate with any investigation  
6 conducted under RCW 42.17A, including any involving the King County Corrections  
7 Guild, to the extent such cooperation is consistent with his obligations under the  
8 Washington Rules of Professional Conduct or any other applicable authority.

9 3. Defendant JARED C. KARSTETTER, JR. shall pay to the State of Washington the amount  
10 of \$15,000.00 as reasonable attorney fees, court costs, and costs of investigation as  
11 authorized under RCW 42.17A.765.


12 4. Defendant JARED C. KARSTETTER, JR. shall pay the State the unsuspended portion of  
13 the civil penalty (\$6,465) and fees and costs (\$15,000) within 30 days of the entry of the  
14 Judgment.

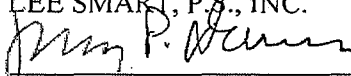
15 DONE IN OPEN COURT this 27 day of July, 2018.

16   
17 \_\_\_\_\_  
JUDGE JAMES J. DIXON

James Dixon

18 PRESENTED BY:  
19 OFFICE OF THE ATTORNEY GENERAL  
20 STATE OF WASHINGTON

21   
LINDA A. DALTON, WSBA No. 15467  
22 Senior Assistant Attorney General  
S. TODD SIPE, WSBA No. 23203  
23 Assistant Attorney General  
Attorneys for Plaintiff State of Washington

24 LEE SMART, P.S., INC.  
  
25 JEFFREY P. DOWNER, WSBA No. 12625  
26 Attorney for Defendant JARED C. KARSTETTER, JR.