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FILED
SUPERIOR COURT
THURSTON COUNTY, WA

2018 JUN -8 AM 9:58

Linda Myhre Enlow
Thurston County Clerk

- 1 EXPEDITE
- 2 No Hearing Set
- 3 Trial is Set
- 4 Date:
- 5 Time:
- 6 Judge Christopher Lanese

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

CLARK COUNTY REPUBLICAN
CENTRAL COMMITTEE, a
Washington registered political
committee which maintains exempt
and non-exempt accounts,

Defendant.

NO. 17-2-05688-34

STIPULATION AND AGREED
JUDGMENT

EX PARTE

JUDGMENT SUMMARY (RCW 4.64.030)

- 17 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 18 B. JUDGMENT DEBTOR: CLARK COUNTY REPUBLICAN CENTRAL
19 COMMITTEE, a Washington registered political
committee
- 20 C. PRINCIPAL JUDGMENT: \$74,725 with \$37,362.50 suspended for a period of 4
21 years days contingent on no findings of violations of
the law committed during the period of suspension
- 22 D. INTEREST: No prejudgment interest is owed. Principal judgment
23 amount(s) due and owing shall not bear interest unless
24 the principal judgment is unpaid by the due date specified
herein
- 25 E. COSTS AND FEES: \$4,816 in reasonable attorney fees; \$4,308 in
26 investigation costs, and \$240 in court costs

STIPULATION AND
AGREED JUDGMENT

1 F. ATTORNEYS FOR
2 JUDGMENT CREDITOR

ROBERT W. FERGUSON, Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General

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5 **STIPULATION**

6 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the
7 Defendant, CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE, desiring to resolve
8 all claims arising out of the State's Complaint, hereby enter into the following stipulation:

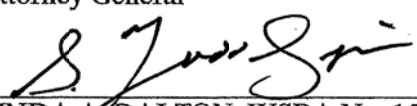
- 9 1. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE agrees to pay
10 the State an assessed civil penalty of \$74,735 for its violations of RCW 42.17A for failing
11 to timely disclose contributions it received since November 2012 and for filing to timely
12 report expenditures it made since October 2012.
- 13 2. The parties agree that \$37,362.50 of the assessed civil penalty will be suspended based on
14 the following terms and 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, Defendant CLARK COUNTY
17 REPUBLICAN CENTRAL COMMITTEE, agrees that it will not violate any
18 provision of RCW 42.17A.
- 19 b. In the event Defendant CLARK COUNTY REPUBLICAN CENTRAL
20 COMMITTEE is found by the Public Disclosure Commission or a court to have
21 committed a violation of RCW 42.17A during the suspension period, the suspended
22 penalty of \$37,362.50 will immediately become due and payable within 30 days of
23 such finding without further intervention of the Court.
- 24 c. If Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE is not
25 found to have committed violations of RCW 42.17A by the Public Disclosure
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Commission or a court during the suspension period, then the suspended portion of the penalty will be set aside.

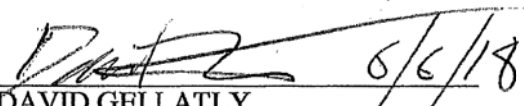
- 3. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE agrees to pay the STATE the total amount of \$9,364 as reasonable attorney fees, court costs, and costs of investigation in this action.
- 4. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE agrees to pay the State the unsuspended portion of the civil penalty (\$37,362.50) and fees and costs (\$9,364) by paying the STATE 50% of the net monetary contributions it receives after June 1, 2018 after accounting for the expenses incurred in collecting those donations. Payments shall be made to the STATE every three months starting September 1, 2018 until the unsuspended portion of the civil penalty and the State's fees and costs (a total of \$46,726.50) are paid in full. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE agrees to provide an accounting of its calculations of the quarterly payment at the same time as the payment is transmitted.

DATED this 7th day of June, 2018.

ROBERT W. FERGUSON
Attorney General


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

CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE

 6/6/18
By: DAVID GELLATLY
Chair, Clark County Republican Central Committee

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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, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and S. TODD SIPE, Assistant Attorney General, apprised the Court of their agreement with the CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE 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 CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$74,735 payable to the State of Washington.
2. The amount of \$37,362.50 of the assessed penalty is hereby suspended upon Defendant, CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE'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 CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE shall not violate any provision of RCW 42.17A.
 - b. In the event Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE 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 \$37,362.50 shall be immediately due and payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE is not
2 found to have committed violations of RCW 42.17A by the Public Disclosure
3 Commission or a court during the suspension period, then the suspended portion of the
4 penalty shall be set aside.

5 3. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE shall pay the
6 STATE the total amount of \$9,364 as reasonable attorney fees, court costs, and costs of
7 investigation in this action.

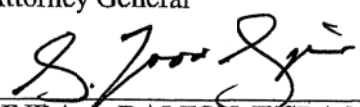
8 5. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE shall pay the
9 State the unsuspended portion of the civil penalty (\$37,362.50) and fees and costs (\$9,364)
10 by paying the STATE 50% of the net monetary donations it receives after June 1, 2018
11 after accounting for the expenses incurred in collecting those donations. Payments shall be
12 made to the STATE every three months starting September 1, 2018 until the unsuspended
13 portion of the civil penalty and the State's fees and costs (a total of \$46,726.50) are paid in
14 full. Defendant CLARK COUNTY REPUBLICAN CENTRAL COMMITTEE shall
15 provide an accounting of its calculations of the quarterly payment at the same time as the
16 payment is transmitted.

17 DONE IN OPEN COURT this 8th day of June, 2018.

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19 
JUDGE CHRISTOPHER LANESE

20 PRESENTED BY:

21 ROBERT W. FERGUSON
22 Attorney General

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24 LINDA A. DALTON, WSBA No. 15467
25 Senior Assistant Attorney General
26 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for State of Washington

STIPULATION AND
AGREED JUDGMENT