

1 EXPEDITE
2 No Hearing Set
3 Hearing is Set
4 Date:
5 Time:
6 Judge James J. Dixon

FILED

APR 06 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

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8 **STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,
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11 Plaintiff,
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13 v.
14 SHARLAINE M. LaCLAIR,
15 individually, and PEOPLE FOR
16 SHARLAINE LaCLAIR, a candidate
17 authorized political committee,
18
19 Defendants.

NO. 17-02-02222-34
STIPULATION AND AGREED
JUDGMENT

EX PARTE

16 **JUDGMENT SUMMARY (RCW 4.64.030)**

- 17 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
18 B. JUDGMENT DEBTOR: SHARLAINE M. LaCLAIR, individually, and
19 PEOPLE FOR SHARLAINE LaCLAIR, a candidate
20 authorized political committee
21 C. PRINCIPAL JUDGMENT: \$2,500 with \$1,250 suspended for a period of four years
22 contingent on no findings of violations of the law
23 committed during the period of suspension
24 D. INTEREST: No prejudgment interest is owed. Principal judgment
25 amount(s) due and owing shall not bear interest unless
26 the principal judgment is unpaid by the due date specified
herein
E. COSTS AND FEES: None
F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON
Attorney General
LINDA A. DALTON, WSBA No. 15467

1 Senior Assistant Attorney General
2 KELLY R. HARMON, WSBA No. 22498
Assistant Attorney General

3 G. ATTORNEY FOR JUSTIN KOVER, WSBA No. 51117
4 JUDGMENT DEBTOR

5
6 **STIPULATION**

7 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
8 Defendants, SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
9 LaCLAIR, a candidate authorized political committee, desiring to resolve all claims arising out
10 of the State's complaint as well as her failure to properly maintain campaign records, hereby
11 enter into the following stipulation:

- 12 1. Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
13 LaCLAIR, a candidate authorized political committee, agree to pay an assessed civil penalty
14 in the amount of \$2,500 for their violations of RCW 42.17A for failing to report in-kind
15 contribution for filing fee, failing to timely disclose debts incurred, failure to update
16 committee registration form, and failure to maintain records.
- 17 2. The parties agree that Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE
18 FOR SHARLAINE LaCLAIR, a candidate authorized political committee shall be required
19 to file updated reports to reflect the violations they committee but recognize that because
20 Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
21 LaCLAIR, a candidate authorized political committee failed to maintain adequate campaign
22 records will be required to file them on paper forms to be scanned into the Commission's
23 system.
- 24 3. The parties agree that \$1,250 of the assessed civil penalty will be suspended based on the
25 following terms and conditions:
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a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, agree that they will not violate any provision of RCW 42.17A.

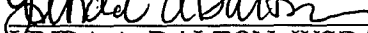
b. In the event Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, are found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$1,250 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, are not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside.

4. Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, agree to pay the State the unsuspended portion of the civil penalty (\$1,250) within 30 days from the date of the entry of the Judgment.

DATED this 5 day of April, 2018.

ROBERT W. FERGUSON
Attorney General


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
KELLY R. HARMON, WSBA No. 22498
Assistant Attorney General
Attorneys for Plaintiff



JUSTIN KOVER, WSBA No. 51117
Attorney at Law
Attorney for Defendants

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JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and KELLY R. HARMON, Assistant Attorney General, and Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, appearing through their attorney, JUSTIN KOVER, Attorney at Law, 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, hereby ORDERS as follows:

1. Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, are hereby assessed a civil penalty, for their violations of the provisions of RCW 42.17A as outlined in the Stipulation, in the amount of \$2,500 payable to the State of Washington.
2. The amount of \$1,250 of the assessed penalty is hereby suspended upon Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee, 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, Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee agree that they will not violate any provision of RCW 42.17A.
 - b. In the event Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE LaCLAIR, a candidate authorized political committee are found

1 by the Public Disclosure Commission or a court to have committed a violation of
2 RCW 42.17A during the suspension period, the suspended penalty of \$1,250 will
3 immediately become due and payable within 30 days of such finding without further
4 intervention of the Court.

5 c. If Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR
6 SHARLAINE LaCLAIR, a candidate authorized political committee are not found to
7 have committed violations of RCW 42.17A by the Public Disclosure Commission or
8 a court for conduct during the suspension period, then the suspended portion of the
9 penalty will be set aside.

10 3. Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
11 LaCLAIR, a candidate authorized political committee, shall pay the State the unsuspended
12 portion of the civil penalty (\$1,250) within 30 days from the date of the entry of the
13 Judgment.

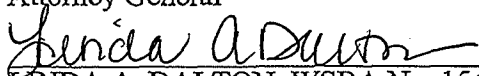
14 4. Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
15 LaCLAIR, a candidate authorized political committee shall file updated disclosure reports
16 with the Public Disclosure Commission, which reports shall be filed in paper form as a result
17 of Defendants SHARLAINE M. LaCLAIR, individually, and PEOPLE FOR SHARLAINE
18 LaCLAIR, a candidate authorized political committee's failure to maintain adequate
19 campaign records.

20 DONE IN OPEN COURT this ____ day of April, 2018.

21 JAMES J. DIXON

22 JUDGE JAMES J. DIXON

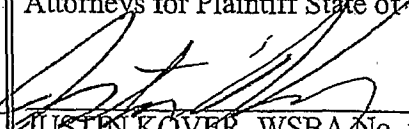
23 Presented by:
24 ROBERT W. FERGUSON
25 Attorney General

26 
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
KELLY R. HARMON, WSBA No. 22498

1 Assistant Attorney General
Attorneys for Plaintiff State of Washington

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JUSTIN KOVER, WSBA No. 51117

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Attorney at Law
Attorney for Defendants

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STIPULATION AND
AGREED JUDGMENT