

1800 One Convention Place, 701 Pike Street
Seattle, Washington 98101-3929

Tel. 206.624.7990
Fax 206.624.5944

Toll Free 877.624.7990
Web www.leesmart.com

RECEIVED

AUG 10 2018

August 7, 2018

ATTORNEY GENERAL'S OFFICE
Campaign Finance Unit

Joel E. Wright
Jeffrey P. Downer
Gregory P. Turner
Steven G. Wraith
Bradley D. Westphal
John C. Versnel, III
Craig L. McIvor
Marc Rosenberg
Rosemary J. Moore
Peter E. Sutherland
Dirk J. Muse
Pamela J. DeVet

VIA U.S. CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Ms. Linda A. Dalton
Mr. Stephen Todd Sipe
Attorney General
Campaign Finance Unit
PO Box 40100
Olympia, WA 98504-0100

Re: *State v. Karstetter*
Matter ID: 02922-017074

Dear Counsel:

Enclosed please find a check in the amount of \$21,465.00 for full satisfaction of the judgment. Will you please file a Satisfaction of Judgment with the court? Thank you for your attention to this matter.

Sincerely,



Taniya T. Chai
Legal Assistant to Matthew A. Quesnell

Kellan W. Byrne
James T. Graves
Jeffrey R. Kaatz
Jonathan J. Loch
Daniel C. Mooney
Cynthia T. Pham
Matthew A. Quesnell
Kyle J. Rekofke
Katherine L. Saint Germain
Holly A. Williams

Of Counsel:
Donna M. Young
Nicholas L. Jenkins

Nelson T. Lee
1920-2004
Fred T. Smart
1917-2012
John Patrick Cook
1934-2001
David L. Martin
1942-2012

/ttc
Enclosure



CNA ATTN: CLAIM
 P O BOX 8317
 CHICAGO IL 60680

RECEIVED



AUG 16 2018

PUBLIC DISCLOSURE COMMISSION

000429

LEE SMART PS INC: ATTN. J. DOWNER



701 PIKE STREET
 SEATTLE WA 98101-3924

RECEIVED
 AUG 10 2018
 ATTORNEY GENERAL'S OFFICE
 Campaign Finance Unit

* To expedite handling of your claim, please include our claim number on all future correspondence to us.							Claim Number *	
Insured/Client LAW OFFICES OF JARED C KARSTET							ATT	
Date of Loss 09/28/16							Total WC Ind to Date	
From - thru Dates			Suff/DT	TRAN Code#	EXP	Pay Code#	Amount	
			022	21			\$21,465.00	
							\$21,465.00	

Reason
 IN FULL SATISFACTION OF AGREED SETTLEMENT

To ensure timely delivery of your check, please verify that the address on this check is complete and correct. If not, please notify your claims representative with the correct information. Thank you.

ACCIWF 02.28.13

PLEASE DETACH BEFORE CASHING



Continental Casualty Company
 Chicago, IL 60604

UNDERWRITTEN BY:
 CONTINENTAL CASUALTY COMPANY

106403784
 Date Issued 08/01/18
 66-156
 531
 Bank Acct. 4759628092

VOID IF PURPLE BACKGROUND IS ABSENT		THIS DOCUMENT CONTAINS A WATERMARK - HOLD UP TO LIGHT TO VIEW	
Claim Number LW A22863	Desk Code ZN	Insured/Client LAW OFFICES OF JARED C KARSTET	Issuing Off. No. LW
Prefix & Contract No. LAW--0267896743	In Payment of	Claimant ATTY GENL/STATE OF WA VS KARST	Date of Loss 09/28/16

IN FULL SATISFACTION OF AGREED SETTLEMENT

PAY TWENTYONE THOUSAND FOUR HUNDRED SIXTYFIVE AND NO/100THS Dollars

TO THE ORDER OF STATE OF WASHINGTON, PUBLIC DISCLOSURE COMM.
 C/O JANA GREER, ADMIN. OFFICER
 P O BOX 40908
 OLYMPIA WA 98504-0908

*****\$21,465.00

Wells Fargo Bank, N.A

VOID IF NOT CASHED IN SIX MONTHS FROM MONTH OF ISSUE

⑈0106403784⑈ ⑆053101561⑆ 4759628092⑈

1800 One Convention Place, 701 Pike Street
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Campaign Finance Unit

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1917-2012
John Patrick Cook
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David L. Martin
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FILED

Jan 27 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

EXPEDITE
 No Hearing Set
 Trial is Set
Date: Monday January 14, 2019
Time: 8:30 a.m.
Judge James J. Dixon

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

JARED KARSTETTER,

Defendant.

NO. 17-2-04616-34

STIPULATION AND AGREED
JUDGMENT

EX PARTE

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: JARED C. KARSTETTER, JR.
- C. PRINCIPAL JUDGMENT: \$16,165 with \$9,700 suspended for a period of 4 years contingent on no findings of violations of RCW 42.17A committed during the period of suspension
- D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and owing shall not bear interest unless the principal judgment is unpaid by the due date specified herein
- E. COSTS AND FEES: \$15,000 in reasonable attorney fees, costs of investigation and court costs
- F. ATTORNEYS FOR JUDGMENT CREDITOR: Office of the Attorney General, State of Washington
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
- G. ATTORNEY FOR JUDGMENT DEBTOR: JEFFREY P. DOWNER, WSBA No. 12625
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 Linda A. Dalton
LINDA A. DALTON, WSBA No. 15467
16 Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
17 Assistant Attorney General
Attorneys for Plaintiff State of Washington

18 LEE SMART, P.S., INC.

19 Jeffrey P. Downer
20 JEFFREY P. DOWNER, WSBA No. 12625
21 Attorney for Defendant Karstetter

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 S. TODD SIPE, Assistant Attorney General, and Defendant, JARED C. KARSTETTER, JR. appearing through his attorney, JEFFREY P. DOWNER, Lee Smart P.S., Inc., 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 JARED C. KARSTETTER, JR. is hereby assessed a civil penalty under the provisions of RCW 42.17A in the amount of \$16,165 payable to the State of Washington.
2. The amount of \$9,700 of the assessed penalty is hereby suspended upon Defendant JARED C. KARSTETTER, JR.'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, JARED C. KARSTETTER, JR. will not violate any provision of RCW 42.17A.
 - b. In the event Defendant JARED C. KARSTETTER, JR. is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A occurring during the suspension period, the suspended penalty of \$9,700 will immediately become due and payable within 30 days of such finding without further intervention of the Court.
 - c. If Defendant JARED C. KARSTETTER, JR. is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct occurring during the suspension period, then the suspended portion of the penalty will be set 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.

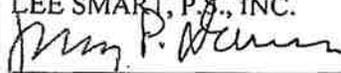
15 DONE IN OPEN COURT this 27 day of July, 2018.

16 
17 _____
JUDGE JAMES J. DIXON

James Dixon

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

20 
LINDA A. DALTON, WSBA No. 15467
21 Senior Assistant Attorney General
22 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
23 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.