

1 G. ATTORNEY FOR JUDGMENT DEBTOR: DANIELLE FRANCO-MALONE, WSBA
2 #40979; DMITRI IGLITZIN, WSBA #17673

3 **STIPULATION**

4 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON ex rel. GLEN
5 MORGAN, and the Defendant, WALLA WALLA FIREPAC, a political committee, being
6 desirous of resolving all claims arising out of the Plaintiff's complaint, hereby enter into the
7 following stipulation:

- 8 1. Defendant agrees to pay to the State of Washington an assessed civil penalty in the
9 amount of \$6,000 for violations of RCW 42.17A.
- 10 2. The parties agree that \$5,000 of the assessed civil penalty will be suspended based on the
11 following terms and conditions:
- 12 a. The suspension will be in effect for four years from the date of execution of the
13 Judgment. During the suspension, Defendant agrees that it will not violate any
14 provision of RCW 42.17A.
- 15 b. In the event one or both of the Defendant is found by the Public Disclosure
16 Commission or a court to have committed more than a de minimis violation of RCW
17 42.17A during the suspension period, the suspended penalty of \$5,000 will
18 immediately become payable within 30 days of such finding without further
19 intervention of the Court.
- 20 c. If Defendant is not found to have committed violations of RCW 42.17 by the Public
21 Disclosure Commission or a court for conduct during the suspension period, then the
22 suspended portion of the penalty shall be set aside.
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- 1 3. Defendant agrees to pay the State the unsuspended portion of the civil penalty (\$1,000)
2 within 30 days of the date of entry of the Judgment.
- 3 4. Defendant agrees to pay, in a separate transmittal, the total amount of \$5237.50 as
4 attorney fees, court costs, and costs of investigation to Kover Law, PLLC on behalf of the
5 Plaintiff, this amount to be paid within 30 days of the date of entry of the Judgment.

6 DATED this 8th day of March, 2018

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8 _____
9 JUSTIN KOVER, WSBA #51117
Attorney for Plaintiff

10 DATED this 9TH day of _____ MARCH _____, 2018

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12 _____
13 DANIELLE FRANCO-MALONE, WSBA #40979
Attorney for Defendant

14 **JUDGMENT**

15 THIS MATTER came on regularly before the undersigned judge of the above-
16 entitled Court. The Plaintiff, STATE OF WASHINGTON ex rel. GLEN MORGAN,
17 appearing through its attorney of record, JUSTIN KOVER, and Defendant, WALLA
18 WALLA FIREPAC, appearing through their attorneys, DANIELLE FRANCO-
19 MALONE and DMITRI IGLITZIN, apprised the Court of their agreement to the entry of
20 this judgment for the purpose of settling and compromising this action brought under
21 RCW 42.17A. The Court, having reviewed the records and files herein, and having
22 found the settlement to be a just and proper resolution of this matter, and being otherwise
23 fully advised in the premises, now, therefore, hereby

1 ORDERS that Defendant, WALLA WALLA FIREPAC, is hereby assessed a civil
2 penalty, under the provisions of RCW 42.17A, in the amount of \$6,000 payable to the
3 State of Washington. The Court further

4 ORDERS that the amount of \$5,000 of the assessed penalty is hereby suspended
5 upon Defendant WALLA WALLA FIREPAC's compliance with the following court-
6 ordered conditions:

- 7 a. The suspension will be in effect for four years from the date of execution of the
8 Judgment. During the suspension, Defendant agrees that it will not violate any
9 provision of RCW 42.17A.
- 10 b. In the event Defendant is found by the Public Disclosure Commission or a court
11 to have committed more than a de minimis violation of RCW 42.17A during the
12 suspension period, the suspended penalty of \$5,000 will immediately become
13 payable within 30 days of such finding without further intervention of the Court.
- 14 c. If Defendant is not found to have committed violations of RCW 42.17A by the
15 Public Disclosure Commission or a court for conduct during the suspension
16 period, then the suspended portion of the penalty shall be set aside.

17 It is further

18 ORDERED that Defendant WALLA WALLA FIREPAC shall pay to the State of
19 Washington the unsuspended portion of the assessed civil penalty (\$1,000) within 30 days of the
20 entry of this Judgment. It is further

21 ORDERED that Defendant WALLA WALLA FIREPAC shall pay, in a separate
22 transmittal, the total amount of \$5237.50 as attorney fees and court costs to Kover Law, PLLC
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1 on behalf of the Plaintiff, this amount to be paid within 30 days of the date of entry of the
2 Judgment.

3 DONE IN OPEN COURT this _____ day of _____, 2018.

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5 _____
6 The Honorable Judge CAROL MURPHY,
7 Presiding

7 Presented by: 

8 Approved as to form:
9 

10 _____
11 JUSTIN KOVER, WSBA #51117

12 _____
13 DANIELLE FRANCO-MALONE, WSBA #40979