

Respondent Name(s)
Monica Stonier
Complainant Name(s)
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Tue, 8 Aug 2023 at 10:10 PM)</p> <p>To whom it may concern,</p> <p>It has come to my attention, that Monica Stonier, in her current capacity as State Legislator from the 49th LD, violated Washington State's Campaign Finance laws (RCW 42.17A). This violation is detailed as follows:</p> <p>1) Illegal misuse of campaign funds. (Violation of RCW 42.17A.430(8))</p> <p>In this specific example, in violation of state law, Rep. Stonier has illegally transferred campaign funds to a political committee, namely, the Clark County Democratic Party. This violates the state law referenced above. Rep. Stonier illegally transferred this \$1250 on June 1, 2023 (See PDC C4 Report #110157891 , attached for Staff reference). The description indicates that this was for "Other: Table at Democrats annual Fundraiser."</p> <p>The Clark County Democratic Party's website indicate what this \$1250 expenditure purchases:</p> <p><i>"Your participation is critical to the success of our 2023 Ogden Dinner Awards and Auction. Table and individual tickets can be purchased here. Individual tickets are \$125 each. A table for 10 is \$1250. Please contact Sana Pierce-Wright, shpiercewright@gmail.com, if you need assistance with ticket purchases."</i></p> <p>I've posted a screen capture of the website indicating this expenditure sales effort by the Clark County Democrats, and I've highlighted the costs, etc. The Clark County Democrats report receiving this cash around the same time (See PDC C3 Report #110153517, attached for Staff reference):</p> <p>The fair market value (FMV) of this 10 person table with food, drinks, and other details is certainly less than \$1250. This ticket purchase is an effort to solicit funds (donations) from ticket purchasers like Rep Stonier. If Monica Stonier spent her own cash rather than her campaign cash, she would be okay, but she chose to use other people's money (also know as her campaign funds), so consistent with other similar case the PDC has handled in the recent past, the PDC must force Rep. Stonier to personally reimburse her campaign the difference between the \$1250 contribution her campaign illegally made to the Clark County Democrats and the FMV of the amazing table and food for 10 that he and the lucky guests consumed. Also, it would be an acceptable and legal resolution (along with PDC approved sanctions) for the Clark County Democrats to reimburse to Rep. Stonier the difference as</p>

well. Either way, whoever gives up the cash, they can resolve the practical violations documented here (in addition to the sanctions the PDC imposes on this lawbreaker).

In recognition that I can't be certain which PDC staff investigator is assigned to this case, and many staff are relatively new to the PDC, I will highlight several similar campaign finance cases which have been resolved by the PDC or the AG in the past which are identical in nature and fact pattern to this most recent Rep. Stonier violation (not including the Lisa Brown addendum complaint, and the Don Orange complaint I recently filed with similar fact patterns):

Example 1 – PDC Enforcement Case #8928 – Jim Cooper, Olympia City Councilman, Thurston County Commissioner Candidate – Also spent campaign funds on a similar program with the Thurston County Democrats (in fact, almost identical to the Mr. Orange violation detailed here). This resulted in formal sanctions from the PDC at the time (See letter attached) and also a lawsuit filed by the AG (settlement and complaint attached for reference).

Example 2 – PDC Enforcement Case #8734 – Michael Waite, Republican candidate for Washington State Treasurer – This one was the same legal violation, although more minor than the egregious Mr. Orange violation documented in this complaint.

While there is a history of other violations of **RCW 42.17A.430** which have been identified in other cases in the past, these two examples are the closest that come to mind with this most recent Rep. Stonier violation.

Rep. Monica Stonier – a sad and repetitive history of lawbreaking

It is sad to report that Rep. Monica Stonier has a long and storied law breaking past when it comes to compliance with Washington State's campaign finance laws. For example,

- PDC staff was forced to file a complaint against Rep. Stonier for which she was **fined \$250 in 2021** for an attempt to conceal her Financial Affairs report from the public (See **PDC Enforcement Case #94155**, final order attached for Staff reference)
- I was forced to file a Citizen Action Notice lawsuit against Rep. Stonier for her various lawbreaking activities in 2017 (See **Thurston County Superior Court Case #17-2-06579-34**, final settlement attached for Staff reference). That case resulted in a **\$6,215 settlement** (See **PDC Enforcement Case #25128**)

Unfortunately, politicians like this often have the attitude that they don't believe the laws apply to them, and they might even laugh at the PDC and its mission to enforce Washington State's campaign finance laws. Clearly the fines and settlements in the recent past have had no effect on deterring future lawbreaking for this politician.

Despite this unfortunate attitude from the lawbreakers like this, I urge the PDC to stick to the facts and the law, which are clearly on the side of enforcement of this statute against this lawbreaker.

Best Regards,

Glen Morgan

Cooper-20180615-StipJudg-Final.pdf
165.64 KB

Jim-Cooper-AG-Complaint-20161219.pdf
328.73 KB

8928 Cooper Warning Letter_16Dec2016.pdf
737.33 KB

Clark County Dems - Ogden Dinner 2023 page printout.pdf
1.13 MB

Ogden Dinner - highlighted table costs.png
174.99 KB

Stonier - StipulationJudgment-01312018-1.pdf
2.57 MB

94155 Monica Jurado Stonier CY20 Annual F1 Order.pdf
296.55 KB

Clark County Dems - receipt of illegal - no FMV - table purchase of 1250 - C3 - 110153517.pdf
1.2 MB

Stonier - Illegal overlimit - no FMV - contribution to Clark County Dems - C4 - 110157891.pdf
2.61 MB

What impact does the alleged violation(s) have on the public?

The public has a right to know if their elected officials even have the capacity to start following the law. They need to know that when an elected official continues to get caught breaking the law, they still can turn their life around and start following it for a change. This is a frequent lawbreaker with multiple violations of Washington State's campaign finance laws in her history. Can she eventually do the right thing? Someday?

List of attached evidence or contact information where evidence may be found

All exhibits are clearly labeled, referenced, and attached as exhibits. Including the historic violations of this politician

List of potential witnesses with contact information to reach them

Everyone associated with her campaign, obviously. Probably the Clark County Democrats as well since they seem to be inviting these types of violations.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

FILED

JUN 15 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
☐ No Hearing Set
☒ Trial is Set
Date: Monday August 20, 2018
Time: 8:30 a.m.
Judge John C. Skinder

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 16-2-04960-34

Plaintiff,

STIPULATION AND JUDGMENT

v.

JAMES M. COOPER, JR., individually,
and FRIENDS OF JIM COOPER, a
political committee,

EX PARTE

Defendants.

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: Defendants JAMES M. COOPER, JR., individually,
and FRIENDS OF JIM COOPER, a political committee
- C. PRINCIPAL JUDGMENT: \$1,125.00
- 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: None
- F. ATTORNEYS FOR JUDGMENT CREDITOR ROBERT W. FERGUSON
Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
- G. ATTORNEY FOR JUDGMENT DEBTOR JOHN A. KESLER III, WSBA No. 39380
Bean, Gentry, Wheeler & Peternell PLLC

STIPULATION AND
AGREED JUDGMENT

1

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

COPY

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STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and Defendants, JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, desiring to resolve claims arising out of the State's First Amended Complaint and the citizen action notices filed to date regarding Defendants' 2016 election campaign, hereby enter into the following stipulation:

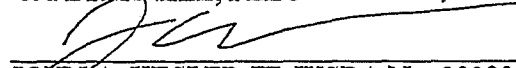
1. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, agree to pay an assessed civil penalty in the amount of \$1,125.00 for their violations of RCW 42.17A as alleged in the State's First Amended Complaint including failing to timely file and disclose contributions and expenditures, including debts; failing to disclose the true identity of contributors to a political committee; improperly transferring campaign contributions; and making personal use of campaign funds.
2. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, agree to pay the State the civil penalty (\$1,125.00) within 90 days from the date of the entry of the Judgment.

DATED this 12th day of June, 2018.

ROBERT W. FERGUSON
Attorney General


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
Attorneys for Plaintiff

BEAN, GENTRY, WHEELER
& PETERNELL, PLLC


JOHN A. KESLER III, WSBA No. 39380
Attorney at Law
Attorney for Defendants

JUDGMENT

23 THIS MATTER came on regularly before the undersigned judge of the above-entitled
24 Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record,
25 ROBERT W. FERGUSON, Attorney General, and LINDA A. DALTON, Senior Assistant
26 Attorney General, and Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF

1 JIM COOPER, a political committee, appearing through their attorney, JOHN A. KESLER III,
2 Attorney at Law, apprised the Court of their agreement to the entry of this judgment for the
3 purpose of settling and compromising this action brought under RCW 42.17A. The Court,
4 having reviewed the records and files herein, and having found the settlement to be a just and
5 proper resolution of this matter, and being otherwise fully advised in the premises, hereby
6 ORDERS as follows:

7 1. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a
8 political committee, are hereby assessed a civil penalty, for their violations of the
9 provisions of RCW 42.17A as alleged in the State's First Amended Complaint and outlined
10 in the Stipulation, in the amount of \$1,125.00 payable to the State of Washington.

11 3. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a
12 political committee, shall pay the State the civil penalty (\$1,125.00) within 90 days from
13 the date of the entry of the Judgment.

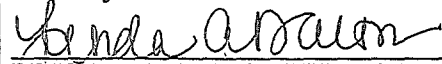
14 DONE IN OPEN COURT this 15 day of June, 2018.

15 **JOHN C. SKINDER**

16 JUDGE JOHN C. SKINDER

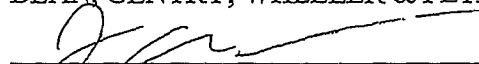
17 PRESENTED BY:

18 ROBERT W. FERGUSON
19 Attorney General

20 
21 LINDA A. DALTON, WSBA No. 15467
22 Senior Assistant Attorney General
23 Attorneys for Plaintiff State of Washington

24 And:

25 BEAN, GENTRY, WHEELER & PETERNELL, PLLC

26 
JOHN A. KESLER III, WSBA No. 39380
Attorney for Defendants

FILED

DEC 19 2016

Superior Court
Linda Myhre Enlow
Thurston County Clerk

COPY

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 16-2-04960-34

Plaintiff,

v.

JAMES M. COOPER, Jr.,
individually, and FRIENDS OF JIM
COOPER, a political committee,

COMPLAINT FOR CIVIL
PENALTIES AND FOR
INJUNCTIVE RELIEF FOR
VIOLATIONS OF
RCW 42.17A

Defendants.

I. NATURE OF ACTION

The State of Washington (State) brings this action to enforce the state's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendants, JAMES M. COOPER, Jr. and FRIENDS OF JIM COOPER, a political committee, violated provisions of RCW 42.17A by 1) concealing and failing to disclose the true identity of contributors to the Thurston County Democratic Central Committee, 2) by improperly transferring campaign contributions to another political committee, and 3) using campaign funds for personal use. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

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2.2 Defendant JAMES M. COOPER, Jr. (Cooper) was a 2016 candidate for the Thurston County Board of Commissioners during the relevant time periods. As such, he was expected to comply with the provisions of RCW 42.17A.

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1 Finally, RCW 42.17A declares as a matter of public policy “[t]hat the people have the
2 right to expect from their elected representatives at all levels of government the utmost
3 of integrity, honesty, and fairness in their dealings.” RCW 42.17A.001(2).

4 4.2 Washington’s campaign finance law also requires a campaign to timely
5 report expenditures of a candidate’s campaign. RCW 42.17A.235, .240(8);
6 RCW 42.17A.005(20). The PDC form to report expenditures is called a “Summary,
7 Full Report Receipts and Expenditures” and is a Form “C4.”

8 4.3 Washington’s campaign finance law requires a candidate for public office
9 to be responsible for the expenditures of his or her campaign. “No expenditures may be
10 made or incurred by any candidate or political committee unless authorized by the
11 candidate or the person or persons named on the candidate’s or committee’s registration
12 form.” RCW 42.17A.425.

13 4.4 A candidate may not dispose of campaign contributions without
14 restriction. Under RCW 42.17A.430, “No candidate or authorized committee may
15 transfer funds to any other candidate or other political committee.”

16 4.5 Under RCW 42.17A.435, a person may not conceal the identity of the
17 person on whose behalf a contribution is made. Additionally, under
18 RCW 42.17A.470(1), “[a] person, other than an individual, may not be an intermediary
19 or an agent for a contribution.” Under RCW 42.17A.445, personal use of campaign
20 funds is prohibited except in specific circumstances, none of which is relevant here.

21 4.6 Defendant Cooper formally declared his candidacy for Thurston County
22 Board of Commissioners by filing Public Disclosure Commission Candidate
23 Registration Form C-1 on November 13, 2015.

24 4.7 On October 17, 2016, the Attorney General’s Office, Thurston County
25 Prosecuting Attorney’s Office, and state Public Disclosure Commission received a
26 citizen action notice (Notice) from complainant Glen Morgan. In his Notice, Morgan

1 asserted that Defendants violated state law by using campaign funds to make
2 contributions to a political party.

3 4.8 Prior to May 7, 2016, the Thurston County Democratic Central
4 Committee announced a fundraising event to support the local political party's political
5 activities including contributions to other democratic candidates. The event was
6 referred to as the "Kennedy Dinner." Relevant to this litigation, the cost to attend the
7 event was at least \$100 per ticket. This cost covers the fair market value of the actual
8 dinner and a contribution to the Thurston County Democratic Central Committee.
9 According to Defendants, the estimated fair market value of the dinner is \$76.19.

10 4.9 Defendant Cooper invited 14 individuals to attend the event and sit at two
11 tables Defendants wanted to sponsor. Sixteen individuals attended the event (which
12 included Defendant Cooper and his spouse) and were associated with the Defendants'
13 two sponsored tables.

14 4.10 Four of the 16 attendees identified above purchased their event ticket
15 directly from the Thurston County Democratic Central Committee.

16 4.11 On May 7, 2016, Defendant Cooper authorized an expenditure of \$1,300
17 from campaign contributions Defendants received to purchase the additional 12 event
18 tickets. Defendants reports this expenditure to the Thurston County Democratic Central
19 Committee on their June 10, 2016 C4 report.

20 4.12 On information and belief, of the 12 additional individuals who attended
21 using Defendants' purchased tickets, Defendants state that certain individuals
22 reimbursed Defendants to defray the cost of event tickets which included a campaign
23 contribution to the Thurston County Democratic Central Committee.

24 4.13 Defendants used campaign funds to purchase tickets for Defendant
25 Cooper and his spouse to attend the event.

26 ///

1 4.14 To the extent that individuals contributed to the Campaign to cover the
2 cost of their ticket price, but their contributions did not cover the fair market value of
3 the dinner, Defendants used campaign funds to pay both the additional dinner cost as
4 well as the contribution to the Thurston County Democratic Central Committee.

5 **V. CLAIMS**

6 The State re-alleges and incorporates by reference all the factual allegations
7 contained in the preceding paragraphs, and based on those allegations, makes the
8 following claims:

9 5.1 First Claim: The State reasserts the factual allegations made above and
10 further asserts that Defendants in violation of RCW 42.17A.435 and .470 concealed and
11 failed to disclose the true identity of contributors to the Thurston County Democratic
12 Central Committee when Defendants purchased tickets to the Thurston County
13 Democratic Central Committee's pre-election fundraising dinner in Defendants' name
14 and received reimbursement from those contributors for the tickets.

15 5.2 Second Claim: The State reasserts the factual allegations made above and
16 further asserts that Defendants in violation of RCW 42.17A.430(8) improperly
17 transferred Defendants' campaign funds to another political committee.

18 5.3 Third Claim: The State reasserts the factual allegations made above and
19 further asserts that Defendants in violation of RCW 42.17A.445 improperly used
20 campaign funds for personal use including partial payment of the fair market value of
21 the dinner as well as contribution to the Thurston County Democratic Central
22 Committee's pre-election fundraising dinner.

23 5.4 Fourth Claim: The State reasserts the factual allegations made above and
24 further asserts that the Defendants' actions stated in the above claims were negligent
25 and/or intentional.


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6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750, including but not limited to imposition of a civil penalty, all to be determined at trial;

6.3 For temporary and permanent injunctive relief, as authorized by RCW 42.17A.750(1)(h); and

DATED this 19th day of December, 2016.


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff State of Washington



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 16, 2016

jim@electjimcooper.com

Subject: PDC Complaint 8928 - Formal Written Warning

Dear Mr. Cooper:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission on October 17, 2016. The complaint made fifty allegations that you may have violated RCW 42.17A.205, .235, .240, and .435 by failing to report campaign donations and spending as required by statute, and for illegally donating to a political party from campaign funds during your 2016 race for Thurston County Commission. As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

Your campaign appears to have committed a minor violation of RCW 42.17A.235 for failing to report one in-kind contribution of \$46.08, and a technical violation of RCW 42.17A.435 for making prohibited contributions of \$381 to a party organization from campaign funds.


Pursuant to WAC 390-37-060, I am issuing this Formal Written Warning. You have agreed to either have the Thurston County Democratic Central Committee reimburse \$381 to your campaign, or you will reimburse your campaign from personal funds. Please confirm that the campaign reimbursement has been made by February 17, 2017 (approximately 60 days from today).

If you are found to be out of compliance with this agreement after February 17, 2016, letter, and have not made an acceptable arrangement to return the funds, a Hearing Notice will be issued and you will have to appear at a Brief Adjudicative Proceeding before the Chair of the Public Disclosure Commission.

If there are future violations of PDC laws or rule, the Commission will consider this Formal Written Warning in deciding on further Commission action. Should you have questions about PDC

Complaint 8928 you may contact or contact Kurt Young, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,


Evelyn Fielding Lopez
Executive Director

Enclosure: Letter to Complainant



Clark County Democrats Ogden Dinner Awards and Auction

Saturday, June 10, 2023
5:00 PM – 9:00 PM

Hilton Hotel
301 West 6th Street,
Vancouver, WA, 98660,
[United States \(map\)](#)



Please join the Clark County Democrats at our annual Ogden Dinner Awards and Auction, 5 PM, June 10th, 2023 at the Hilton Hotel in Vancouver, Washington. You won't want to miss the incredible line up of speakers at this year's event – details coming soon!

Gathering under the theme “Building to the Future” the 2023 dinner and auction will showcase our Democratic beliefs, principles and determination to hold together strong and keep fighting for our values to be represented in our community! Like many communities across the country, 2023 will bring the election of city



foundation needed to support candidates who share our values in these important local government elections. Looking ahead to 2024, this foundation will assist the Democrats' fight to maintain the 3rd Congressional District, U.S. Senate, and the White House.

We hope you will help us in our efforts. Your participation is critical to the success of our 2023 Ogden Dinner Awards and Auction. Table and individual tickets can be purchased [here](#).

Individual tickets are \$125 each. A table for 10 is \$1250. Please contact Sana Pierce-Wright, shpiercewright@gmail.com, if you need assistance with ticket purchases.

In addition we'd love your donation of an experience or item for the silent auction or even a package for the live auction. Please contact Peter Harrison, mrpeterjharrison@gmail.com, to make arrangements for your donation.

Thank you for your support and we look forward to seeing you in June!

[Purchase Tickets Here](#)



Clark County Democrats General Meeting, June 2023

© 2021 CLARK
COUNTY DEMOCRATS

Clark County
Democrats,
7723 NE Fourth Plain
Blvd Suite C
Vancouver, WA 98662

(360) 254-9116
chair@clarkcountydems.com

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IN MEMORIAM

THE DEMOCRAT NEWSLETTER

Sign up to receive
emails and updates
from the Clark
County Democrats.

SIGN UP



keep fighting for our values to be represented in our community! Like many communities across the country, 2023 will bring the election of city councils, school boards, and port commissioner races to Clark County. A successful 2023 Ogden Dinner Awards and Auction will give us the firm foundation needed to support candidates who share our values in these important local government elections. Looking ahead to 2024, this foundation will assist the Democrats' fight to maintain the 3rd Congressional District, U.S. Senate, and the White House.

We hope you will help us in our efforts. Your participation is critical to the success of our 2023 Ogden Dinner Awards and Auction. Table and individual tickets can be purchased [here](#). Individual tickets are \$125 each. A table for 10 is \$1250. Please contact Sana Pierce-Wright, shpiercewright@gmail.com, if you need assistance with ticket purchases.

In addition we'd love your donation of an experience or item for the silent auction or even a package for the live auction. Please contact Peter Harrison, mrpeterjharrison@gmail.com, to make arrangements for your donation.

Thank you for your support and we look forward to seeing you in June!

[Purchase Tickets Here](#)

FILED

JAN 31 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
(if filing within 5 court days of hearing)
☒ No Hearing is set:
Date: _____
Time: _____
Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

STATE OF WASHINGTON *ex rel.*
GLEN MORGAN,

Plaintiff,

vs.

MONICA STONIER (a candidate), and
VOTE MONICA STONIER (a candidate
authorized committee),

Defendants.

No. 17-2-06579-34

STIPULATION AND JUDGMENT
[Proposed] FOR CIVIL PENALTIES,
ATTORNEYS' FEES AND COSTS

Ex Parte

COPY

JUDGMENT SUMMARY

Judgment Creditor:	State of Washington
Attorneys for Judgment Creditor:	Angus Lee, Angus Lee Law Firm PLLC
Judgment Debtors:	Monica Stonier and Vote Monica Stonier
Attorneys for Judgment Debtor:	Walter Smith, Smith & Dietrich Law Offices PLLC
Amount of Civil Penalties:	\$2,900, with \$1,450 suspended for a period of 2 years contingent on no findings of violations of RCW 42.17A committed during the period of suspension
Amount of Attorneys' Fees:	\$3,000
Amount of Costs:	\$315
Total Principal Judgment Amount:	\$4,765.00

No interest shall accrue on the amounts awarded in this Judgment provided the Defendants comply with their duties to pay the amounts and by the deadlines stated in the Court's Judgment, below.

STIPULATION AND JUDGMENT [Proposed] - 1

Smith & Dietrich Law Offices PLLC
400 Union Ave SE, Suite 200
Olympia WA 98501

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STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (State), acting through the Relator, GLEN MORGAN, and Defendants MONICA STONIER and VOTE MONICA STONIER, desiring to resolve any and all claims arising out of the Plaintiff's Complaint, hereby enter into the following stipulation:

1. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay an assessed civil penalty in the amount of \$2,900.00 for failing to timely and properly report contributions received and expenditures made as required by Chapter 42.17A RCW.

2. The Parties agree that one half of the assessed civil penalty (\$1,450) will be suspended based on the following terms and conditions:

a. The suspension will be effective for two years from the date of entry of this Judgment. During the period of suspension, Defendants MONICA STONIER and VOTE MONICA STONIER agree that they will not violate any provision of Chapter 42.17A RCW.

b. In the event Defendants MONICA STONIER or VOTE MONICA STONIER are found by the Public Disclosure Commission or a court to have committed one or more substantial violations of Chapter 42.17A RCW, as defined in this paragraph, during the suspension period, the suspended penalty of \$1,450 will immediately become due and payable within 30 days of such finding without further intervention of the Court. For purposes of this stipulation and judgment, the term "substantial violations" includes any of the following: a) six (6) or more distinct instances of failing to file required campaign finance disclosure reports by 14 days after their respective due dates; b) engaging in any concealment of reportable activity as defined in RCW 42.17A.435; or c) engaging in any intentional violation of the campaign finance disclosure laws.

1 c. If Defendants are not found to have committed one or more substantial violations,
2 as defined in paragraph 2(b), above, of Chapter 42.17A RCW by the Public Disclosure
3 Commission or a court for conduct during the suspension period, then the suspended portion of
4 the penalty will be set aside.

5
6 3. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
7 to counsel for the Plaintiff the total amount of \$3,315.00 in full satisfaction of the State and the
8 Relator's attorneys' fees and costs in this action. Payment for Plaintiff's attorney fees and costs
9 will be delivered by check made out to the Angus Lee Law Firm PLLC, and delivered to the firm
10 at 9105A NE Highway 99, Suite 200, Vancouver 98665.

11
12 4. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
13 the State the unsuspended portion of the civil penalty (\$1,450.00) by check made out to the State
14 of Washington, and delivered to Campaign Finance Unit at the Washington Attorney General's
15 Office, 1125 Washington Street Southeast, in the city of Olympia.

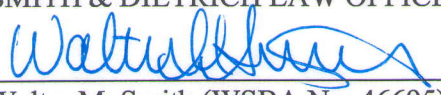
16
17 5. Defendants MONICA STONIER and VOTE MONICA STONIER agree to pay
18 the State the unsuspended portion of the civil penalty (\$1,450) and pay to Relator attorney fees
19 and costs (\$3,315), with the payment to Relator's counsel due within thirty days of the date this
20 Judgment is entered, and the payments to the State due by December 31, 2019.

21 Dated this 30th day of January, 2018.

22
23 ANGUS LEE LAW FIRM, PLLC

24 
25 Angus Lee (WSBA No. 36473)
26 angus@angusleelaw.com
27 9105A NE Highway 99, Suite 200
28 Vancouver, WA 98665
Phone: (360) 635-6464
Counsel for Plaintiff

SMITH & DIETRICH LAW OFFICES PLLC


Walter M. Smith (WSBA No. 46695)
walter@smithdietrich.com
400 Union Ave. SE, Suite 200
Olympia, WA 98501
Phone: (360) 918-7230
Counsel for Defendants

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JUDGMENT

This matter came before the Court regularly for a hearing on the parties' Stipulation and Proposed Judgment. Plaintiff, STATE OF WASHINGTON, acting through GLEN MORGAN, Relator, and appearing through counsel of record, ANGUS LEE, of the Angus Lee Law Firm, PLLC, and Defendants MONICA STONIER and VOTE MONICA STONIER, appearing through counsel of record, WALTER SMITH of Smith & Dietrich Law Offices, PLLC, apprised the Court of their agreement to entry of judgment for the purpose of settling and compromising this action brought under Chapter 42.17A RCW. The Court, having reviewed the record before it, and having found the settlement of the Parties to be a just and proper resolution of this matter, hereby ORDERS as follows:

1. Defendants MONICA STONIER and VOTE MONICA STONIER are hereby assessed a civil penalty in the amount of \$2,900.00 for failing to timely and properly report contributions received and expenditures made as required under Chapter 42.17A RCW.

2. The amount of \$1,450.00 of the assessed civil penalty is hereby suspended based on Defendants MONICA STONIER and VOTE MONICA STONIER's compliance with the following Court-ordered terms and conditions:

a. The suspension will be effective for two years from the date of entry of this Judgment. During the period of suspension, Defendants MONICA STONIER and VOTE MONICA STONIER will not commit any substantial violation of Chapter 42.17A RCW as defined in this Judgment.

b. In the event Defendants MONICA STONIER or VOTE MONICA STONIER are found by the Public Disclosure Commission or a court to have committed one or more substantial violations of Chapter 42.17A RCW during the suspension period, the suspended penalty of

1 \$1,450 will immediately become due and payable within 30 days of such finding without further
2 intervention of the Court. For purposes of this Judgment, the term "substantial violations"
3 includes any of the following: a) six (6) or more distinct instances of failing to file required
4 campaign finance disclosure reports by 14 days after their respective due dates; b) engaging in
5 any concealment of reportable activity as defined in RCW 42.17A.435; or c) engaging in any
6 intentional violation of the campaign finance disclosure laws.
7

8 c. If Defendants MONICA STONIER and VOTE MONICA STONIER are not
9 found to have committed one or more substantial violations, as defined in paragraph 2(b), above,
10 of Chapter 42.17A RCW by the Public Disclosure Commission or a court for conduct during the
11 suspension period, then the suspended portion of the penalty will be set aside.
12

13 3. Defendants MONICA STONIER and VOTE MONICA STONIER are ordered to
14 pay to counsel for the Plaintiff, the Angus Lee Law Firm, PLLC, the total amount of \$3,315.00
15 in full satisfaction of the Plaintiff's attorneys' fees and costs in this action, with such amount to
16 be paid by check delivered to Relator's counsel within thirty days of the date this Judgment is
17 entered. Payment for Plaintiff's attorney fees and costs will be delivered by check made out to
18 the Angus Lee Law Firm, PLLC, and delivered to the firm at 9105A NE Highway 99, Suite 200,
19 Vancouver, WA 98665.
20

21 4. Defendants MONICA STONIER and VOTE MONICA STONIER are ordered to
22 pay the State the unsuspended portion of the civil penalty (\$1,450.00) by no later than December
23 31, 2019. Payment will be made by check made out to the State of Washington, and delivered to
24 the Campaign Finance Unit at the Washington Attorney General's Office, 1125 Washington
25 Street Southeast, in the city of Olympia.
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27
28



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

August 16, 2021

Monica Jurado Stonier
7817
Vancouver WA 98662

And delivered electronically to “monica.stonier@gmail.com ”

Subject: PDC Order, Case 94155

Dear Monica Jurado Stonier,

Enclosed is a copy of the Public Disclosure Commission’s Order Imposing Fine that was entered in the above-referenced case.

At the July 15, 2021, Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of \$250, of which \$150 is suspended, in accordance with WAC 390-37-143. The \$100 non-suspended penalty is payable within 30 days of the date of this Order.

The \$100 non-suspended penalty is payable no later than September 15, 2021.

Please make the check or money order payable to the WA State Treasurer, and mail the payment to the following:

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

It is further ordered that you file the missing F-1 report within 30 days of the date of this Order.

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdcc@pdcc.wa.gov.

Sincerely,

Electronically Signed by Tabitha Townsend
PDC Staff

Enclosure: Initial Order



State of Washington
PUBLIC DISCLOSURE COMMISSION
711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 94155

Monica Jurado Stonier,

Respondent.

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Monica Jurado Stonier on June 25, 2021, a brief adjudicative proceeding was held on July 15, 2021, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.700 by failing to timely file a Personal Financial Affairs Statement (F-1 report) for calendar year 2020, which was due to be filed no later than April 15, 2021.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair Fred Jarrett was the Presiding Officer. The Commission staff was represented by Compliance Coordinators Tabitha Townsend and Tabitha Blacksmith, and Jennifer Hansen, Political Finance Officer. The Respondent did not participate in the hearing or submit any written materials.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent is or was an elected or appointed official for STATE REPRESENTATIVE of LEG DISTRICT 49 - HOUSE.
2. As an elected or appointed official during the calendar year 2020, the Respondent was required to file an F-1 report by April 15, 2021.
3. The Respondent did not file the F-1 report by the date of the enforcement hearing.
4. The Respondent has no prior violations.

///

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.700 by failing to file the F-1 report by April 15, 2021.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent is assessed a total civil penalty of \$250, of which \$150 is suspended, in accordance with the Annual F-1 penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that the Respondent:**
 - a. **Pay the \$100 civil penalty within 30 days of the date of this Order. If the Respondent fails to pay the \$100 within 30 days, PDC staff is directed to refer the matter to collections.**
 - b. **File the missing F-1 report within 30 days of the date of this Order.**
3. **It is further ordered that \$150 of the \$250 penalty is suspended on the following conditions:**
 - a. **The Respondent is not found to have committed any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.**
 - b. **The non-suspended portion of the penalty (\$100) is paid by the Respondent within 30 days of the date of this Order. If the Respondent fails to pay the non-suspended penalty of \$100 within 30 days, the suspended portion of the penalty (\$150) shall immediately become due without further action by the Commission and PDC staff is directed to refer the matter to collections for the full penalty amount of \$250.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 12th of August 2021.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

I, Tabitha Townsend, certify that I emailed a copy of this order to the Respondent at their respective email address on the date stated herein.

Electronically Signed by Tabitha Townsend
Signed

August 16, 2021
Date

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdcc.wa.gov **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Clark County Democratic Central Committee (CCDCC)
Clark County Democratic Central Committee -
PO Box 179
Vancouver, WA 98666

Deposit date: 06/05/2023
Report number: 110153517
Submitted date: 06/19/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$1,250.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
06/05/2023	ELECT MONICA STONIER PO Box 61762 , Vancouver, WA 98666		\$1,250.00	N \$2,250.00

Date of deposit
06/05/2023

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
Patricia Melise O'Bannon - 06/19/2023



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Monica Jurado Stonier (Monica Stonier)
Elect Monica Stonier -
PO Box 61762
Vancouver, WA 98666
STATE REPRESENTATIVE
LEG DISTRICT 49 - HOUSE

Coverage: 06/01/2023 to 06/30/2023
Final report: No
Report number: 110157891
Election year: 2024
Date submitted: 07/10/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$15,934.59
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$15,934.59
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$1,226.00
11. Cash expenditures (Line 3 schedule A).	\$1,650.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$1,650.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$2,876.00

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$13,058.59
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$13,058.59

Candidate name

Monica Jurado Stonier (Monica Stonier)

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Marsha Manning - 07/10/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:				
2. TOTAL CASH RECEIPTS (LINE 2 OF C4):				\$0.00
3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):				
Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$0.00
06/01/2023	Clark County Democrats PO Box 179 , Vancouver, WA 98666	Other: Table at Democrats annual fundraiser		\$1,250.00
06/06/2023	Manning Marsha 3801 NE 172nd Ave , Vancouver, WA 98682- 8594	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.		\$400.00
			\$0.00	\$1,650.00
4. TOTAL EXPENDITURES:				\$1,650.00