

FILED

JUN 01 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

1 EXPEDITE
2 No Hearing Set
3 Trial is Set
4 Date: August 20, 2018
5 Time: 8:30 a.m.
6 Judge James J. Dixon

7
8 STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

9 STATE OF WASHINGTON,

NO. 16-2-04959-34

10 Plaintiff,

STIPULATION AND AGREED
JUDGMENT

11 v.

12 TERESA PURCELL, individually, and
13 PEOPLE FOR TERESA PURCELL, a
candidate political committee,

EX PARTE

14 Defendants.

15
16 JUDGMENT SUMMARY (RCW 4.64.030)

- 17 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 18 B. JUDGMENT DEBTOR: TERESA PURCELL, individually, and PEOPLE FOR
19 TERESA PURCELL, a candidate political committee
- 20 C. PRINCIPAL JUDGMENT: \$18,395 with \$8,000 suspended for a period of 4 years
contingent on no findings of violations of RCW 42.17A
21 committed during the period of suspension
- 22 D. INTEREST: No prejudgment interest is owed. Principal judgment
amount(s) due and owing shall not bear interest unless
23 the principal judgment is unpaid by the due date specified
herein
- 24 E. COSTS AND FEES: \$4,000 in reasonable attorney fees, costs of
25 investigation and court costs

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STIPULATION AND AGREED
JUDGMENT

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

- 1 F. ATTORNEYS FOR ROBERT W. FERGUSON, Attorney General
JUDGMENT CREDITOR LINDA A. DALTON, WSBA No. 15467
2 Senior Assistant Attorney General
3 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
- 4 G. ATTORNEY FOR WILLIAM RAVA, WSBA No. 29948
JUDGMENT DEBTOR LAUREN STANIAR, WSBA No. 48741
5 PERKINS COIE LLP

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7 **STIPULATION**

8 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the
9 Defendants, TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
10 candidate political committee, desiring to resolve all claims made in the State's Fourth
11 Amended Complaint and any citizen action notice filed through the date of entry of the
12 judgment, hereby enter into the following stipulation:

- 13 1. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
14 candidate political committee, acknowledge that they committed multiple violations of the
15 state campaign finance disclosure laws during the course of their 2016 election campaign
16 for State Representative, and that this Stipulation and Agreed Judgment constitutes a fair,
17 reasonable, and complete resolution of those violations. The parties to this stipulation also
18 acknowledge that TERESA PURCELL and PEOPLE FOR TERESA PURCELL did not
19 intend to violate any laws.
- 20 2. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
21 candidate political committee, agree to pay the State an assessed civil penalty in the
22 amount of \$18,395 with \$8,000 suspended for four years for violations of RCW 42.17A as
23 asserted in the Fourth Amended Complaint and any citizen action notice filed through the
24 date of entry of the judgment.
- 25 3. The parties agree that \$8,000 of the assessed civil penalty will be suspended based on the
26 following terms and conditions:

1 a. The suspension will be in effect for four years from the date of execution of the
2 Judgment. During the period of suspension, Defendants TERESA PURCELL,
3 individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee,
4 agree that they will not violate any provision of RCW 42.17A.

5 b. In the event Defendants TERESA PURCELL, individually, and PEOPLE FOR
6 TERESA PURCELL, a candidate political committee, are found by the Public
7 Disclosure Commission or a court to have committed a violation of RCW 42.17A
8 during the suspension period, the suspended penalty of \$8,000 will immediately
9 become due and payable within 30 days of such finding without further intervention of
10 the Court.

11 c. If Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA
12 PURCELL, a candidate political committee, are not found to have committed violations
13 of RCW 42.17A by the Public Disclosure Commission or a court for conduct occurring
14 during the suspension period, then the suspended portion of the penalty will be set
15 aside.

16 4. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
17 candidate political committee, agree to pay the State the total amount of \$4,000 as
18 reasonable attorney fees, court costs, and investigation costs in this action.

19 5. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
20 candidate political committee, agree to pay the State the unsuspended portion of the civil
21 penalty (\$10,395) and fees and costs (\$4,000) on the following payment schedule:

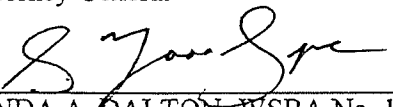
- 22 a. \$5,600 to be paid no later than July 1, 2018;
23 b. \$3,100 to be paid no later than December 1, 2018;
24 c. \$3,100 to be paid no later than June 1, 2019; and
25
26

1 d. \$2,595 to be paid no later than December 1, 2019.

2 DATED this 25th day of May, 2018.

3 ROBERT W. FERGUSON
4 Attorney General

PERKINS COIE LLP

5 
6 LINDA A. DALTON, WSBA No. 15467
7 Senior Assistant Attorney General
8 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff State of Washington

 5/24/18
WILLIAM C. RAVA, WSBA No. 229484
LAUREN STANIAR, WSBA No. 48741
Attorneys for Defendants

9 JUDGMENT

10 THIS MATTER came on regularly before the undersigned judge of the above-entitled
11 Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of
12 record, LINDA A. DALTON, Senior Assistant Attorney General and S. TODD SIPE,
13 Assistant Attorney General, and Defendants TERESA PURCELL, individually, and PEOPLE
14 FOR TERESA PURCELL, a candidate political committee, appearing through their attorneys,
15 WILLIAM C. RAVA and LAUREN STANIAR, Perkins Coie LLP, apprised the Court of their
16 agreement to the entry of this judgment for the purpose of settling and compromising claims
17 contained in the State's Fourth Amended Complaint and any citizen action notices filed
18 through the date of entry of the judgment and brought under RCW 42.17A. The Court, having
19 reviewed the records and files herein, and having found the settlement to be a just and proper
20 resolution of this matter, and being otherwise fully advised in the premises, it is hereby

21 **ORDERED** as follows:

- 22 1. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
23 candidate political committee, are hereby assessed a civil penalty, under the provisions of
24 RCW 42.17A, in the amount of \$18,395 payable to the State of Washington.

- 1 2. The amount of \$8,000 of the assessed penalty is hereby suspended upon Defendants
2 TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate
3 political committee's compliance with the following court-ordered conditions:
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- 5 a. The suspension will be in effect for four years from the date of execution of the
6 Judgment. During the period of suspension, Defendants TERESA PURCELL,
7 individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee,
8 will not violate any provision of RCW 42.17A.
 - 9 b. In the event Defendants TERESA PURCELL, individually, and PEOPLE FOR
10 TERESA PURCELL, a candidate political committee, are found by the Public
11 Disclosure Commission or a court to have committed a violation of RCW 42.17A
12 occurring during the suspension period, the suspended penalty of \$8,000 will
13 immediately become due and payable within 30 days of such finding without further
14 intervention of the Court.
 - 15 c. If Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA
16 PURCELL, a candidate political committee, are not found to have committed violations
17 of RCW 42.17A by the Public Disclosure Commission or a court for conduct occurring
18 during the suspension period, then the suspended portion of the penalty will be set
19 aside.
- 20 3. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
21 candidate political committee, shall pay to the State of Washington the amount of
22 \$4,000.00 as reasonable attorney fees, court costs, and costs of investigation as authorized
23 under RCW 42.17A.765.
- 24 4. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a
25 candidate political committee, shall pay the State the unsuspended portion of the civil
26 penalty (\$10,395) and fees and costs (\$4,000) on the following payment schedule:

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- a. \$5,600 to be paid no later than July 1, 2018;
- b. \$3,100 to be paid no later than December 1, 2018;
- c. \$3,100 to be paid no later than June 1, 2019; and
- d. \$2,595 to be paid no later than December 1, 2019.

DONE IN OPEN COURT this 1st day of ^{June} ~~May~~, 2018.

JUDGE JAMES J. DIXON

PRESENTED BY:

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 Plaintiff State of Washington

AND:

PERKINS COIE LLP

WILLIAM C. RAVA, WSBA No. 229484
LAUREN STANIAR, WSBA No. 48741
Attorneys for Defendants