

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  
21 contingent on no findings of violations of RCW 42.17A  
22 committed during the period of suspension
- 23 D. INTEREST: No prejudgment interest is owed. Principal judgment  
24 amount(s) due and owing shall not bear interest unless  
25 the principal judgment is unpaid by the due date specified  
26 herein
- E. COSTS AND FEES: \$4,000 in reasonable attorney fees, costs of  
investigation and court costs

STIPULATION AND AGREED  
JUDGMENT

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

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

6  
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:

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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 TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, agree that they will not violate any provision of RCW 42.17A.

b. In the event Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate 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 \$8,000 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, are 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.

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

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

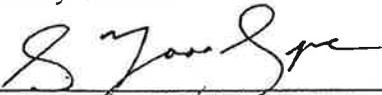
- a. \$5,600 to be paid no later than July 1, 2018;
- b. \$3,100 to be paid no later than December 1, 2018;
- c. \$3,100 to be paid no later than June 1, 2019; and

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

2 DATED this 25<sup>th</sup> 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.  
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2. The amount of \$8,000 of the assessed penalty is hereby suspended upon Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee'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, Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, will not violate any provision of RCW 42.17A.
  - b. In the event Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, are 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 \$8,000 will immediately become due and payable within 30 days of such finding without further intervention of the Court.
  - c. If Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, are 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.
3. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, shall pay to the State of Washington the amount of \$4,000.00 as reasonable attorney fees, court costs, and costs of investigation as authorized under RCW 42.17A.765.
4. Defendants TERESA PURCELL, individually, and PEOPLE FOR TERESA PURCELL, a candidate political committee, shall pay the State the unsuspended portion of the civil penalty (\$10,395) and fees and costs (\$4,000) on the following payment schedule:

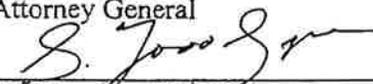
- 1 a. \$5,600 to be paid no later than July 1, 2018;  
2 b. \$3,100 to be paid no later than December 1, 2018;  
3 c. \$3,100 to be paid no later than June 1, 2019; and  
4 d. \$2,595 to be paid no later than December 1, 2019.

5 DONE IN OPEN COURT this 1<sup>st</sup> day of <sup>June</sup> ~~May~~, 2018.

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7   
JUDGE JAMES J. DIXON

8 PRESENTED BY:

9 ROBERT W. FERGUSON  
Attorney General

10   
11 LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
12 S. TODD SIPE, WSBA No. 23203  
Assistant Attorney General  
13 Attorneys for Plaintiff State of Washington

14 AND:

15 PERKINS COIE LLP

16   
17 WILLIAM C. RAVA, WSBA No. 229484  
LAUREN STANIAR, WSBA No. 48741  
18 Attorneys for Defendants

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