

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

IN RE:

WASHINGTON STATE JAYCEES, INC.
Respondent.

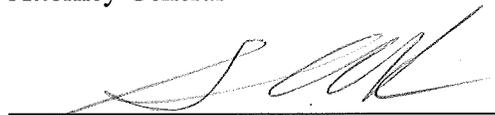
NO. 12-2-05840-7 SEA

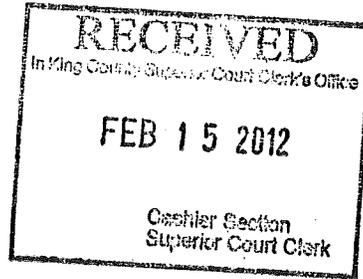
PETITION FOR ORDER APPROVING
ASSURANCE OF DISCONTINUANCE
PURSUANT RCW 19.86.100

COMES NOW, State of Washington, by and through its attorneys, Robert M. McKenna, Attorney General and Shannon E. Smith, Assistant Attorney General and petitions this Court for an Order Approving the Assurance of Discontinuance. This Petition is made pursuant to RCW 19.86.100, which authorizes the Attorney General to accept an Assurance of Discontinuance in the enforcement of the Consumer Protection Act.

DATED this 15th day of February, 2012.

ROB MCKENNA
Attorney General


SHANNON E. SMITH WSBA #19077
Assistant Attorney General
Attorneys for State of Washington



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

IN RE:
WASHINGTON STATE JAYCEES, INC.
Respondent.

NO. 12-2-05840-7 SEA
ORDER APPROVING ENTRY OF
ASSURANCE OF DISCONTINUANCE

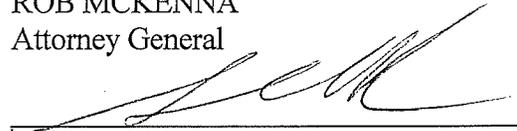
The Court hereby approves the attached Assurance of Discontinuance pursuant to RCW 19.86.100, and orders its entry into the Court's record.

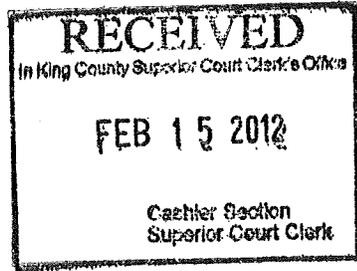
Approved on this _____ day of February, 2012.

FEB 15 2012

JOAN B. ALLISON
JUDGE/COURT COMMISSIONER

Presented By:
ROB MCKENNA
Attorney General


SHANNON E. SMITH WSBA #19077
Assistant Attorney General
Attorneys for State of Washington



STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

WASHINGTON STATE JAYCEES,
INC.

Respondent.

NO. 12-2-05840-7 SEA

ASSURANCE OF
DISCONTINUANCE

The State of Washington, by and through its attorneys, Robert M. McKenna, Attorney General, and Shannon E. Smith, Senior Counsel, files this Assurance of Discontinuance pursuant to RCW 19.86.100.

1. The Attorney General initiated an investigation into the charitable registration status of the Respondent, Washington State Jaycees, Inc.

2. The Attorney General deems the following to constitute unfair or deceptive acts or practices in violation of the Consumer Protection Act, RCW 19.86.020, and violations of the Charitable Solicitation Act, RCW 19.09: Soliciting or collecting charitable contributions from the general public in the state of Washington, without registering as a charitable organization with the Washington Secretary of State as required by RCW 19.09.

3. Respondent agrees to cease operating as a charitable organization in the state of Washington unless and until Respondent has successfully registered as a charitable organization with the Washington Secretary of State. If Respondent continues to operate as a charitable organization in the state of Washington, proof of the registration must be received

1 by the Office of the Attorney General in order to comply with the requirements of this
2 Assurance of Discontinuance.

3 4. The Respondent agrees to pay the costs and reasonable attorney's fees incurred
4 by the Attorney General in pursuing this matter in the amount of \$1,000.00, payable in full
5 upon signing this Assurance of Discontinuance. Payment shall be made by valid cashier's
6 check, paid to the order of "Attorney General—State of Washington."

7 5. Respondent shall send the signed Assurance of Discontinuance and the
8 cashier's check to the Office of the Attorney General, Attention: Cynthia Lockridge,
9 Consumer Protection Division, 800 Fifth Avenue, Suite 2000, Seattle, Washington, 98104-
10 3188.

11 6. This Assurance of Discontinuance shall not be considered an admission of
12 violation of the Consumer Protection Act or the Charitable Solicitations Act for any purpose,
13 but failure to comply with this Assurance of Discontinuance shall be *prima facie* evidence of
14 violations of RCW 19.86.020, thereby placing upon the violator, Washington State Jaycees
15 Inc., and its officers, directors, and principals, the burden of defending against imposition by
16 the Court of injunctions, restitution, and civil penalties of up to \$2,000.00 per violation and
17 costs, including reasonable attorney's fees, incurred by the Attorney General in pursuing such
18 action.

19 7. Under no circumstances shall this Assurance of Discontinuance or the name of
20 the State of Washington, the Office of the Attorney General, the Washington Secretary of
21 State, or any of its employees or representatives be used by the Respondent or by its officers,
22 employees, representatives, or agents in conjunction with any business activity of the
23 Respondent.

24 ///
25 ///
26 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

8. Nothing in this Assurance of Discontinuance shall be construed so as to limit or bar any other person or entity from pursuing any legal remedies against the Respondent.

APPROVED IN OPEN COURT THIS FEB 15 2012 day of _____, 2011.

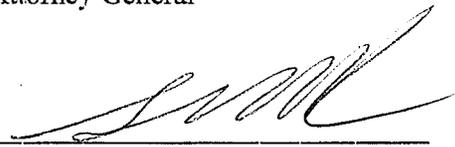
JOAN B. ALLISON

JUDGE/COURT COMMISSIONER

Approved for Entry and Presented by:

Agreed to, Approved for Entry, Notice of Presentation Waived:

ROBERT M. MCKENNA
Attorney General



SHANNON SMITH, WSBA# 19077
Assistant Attorney General
Attorneys for State of Washington



WSBA # 11941
Counsel for Washington State Jaycees Inc.