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2010 FEB 16 PM 2:47

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

NETWORK SERVICES OF PUGET SOUND,
a Washington Non-Profit Corporation, a/k/a
NETWORK MINISTRY and NETWORK
SERVICES; SALLI DEBOER, individually
and as part of her marital community,

Defendants.

NO. 08-2-41558-9SEA

CONSENT DECREE

[CLERK'S ACTION REQUIRED]

I. JUDGMENT SUMMARY

- 1.1 Judgment Creditor: State of Washington
- 1.2 Judgment Debtors: Network Services of Puget Sound, a/k/a Network Ministry and Network Services; Salli DeBoer, individually and as part of her marital community
- 1.3 Judgment Amount: \$3200 (plus \$3000 suspended civil penalties and \$9336 suspended costs and attorneys' fees).
 - (a) Civil Penalty: \$0 imposed. (\$6000 suspended on compliance with the terms of the Consent Decree).
 - (b) Costs & Attorneys' Fees: \$3200 imposed (\$9336 suspended on compliance with the terms of the Consent Decree).

COPY

1 Defendants further agree that this Court shall retain jurisdiction of this action for the
2 purpose of implementing and enforcing the terms and conditions of the Consent Decree and for
3 all other purposes; and

4 The Court finds no just reason for delay;

5 NOW, THEREFORE, it is hereby ORDERED, ADJUDGED, AND DECREED as
6 follows:

7 II. GENERAL

8 2.1 Jurisdiction. This Court has jurisdiction over the subject matter of this action
9 and over the parties. The Plaintiff's Complaint in this matter states claims upon which relief
10 may be granted under the provisions of the Charitable Solicitations Act, RCW 19.09 and the
11 Consumer Protection Act, RCW 19.86.

12 2.2 Defendants. Unless the context otherwise requires, for purposes of this Consent
13 Decree, the term "Defendants" shall mean Network Services of Puget Sound, a/k/a Network
14 Ministry and Network Services, and Salli DeBoer, individually and as part of her marital
15 community.

16 III. INJUNCTIONS

17 3.1 Application of Injunctions. The injunctive provisions of this Consent Decree
18 shall apply to the Defendants and the Defendants' successors, assigns, officers, agents,
19 servants, employees, representatives, affiliates, and all other persons or entities in active
20 concert or participation with the Defendants.

21 3.2 Notice. Defendants shall immediately inform all successors, assigns,
22 transferees, officers, agents, servants, employees, representatives, attorneys, and all other
23 persons or entities in active concert or participation with Defendants of the terms and
24 conditions of this Consent Decree.
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1 **3.3 Injunctions.** Defendants and all successors, assigns, transferees, officers,
2 agents, servants, employees, representatives, affiliates, attorneys, and all other persons or
3 entities in active concert or participation with Defendant are hereby permanently enjoined and
4 restrained from directly or indirectly engaging in the following acts or practices:

5 (a) Defendants shall not solicit charitable contributions from the general
6 public in the state of Washington without being registered to engage in charitable solicitations
7 as required by RCW 19.09.

8 (b) Defendants shall not misrepresent, in any manner, directly or by
9 implication, that all charitable contributions will be used to support a charitable purpose if any
10 of the charitable contributions received by Defendants are used for administrative or
11 fundraising expenses in addition to charitable purposes. "Administrative expenses" includes,
12 but is not limited to expenses relating to Defendants' facilities (including mortgage payments,
13 utilities, and maintenance), executive compensation and benefits, and staff compensation and
14 benefits.

15 (c) Defendants shall not make any misrepresentations in soliciting
16 charitable contributions.

17 (d) Defendants shall not misrepresent, in any manner, directly or by
18 implication, their tax-exempt status with the Internal Revenue Service.

19 (e) Defendants shall include all disclosures required by the Washington
20 Secretary of State on all solicitation materials, including website solicitations.

21 (f) Defendants shall provide all current and successive Board Members
22 with a copy of this Consent Decree within three business days of service of a conformed copy
23 upon Defendants or within three days of appointment to the Board of Directors, whichever is
24 applicable.

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IV. CIVIL PENALTY

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4.1 Pursuant to RCW 19.86.140, a civil penalty of \$3000 is imposed against Defendants. However, the entire civil penalty shall be suspended upon Defendants' compliance with the terms of this Consent Decree.

4.2 Defendants shall be jointly and severally liable for any payment that becomes due under this section. Any payment that becomes due and owing under this section shall be in the form of a valid check paid to the order of the "Attorney General—State of Washington" and shall be due and owing immediately upon order of the Court. Payment shall be sent to the Office of the Attorney General, Attention: Cynthia Lockridge, Administrative Office Manager, 800 Fifth Avenue, Suite 2000, Seattle, Washington, 98104-3188.

V. ATTORNEYS' COSTS AND FEES

5.1 Pursuant to RCW 19.86.080, Plaintiff shall recover and Defendant shall pay the costs and reasonable attorneys' fees incurred by the Plaintiff in pursuing this matter in amount of \$12,536; provided \$9336 of the costs and attorneys' fees are suspended upon Defendants' compliance with the terms of this Consent Decree. Defendants shall pay the **\$3200** in imposed costs and attorneys' fees by making payments in accordance with the following schedule: Defendants shall pay \$25 per month starting on March 1, 2010 for 10 consecutive months; Defendants shall may payments in the amount of \$75 per months for 38 consecutive months starting on January 1, 2011; Defendants shall make the final payment in the amount of \$100 no later than March 1, 2014. The first installment of \$25 shall be due on or before March 1, 2010 and all consecutive payments shall be due on or before the tenth (10th) calendar day of each month until the entire imposed amount is paid. The final payment is due no later than March 1, 2014.

1 subject Defendants to a minimum civil penalty of \$2000 per day for each day beyond 14 days
2 after such reasonable written request that the Attorney General is prevented by Defendants
3 from accessing all records as provided by this paragraph.

4 **6.5** Representatives of the Office of the Attorney General may be permitted to
5 question Defendants, or any officer, director, agent, or employee of any corporation affiliated
6 with Defendants, in deposition, pursuant to the provisions and notice requirements of CR 30, in
7 order to monitor compliance with this Consent Decree.

8 **6.6** Nothing in this Consent Decree shall be construed as to limit or bar any
9 governmental entity or consumer from pursuing other available remedies against Defendants;
10 nor shall anything in this Consent Decree be construed to limit the Attorney General's right to
11 request financial statements from Defendants

12 **6.7** Under no circumstances shall this Consent Decree or the name of the State of
13 Washington, the Office of the Attorney General, Consumer Protection Division, or any of their
14 employees or representatives be used by any Defendant named in the Complaint in connection
15 with any selling, advertising, or promotion of products or services, or as an endorsement or
16 approval of Defendant's acts, practices or conduct of business.

17 **VII. DISMISSAL AND WAIVER OF CLAIMS**

18 **7.1** Upon entry of this Consent Decree, all claims in this matter, not otherwise
19 addressed by this Consent Decree are dismissed; the cause of action set forth in Paragraph 8 of
20 the Complaint is dismissed.

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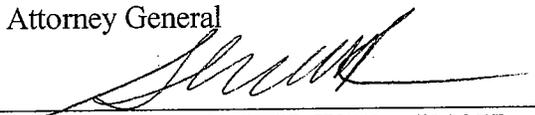
DONE IN OPEN COURT this _____ day of FEB 16 2010, 2010.

ERIC WATNESS
JUDGE/COURT COMMISSIONER

Approved for Entry and Presented by:

Approved for Entry, Notice of Presentation
Waived:

ROBERT M. MCKENNA
Attorney General



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

Frederick P. Corbit, WSBA #10999
Counsel for Defendant
Network Services of Puget Sound

Salli DeBoer
Pro Se

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JUDGE/COURT COMMISSIONER

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Attorney General



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

Frederick P. Corbit, WSBA #10999
Counsel for Defendant
Network Services of Puget Sound

Salli DeBoer
Pro Se

ORIGINAL

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JUDGE/COURT COMMISSIONER

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State of Washington

Frederick P. Corbit, WSBA #10999
Counsel for Defendant
Network Services of Puget Sound

Salli DeBoer ED, NSPS

Salli DeBoer
Pro Se