

FILED

MAR - 2 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

CUSTOM FUNDRAISING
SOLUTIONS, LLC.,

Respondent.

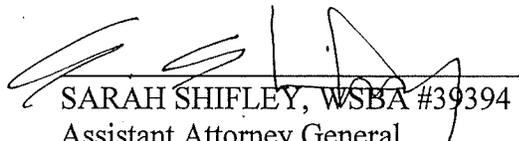
NO. **15-2-00394-9**
PETITION FOR ORDER APPROVING
ASSURANCE OF
DISCONTINUANCE PURSUANT
RCW 19.86.100

COMES NOW, State of Washington, by and through its attorneys, Robert W. Ferguson, Attorney General and Sarah Shifley, Assistant Attorney General and petitions this Court for an Order approving the attached 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. A proposed order is enclosed.

DATED this 6th day of February, 2015.

Presented By:

ROBERT W. FERGUSON
Attorney General


SARAH SHIFLEY, WSBA #39394
Assistant Attorney General
Attorneys for State of Washington

RECEIVED

FEB 20 2015

FILED

CONSUMER PROTECTION DIVISION
SEATTLE

MAR - 3 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

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STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

CUSTOM FUNDRAISING
SOLUTIONS,

Respondent.

NO. 15-2-00394-9
ORDER APPROVING ASSURANCE
OF DISCONTINUANCE PURSUANT
RCW 19.86.100

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, the Court hereby approves and orders entry of the Assurance of Discontinuance in this matter. Following entry of the Assurance of Discontinuance, the clerk is directed to close this matter.

MAR - 3 2015

DATED this _____ day of _____, 2015.

REBEKAH ZINN
COURT COMMISSIONER

JUDGE/COURT COMMISSIONER

Approved for Entry and Presented By:

ROBERT W. FERGUSON
Attorney General

Approved for Entry; Notice of
Presentation Waived:


SARAH SHIFLEY, WSBA# 39394
Assistant Attorney General
Attorneys for State of Washington


Craig S. Andersen, Outside Counsel
(Print Name) WSBA #19810
Custom Fundraising Solutions, LLC,
Authorized Representative

FILED

MAR - 3 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

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**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

In re:

CUSTOM FUNDRAISING
SOLUTIONS, LLC.

Respondent.

NO. 15-2-00394-9

ASSURANCE OF
DISCONTINUANCE

The State of Washington, by and through its attorneys, Robert W. Ferguson, Attorney General, and Sarah Shifley, Assistant Attorney General, files this Assurance of Discontinuance pursuant to RCW 19.86.100.

1. The Attorney General initiated an investigation into the commercial fundraiser registration status of the Respondent, Custom Fundraising Solutions, LLC.

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 commercial fundraiser with the Washington Secretary of State as required by RCW 19.09.

3. Respondent agrees to cease operating as a commercial fundraiser in the state of Washington unless and until Respondent has successfully registered as a commercial fundraiser

1 with the Washington Secretary of State. If Respondent continues to operate as a commercial
2 fundraiser in the state of Washington, proof of the registration must be received by the Office of
3 the Attorney General in order to comply with the requirements of this Assurance of
4 Discontinuance.

5 4. The Respondent agrees to pay the costs and reasonable attorney fees incurred by
6 the Attorney General in pursuing this matter in the amount of \$530.00, payable in full upon
7 signing this Assurance of Discontinuance. Payment shall be made by valid cashier's check, paid
8 to the order of Attorney General—State of Washington.

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

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

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

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

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4 APPROVED IN OPEN COURT THIS _____ day of MAR - 3 2015, 2015.

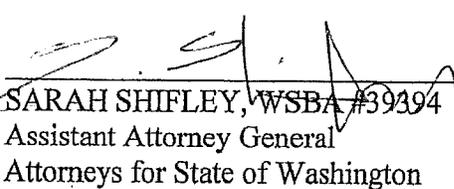
5 REBEKAH ZINN
6 COURT COMMISSIONER

7 JUDGE/COURT COMMISSIONER

8 Approved for Entry and Presented by:

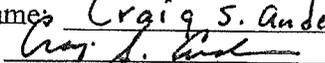
9 Agreed to, Approved for Entry, Notice of
Presentation Waived:

10 ROBERT W. FERGUSON
11 Attorney General

12 
13 SARAH SHIFLEY, WSBA #39394
14 Assistant Attorney General
Attorneys for State of Washington


Custom Fundraising Solutions, LLC,
by its Authorized Representative
Date: 5 February 2015
WSBA #19810

15 Additional information relating to the
16 person authorized by Sadie's Fight
to sign this Assurance of
17 Discontinuance on its behalf:

18 PRINT Name: Craig S. Andersen
Signature: 
19 Position in Organization: outside counsel
Address: 2217 Country Club Rd. Woodburn, Ore.
20 Phone: (503) 989-1933