

FILED
KING COUNTY, WASHINGTON

AUG 28 2015

SUPERIOR COURT CLERK

EXP07

**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

SECOND CHANCE RANCH,
Respondent.

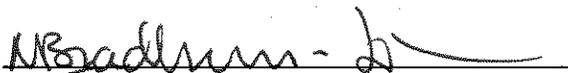
NO. 15-2-21143-9SEA

ORDER APPROVING ASSURANCE
OF DISCONTINUANCE PURSUANT
RCW 19.86.100

Agreed

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.

DATED this ____ day of 8/28, 2015.



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



Nicholas D. Kovarik, WSBA #35462
Piskel Yahne Kovarik, PLLC
Attorney for Second Chance Ranch

FILED
KING COUNTY, WASHINGTON
AUG 31 2015
DEPARTMENT OF
JUDICIAL ADMINISTRATION

EXP07

STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

In re:

SECOND CHANCE RANCH,

Respondent.

NO. 15-2-21143-9SEA

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. In March, 2015 the Attorney General initiated an investigation into the charitable registration status of the Respondent, Second Chance Ranch. The Attorney General's investigation revealed that Second Chance Ranch had not been registered properly from early March, 2013 to May, 2015 and that, during that time, Second Chance Ranch solicited and received over \$50,000 from the general public. In addition, the Attorney General learned that Second Chance Ranch provided false and incorrect information to the Washington Secretary of State regarding Second Chance Ranch's obligation to register as a charity pursuant to the Charitable Solicitations Act, RCW 19.09.

~~COPY~~

1 2. The Attorney General deems the following to constitute unfair or deceptive acts or
2 practices in violation of the Consumer Protection Act, RCW 19.86.020, and violations of the
3 Charitable Solicitation Act, RCW 19.09:

- 4 a. Soliciting or collecting charitable contributions from the
5 general public in the state of Washington, without
6 registering as a charitable organization with the
7 Washington Secretary of State as required by RCW 19.09.
8 b. Providing false or incorrect information to the Washington
9 Secretary of State and the Washington State Attorney
10 General's Office.

11 3. Respondent agrees to register as a charitable organization with the Washington
12 Secretary of State, and maintain proper charitable registration status, while operating as a
13 charitable organization in the state of Washington.

14 4. Respondent agrees that all information it provides to the Washington Secretary of
15 State and Attorney General, including but not limited to information regarding the financial status
16 of the organization, will be truthful and accurate.

17 5. Respondent shall send the signed Assurance of Discontinuance and
18 corresponding Order to the Office of the Attorney General, Attention: Donnelle Brooke,
19 Consumer Protection Division, 800 Fifth Avenue, Suite 2000, Seattle, Washington, 98104-
20 3188.

21 7. This Assurance of Discontinuance shall not be considered an admission of
22 violation of the Consumer Protection Act or the Charitable Solicitations Act for any purposes, but
23 failure to comply with this Assurance of Discontinuance shall be *prima facie* evidence of
24 violations of RCW 19.86.020, thereby placing upon the violator, Second Chance Ranch, and its
25 officers, directors, and principals, the burden of defending against imposition by the Court of
26 injunctions, restitution, and civil penalties of up to \$2,000.00 per violation and costs, including
reasonable attorney's fees, incurred by the Attorney General in pursuing such action.

1 8. Under no circumstances shall this Assurance of Discontinuance or the name of the
2 State of Washington, the Office of the Attorney General, the Washington Secretary of State, or
3 any of its employees or representatives be used by the Respondent or by its officers, employees,
4 representatives, or agents in conjunction with any business activity of the Respondent.

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

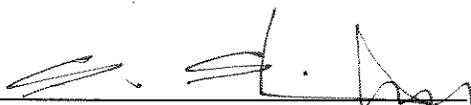
7
8 APPROVED IN OPEN COURT THIS _____ day of 8/31/15, 2015.

9
10 
11 _____
12 JUDGE/COURT COMMISSIONER

12 Approved for Entry and Presented by:

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

14 ROBERT W. FERGUSON
15 Attorney General

16 
17 SARAH SHIFLEY, WSBA #39394
18 Assistant Attorney General
19 Attorneys for State of Washington

20 
21 Nicholas D. Kovarik, WSBA #35462
22 Piskel Yahne Kovarik, PLLC
23 Attorney for Second Chance Ranch

24 Date: 8/25/15