

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

NO.

06205089-9

SUMMONS

**TO THE DEFENDANTS: The Cancer Relief Fund d/b/a Flame of Hope
Cancer Relief Fund, Flame of Life Cancer Relief
Fund, Ray of Hope Cancer Relief Fund, and Spokane
Cancer Relief Fund
10905 E. Montgomery Dr., No. 4
Spokane, WA 99206**

1 A lawsuit has been started against you in the above entitled court by STATE OF
2 WASHINGTON, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is
3 served upon you with this summons.

4 In order to defend against this lawsuit, you must respond to the complaint by stating your
5 defense in writing, and by serving a copy upon the undersigned attorney for the plaintiff within 20
6 days after the service of this Summons; or if served outside the State of Washington, within sixty
7 (60) days after service of this Summons, excluding the day of service, or a default judgment may
8 be entered against you without notice. A default judgment is one where the plaintiff is entitled to
9 what he asks for because you have not responded. If you serve a notice of appearance on the
10 undersigned person, you are entitled to notice before a default judgment may be entered.

11 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
12 demand must be in writing and must be served upon the person signing this summons. Within 14
13 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service
14 on you of this Summons and Complaint will be void.

15 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
16 that your written response, if any, may be served on time.

17 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
18 of Washington.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

DATED this 1st day of November, 2006.

ROB MCKENNA
Attorney General



SHANNON E. SMITH, WSBA #19077
JACK G. ZURLINI, WSBA # 30621
Assistant Attorneys General
Attorneys for Plaintiff
State of Washington

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

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,
Plaintiff,

NO. **06205089-9**
SUMMONS

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

**TO THE DEFENDANT: Brady Kenneth Nelson
2820 S. Sunnybrook Road
Veradale, WA 99037**

A lawsuit has been started against you in the above entitled court by STATE OF
WASHINGTON, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is
served upon you with this summons.

1 In order to defend against this lawsuit, you must respond to the complaint by stating your
2 defense in writing, and by serving a copy upon the undersigned attorney for the plaintiff within 20
3 days after the service of this Summons; or if served outside the State of Washington, within sixty
4 (60) days after service of this Summons, excluding the day of service, or a default judgment may
5 be entered against you without notice. A default judgment is one where the plaintiff is entitled to
6 what he asks for because you have not responded. If you serve a notice of appearance on the
7 undersigned person, you are entitled to notice before a default judgment may be entered.
8

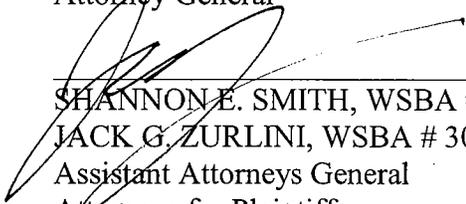
9 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
10 demand must be in writing and must be served upon the person signing this summons. Within 14
11 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service
12 on you of this Summons and Complaint will be void.
13

14 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
15 that your written response, if any, may be served on time.

16 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
17 of Washington.

18 DATED this 1st day of November, 2006.
19

20 ROB MCKENNA
21 Attorney General

22 
23 SHANNON E. SMITH, WSBA #19077
24 JACK G. ZURLINI, WSBA # 30621
25 Assistant Attorneys General
26 Attorneys for Plaintiff
State of Washington

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

NO. **06205089-9**
SUMMONS

TO THE DEFENDANT: Danna B. Nelson
2820 S. Sunnybrook Road
Veradale, WA 99037

A lawsuit has been started against you in the above entitled court by STATE OF WASHINGTON, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

1 In order to defend against this lawsuit, you must respond to the complaint by stating your
2 defense in writing, and by serving a copy upon the undersigned attorney for the plaintiff within 20
3 days after the service of this Summons; or if served outside the State of Washington, within sixty
4 (60) days after service of this Summons, excluding the day of service, or a default judgment may
5 be entered against you without notice. A default judgment is one where the plaintiff is entitled to
6 what he asks for because you have not responded. If you serve a notice of appearance on the
7 undersigned person, you are entitled to notice before a default judgment may be entered.
8

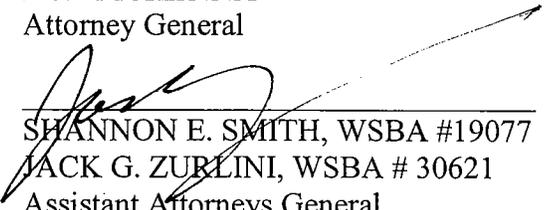
9 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
10 demand must be in writing and must be served upon the person signing this summons. Within 14
11 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service
12 on you of this Summons and Complaint will be void.
13

14 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
15 that your written response, if any, may be served on time.

16 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
17 of Washington.

18 DATED this 1st day of November, 2006.
19

20 ROB MCKENNA
21 Attorney General

22 
23 SHANNON E. SMITH, WSBA #19077
24 JACK G. ZURLINI, WSBA # 30621
25 Assistant Attorneys General
26 Attorneys for Plaintiff
State of Washington

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,
Plaintiff,

NO. **06205089-9**
SUMMONS

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

**TO THE DEFENDANT: Ryan Alexander Nelson
4503 Hwy. 27
Spokane, WA 99206**

A lawsuit has been started against you in the above entitled court by STATE OF WASHINGTON, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

1 In order to defend against this lawsuit, you must respond to the complaint by stating your
2 defense in writing, and by serving a copy upon the undersigned attorney for the plaintiff within 20
3 days after the service of this Summons; or if served outside the State of Washington, within sixty
4 (60) days after service of this Summons, excluding the day of service, or a default judgment may
5 be entered against you without notice. A default judgment is one where the plaintiff is entitled to
6 what he asks for because you have not responded. If you serve a notice of appearance on the
7 undersigned person, you are entitled to notice before a default judgment may be entered.
8

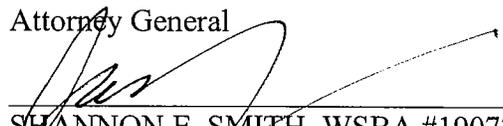
9 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
10 demand must be in writing and must be served upon the person signing this summons. Within 14
11 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service
12 on you of this Summons and Complaint will be void.
13

14 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
15 that your written response, if any, may be served on time.

16 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
17 of Washington.

18 DATED this 1st day of November, 2006.
19

20 ROB MCKENNA
21 Attorney General

22 
23 SHANNON E. SMITH, WSBA #19077
24 JACK G. ZURLINI, WSBA # 30621
25 Assistant Attorneys General
26 Attorneys for Plaintiff
State of Washington

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

NO. **06205089-9**

COMPLAINT FOR INJUNCTIVE
AND OTHER RELIEF UNDER THE
CONSUMER PROTECTION ACT,
CHAPTER 19.86 RCW; AND THE
CHARITABLE SOLICITATIONS
ACT, CHAPTER 19.09 RCW

COMES NOW PLAINTIFF, State of Washington, by and through its attorneys
Rob McKenna, Attorney General and Shannon E. Smith, Senior Counsel, and Jack G. Zurlini,
Jr., Assistant Attorney General, and brings this action against Defendants named herein,
alleging as follows:

///

///

1 **I. JURISDICTION AND VENUE**

2 **1.1** This Complaint is filed and these proceedings are instituted under the

3 **1.2** provisions of the Consumer Protection Act, Chapter 19.86 RCW and the
4 Charitable Solicitations Act, Chapter 19.09 RCW.

5 **1.3** The violations alleged in this Complaint have been and are being committed in
6 whole or in part in Spokane County, Washington, by Defendants named herein.

7 **1.4** The Attorney General is authorized to commence this action pursuant to
8 RCW 19.86.080; 19.86.140; 19.09.340(2).

9 **II. DEFENDANTS**

10 **2.1** Defendant The Cancer Relief Fund is a Washington non-profit corporation that
11 is registered to do business under the trade names "Flame of Hope Cancer Relief Fund,"
12 "Flame of Life Cancer Relief Fund," "Ray of Hope Cancer Relief Fund," and "Spokane Cancer
13 Relief Fund." The Cancer Relief Fund's principal place of business is at 10905 E.
14 Montgomery Dr., No. 4, Spokane, WA 99206.

15 **2.2** Defendant Brady Kenneth Nelson is owner and president of Regal, and, as such,
16 controls its policies, activities, and practices, including those alleged in this Complaint.
17 Brady Nelson also is a director of The Cancer Relief Fund, and, as such, controls its policies,
18 activities, and practices, including those alleged in this Complaint. Defendant Brady Nelson
19 resides at 2820 S. Sunnybrook Road, Veradale, WA 99037. Defendant is married to Danna B.
20 Nelson, and together they constitute a marital community. All actions taken by Defendant
21 Brady Nelson as alleged in the Complaint herein are for the benefit of his marital community.

22 **2.3** Defendant Danna B. Nelson is a director of The Cancer Relief Fund, and, as
23 such, she controls its policies, activities, and practices, including those alleged in this
24 Complaint. Defendant Danna Nelson resides at 2820 S. Sunnybrook Road, Veradale, WA
25 99037. Defendant is married to Brady Kenneth Nelson and together they constitute a marital
26

1 **IV. FACTS**

2 **4.1** Defendants Brady Nelson, Danna Nelson and Ryan Nelson formed Defendant
3 The Cancer Relief Fund, a Washington non-profit corporation, and incorporated into the
4 Regal Satellite's telemarketing activities the representation to consumers that a portion of
5 Regal Satellite's proceeds from the sale of satellite television service would be donated to
6 defendant The Cancer Relief Fund.

7 **4.2** A person or entity that solicits or collects charitable contributions from the
8 general public must be registered as a charitable organization with the Secretary of State
9 pursuant to RCW 19.09.065, unless otherwise exempted from registration pursuant to
10 RCW 19.09.076. At no time material to this action was Defendant The Cancer Relief Fund
11 registered as a charitable organization in the State of Washington and The Cancer Relief Fund
12 does not qualify for exemption from registration.

13 **V. FIRST CAUSE OF ACTION**

14 **(Conducting Charitable Solicitations Without Registering with Secretary of State)**

15 **5.1** Plaintiff realleges paragraphs 1.1 through 4.2 and incorporates them herein as
16 if set forth in full.

17 **5.2** Defendants The Cancer Relief Fund, Brady Nelson, Ryan Nelson, and Danna
18 Nelson solicited or collected charitable contributions in the state of Washington without being
19 registered as a charitable organization pursuant to RCW 19.09.

20 **5.3** The conduct described in paragraph 5.2 violates the Charitable Solicitations
21 Act, specifically RCW 19.09.065; 19.09.100(12), (15), (16), (18). Pursuant to
22 RCW 19.09.340, violations of the Charitable Solicitations Act are *per se* violations of the
23 Consumer Protection Act, RCW 19.86.

24 **5.4** Notwithstanding RCW 19.09.340, the conduct described in paragraph 5.2 has
25 the capacity to mislead a substantial number of consumers and constitutes unfair or deceptive
26

1 acts or practices in trade or commerce, and unfair methods of competition in violation of
2 RCW 19.86.020.

3 **VI. PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff, State of Washington, prays for relief as follows:

5 **6.1** That the Court adjudge and decree that Defendants have engaged in the
6 conduct complained of herein.

7 **6.2** That the Court adjudge and decree that the conduct complained of herein
8 constitutes unfair or deceptive acts and practices and unfair methods of competition in
9 violation of the Consumer Protection Act, Chapter 19.86 RCW.

10 **6.3** That the Court issue a permanent injunction enjoining and restraining
11 Defendants, and their representatives, successors and assigns, officers, agents, servants,
12 employees and all other persons acting or claiming to act for, or on behalf of, or acting in
13 concert or participating with Defendants, from continuing or engaging in unlawful conduct
14 complained of herein.

15 **6.4** That the Court assess a civil penalty, pursuant to RCW 19.86.140, of up to
16 \$2,000 per violation against each of the Defendants for each violation of RCW 19.86.020
17 caused by the conduct complained of herein.

18 **6.5** That the Court make such orders pursuant to RCW 19.86.020 as it deems
19 appropriate to provide for restitution to consumers for money or property acquired by
20 Defendants as a result of the conduct complained of herein.

21 **6.6** That the Court make such orders pursuant to RCW 19.86.020 to provide that
22 Plaintiff, State of Washington, have and recover from Defendants the costs of this action,
23 including reasonable attorneys' fees.

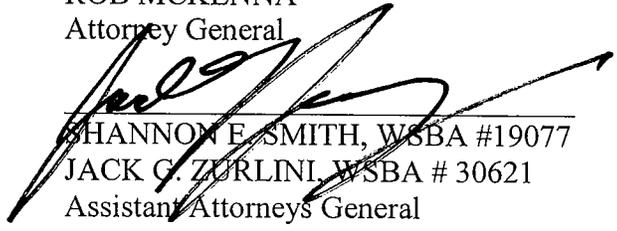
24 **6.7** That the Court order such other relief as it may deem just and proper to fully

25 ///

1 and effectively dissipate the effects of the conduct complained of herein, or which may
2 otherwise seem proper to the Court.

3 DATED this 20th day of November, 2006.

4 ROB MCKENNA
5 Attorney General

6 
7 SHANNON E. SMITH, WSBA #19077
8 JACK G. ZURLINI, WSBA # 30621
9 Assistant Attorneys General
10 Attorneys for Plaintiff
11 State of Washington
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

THE CANCER RELIEF FUND, d/b/a FLAME OF
HOPE CANCER RELIEF FUND, FLAME OF
LIFE CANCER RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY KENNETH
NELSON, individually and as part of his marital
community; DANNA B. NELSON, individually
and as part of her marital community; RYAN
ALEXANDER NELSON, individually and as part
of his marital community,

Defendants.

NO.

06205089-9

CONSENT DECREE

(CLERK'S ACTION
REQUIRED)

I. JUDGMENT SUMMARY

1.1 Judgment Creditor: State of Washington

1.2 Judgment Debtors: The Cancer Relief Fund, d/b/a Flame of
Hope Cancer Relief Fund, Flame of Life
Cancer Relief Fund, Ray of Hope Cancer
Relief Fund, and Spokane Cancer Relief
Fund; Brady K. Nelson, individually and
as part of his marital community;
Danna B. Nelson, individually and as part
of her marital community; and Ryan A.
Nelson, individually and as part of his
marital community

1 Plaintiff and Defendants having agreed on a basis for the settlement of the matters alleged
2 in the Complaint, and to the entry of this Consent Decree against Defendants without the need for
3 trial or adjudication of any issue of law or fact; and

4 Plaintiff and Defendants having agreed that this Consent Decree does not constitute
5 evidence or an admission regarding the existence or non-existence of any issue, fact, or violation
6 of any law alleged by Plaintiff; and

7 Defendants recognize and state that this Consent Decree is entered into voluntarily and
8 that no promises or threats have been made by the Attorney General's Office or any member,
9 officer, agent or representative thereof to induce it to enter into this Consent Decree, except as
10 provided herein; and

11 Defendants waive any right they may have to appeal from this Consent Decree; and

12 Defendants further agree that they will not oppose the entry of this Consent Decree on the
13 grounds the Consent Decree fails to comply with Rule 65(d) of the Rules of Civil Procedure, and
14 hereby waives any objections based thereon; and

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

18 The Court finding no just reason for delay;

19 **NOW, THEREFORE**, it is hereby **ORDERED, ADJUDGED, AND DECREED** as
20 follows:

21 **II. GENERAL**

22 **2.1** Jurisdiction. This Court has jurisdiction over the subject matter of this action and
23 over the parties. The Plaintiff's Complaint in this matter states claims upon which relief may be
24 granted under the provisions of the Charitable Solicitations Act, RCW 19.09, and the Consumer
25 Protection Act, RCW 19.86.

1 the Washington Secretary of State as provided in WAC 434-120-110;

2 (c) Representing, directly or by implication, that Defendants or any other
3 charitable organization or entity Defendants may form is registered with the Washington
4 Secretary of State unless it is so registered;

5 (d) Representing, directly or by implication, to consumers or to
6 representatives of the Washington Secretary of State or the Washington Attorney General's
7 Office that The Cancer Relief Fund or any other charitable organization or entity the
8 Defendants may form has been granted tax-exempt status from the Internal Revenue Service
9 unless that status has been granted and is in effect.

10 **IV. CIVIL PENALTIES**

11 **4.1** Pursuant to RCW 19.86.140, Plaintiff shall have and recover, and Defendants shall
12 be liable for and shall pay, civil penalties of \$5,000.00. However, the entire amount of the
13 penalties are suspended conditioned upon Defendants' full compliance with the terms of this
14 Consent Decree for a period of thirty-six (36) months from entry of this Consent Decree.

15 **4.2** Payment owing under this provision shall be in the form of a valid check paid to
16 the order of the "Attorney General—State of Washington" and shall be due and owing
17 immediately upon entry of the Consent Decree. Payment shall be sent to the Office of the
18 Attorney General, Attention: Cynthia Lockridge, Administrative Office Manager,
19 800 Fifth Avenue, Suite 2000, Seattle, Washington, 98104-3188.

20 **V. ATTORNEY'S COSTS & FEES**

21 **5.1** Pursuant to RCW 19.86.080, Plaintiff shall recover and Defendants shall pay the
22 costs and reasonable attorney's fees incurred by the Plaintiff in pursuing this matter in the amount
23 of \$2,500.00, payable upon entry of this Consent Decree.

24 **5.2** In any successful action to enforce any part of this Consent Decree, Defendants
25 will pay the Attorney General its attorney's fees and costs, including reasonable attorney's fees as
26

1 question Defendants, or any officer, director, agent, or employee of any corporation affiliated
2 with Defendants, in deposition, pursuant to the provisions and notice requirements of CR 30, in
3 order to monitor compliance with this Consent Decree.

4 **6.6** Nothing in this Consent Decree shall be construed as to limit or bar any other
5 governmental entity or consumer from pursuing other available remedies against Defendants.

6 **6.7** Under no circumstances shall this Consent Decree or the name of the State of
7 Washington, the Office of the Attorney General, Consumer Protection Division, or any of their
8 employees or representatives be used by any Defendants named in the Complaint in connection
9 with any selling, advertising, or promotion of products or services, or as an endorsement or
10 approval of Defendants' acts, practices or conduct of business.

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

12 **7.1** Upon entry of this Consent Decree, all claims in this matter, not otherwise
13 addressed by this Consent Decree are dismissed.

14 DONE IN OPEN COURT this ____ day _____, 2006.

15 

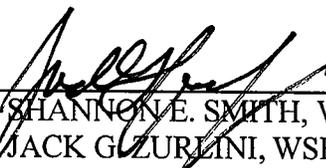
16 **JUDGE/COURT COMMISSIONER**

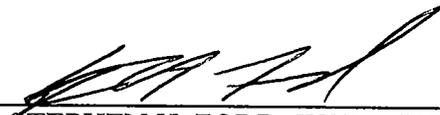
17 **COURT COMMISSIONER**

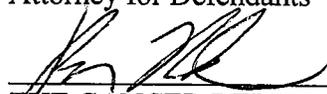
18 Approved for entry and presented by:

19 Approved for Entry, Notice of Presentation
20 Waived:

21 **ROB MCKENNA**
22 Attorney General

23 
24 SHANNON E. SMITH, WSBA #19077
25 JACK GZURLINI, WSBA #30621
26 Assistant Attorneys General
Attorneys for Plaintiff
State of Washington

23 
24 STEPHEN H. FORD, WSBA #22209
25 Attorney for Defendants

26 
THE CANCER RELIEF FUND

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

Defendant
By: Ryan A. Nelson


RYAN A. NELSON
Defendant


BRADY K. NELSON
Defendant


DANNA B. NELSON
Defendant

COPY
ORIGINAL FILED

NOV 21 2006

THOMAS R. FALLQUIST
SPOKANE COUNTY

STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

THE CANCER RELIEF FUND, d/b/a
FLAME OF HOPE CANCER RELIEF
FUND, FLAME OF LIFE CANCER
RELIEF FUND, RAY OF HOPE
CANCER RELIEF FUND, and SPOKANE
CANCER RELIEF FUND; BRADY
KENNETH NELSON, individually and as
part of his marital community; DANNA B.
NELSON, individually and as part of her
marital community; RYAN ALEXANDER
NELSON, individually and as part of his
marital community,

Defendants.

NO. **06205089-9**
ACCEPTANCE OF SERVICE

The undersigned, Stephen H. Ford, attorney for Defendants The Cancer Relief Fund, d/b/a
Flame of Hope Cancer Relief Fund, Flame of Life Cancer Relief Fund, Ray of Hope Cancer
Relief Fund, and Spokane Cancer Relief Fund, Brady Kenneth Nelson, Danna B. Nelson, and
Ryan Alexander Nelson, hereby accepts service of the Summons and Complaint on behalf of
Defendants.

DATED this 10 day of November, 2006.



STEPHEN H. FORD
WSBA # 22209
Attorney for Defendants

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