

FILED

APR - 3 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

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CONSUMER PROTECTION DIVISION
SEATTLE

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

RED BUCKET EQUINE RESCUE,
Respondent.

NO. 15-2-00634-4


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 3rd day of March, 2015.

Presented By:

ROBERT W. FERGUSON
Attorney General


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

FILED

APR - 7 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

RED BUCKET EQUINE RESCUE,
Respondent.

NO. 15-2-00634-4
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.

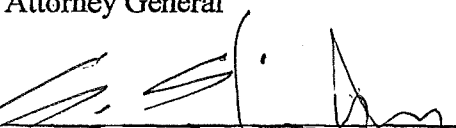
DATED this _____ day of APR - 7 2015 2015.

JAMES J. DIXON

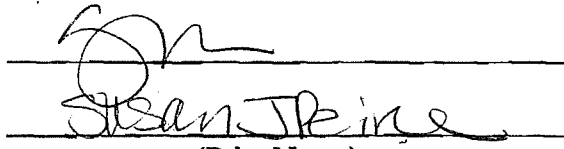
JUDGE/COURT COMMISSIONER

Approved for Entry and Presented By:

ROBERT W. FERGUSON
Attorney General


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

Approved for Entry; Notice of
Presentation Waived:


(Print Name)

Red Bucket Equine Rescue, Athorized
Representative

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FILED

APR - 7 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

In re:

RED BUCKET EQUINE RESCUE,

Respondent.

NO. 15-2-00634-4
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 charitable registration status of the Respondent, Red Bucket Equine Rescue.

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

1 organization in the state of Washington, proof of the registration must be received by the Office of
2 the Attorney General in order to comply with the requirements of this Assurance of
3 Discontinuance.

4 4. The Respondent agrees to pay the costs and reasonable attorney fees incurred by
5 the Attorney General in pursuing this matter in the amount of \$500.00, payable in full upon
6 signing this Assurance of Discontinuance. Payment shall be made by valid cashier's check, paid
7 to the order of Attorney General—State of Washington.

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

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 purposes, but
13 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, Red Bucket Equine Rescue, and
15 its officers, directors, and principals, the burden of defending against imposition by the Court of
16 injunctions, restitution, and civil penalties of up to \$2,000.00 per violation and costs, including
17 reasonable attorney's fees, incurred by the Attorney General in pursuing such action.

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

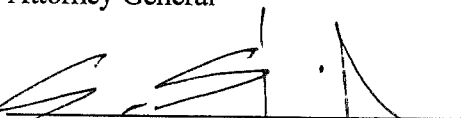
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4 APPROVED IN OPEN COURT THIS APR - 7 2015 day of _____, 2015.

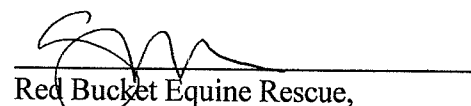
5
6 JAMES J. DIXON
7 JUDGE/COURT COMMISSIONER

8 Approved for Entry and Presented by:

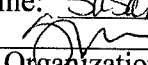
9 Agreed to, Approved for Entry, Notice of
Presentation Waived:

10 ROBERT W. FERGUSON
11 Attorney General

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

15 
16 Red Bucket Equine Rescue,
17 by its Authorized Representative
18 Date: 3-5-15

19 Additional information relating to the
20 person authorized by Red Bucket Equine
21 Rescue to sign this Assurance of
22 Discontinuance on its behalf:

23 PRINT Name: Susan Peirce
24 Signature: 
25 Position in Organization: President
26 Address: 2805 English Ranch Road 115CA
Phone: 30-466-6223