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**FILED**

APR 17 2017

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

In re:

KINDNESS RANCH ANIMAL  
SANCTUARY,

Respondent.

NO. 17-2-02298-34


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 Leilani Fisher, 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 13<sup>th</sup> day of April, 2017.

Presented By:

ROBERT W. FERGUSON  
Attorney General

  
LEILANI FISHER, WSBA #48233  
Assistant Attorney General  
Attorneys for State of Washington

**FILED**

APR 18 2017

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

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**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

In re:  
  
KINDNESS RANCH ANIMAL  
SANCTUARY,  
  
Respondent.

NO. 17-2-02298-34  
  
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.

DATED this 18<sup>th</sup> day of April, 2017.

REBEKAH ZINN  
COURT COMMISSIONER  
\_\_\_\_\_  
JUDGE/COURT COMMISSIONER

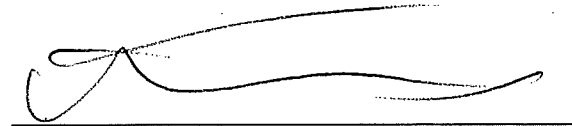
Approved for Entry and Presented By:

Approved for Entry; Notice of  
Presentation Waived:

ROBERT W. FERGUSON  
Attorney General



LEILANI FISHER, WSBA# 48233  
Assistant Attorney General  
Attorneys for State of Washington



Attorney for Kindness Ranch Animal  
Sanctuary

FILED

APR 18 2007

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT

In re:

KINDNESS RANCH ANIMAL  
SANCTUARY,

Respondent.

NO. 17-2-02298-34

ASSURANCE OF  
DISCONTINUANCE

The State of Washington, by and through its attorneys, Robert W. Ferguson, Attorney General, and Leilani Fisher, 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, Kindness Ranch Animal Sanctuary.

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 \$1,000.00, 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, Kindness Ranch Animal  
15 Sanctuary, and its officers, directors, and principals, the burden of defending against imposition  
16 by the Court of injunctions, restitution, and civil penalties of up to \$2,000.00 per violation and  
17 costs, including reasonable attorney's fees, incurred by the Attorney General in pursuing such  
18 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 18<sup>th</sup> day of April, 2017.

5 REBEKAH ZINN  
6 COURT COMMISSIONER  
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JUDGE/COURT COMMISSIONER

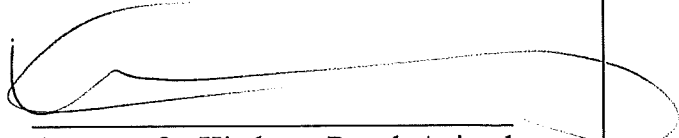
Approved for Entry and Presented by:

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

ROBERT W. FERGUSON  
Attorney General



LEILANI FISHER, WSBA #48233  
Assistant Attorney General  
Attorneys for State of Washington



Attorney for Kindness Ranch Animal  
Sanctuary