

FILED
COPY
JUL 21 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

LEAGUE OF WOMEN VOTERS OF
THE UNITED STATES,

Respondent.

NO. 15-2-01369-3

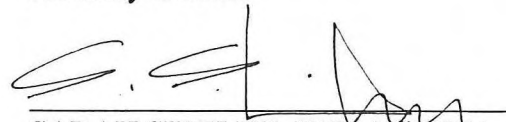
PETITION FOR ORDER APPROVING
ASSURANCE OF
DISCONTINUANCE PURSUANT
RCW 19.86.100

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 7th day of July, 2015.

Presented By:

ROBERT W. FERGUSON
Attorney General


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

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**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

LEAGUE OF WOMEN VOTERS OF
THE UNITED STATES,

Respondent.

NO. 15-2-01369-3
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.

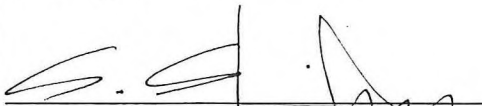
DATED this 21st day of July, 2015.

REBEKAH ZINN
COURT COMMISSIONER

JUDGE/COURT COMMISSIONER

Approved for Entry and Presented By:

ROBERT W. FERGUSON
Attorney General


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

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STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

In re:

LEAGUE OF WOMEN VOTERS OF
THE UNITED STATES,

Respondent.

NO. 15-2-01369-3
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, League of Women Voters of the United States.

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

1 with the Washington Secretary of State. If Respondent continues to operate as a charitable
2 organization 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 \$1,000.00, 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, League of Women Voters of the
16 United States, and its officers, directors, and principals, the burden of defending against
17 imposition by the Court of injunctions, restitution, and civil penalties of up to \$2,000.00 per
18 violation and costs, including reasonable attorney's fees, incurred by the Attorney General in
19 pursuing such action.

20 7. Under no circumstances shall this Assurance of Discontinuance or the name of the
21 State of Washington, the Office of the Attorney General, the Washington Secretary of State, or
22 any of its employees or representatives be used by the Respondent or by its officers, employees,
23 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 21ST day of JULY, 2015.


5 REBEKAH ZINN
6 COURT COMMISSIONER

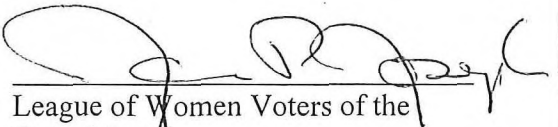
7 ~~JUDGE~~/COURT COMMISSIONER

8 Approved for Entry and Presented by:

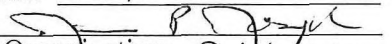
9 Agreed to, Approved for Entry, Notice of
Presentation Waived:

10 ROBERT W. FERGUSON
11 Attorney General

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

15 
16 League of Women Voters of the
17 United States
18 by its Authorized Representative
19 Date: 7/1/15

20 Additional information relating to the
21 person authorized by League of Women
22 Voters of the United States to sign this
23 Assurance of Discontinuance on its behalf:

24 PRINT Name: JAMES P. JOSEPH
25 Signature: 
26 Position in Organization: ATTORNEY
Address: ARNOLD & PORTER KLLP
Phone: 555 12th St, NW
WASHINGTON, DC
20004
202-942-5355