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7 **STATE OF WASHINGTON**  
8 **KING COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 AMERICAN CANCER SOCIETY OF  
13 SEATTLE, a Washington nonprofit  
14 corporation; AMERICAN CANCER  
15 SOCIETY OF WASHINGTON, a  
16 Washington nonprofit corporation;  
17 AMERICAN RED CROSS OF SEATTLE,  
18 a Washington nonprofit corporation;  
19 AMERICAN RED CROSS OF  
20 WASHINGTON, a Washington nonprofit  
21 corporation; UNITED WAY OF  
22 SEATTLE, a Washington nonprofit  
23 corporation; UNITED WAY OF  
24 WASHINGTON, a Washington nonprofit  
25 corporation; and IAN RICHARD  
26 HOSANG, individually.

Defendants.

NO. 18-2-19735-0 SEA

COMPLAINT FOR INJUNCTIVE  
AND OTHER RELIEF

21 The Plaintiff, State of Washington, by and through its attorneys Robert W. Ferguson,  
22 Attorney General, and Joshua Studor, Assistant Attorney General, brings this action against the  
23 Defendant. The State alleges the following on information and belief:

24 **I. PARTIES**

25 1.1 The Plaintiff is the State of Washington.

1 1.2 Defendants American Cancer Society of Seattle, American Cancer Society of  
2 Washington, American Red Cross of Seattle, American Red Cross of Washington, United Way  
3 of Seattle, and United Way of Washington (the Nonprofit Defendants) are nonprofit corporations  
4 registered with the Washington Secretary of State. None of the Nonprofit Defendants are  
5 associated with the internationally recognized American Cancer Society, American Red Cross,  
6 or United Way organizations.

7 1.3 Defendant Ian Richard Hosang is the registered agent for all six of the entity  
8 defendants. He lists his street and mailing addresses as 1425 Broadway, Suite 260, Seattle, WA  
9 98122. However, Hosang resides in Brooklyn, New York. All actions taken by Hosang as alleged  
10 in this Complaint are for his benefit.

11 **II. THE ATTORNEY GENERAL IS AUTHORIZED TO COMMENCE THIS**  
12 **ACTION PURSUANT TO RCW 19.86 AND RCW 24.03.**

13 2.1 The Attorney General has authority under RCW 19.86.080 to prevent and restrain  
14 violations of the Consumer Protection Act.

15 2.2 The Attorney General has authority under RCW 24.03.040 to prevent and restrain  
16 violations of the Nonprofit Corporations Act and to seek involuntary dissolution of a defendant  
17 nonprofit corporation.

18 **III. JURISDICTION AND VENUE**

19 3.1 The State files this Complaint and institutes these proceedings under the  
20 provisions of the Nonprofit Corporations Act, RCW 24.03.

21 3.2 The Defendants have engaged in the conduct set forth in this Complaint in King  
22 County and elsewhere in the State of Washington.

23 3.3 Venue is proper in King County pursuant to RCW 4.12.020 and 4.12.025, and  
24 Court Rule 82 because the Defendants have transacted business in King County, and provides  
25 consumers and the Secretary of State with an address in King County.  
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1 **IV. FACTS**

2 4.1 The American Cancer Society was established in 1913 as a nationwide voluntary  
3 health organization focused on reducing instances of cancer. It is based in Atlanta, Georgia but  
4 has local chapters throughout the United States. The American Cancer Society has offices in  
5 Everett, Seattle, Spokane, and Tacoma, Washington.

6 4.2 The American Red Cross (a.k.a. American National Red Cross) is a nonprofit  
7 organization founded in 1881 and focused on emergency assistance, disaster relief, and disaster  
8 preparedness. It is headquartered in Washington, D.C. The American Red Cross Northwest  
9 Region has an office in Seattle.

10 4.3 The United Way Worldwide was established in 1887 and is an international  
11 charitable organization headquartered in Alexandria, Virginia, focused on strengthening  
12 communities through education and advocacy. There are a number of United Way chapters in  
13 Washington, including the United Way of King County, which is located in Seattle, Washington.

14 4.4 Though they share names, the entity defendants are not associated with the  
15 organizations described in paragraphs 4.1 through 4.3.

16 4.5 On November 7, 2016, Ian R. Hosang, filed articles of incorporation for the  
17 American Cancer Society of Washington. The Secretary of State assigned a UBI Number of 604  
18 055 015. Its stated purpose is to “actively assist individuals who have cancer by providing them  
19 and their families with money, food, clothing, and transportation during their hospitalization and  
20 recovery period.” It identifies 1425 Broadway, Suite 260, Seattle, WA 98122 as its principle  
21 office street address. On information and belief, American Cancer Society of Washington has  
22 not solicited charitable contributions in Washington and has not registered as a charitable  
23 organization. American Cancer Society of Washington is not associated with the national  
24 organization headquartered in Atlanta, Georgia.

25 4.6 On February 8, 2018, Ian R. Hosang, filed articles of incorporation for the  
26 American Cancer Society of Seattle. The Secretary of State assigned a UBI Number of 604 225

1 611. Its stated purpose is to “provide food, clothing, transportation, shelter and financial  
2 assistance to individual who have been diagnosed with cancer and their families.” On  
3 information and belief, American Cancer Society of Seattle has not solicited charitable  
4 contributions in Washington and has not registered as a charitable organization. American  
5 Cancer Society of Seattle is not associated with the national organization headquartered in  
6 Atlanta, Georgia.

7 4.7 On February 9, 2018, Ian R. Hosang, filed articles of incorporation for the  
8 American Red Cross of Seattle. The Secretary of State assigned a UBI Number of 604 225 804.  
9 Its stated purpose is to “assist and provide support, in the form of food, clothing, housing,  
10 transportation and financial assistance to individuals and or families who have been displaced,  
11 either by nature or man made, by disasters. (sic)” On information and belief, American Red  
12 Cross of Seattle has not solicited charitable contributions in Washington and has not registered  
13 as a charitable organization. American Red Cross of Seattle is not associated with the national  
14 organization headquartered in Washington, D.C.

15 4.8 On February 8, 2018, Ian R. Hosang, filed articles of incorporation for the  
16 American Red Cross of Washington. The Secretary of State assigned a UBI Number of 604 225  
17 278. Its stated purpose is to “assist and provide support, in the form of food, clothing, housing,  
18 transportation and financial assistance to individuals and or familiew (sic) who have been  
19 displaced, either by nature or man made, by disasters, (sic)” On information and belief, American  
20 Red Cross of Washington has not solicited charitable contributions in Washington and has not  
21 registered as a charitable organization. American Red Cross of Washington is not associated  
22 with the national organization headquartered in Washington, D.C.

23 4.9 On February 9, 2018, Ian R. Hosang, filed articles of incorporation for the United  
24 Way of Seattle. The Secretary of State assigned a UBI Number of 604 225 801. Its stated purpose  
25 is to “focus on education, financial stability and health, the building blocks for a good life and a  
26 strong community. We will measure our success in the actual number of lives, out (sic) assistance

1 and guidance, changed in a positive and progressive way, creating a strong and better society  
2 (sic).” On information and belief, the United Way of Seattle has not solicited charitable  
3 contributions in Washington and has not registered as a charitable organization. The United Way  
4 of Seattle is not associated with the national organization headquartered in Alexandria, Virginia.

5 4.10 On February 9, 2018, Ian R. Hosang, filed articles of incorporation for the United  
6 Way of Washington. The Secretary of State assigned a UBI Number of 604 224 798. Its stated  
7 purpose is to “focus on education, financial stability and healthk (sic) the building blocks for a  
8 good life and a strong community. We will measure our success in the actual number of lives,  
9 our assistance and guidance, changed in a positive and progressive way, creating a stronger and  
10 better society (sic).” On information and belief, the United Way of Washington has not solicited  
11 charitable contributions in Washington and has not registered as a charitable organization. The  
12 United Way of Washington is not associated with the national organization headquartered in  
13 Alexandria, Virginia.

14 4.11 None of the Defendants live, work, or operate out of 1425 Broadway, Suite 260,  
15 Seattle, WA 98122. The listed address is actually a mailbox within a commercial mail drop.  
16 When any of the defendants receive mail at the Broadway address, the commercial mail drop  
17 forwards the items to P.O. Box 30029, Brooklyn, NY 11203.

18 4.12 In addition to registering the Defendant nonprofit corporations, Hosang registered  
19 nonprofits in Michigan, California, Wisconsin, Ohio, Georgia, New York, Florida, and Maryland  
20 all using variations on the names United Way, American Red Cross, and American Cancer  
21 Society.

22 4.13 Hosang’s registration of the Defendants using the names of three well-known  
23 nonprofit charities is likely to cause confusion regarding whether his organizations are the  
24 legitimate organizations. For example, if a member of the public were to search the Secretary of  
25 State’s web site for “Red Cross,” in order to contribute to the legitimate organization, he or she  
26

1 will likely find the American Red Cross of Seattle and believe it is his or her local branch of the  
2 American Red Cross.

3 4.14 The Defendants serve no legitimate charitable or commercial purpose. On  
4 information and belief, they do not actively solicit charitable contribution, distribute charity, or  
5 provide any educational services. They are not registered as charitable organizations with the  
6 Secretary of State. The Defendants have no office location, no web presence, and no phone  
7 number. None of the board members even reside in Washington State.

8 4.15 On information and belief, the purpose of the Defendant nonprofits is to obscure  
9 financial transactions in a manner that would likely be prohibited by law.

10 **V. FIRST CAUSE OF ACTION**  
11 **(Petition for Involuntary Dissolution)**

12 5.1 Plaintiff realleges paragraphs 1.1 through 4.15 and incorporates them herein by this  
13 reference.

14 5.2 The nonprofit corporation defendants are registered with the Washington Secretary  
15 of State under the provisions of the Nonprofit Corporations Act (RCW 24.03). The Nonprofit  
16 Corporations Act, RCW 24.03.250, allows the superior court to involuntarily dissolve a nonprofit  
17 corporation when its directors and/or those in control of the corporations have acted, are acting, or  
18 will act in a manner that is illegal, oppressive, or fraudulent.

19 5.3 The Defendant's articles of incorporation were obtained by fraud because

- 20 • Neither Hosang nor any other members of the board are associated with the
- 21 organizations whose names were used;
- 22 • Hosang included a fraudulent physical office address;
- 23 • Hosang included a fraudulent street address for the registered agent;
- 24 • Hosang included a fraudulent purpose.

25 5.4 None of the six corporation defendants were incorporated for a lawful purpose.  
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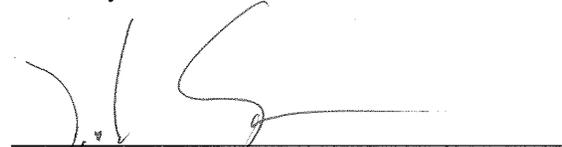
1 all other persons acting or claiming to act for, on behalf of, or in active concert or participation with  
2 the Defendants, from continuing or engaging in the unlawful conduct complained of herein.

3 7.5 That the Court involuntarily dissolve defendants American Cancer Society of  
4 Seattle, American Cancer Society of Washington, American Red Cross of Seattle, American Red  
5 Cross of Washington, United Way of Seattle, and United Way of Washington, and distribute any  
6 remaining assets to one or more domestic or foreign corporations, societies, or organizations  
7 engaged in charitable activities substantially similar to the stated charitable purposes of the  
8 defendant corporations.

9 7.6 For such other relief as the Court may deem just and proper.

10 DATED this 7<sup>th</sup> day of August, 2018.

11 ROBERT W. FERGUSON  
12 Attorney General

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