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

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 CA CERTIFICATE SERVICE LLC d/b/a
13 WA CERTIFICATE SERVICE, a Florida
14 limited liability company; JAMES L.
15 BEARD, individually; CORPORATE
16 COMPLIANCE SERVICE LLC, a Florida
17 limited liability company; DEAN G.
18 MARSHLACK, individually and as part of
19 the marital community comprised of DEAN
20 G. MARSHLACK and AMANDA M.
21 MARSHLACK; CENTURION GROUP
INVESTMENTS LLC, a Florida limited
liability company; CHAD M. DAVIS a/k/a
CHAD MERK, individually; MERK
ENTERPRISES, LLC, a Florida limited
liability company; JOSHUA T. STRAWN,
individually; ERRL HOLDINGS, LLC, a
Florida limited liability company,

Defendants.

NO.

COMPLAINT FOR INJUNCTIVE
AND OTHER RELIEF UNDER THE
CONSUMER PROTECTION ACT,
RCW 19.86

22 Plaintiff, State of Washington, by and through its attorneys Robert W. Ferguson,
23 Attorney General, and Shidon B. Aflatooni and Sebastian Miller, Assistant Attorneys General,
24 brings this action against Defendants CA Certificate Service LLC d/b/a WA Certificate Service,
25 James L. Beard, Corporate Compliance Service LLC, Dean G. Marshlack, Centurion Group
26 Investments LLC, Chad M. Davis a/k/a Chad Merk, Merk Enterprises, LLC, Joshua T. Strawn,

1 and Errl Holdings, LLC (collectively, “Defendants”). The State alleges the following on
2 information and belief:

3 I. INTRODUCTION

4 1.1 For years, Defendants have perpetrated a large scale, lucrative mail solicitation
5 scheme designed to victimize small business owners in Washington. By disseminating thousands
6 of solicitations that appear to be bills sent by or on behalf of the Washington Secretary of State
7 (“SOS”) demanding payment for \$82.50, Defendants dupe these unsuspecting business owners
8 into purchasing a *non-mandatory* certificate that simply certifies the business is current and
9 authorized to conduct business in Washington—a certificate that can be purchased from the SOS
10 for only \$20.¹ From March 2019 through early February 2022, Defendants mailed over 195,000
11 deceptive solicitations to Washington business owners, almost 15,000 of whom responded by
12 sending payment to Defendants. As a result, Defendants have cheated thousands of small business
13 owners out of \$82.50, resulting in more than \$1.18 million in ill-gotten gains for Defendants.

14 1.2 Defendants’ certificate “service” provides no value to Washington business owners,
15 and is part of a larger, nationwide scam that also targets small businesses outside of Washington.
16 Defendants’ scam preys on small business owners’ desire to remain in good standing with the SOS.
17 Not surprisingly, the Washington Attorney General’s Office and SOS have received scores of
18 complaints about Defendants’ solicitations, and the Better Business Bureau has awarded CA
19 Certificate Service an “F” rating.

20 1.3 Defendants’ egregious, widespread practice of impersonating the government and
21 mailing deceptive solicitations for the purchase of non-mandatory certificates violates the
22 Washington Consumer Protection Act, RCW 19.86.020. The State files this lawsuit to recover the
23 amounts paid to Defendants by hard-working Washingtonians, seek civil penalties for Defendants’
24 unlawful behavior, and to put an end to Defendants’ deceptive practices in Washington.

25
26 ¹ <https://www.sos.wa.gov/corps/certificatesofstatus.aspx> (last accessed Mar. 15, 2022).

II. PARTIES

2.1 The Plaintiff is the Attorney General of the State of Washington.

2.2 Defendant CA Certificate Service LLC d/b/a WA Certificate Service (“CACS”), is a Florida limited liability company whose principal place of business is at 4326 26th Ave. N., St. Petersburg, FL 33713. CACS is registered to conduct business in Washington and its Unified Business Identifier number is 604 426 584.

2.3 Defendant James L. Beard (“Beard”), upon information and belief, is an unmarried individual residing in St. Petersburg, Pinellas County, Florida. At all times material to this Complaint, Beard owned CACS.

2.4 Defendant Corporate Compliance Service LLC (“Corporate Compliance”) is a Florida limited liability company whose principal place of business is at 4326 26th Ave. N., St. Petersburg, FL 33713. At all times material to this Complaint, Beard owned Corporate Compliance.

2.5 Defendant Dean G. Marshlack (“Marshlack”) is a married individual residing in Odessa, Hillsborough County, Florida. All acts of Marshlack alleged herein were taken on behalf of himself and his marital community. Upon information and belief, at all times material to this Complaint, Marshlack was an owner, partner, shareholder, employee and/or agent of CACS.

2.6 Defendant Centurion Group Investments LLC (“Centurion”) is a Florida limited liability company whose principal place of business is at 2312 4th St. N., Suite 104, St. Petersburg, FL 33704. At all times material to this Complaint, Marshlack owned Centurion.

2.7 Defendant Chad M. Davis a/k/a Chad Merk (“Davis”), upon information and belief, is an unmarried individual residing in Seminole, Pinellas County, Florida. Upon information and belief, at all times material to this Complaint, Davis was an owner, partner, shareholder, employee and/or agent of CACS.

1 2.8 Defendant Merk Enterprises, LLC (“Merk Enterprises”) is a Florida limited liability
2 company whose principal place of business is at 4289 “73th” Ave., Pinellas Park, FL 33781. At all
3 times material to this Complaint, Davis owned Merk Enterprises.

4 2.9 Defendant Joshua T. Strawn (“Strawn”), upon information and belief, is an
5 unmarried individual residing in St. Petersburg, Pinellas County, Florida. Upon information and
6 belief, at all times material to this Complaint, Strawn was an owner, partner, shareholder, employee
7 and/or agent of CACS.

8 2.10 Defendant Errl Holdings, LLC (“Errl Holdings”) is a Florida limited liability
9 company whose principal place of business is at 4289 “73th” Ave., Pinellas Park, FL 33781. At all
10 times material to this Complaint, Strawn owned Errl Holdings.

11 2.11 Defendants Beard, Marshlack, Davis, and Strawn are sued in their individual
12 capacity and capacity as owners, partners, shareholders, employees and/or agents of CACS because
13 they are personally liable for the violations alleged herein in that, upon information and belief, they
14 participated in the acts and practices that form the basis of the allegations set forth in this Complaint.
15 These Defendants are also personally liable for the violations alleged herein because they had actual
16 or constructive knowledge of the acts and practices alleged and approved of such deceptive acts
17 and practices.

18 **III. JURISDICTION AND VENUE**

19 3.1 The State files this Complaint and institutes these proceedings under the
20 provisions of the Consumer Protection Act (“CPA”), RCW 19.86.

21 3.2 Defendants have purposefully availed themselves of the privileges and benefits
22 of conducting business in King County and elsewhere in the State of Washington by engaging
23 in the conduct set forth in this Complaint, including but not limited to, mailing solicitations to
24 and receiving payment from businesses located in King County.

3.3 Venue is proper in King County pursuant to RCW 4.12.020 and 4.12.025, and Court Rule 82 because the cause of action arose, in part, in King County and Defendants transacted business in King County.

3.4 The Attorney General is authorized to commence this action pursuant to RCW 19.86.080 and RCW 19.86.140. The Washington State Attorney General’s Office created the Consumer Protection Division to detect, investigate, and prosecute any act prohibited or declared to be unlawful under the Washington Consumer Protection Act.

IV. FACTS

4.1 On or about March 13, 2019, prior to CACS being registered to conduct business in Washington, Defendants began mailing deceptive solicitations to owners of newly formed Washington businesses, many of them small businesses.

4.2 Indicative of the fraud Defendants were perpetrating, Washington business owners almost immediately began submitting complaints to the Washington Secretary of State (“SOS”) and Washington Attorney General’s Office (“AGO”).

4.3 Since March 19, 2019, the AGO has received 89 complaints against CACS.

A. Defendants' Mass Mailing Operations

4.4 Shortly after a Washington business owner registers his or her business with the SOS, Defendants mail a deceptive solicitation to that new business owner (“new Washington business owner”).

4.5 Defendants prepare their solicitations for mass mailing to new Washington business owners several times per week, through a third-party vendor located in Florida.

4.6 Upon information and belief, using a computer script that scrapes information, including the entity’s name, type (*e.g.*, LLC), registration date, principal address, and Unified Business Identifier number (“Washington specific data”), several times per week, Defendants obtain information regarding new Washington business owners from information made publicly available by the SOS.

1 4.7 Several times per week, Defendants provide their vendor with this Washington
2 specific data, which the vendor uses to prepare the solicitations and envelopes for mailing, and
3 regularly mass mails the solicitations on the same day it receives the Washington specific data.

4 4.8 Beginning in April 2021, Defendants began a “remarket” campaign, which upon
5 information and belief, involved Defendants mass mailing solicitations on a weekly basis
6 targeting (1) business owners who registered their business in 2020 with the SOS and previously
7 paid Defendants for a certificate in response to their deceptive solicitations, and (2) select
8 business owners of whom Defendants previously mailed the business owner the “new
9 Washington business owner” solicitation (“Remarket Solicitations”).

10 4.9 Prior to each mass mailing, Davis, or one or more unidentified individuals
11 responding from the email address records@corpcomplianceservice.com or
12 records@certificatefilings.com, approves the content and form of the solicitations and envelopes
13 with the vendor, and is responsible for submitting payment to the vendor, billed to
14 Corporate Compliance.

15 **B. Scam Alerts And Prior Enforcement Actions Against CACS**

16 4.10 Soon after receiving complaints about CACS, on or about March 18, 2019, the
17 SOS issued a scam alert regarding Defendants’ “misleading letters” and informed the public that
18 Defendants’ solicitations suggest business owners must order a Certificate of Status to complete
19 their business registration process, and that if a business owner needs to order this certificate, it
20 could be purchased from the SOS for \$20, not the \$82.50 “invoiced” in the solicitation.²

21 4.11 Defendants also mass mail similar, deceptive solicitations to business owners
22 registered in Georgia, Michigan, Minnesota, Nevada, Ohio, Utah, and Virginia.

23 4.12 The Michigan Attorney General, the Utah Department of Commerce, and the
24 Virginia Attorney General have sued CACS regarding Defendants’ deceptive solicitations, and

25
26 ² Misleading letters asking for fees, [https://www.sos.wa.gov/corps/misleading-letters-asking-for-](https://www.sos.wa.gov/corps/misleading-letters-asking-for-fees.aspx)
fees.aspx (last accessed Mar. 15, 2022).

1 Georgia and Ohio have issued scam alerts warning business owners about Defendants'
2 misleading and deceptive solicitations.³

3 4.13 As of the date of this lawsuit, CACS has an “F” rating with the Better
4 Business Bureau.⁴

5 **C. Defendants’ Deceptive Solicitations and Envelopes**

6 4.14 From March 2019 through early February 2022, Defendants mass mailed 189,672
7 deceptive solicitations to new Washington business owners, plus an additional 5,369 deceptive
8 Remarket Solicitations between April 2021 and early February 2022, totaling
9 195,041 solicitations.

10 4.15 Through December 2021, at least 14,743 Washington business owners were
11 deceived into sending Defendants payment to purchase a non-mandatory certificate.

12 4.16 The Washington small business owner response rate of 7.5 percent⁵ to
13 Defendants’ solicitations is nearly four to six times higher than the expected response rate for
14 comparable solicitations.⁶

15 4.17 Washington business owners have paid Defendants more than \$1.18 million after
16 deducting chargebacks and refunds, which upon information and belief, were issued to business
17 owners, who after paying for a certificate, later realized the solicitation was a scam.

18 ³ See, e.g., LaRose Warns Ohio Businesses to Watch for Deceptive Letters,
19 <https://www.ohiosos.gov/media-center/press-releases/2020/2020-03-06/> (last accessed Mar. 15, 2022).

20 ⁴ <https://www.bbb.org/us/fl/saint-petersburg/profile/not-elsewhere-classified/ca-certificate-service-llc-0653-90360111> (last accessed Mar. 15, 2022).

21 ⁵ Defendants’ response rate is likely higher because payment data is only through December 2021, while
22 solicitation mailing data is through early February 2022.

23 ⁶ In *State v. LA Investors, LLC*, 2 Wn. App.2d 524, 410 P.3d 1183 (2018), *review denied*, 190 Wn.2d 1023,
24 418 P.3d 796 (2018), the State of Washington sued a company for mass mailing deceptive solicitations demanding
25 payment for a copy of a property deed to Washington property owners who recently purchased or refinanced a
26 home. In its opinion affirming the trial court’s order that these solicitations created the deceptive net impression
that they were sent by a governmental agency and a bill that must be paid, the Court of Appeals discussed the State’s
expert’s opinion who opined that LA Investors’ 3.9 percent response rate “was two to three times the expected rate
of average response for comparable mailers” and that LA Investors’ solicitations “enjoyed a high response rate,
even though it failed to use many of the most effective methods used in direct mail to increase response rates, ‘such
as offering free gifts and free trials, providing money-saving offers, highlighting testimonials concerning the value
of the product, and featuring prominently money-back guarantees of satisfaction.’” *LA Investors, LLC*,
2 Wn. App.2d at 530, 532-533.

1 4.18 If a Washington business owner is deceived into sending money in response to a
2 solicitation, Defendants, upon information and belief, purchase a “Certificate of Existence” (aka
3 Certificate of Status) from the SOS for \$20 and that certificate is sent to the business owner.

4 **1. Solicitations mailed to new Washington business owners**

5 4.19 Defendants mass mailed their first solicitations to Washington business owners
6 on March 13, 2019, and after slightly revising their solicitation prior to their next mass mailing,
7 Defendants mass mailed solicitations targeting new Washington business owners that contained
8 similar language and formatting. *See, e.g.*, Exhibits A-D (2019-2021 form solicitations).

9 4.20 The format, images, and content of Defendants’ solicitations create the deceptive
10 net impression that the solicitation is a bill or invoice from or on behalf of a governmental agency
11 of which payment is required, including:

- 12 • The top states in bold, capital letters “[YEAR] CERTIFICATE OF STATUS
13 REQUEST FORM,” or starting in 2021 “CERTIFICATE OF EXISTENCE
14 REQUEST FORM.”
- 15 • The top left corner contains an official-looking seal identifying “Washington
16 Certificate Service” with the image of a check mark superimposed on
17 a document.
- 18 • The business owner is directed in bold, capital letters to complete the form
19 stating, “IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN
20 COMPLETING THIS FORM. PLEASE PRINT CLEARLY.”
- 21 • Identifying a “Key Code,” the business’ “UBI Number,” a “Notice Date,” and
22 placement of barcodes, which serve no function.
- 23 • Language that purchase is necessary to complete the registration process with
24 the SOS: “You have one step left in order to attain your elective Washington
25 Certificate of Status. Below is a form for your newly registered business.
26

Please confirm the accuracy of the information below for your Washington Certificate of Status Request.” (emphasis in original).

- Creating a false sense of urgency that the certificate must be purchased by a certain date, stating in large, bold, capital letters, “PLEASE RESPOND BY” and providing an artificial deadline.
- A “Certificate of Status Fee” of \$82.50, and following the fee notation, four steps the business owner must complete to order the certificate.

4.21 Some Washington business owners believed the solicitation was from the SOS, as indicated by payments sent to Defendants addressing the payee as the “Washington SOS,” “Wa. Secretary of State,” or “Washington Secretary of State.”

4.22 The sole, inconspicuous disclaimer in the middle of the solicitation, surrounded by official-sounding language, states in small print, “This is not a government agency.”

2. Remarket solicitations mailed to Washington business owners

4.23 The Remarket Solicitations are similar to solicitations mailed to new Washington business owners, but contain a slightly different appearance and language, including:

- The top right identifies the year in large numbers that mimic official documents such as federal tax returns: the “20” appears in large, outlined characters, and the “21” appears in large, bolded gray characters.

2021 CERTIFICATE OF STATUS REQUEST UPDATE FORM



WA Certificate Service
1420 Marvin Road NE
Suite C - 348
Lacey, WA 98516

QUESTIONS?



TOLL FREE (888) 842-9265

- Removes “Congratulations on registering your business with the State of Washington” and replaces with **“Congratulations on your continued business in the state of Washington for the year of 2021.”**
- Removes “Your Articles have been filed with the secretary of state and are complete” and replaces with “Your Annual Report has been filed with the secretary of state and your business maintains an active status.” *Compare*, Exhibits D and E.

4.24 Similar to the solicitations mailed to new Washington business owners, the Remarket Solicitations create the deceptive net impression that the solicitation is a bill or invoice from a governmental agency of which payment is required.

3. Form and content of envelopes

4.25 Standing alone, Defendants’ solicitations create the deceptive net impression that the solicitation is a bill or invoice from a governmental agency of which payment is required; however, the form and content of the envelopes also contribute to creating this deceptive net impression, including:

- Identifying the sender’s address as a local Washington address.
- The official-looking seal identifying “Washington Certificate Service” with the image of a check mark superimposed on a document.
- The left side of the envelope states in bold, black capital text “IMPORTANT -- OPEN IMMEDIATELY” and below in bold, red capital text “2019-CERTIFICATE OF STATUS REQUEST FORM” and below that in bold, black capital text “BUSINESS MAIL – TIME SENSITIVE.”

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- The bottom right of the envelope identifies the year in large numbers mimicking official documents: the “20” appears in large, black outlined characters and the “19” appears in large, bolded black characters.



4.26 Over the course of more than a year, there were slight variations to Defendants’ envelopes, but these envelopes remained largely the same until May 2020. *See, e.g.*, Exhibit F (envelopes in use starting April 2019), Exhibit G (envelopes in use starting approximately January 2020), Exhibit H (envelopes in use starting approximately May 2020).

D. Defendants’ Use of Local Mailboxes to Deceive Washington Business Owners

4.27 Defendants rent mailboxes from local mailbox providers, and on the solicitations and envelopes, have identified five different Washington addresses in Federal Way, Seattle, Tacoma, Lacey, and Bainbridge Island to create the deceptive net impression that CACS is or acting on behalf of a local governmental agency.

4.28 After Washington business owners mail checks or money orders to these local addresses, the mailbox providers forward all correspondence to Defendants’ home base in and around St. Petersburg, Florida, mainly to addresses associated with Marshlack.

4.29 These mailboxes have been opened and paid for by Beard and/or Marshlack, including through Marshlack’s company Centurion.

1 4.30 Defendants have been forced to use several mailboxes because the mailbox
2 providers at the Federal Way, Seattle, and Tacoma locations shut down Defendants' mailbox
3 after receiving numerous complaints about CACS and/or determining CACS was a scam.

4 4.31 Upon information and belief, Defendants continue to use the Bainbridge Island
5 address as the return address on their solicitations.

6 **E. Weekly Distributions to the Individual Defendants**

7 4.32 Beard, Marshlack, Davis and Strawn are paid weekly distributions from CACS'
8 operational account, which upon information and belief, includes funds from CACS' operations
9 in Washington, Georgia, Michigan, Minnesota, Nevada, Ohio, Utah, and Virginia.

10 4.33 Of the weekly distributions from CACS' operational account, Marshlack, Davis,
11 and Strawn each generally receive 30 percent, and Beard receives 10 percent.

12 4.34 From March 2019 through mid-December 2021, CACS distributed more than
13 \$3.6 million to Beard, Marshlack, Davis or Merk Enterprises, and Strawn or Errl Holdings.

14 **F. The Individual Defendants' Current and Prior Businesses Sending Deceptive**
15 **Postcards and Solicitations and Related Scam Alerts and State Actions**

16 4.35 Defendants Beard, Marshlack, Davis, and Strawn are prolific scammers who,
17 since 2013, have operated businesses sending deceptive postcards or solicitations, similar to
18 solicitations Defendants mail for CACS, to consumers and business owners, as a result of which
19 various states have issued scam alerts or taken legal action. These businesses include:

- 20 • **Business Filing Services Inc.**, owned by Strawn. In 2014, North Carolina
21 issued a scam alert for solicitations seeking payment for a certificate of
22 existence warning, **"This is a scam."** (emphasis in original).⁷
- 23 • **Division of Corporate Services Inc.**, owned by Davis and Strawn. In 2015,
24 the Michigan Attorney General sued for misleading solicitations designed to

25 ⁷ 2014 Certificate of Existence Scam,
26 https://www.sosnc.gov/documents/forms/Business_Registration/alerts/2014_certificate_of_existense.pdf (last
accessed Mar. 15, 2022).

1 appear as an official state form that a business or non-profit was required to
2 complete annually, and that sought payment for fake business meeting
3 minutes. North Carolina and Pennsylvania issued scam alerts.⁸

- 4 • **Annual Business Services, LLC aka Business Compliance Division, Inc.,**
5 two companies owned by Davis and Strawn. In 2015 the:

- 6 ○ Virginia Attorney General sued for deceptive solicitations that gave the
7 appearance of originating from a government source and that purchase of
8 certain record preparation services was required. The North Dakota
9 Attorney General issued a Cease and Desist order for similar conduct; and
10 ○ Idaho Attorney General settled its dispute for another deceptive practice
11 of mailing official-looking postcards directing business owners to
12 immediately call to “avoid potential fees and penalties,” and if called,
13 were told they needed to purchase a certificate of existence. Georgia,
14 Louisiana, Nevada, and Pennsylvania issued scam alerts.⁹

- 15 • **United Business Services, LLC**, owned by Beard, and **Corporations Filing**
16 **Service, LLC**, of whom Davis and Strawn received regular payments. In
17 2016, the Nebraska Attorney General sued for deceptive postcards mailed to
18 business owners, appearing as originating from a governmental agency, for
19 the purchase of labor law posters and certificates of existence.

- 20 • **Centurion Filing Services, LLC** owned by Marshlack. Between 2020 and
21 2022, the Mississippi, Iowa, and Rhode Island Attorneys General sued for
22 deceptive solicitations similar to CACS. In 2021, the Vermont Attorney

23
24 ⁸ See, e.g., 2015 Annual Records Statement Scheme,
25 https://www.sosnc.gov/documents/forms/Business_Registration/alerts/2015_annual_records.pdf (last accessed
26 Mar. 15, 2022).

⁹ See, e.g., Secretary Schedler Warns Businesses about Misleading Postcards,
<https://www.sos.la.gov/OurOffice/PublishedDocuments/082515BusinessCompliancePostcard.pdf> (Aug. 24, 2015)
(last accessed Mar. 15, 2022).

1 General issued a Cease and Desist letter. Colorado, Connecticut, Idaho,
2 Mississippi, North Carolina, Rhode Island, Tennessee, Vermont, and
3 Wisconsin issued scam alerts.¹⁰

- 4 • **FL Certificate Services LLC**, where upon information and belief, Davis
5 approves the content and form of the solicitations, and of whom Davis and
6 Strawn received regular payments. In 2021, the Pennsylvania Attorney
7 General sued for deceptive solicitations similar to CACS. Illinois, Louisiana,
8 Maryland, Oregon, and Pennsylvania issued scam alerts.¹¹
- 9 • **Labor Poster Compliance, LLC**, where the State has filed a concurrent
10 lawsuit, including against Beard and Davis, for solicitations that create the
11 deceptive net impression of a bill from or on behalf of a governmental agency
12 demanding payment for the purchase of a workplace poster.

13 **V. CLAIM FOR VIOLATION OF THE CONSUMER PROTECTION ACT,**
14 **RCW 19.86.020**

15 5.1 Plaintiff re-alleges Paragraphs 1.1 through 4.35 and incorporates them as if set
16 fully herein.

17 5.2 Pursuant to the CPA, RCW 19.86.020, “unfair or deceptive acts or practices in
18 the conduct of any trade or commerce are hereby declared unlawful.”

19 5.3 Defendants’ solicitations constitute deceptive acts or practices in violation of the
20 CPA because these solicitations create the deceptive net impression that they are being sent by
21 or on behalf of a governmental agency and that the solicitations are bills or invoices that must
22 be paid.

23
24 ¹⁰ See e.g., Wisconsin DFI and BBB Wisconsin Warn Businesses about Misleading Solicitations,
25 https://www.wdfr.org/newsroom/press/2021/20210302_NewsRelease_DFIandBBBWarnBusinessesAboutMisleadingSolicitations_vFI.pdf (last accessed Mar. 15, 2022).

26 ¹¹ See, e.g., Alert: Maryland Businesses Receiving Fake “2020 Certificate of Good Standing Request Form” Letter; Same Scam Letter Circulated in Late 2019,
<https://www.marylandattorneygeneral.gov/press/2020/081320ca.pdf> (last accessed Mar. 15, 2022).

5.4 Defendants, at all times relevant to this action, have been engaged in trade or commerce within the meaning of RCW 19.86.010(2) because Defendants solicited the sale of, and sold, a service—non-mandatory certificates—to Washington business owners.

5.5 Defendants' deceptive acts and practices have impacted the public interest. These practices constitute a pattern of conduct repeated thousands of times that Defendants committed in the course of business and for which Defendants continue to repeat and are likely to continue without relief from this Court.

VI. PRAYER FOR RELIEF

Wherefore, the State prays for the following relief:

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

6.2 That the Court adjudge and decree that the conduct complained of constitutes unfair or deceptive acts or practices and is unlawful in violation of the Consumer Protection Act, RCW 19.86.

6.3 That the Court issue a preliminary injunction pursuant to the Consumer Protection Act, RCW 19.86.080, enjoining and restraining Defendants and their representatives, successors, assigns, officers, agents, servants, employees, and all other persons acting or claiming to act for, on behalf of, or in concert or participation with Defendants, from continuing or resuming the unlawful conduct complained of herein.

6.4 That the Court assess civil penalties of up to \$7,500, pursuant to RCW 19.86.140, against Defendants jointly and severally for each and every violation of RCW 19.86.020 caused by the conduct complained of herein.

6.5 That the Court award prejudgment interest at a rate of 12 percent per annum.
See RCW 19.52.020.

6.6 That the Court, as an equitable remedy, disgorge Defendants of money or property acquired by Defendants as a result of the conduct and violations complained of herein.

1 6.7 That the Court issue a permanent injunction pursuant to the Consumer Protection
2 Act, RCW 19.86.080, enjoining and restraining Defendants and their representatives, successors,
3 assigns, officers, agents, servants, employees, and all other persons acting or claiming to act for, on
4 behalf of, or in concert or participation with Defendants, from continuing or resuming the unlawful
5 conduct complained of herein.

6 6.8 That the Court make such orders pursuant to RCW 19.86.080 as it deems
7 appropriate to provide for restitution to consumers of money or property unlawfully acquired by
8 Defendants as a result of the conduct complained of herein.

9 6.9 That the Court make such orders pursuant to RCW 19.86.080 to provide that the
10 Plaintiff, State of Washington, have and recover from Defendants the costs of this action, including
11 reasonable attorneys' fees.

12 6.10 For such other relief as the Court may deem just and proper.
13

14 DATED this 17th day of March, 2022.
15

16 ROBERT W. FERGUSON
17 Attorney General

18 s/ Shidon B. Aflatooni
19 SHIDON B. AFLATOONI, WSBA #52135
20 SEBASTIAN MILLER, WSBA #50261
21 Assistant Attorneys General
22 Attorneys for Plaintiff State of Washington
23 800 Fifth Avenue, Suite 2000
24 Seattle, WA 98104
25
26

EXHIBIT A

2019 CERTIFICATE OF STATUS REQUEST FORM



WA Certificate Service
1911 SW Campus Drive
Suite 471
Federal Way, WA 98023

QUESTIONS?



TOLL FREE (888) 842-9265
RECORDS@WACERTSERVICE.COM

001

IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM. PLEASE PRINT CLEARLY.

Key Code: **WA-CS38470001**

UBI Number: **604 420 334**

Notice Date:

03/13/2019

PLEASE RESPOND BY:

March 27, 2019

Business Address:



Congratulations on registering your business with the State of Washington. Your Articles have been filed with the secretary of state and are complete. You have one step left in order to attain your elective Washington Certificate of Status.

Below is a form for your newly registered business. **Please confirm the accuracy of the information below for your Washington Certificate of Status Request.**

A Washington Certificate of Status is issued by the Secretary of State and may be required for loans, to renew business licenses, or for tax or other business purposes. A Certificate of Good Status certifies that your Washington business is in existence, is authorized to transact business in the state and complies with all state requirements. The Certificate of Status shows the official evidence of an entity's existence and provides a statement of an entity's status, current legal name and date of formation. The Certificate of Status bears the official seal of the Washington Secretary of State.

Business Information

Entity Type: **WA LIMITED LIABILITY COMPANY**

Date Of Registration: **3/8/2019**

Certificate Of Good Standing Fee: **\$82.50**

This is not a government agency

Step 1: Please Confirm Business Name & Address Are Correct.

Business Name:

UBI Number:

604 420 334

Step 2: Contact Information - DO NOT SKIP THIS STEP! Email & Contact Number Are Required For Processing

Name:

Email:

Phone Number:

Step 3: Payment - Select Payment Method & Double Check Payment Information



CHECK OR MONEY ORDER ENCLOSED
IN THE AMOUNT OF: \$72.50

Please make your check or money order payable to:

WA Certificate Service
1911 SW Campus Drive
Suite 471
Federal Way, WA 98023

*[PLEASE ALLOW UP TO TWO WEEKS FOR
PROCESSING AND RETURN OF DOCUMENT]*



Step 4: Authorization - Please Sign, Date & Return This Form With Payment Enclosed In Return Envelope Provided

Signature:

Date:

EXHIBIT B

2019 CERTIFICATE OF STATUS REQUEST FORM



WA Certificate Service
1911 SW Campus Drive
Suite 471
Federal Way, WA 98023

QUESTIONS?

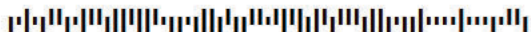


TOLL FREE (888) 842-9265

RECORDS@WACERTSERVICE.COM

11 *****AUTO**ALL FOR AADC 980

001



IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM. PLEASE PRINT CLEARLY.

Key Code: **WA-CS38470002**
UBI Number: **604 421 983**

Notice Date:
03/15/2019

PLEASE RESPOND BY:

March 29, 2019

Business Address:



Congratulations on registering your business with the State of Washington. Your Articles have been filed with the secretary of state and are complete. You have one step left in order to attain your elective Washington Certificate of Status.

Below is a form for your newly registered business. **Please confirm the accuracy of the information below for your Washington Certificate of Status Request.**

A Washington Certificate of Status is issued by the Secretary of State and may be required for loans, to renew business licenses, or for tax or other business purposes. A Certificate of Good Status certifies that your Washington business is in existence, is authorized to transact business in the state and complies with all state requirements. The Certificate of Status shows the official evidence of an entity's existence and provides a statement of an entity's status, current legal name and date of formation. The Certificate of Status bears the official seal of the Washington Secretary of State.

Business Information

Entity Type: **WA LIMITED LIABILITY COMPANY**

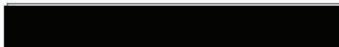
Date Of Registration: **3/14/2019**

Certificate Of Status Fee: **\$82.50**

This is not a government agency

Step 1: Please Confirm Business Name & Address Are Correct.

Business Name:



UBI Number:

604 421 983

Step 2: Contact Information - DO NOT SKIP THIS STEP! Email & Contact Number Are Required For Processing

Name:

Email:

Phone Number:

Step 3: Payment - Select Payment Method & Double Check Payment Information



**CHECK OR MONEY ORDER ENCLOSED
IN THE AMOUNT OF: \$82.50**

Please make your check or money order payable to:

WA Certificate Service
1911 SW Campus Drive
Suite 471
Federal Way, WA 98023

*[PLEASE ALLOW UP TO TWO WEEKS FOR
PROCESSING AND RETURN OF DOCUMENT]*



Step 4: Authorization - Please Sign, Date & Return This Form With Payment Enclosed In Return Envelope Provided

Signature:

Date:

EXHIBIT C

2020 CERTIFICATE OF STATUS REQUEST FORM



WA Certificate Service
1916 Pike Place
Suite 12 - #56
Seattle, WA 98101

QUESTIONS?



TOLL FREE (888) 842-9265
RECORDS@WACERTSERVICE.COM

001

IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM. PLEASE PRINT CLEARLY.

Key Code: **WA-CS3847-0120**
UBI Number: **604 563 345**

Notice Date:
01/20/2020

PLEASE RESPOND BY:

February 3, 2020



Business Address:



Congratulations on registering your business with the State of Washington. Your Articles have been filed with the secretary of state and are complete. You have one step left in order to attain your elective Washington Certificate of Status.

Below is a form for your newly registered business. **Please confirm the accuracy of the information below for your Washington Certificate of Status Request.**

A Washington Certificate of Status is issued by the Secretary of State and may be required for loans, to renew business licenses, or for tax or other business purposes. A Certificate of Good Status certifies that your Washington business is in existence, is authorized to transact business in the state and complies with all state requirements. The Certificate of Status shows the official evidence of an entity's existence and provides a statement of an entity's status, current legal name and date of formation. The Certificate of Status bears the official seal of the Washington Secretary of State.

Business Information

Entity Type: **WA LIMITED LIABILITY COMPANY**

Date Of Registration: **1/17/2020**

Certificate Of Status Fee: **\$82.50**

This is not a government agency

Step 1: Please Confirm Business Name & Address Are Correct.

Business Name:



UBI Number:

604 563 345

Step 2: Contact Information - DO NOT SKIP THIS STEP! Email & Contact Number Are Required For Processing

Name:

Email:

Phone Number:

Step 3: Payment - Select Payment Method & Double Check Payment Information

☐ CHECK OR MONEY ORDER ENCLOSED
IN THE AMOUNT OF: **\$82.50**

Please make your check or money order payable to:

WA Certificate Service
1916 Pike Place
Suite 12 - #56
Seattle, WA 98101

*[PLEASE ALLOW UP TO TWO WEEKS FOR
PROCESSING AND RETURN OF DOCUMENT]*



Step 4: Authorization - Please Sign, Date & Return This Form With Payment Enclosed In Return Envelope Provided

Signature:

Date:

EXHIBIT D

2021 CERTIFICATE OF EXISTENCE REQUEST FORM



WA Certificate Service
1420 Marvin Road NE
Suite C - #348
Lacey, WA 98516

QUESTIONS?



TOLL FREE (888) 842-9265

11 *****AUTO**ALL FOR AADC 970

58182WA1-0001



IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM. PLEASE PRINT CLEARLY.

Key Code: **WA-CS3847-1228**
UBI Number: **604 679 748**

Notice Date:
12/28/2020

PLEASE RESPOND BY:
January 11, 2021

Business Address:



Congratulations on registering your business with the State of Washington. Your Articles have been filed with the secretary of state and are complete. You have one step left in order to attain your elective Washington Certificate of Status.

Below is a form for your newly registered business. **Please confirm the accuracy of the information below for your Washington Certificate of Status Request.**

A Washington Certificate of Status is issued by the Secretary of State and may be required for loans, to renew business licenses, or for tax or other business purposes. A Certificate of Good Status certifies that your Washington business is in existence, is authorized to transact business in the state and complies with all state requirements. The Certificate of Status shows the official evidence of an entity's existence and provides a statement of an entity's status, current legal name and date of formation. The Certificate of Status bears the official seal of the Washington Secretary of State.

Business Information

Entity Type: **WA LIMITED LIABILITY COMPANY**

Date Of Registration: **12/3/2020**

Certificate Of Status Fee: **\$82.50**

This is not a government agency

Step 1: Please Confirm Business Name & Address Are Correct.

Business Name:

UBI Number:

604 679 748

Step 2: Contact Information - DO NOT SKIP THIS STEP! Email & Contact Number Are Required For Processing

Name:

Email:

Phone Number:

Step 3: Payment - Select Payment Method & Double Check Payment Information

☐ CHECK OR MONEY ORDER ENCLOSED
IN THE AMOUNT OF: **\$82.50**

Please make your check or money order payable to:

WA Certificate Service
1420 Marvin Road NE
Suite C - #348
Lacey, WA 98516

*[PLEASE ALLOW UP TO TWO WEEKS FOR
PROCESSING AND RETURN OF DOCUMENT]*



Step 4: Authorization - Please Sign, Date & Return This Form With Payment Enclosed In Return Envelope Provided

Signature:

Date:

EXHIBIT E

2021 CERTIFICATE OF STATUS REQUEST UPDATE FORM



WA Certificate Service
1420 Marvin Road NE
Suite C - 348
Lacey, WA 98516

QUESTIONS?



TOLL FREE (888) 842-9265

59926WA-001

IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM. PLEASE PRINT CLEARLY.

Key Code: **WA-RM3847-0428**UBI Number: **604 549 923**

Notice Date:

04/29/2021

PLEASE RESPOND BY:

May 14, 2021

Business Address:



Congratulations on your continued business in the state of Washington for the year of 2021. Your Annual Report has been filed with the secretary of state and your business maintains an active status. You have one step left in order to attain your elective Washington Certificate of Status update. Below is a form for your newly registered business. If your business is no longer active, this form has been sent to you in error. **Please confirm the accuracy of the information below for your Washington Certificate of Status Request.**

A Washington Certificate of Status is issued by the Secretary of State and may be required for loans, to renew business licenses, or for tax or other business purposes. A Certificate of Status certifies that your Washington business is in existence, is authorized to transact business in the state and complies with all state requirements. The Certificate of Status shows the official evidence of an entity's existence and provides a statement of an entity's status, current legal name and date of formation. The Certificate of Status bears the official seal of the Washington Secretary of State.

Business InformationEntity Type: **WA LIMITED LIABILITY COMPANY**Date Of Registration: **2020**Certificate Of Status Fee: **\$82.50**

This is not a government agency

Step 1: Please Confirm Business Name & Address Are Correct.

Business Name:

UBI Number:

604 549 923**Step 2: Contact Information - DO NOT SKIP THIS STEP! Email & Contact Number Are Required For Processing**

Name:

Email:

Phone Number:

Step 3: Payment - Select Payment Method & Double Check Payment Information

**CHECK OR MONEY ORDER ENCLOSED
IN THE AMOUNT OF: \$82.50**

Please make your check or money order payable to:

WA Certificate Service

1420 Marvin Road NE

Suite C - 348

Lacey, WA 98516

*[PLEASE ALLOW UP TO TWO WEEKS FOR
PROCESSING AND RETURN OF DOCUMENT]*



604 549 923

Step 4: Authorization - Please Sign, Date & Return This Form With Payment Enclosed In Return Envelope Provided

Signature:

Date:

EXHIBIT F



WA Certificate Service
1916 Pike Place
Suite 12 - #56
Seattle, WA 98101



IMPORTANT

2019-CERTIFICATE OF STATUS REQUEST FORM
BUSINESS MAIL

2019

EXHIBIT G



WA Certificate Service
1916 Pike Place
Suite 12 - #56
Seattle, WA 98101

IMPORTANT--OPEN IMMEDIATELY

2020-CERTIFICATE OF STATUS REQUEST FORM
BUSINESS MAIL

2020

EXHIBIT H

WA Certificate Service
2602 S. 38th Street
Suite A - 75
Tacoma, WA 98409

TAMPA FL 335
SAINT PETERSBURG FL
6 NOV 2020 PM 6 L



Contact
DA's office

98023-829439

