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STATE OF WASHINGTON  
SPOKANE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

NEIL L. CAMENKER, d/b/a STATE  
RECORD RETRIEVAL BOARD,  
individually, and on behalf of the  
marital community comprised of NEIL  
L. CAMENKER and TRACINE C.  
CAMENKER, husband and wife;

Defendants.

NO.

11202240-9

COMPLAINT

Plaintiff State of Washington, by and through its attorneys Robert M. McKenna, Attorney General, and Jack G. Zurlini, Jr., Assistant Attorney General, brings this action against Defendants named herein and alleges as follows:

**1. JURISDICTION**

1.1. This complaint is filed and these proceedings are instituted under the provisions of chapter 19.86 RCW, the Unfair Business Practices—Consumer Protection Act.

1.2. The Attorney General is authorized to commence this action pursuant to RCW 19.86.080.

1.3. Jurisdiction over the Defendants is vested in this court pursuant to RCW 19.86.160 and RCW 19.86.140 because Defendants engaged in conduct violating chapter 19.86 RCW and such conduct impacted consumers and businesses in the state of Washington.

1 Jurisdiction over the subject matter of this Complaint is conferred by the above-referenced  
2 statutes.

3 1.4. Venue is properly set in this court pursuant to RCW 19.86.140 in that the  
4 violations alleged herein have been and are being committed in whole or in part in Spokane  
5 County, State of Washington, and other counties in the state of Washington by Defendants.

## 6 **2. DEFENDANT**

7 2.1. Defendant Neil L. Camenker, an individual, is the owner of Record Retrieval  
8 Services, LLC, a California limited liability corporation, and directed and controlled its  
9 business practices as alleged in this Complaint. At all times alleged herein, Defendant Neil  
10 Camenker was and is married to Tracine C. Camenker, and their marital community  
11 benefitted from the illegal activities alleged herein. Defendants have done business in  
12 Washington State and elsewhere under the name "State Record Retrieval Board" and are  
13 collectively referred to as "SRRB" or "Defendants" throughout this Complaint.

## 14 **3. NATURE OF TRADE OR COMMERCE**

15 3.1. At all times relevant to this lawsuit, Defendants have been engaged in a  
16 for-profit business that involves their nation-wide marketing and sale of a service by which  
17 they deliver grant deeds of residential properties to residential homeowners for a fee.  
18 Defendants marketed their services to approximately 5,000 consumers located in Washington  
19 State. Defendants are therefore engaged in trade or commerce within the state of  
20 Washington and in competition with others engaged in similar business activities in  
21 Washington for purposes of applying the Consumer Protection Act, chapter 19.86 RCW.

## 22 **4. FACTS**

23 4.1. In or about late 2010, Defendants, under the business name "State Record  
24 Retrieval Board" sent a direct mail piece to approximately 5,000 Washington homeowners that  
25 offered to provide them with a copy of their grant deeds for a fee of \$87. SRRB's mailer, a  
26 copy of which is attached hereto as exhibit A, is deceptive and unfair. For example, it mimics

1 an official government communication from a Washington State agency by, among other  
2 methods, using the name "State Record Retrieval Board" as the business name; using a mail  
3 drop located in the state's capital Olympia, Washington, as the return address; citing California  
4 statutes that have no applicability in Washington; and threatening homeowners with a late fee  
5 if they do not mail in their payment by a deadline date. In addition, the mailer creates a false  
6 sense of urgency because it sets an arbitrary deadline by which homeowners must mail in a  
7 payment of \$87 and threatens to add a \$35 late fee for the services if payment is mailed in after  
8 the deadline.

9 4.2. In response to its mailer, SRRB received payment of \$87 from at least 45  
10 Washington residents.

11 **5. CAUSES OF ACTION**

12 **VIOLATION OF RCW 19.86.020**

13 5.1. Plaintiff realleges paragraphs 1.1 through 4.2 and incorporates them herein by  
14 this reference.

15 5.2. In the context of conducting its business, Defendants engaged in the conduct  
16 alleged herein. Such conduct constitutes unfair or deceptive acts or practices in trade or  
17 commerce that have the capacity to mislead a substantial number of consumers, and/or unfair  
18 methods of competition in violation of RCW 19.86.020.

19 **6. PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff State of Washington prays for relief as follows:

21 6.1. That the Court adjudge and decree that Defendants have engaged in the conduct  
22 complained of herein.

23 6.2. That the Court adjudge and decree that the conduct complained of in paragraphs  
24 1.1 through 5.2 constitutes unfair or deceptive acts or practices and unfair methods of  
25 competition in violation of the Consumer Protection Act, Chapter 19.86 RCW.  
26



STATE RECORD RETRIEVAL BOARD  
 1001 Cooper Point Rd SW Suite 140 PMB-263  
 Olympia, WA 98502  
 PHONE: 888-637-2652

**DEED RETRIEVAL SERVICES**

PROPERTY ID NO: 31-15-212-017



CODE: 110110

Your reply is requested

29	NOVEMBER 2010						
	S	M	T	W	T	F	S
		1	2	3	4	5	6
	7	8	9	10	11	12	13
	14	15	16	17	18	19	20
21	22	23	24	25	26	27	
28	29	30					

If received after requested date, an additional fee of \$35.00 will be required before processing.

Justin S Zelliff  
 1221 10th St  
 Clarkston, WA 99403-3323

MIXED AADC 901



*\*Please detach coupon and mail with your payment\**

**Please Respond**  
 By: 11/29/10

**PROPERTY ID NO:**  
 31-15-212-017

**Why do we believe you need a copy of your current Grant Deed and Property Profile?**

State Record Retrieval Board recommends that all United States homeowners obtain a copy of their current Grant Deed. This document provides evidence that the property at 1221 10th St, was in fact transferred to the individual(s) Justin S Zelliff.

A Property Profile provides a wealth of information useful to understanding a subject property's makeup. This report includes the property address, owner's name, comparable values, and legal description or parcel identification number. This report will return all pertinent property and owner information for the designated property.

Records obtained through public information show a deed was recorded in your name Justin S Zelliff on 20100922, which indicates your ownership and or interest in the specified property below.

**ASOTIN COUNTY PUBLIC INFORMATION**

Purchase or Transfer Date: N/A

Foundation: N/A

Doc Number: 55-9D

Sale Amount: GD

Lot Code: C010

Property Zone: 20100922

Land Value ID: 156-85

Pool: N/A

Use Code: 262

Improvements: 24

Square Feet: N/A

Property ID: 31-15-212-017

**Legal Property Address:** 1221 10th St Clarkston, WA 99403-3323

To obtain a copy of your Deed and complete Property Profile, please detach and return in the enclosed envelope with your processing fee of \$87.00. You will receive your documents and report within 14 business days.

Upon receipt of your processing fee, your request will be submitted for document preparation and review. If for any reason your request for deed and property profile cannot be obtained, your processing fee will be immediately refunded.

State Record Retrieval is not affiliated with the county in which your deed is filed in, nor affiliated with any government agencies. This offer serves as a solicitation for services and not to be interpreted as a bill due.

This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by an agency of the government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer. State Record Retrieval operates in accordance to both Business and Professions Code 17533.6 & Civil Code 1716

DETACH AND MAIL THIS STUB WITH YOUR PROCESSING FEE  
DO NOT INCLUDE NOTES WITH YOUR PAYMENT  
DO NOT STAPLE, TAPE OR CLIP PAYMENT STUB OR CHECK.

2010



Justin S Zeliff  
1221 10th St  
Clarkston, WA 99403-3323

PROPERTY ID NO.  
31-15-212-017

INDICATE AMOUNT PAID

--

SERVICE FEE 11/29/10 → \$87.00  
If received after requested date, an additional fee of \$35.00  
will be required before processing

MAKE CHECKS PAYABLE TO:  
STATE RECORD RETRIEVAL BOARD  
Please write the PROPERTY ID NO. on the  
lower left corner of your check

STATE RECORD RETRIEVAL BOARD  
1001 Cooper Point Rd SW Suite 140 PMB-263  
Olympia, WA 98502

Your Phone Number: \_\_\_\_\_

**Real Estate Property Records** (also called *property ownership records*) is public information in the United States of America, which means anyone can access it. Real property records are generally filed with and kept on a county level; they originate from two major governmental sources: County Recorder's or Courthouse, Acquiring property information or running a title search used to intend going to the local recorder's office, waiting for hours and often filling out forms and paying a fee for each copy of a property record. State Record, Retrieval Board's high-speed online communications and secure e-commerce have made it possible to employ electronic property searches and deliver millions of real property records in a timely fashion. In addition to deeds; State Record Retrieval Board also prepares property reports for homeowners; including comparable sales data, transaction history, nearby neighbors, schools, and crime rates, State Record Retrieval Board also offers street maps and satellite images, county officials and demographic information. Our traditional searches are limited to County and State.

**What is Real Property?** The rights that one individual has in land or goods to the exclusion of all others; rights gained from the ownership of wealth. Property includes all those things and rights which are the object of ownership. Real property consists of land or anything attached to or a part of the land such as a house. Real property is commonly known as Real Estate. Property that becomes an integral part of a building such as heating and air conditioning units is also considered to real property. All other property such as stocks, bonds, jewelry is called personal property - our agency deals wholly with general real estate, and particularly with real estate property records.

**What are Real Property Records?** Real Property Records contain all of the recorded data associated with a particular Real Estate. Real Property definition includes many different types of properties such as residential, condominium, commercial, industrial, vacant land, mobile home, and time-shares.

**What is Property Title?** Evidence that the ownership of Real Estate is in lawful possession and evidence of ownership; it is the owner's right to possess and use the property.

**What is a Property Deed?** A written document properly signed and delivered, that conveys title to the real property. There are several types of deeds: General Warranty Deed, Quitclaim Deed, Special Warranty Deed, Grant Deed, Trustee's Deed and others.

**Forms of Property Ownership:** Real property can be held in several different methods, which affect income tax, estate tax, continuity,

liability, survivorship, transferability, disposition at death and at bankruptcy. Most recognizable property ownership types are:

**Tenancy in severalty:** Ownership of property by one person or one legal entity.

**Joint tenancy with right of survivorship:** Two or more persons own a property. A joint tenant with the common law right of survivorship means the survivor inherits the property without reference to the decedent's will. Creditors may sue to have the property divided to settle claims against one of the owners.

**Tenancy by the entireties:** A husband and wife own the property with the common law right of survivorship so, if one dies, the other automatically inherits.

**Tenancy in common:** Two or more persons own the property with no right of survivorship; each has an undivided interest. If one dies, his interest passes to his heirs, not necessarily the co-owner. Either party, or a creditor of one, may sue to partition the property.

Other Real Estate forms of ownership are business kinds such as: Corporation, Limited Partnership, Partnership, Real Estate Investment Trust, and Subchapter S Corporation. Practically all types of real estate can be held under virtually all forms of ownership.

Record are available at your local county recorder for a nominal fee; however you will need to go to the county recorder's office in person. You will not be able to receive a profile report as this is proprietary and only deliverable upon purchase of our services.

**DISCLAIMER:** \*The company State Record Retrieval Board is not affiliated with the State of CA or the County Recorder. State Record Retrieval Board is an analysis and retrieval firm that uses multiple resources that provide supporting values, deeds and evidence that is used to execute a property reports and deliver requested deed.

State Record Retrieval is not affiliated with the county in which your deed is filed in, nor affiliated with 'any' other government agencies. This offer serves as a solicitation for services and not to be interpreted as a bill due.

This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by an agency of the government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer. State Record Retrieval operates in accordance to both Business and Professions Code 17533.6 & Civil Code 1716

STATE RECORD RETRIEVAL BOARD  
1001 COOPER POINT RD SW SUITE 140 PMB-203  
OLYMPIA, WA 98502

OPEN IMMEDIATELY  
IMPORTANT INFORMATION ENCLOSED

PRSRHT STD  
U.S. POSTAGE  
PAID  
CORONA, CA  
PERMIT NO. 75

**WARNING:**  
\$2,000 FINE, 5 YEARS IMPRISONMENT,  
OR BOTH FOR ANY PERSON INTERFERING  
OR OBSTRUCTING WITH DELIVERY OF  
THIS LETTER U.S. MAIL TTT.18.CODE  
\*NOT A GOVERNMENT AGENCY