

FILED
NOV 07 2013
SUPERIOR COURT
BETTY J. GOULD
THURSTON COUNTY CLERK

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,
Plaintiff,

NO. 13-2-02286-6
SUMMONS

v.

LA INVESTORS, LLC, d/b/a LOCAL RECORDS OFFICE; and ROBERTO ROMERO, a/k/a JUAN ROBERTO ROMERO ASCENCIO, individually and as a Member and Manager of LA INVESTORS, LLC, and on behalf of the marital community comprised of Roberto Romero and Laura Romero; and LAURA ROMERO, individually and as a Member and Manager of LA INVESTORS, LLC, and on behalf of the marital community comprised of Roberto Romero and Laura Romero.

Defendants.

TO THE ABOVE-NAMED DEFENDANTS
AND TO YOUR ATTORNEYS:

THOMAS L. GILMAN
AMY C. HEVLY
BARRETT & GILMAN
1000 SECOND AVENUE – SUITE 3500
SEATTLE, WA 98104

COPY

1 A lawsuit has been started against Defendants in the above-entitled court by the State of
2 Washington, Plaintiff. Plaintiff's claims are stated in the written Complaint, a copy of which is
3 served upon you with this Summons.

4 In order to defend against this lawsuit, you must respond to the Complaint by stating your
5 defense in writing, and serve a copy upon the person signing this summons within 20 days after
6 the service of this Summons (or if served outside the state of Washington, within 60 days),
7 excluding the day of service, or a default judgment may be entered against you without notice. A
8 default judgment is one where Plaintiff is entitled to what he asks for because you have not
9 responded. If you serve a Notice of Appearance on the undersigned attorney, you are entitled to
10 notice before a default judgment may be entered.

11 You may demand that Plaintiff file this lawsuit with the court. If you do so, the demand
12 must be in writing and must be served upon the person signing this summons. Within 14 days
13 after you served the demand, the Plaintiff must file this lawsuit with the court, or the service on
14 you of this Summons and Complaint will be void.

15 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
16 that your written response, if any, may be served on time.

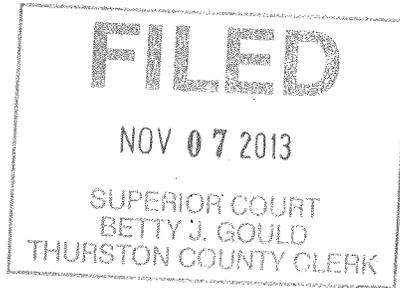
17 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
18 of Washington.

19 DATED this 6th day of November, 2013.

20 ROBERT W. FERGUSON
21 Attorney General

22 

23 BROOKS CLEMMONS, WSBA #22896
24 Assistant Attorney General
25 Attorneys for Plaintiff State of Washington
26 W. 1116 Riverside Avenue
Spokane, WA 99201-1194
(509) 456-3282



STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Petitioner,

v.

LA INVESTORS, LLC, d/b/a
LOCAL RECORDS OFFICE; and
ROBERTO ROMERO, a/k/a JUAN
ROBERTO ROMERO ASCENCIO,
individually and as a Member and
Manager of LA INVESTORS, LLC,
and on behalf of the marital community
comprised of Roberto Romero and
Laura Romero; and LAURA
ROMERO, individually and as a
Member and Manager of LA
INVESTORS, LLC and on behalf of the
marital community comprised of
Roberto Romero and Laura Romero.

Respondents.

NO. ~~13-2-01609-2~~

COMPLAINT FOR INJUNCTIVE
AND OTHER RELIEF UNDER THE
CONSUMER PROTECTION ACT

13-2-02286-6

The Plaintiff, State of Washington, by and through its attorneys Robert W. Ferguson, Attorney General, and James Brooks Clemmons, Jr., Assistant Attorney General, brings this action against the Defendants named below. The State alleges the following on information and belief:

COPY

1 **I. JURISDICTION AND VENUE**

2 1.1 This Complaint is filed and these proceedings are instituted under the provisions
3 of the Unfair Business Practices–Consumer Protection Act, RCW 19.86.

4 1.2 The Attorney General is authorized to commence this action pursuant to
5 RCW 19.86.080 and RCW 19.86.140.

6 1.3 The violations alleged in this Complaint were committed in whole or in part in
7 Thurston County, Washington, by the Defendants named herein.

8 1.4 Venue is proper in Thurston County pursuant to RCW 4.12.020 and
9 RCW 4.12.025.

10 1.5 This Court has personal jurisdiction over Defendants because they have
11 purposely acted or consummated transactions in the state of Washington, and thus have
12 purposely availed themselves of the privilege of conducting business in the state of
13 Washington. The causes of action alleged herein arise from or are connected with those
14 transactions. The Court also has personal jurisdiction over Defendants pursuant to RCW
15 25.15.310(3), which provides that a foreign limited liability company and its members and
16 managers doing business in the state of Washington submit to personal jurisdiction of
17 Washington State courts.

18 **II. DEFENDANTS**

19 2.1 Defendant LA Investors, LLC, is a California limited liability company
20 incorporated on September 9, 2008, with its principal place of business located at 9429
21 Somerset Boulevard, Bellflower, California. Defendant LA Investors, LLC, registered as a
22 foreign limited liability company in Washington on March 12, 2013, with its principal place of
23 business located at 1001 Cooper Point Road SW, #140, #117, Olympia, Washington.
24 Defendant LA Investors, LLC, does business as and uses the name “Local Records Office” as
25 an assumed name and trade name. Defendant LA Investors, LLC, is engaged in the sale of
26

1 goods and services, including marketing and selling Washington consumers a copy of their real
2 property deeds.

3 2.2 Defendant Roberto Romero, also known as Juan Roberto Romero Ascencio, and
4 Defendant Laura Romero own, operate, and manage LA Investors, LLC. Upon information
5 and belief, Defendants Roberto Romero and Laura Romero devise, control and supervise the
6 acts, practices, representations and omissions of Defendant LA Investors, LLC, which give rise
7 to this action. Defendants Juan Roberto Romero Ascencio and Laura Romero are sued both in
8 their individual capacity and in their capacity as members of Defendant LA Investors, LLC.
9 At all times alleged herein, Defendants Roberto Romero and Laura Romero were and are
10 married, and their marital community benefitted from the activities alleged herein.

11 2.3 Defendants LA Investors, LLC, Juan Roberto Romero Ascencio and Laura
12 Romero are collectively referred to as "Defendants."

13 III. NATURE OF TRADE AND COMMERCE

14 3.1 Defendants, at all times relevant to this action, have been engaged in trade or
15 commerce within the meaning of RCW 19.86.020 by marketing and selling goods and services
16 to Washington consumers and have been at all times relevant to this action in competition with
17 others engaged in similar activities in the state of Washington.

18 3.2 Defendants market and sell to Washington real property owners a copy of their
19 real property deed by mailing a solicitation to the property owner through the United States
20 Postal Service. Defendants maintain a post office box located inside a United Parcel Service
21 store at 1001 Cooper Point Road SW, #140, #117, Olympia, Washington, 98502.

22 IV. FACTS

23 4.1 Pursuant to Revised Code of Washington (RCW) 36.22.010(1) a county auditor is
24 required to record and maintain "deeds and other instruments in writing which, by law, are to be
25 filed and recorded in and for the county in which [the auditor] is elected."
26

1 4.2 In Washington, deeds are filed in the county where the property is located.
2 Washington consumers can obtain a copy of a deed from the auditor or county recorder of the
3 county where the property is located.

4 4.3 The cost for a consumer to obtain a copy of their deed or record of title in
5 Washington is set by state law and does not vary depending on a county rate.

6 4.4 RCW 36.18.010 sets forth the fees county auditors or recording officers in
7 Washington "shall collect" for their "official services," which include providing certified and
8 non-certified copies of recorded documents. Pursuant to RCW 36.18.010(2), the cost for
9 preparing and certifying recorded documents is \$3.00 for the first page and \$1.00 for each
10 additional page. Pursuant to RCW 36.18.010(3) the cost for preparing non-certified copies of
11 documents is \$1.00 per page. Pursuant to RCW 36.18.010(6) the cost for searching for records
12 the auditor or recording officer maintains as a part of their official duties is \$8.00 per hour.

13 4.5 Because records maintained by county auditor or recording officers are
14 electronically stored, the \$8.00 per hour search fee authorized by RCW 36.18.010(6) for
15 non-certified copies is rarely charged.

16 4.6 Pursuant to RCW 64.04.020, the essential requisites of an instrument in deed form
17 are that it "shall be in writing, signed by the party bound thereby, and acknowledged by the party
18 before some person authorized" to take acknowledgments of deeds. A deed must also include a
19 full legal description of the property, recite consideration, and contain granting language, which
20 differs depending on the type of the deed, pursuant to RCW 64.04.030-.050. A "warranty
21 deed," for example, "conveys and warrants" the property, while a "quitclaim deed" "conveys
22 and quitclaims" the property and a "bargain and sale deed" "bargains, sells, and conveys" the
23 property.

24 4.7 Residential property deeds are instruments or writings that are usually only one to
25 two pages in length.

1 4.8 As early as July 2012, Defendants began sending solicitations to Washington
2 consumers offering to provide, for “an \$89 processing fee,” “a copy of the only document that
3 identifies [real property owner] as the property owner of [physical address of real property] by
4 a recently recorded transferred title on the property.”

5 4.9 Defendants mail and have mailed solicitations to Washington consumers
6 offering to provide a copy of their deed within one to two months after a new deed was
7 recorded identifying the property owner as the owner of the real property.

8 4.10. The copies of the deeds Defendants market and sell to Washington consumers are
9 non-certified copies of the deed.

10 4.11 Defendants use the name “Local Records Office” to solicit Washington
11 consumers to purchase a copy of the consumer’s residential real property deed.

12 4.12 Defendants have identified a post office box inside a United Parcel Service store
13 at 1001 Cooper Point Road SW, #140 #117, Olympia, Washington 98502 as their principal
14 place of business in Washington. Defendants identify 1001 Cooper Point Road SW, #140
15 #117, Olympia, Washington 98502 as their only business location and address in the
16 solicitations they send to Washington consumers. In Defendants’ solicitation sent to
17 Washington consumers, Defendants do not identify any other geographical location for their
18 business other than the address of 1001 Cooper Point Road SW, #140 #117, Olympia,
19 Washington, 98502.

20 4.13 Defendants mail their solicitation to Washington consumers in an envelope that
21 includes, among other language, the following statements:

22 a. “IMPORTANT PROPERTY INFORMATION RESPOND
23 PROMPTLY”; and

24 b. A “**WARNING**” advising of a “\$2000.00 FINE, 5 YEARS
25 IMPRISONMENT OR BOTH FOR ANY PERSON INTERFERING OR
26

1 OBSTRUCTING WITH THE DELIVERY OF THIS LETTER” and cites a
2 reference to “18 SEC 1702 U.S. Code.”

3 4.14 An exemplary copy of the envelope Defendants use to mail their solicitation to
4 Washington consumers is attached to this complaint as Exhibit A.

5 4.15 As early as July 2012, through at least November 1, 2012, Defendants’
6 solicitation sent to Washington consumers included, among other language, the following
7 statement:

8
9 YOU CAN OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF
10 YOUR TITLE FROM THE COUNTY RECORDER IN THE COUNTY
WHERE YOUR PROPERTY IS LOCATED IN FOR UP TO \$89.00

11 Sometime after November 1, 2012, Defendants’ solicitation no longer included the language
12 “FOR UP TO \$89.00.”

13 4.16 An exemplary copy of the solicitation Defendants mailed to Washington
14 consumers from June 2012, through at least November 1, 2012, is attached to this complaint as
15 Exhibit B.

16 4.17 As early as July 2012, through at least November 1, 2012, Defendants’
17 solicitation sent to Washington consumers included language that states that Defendants operate
18 in accordance with “BOTH BUSINESS AND PROFESSIONS CODE 17533.6.”

19 4.18 California has codified a Business and Professions Code 17533.6.

20 4.19 There is no applicable “Business and Professions Code 17533.6” in operation or
21 effect in Washington.

22 4.20 An exemplary copy of the solicitation Defendants mailed, and upon information
23 and belief, continue to mail, to Washington consumers from at least November 30, 2012, through
24 the present, is attached to this complaint as Exhibit C.

25 ///

26 ///

1 4.21 At all times relevant to this complaint, Defendants' solicitation has included but is
2 not limited to the following language and information in at least two different locations within the
3 solicitation: "Please Respond By:" followed by an arbitrary response deadline.

4 4.22 At all times relevant to this complaint, Defendants' solicitation has included
5 identifying information of the real property owned by the solicited consumer including, but not
6 limited to: "Legal Property Address"; "Purchase or Transfer Date"; "Doc Number"; "Sales
7 Amount"; "Assessed Value"; "Year Built"; "Lot Sq Ft"; "Square Feet"; "Pool"; "Property ID";
8 "Improvements"; "Use Code"; and "Property Zone."

9 4.23 At all times relevant to this complaint, Defendants' solicitation has included a
10 "coupon" that includes but is not limited to the following language and information:

- 11 a. "PROPERTY ID NO" followed by a ten (10) digit number;
- 12 b. "SERVICE FEE" of \$89.00;
- 13 c. "PLEASE RESPOND BY" followed by a response deadline;
- 14 d. "CHECK No.;" and
- 15 e. "Code:" followed by a series of numbers and letters.

16 The "coupon" also contains a bar code. Underneath "CHECK No." is a space for the consumer to
17 write in his or her check number. The "coupon" also bears the notation, "Please write the
18 PROPERTY ID No. on the lower left corner of your check."

19 4.24 At all times relevant to this complaint, Defendants' solicitation has contained a
20 section entitled "Types of property ownership:" which includes a description of "Sole
21 Ownership"; "Tenancy by the Entireties"; "Tenancy in Common"; "Joint Tenancy"; "Community
22 Property"; and "Tenancy in Severalty." For example, with respect to "Joint Tenancy," the
23 description states that "Joint tenancy agreements require that four conditions be met: ownership
24 must be received at the same time, tenants must hold an equal interest, tenants must each be
25 named on the title, and all must have exactly the same rights of possession."
26

1 4.25 At all times relevant to this complaint, Defendants' solicitation sent to Washington
2 consumers includes, among other language, the following statement: "You can obtain a Copy
3 of your Deed or other Record of your Title from the County Recorder in the County where
4 your property is Located In [sic] the price varies depending on each county rate."

5 4.26 At all times relevant to this complaint, Defendants' solicitation has included
6 language that states that "Local Records Office runs powerful on-line [sic] searches to find the
7 Deed of millions of people throughout The United States..." that are sent to new property owners.

8 4.27 The timing, circumstances, wording and layout of Defendants' solicitation creates
9 the net impression that (a) it is necessary for consumers to obtain copies of their real property
10 deeds through Defendants; (b) Defendants are the equivalent of a consumer's county auditor or
11 recording office; (c) a copy of their deed is needed in the event of a property dispute; (d) that \$89
12 is a necessary or appropriate fee for receiving a copy of a document that is available for a much
13 smaller amount if obtained from a county auditor or recording office; and (e) the solicitation
14 comes from a governmental agency and/or is a bill or invoice the consumer is obligated to comply
15 with, respond to or pay.

16
17 **V. FIRST CAUSE OF ACTION-VIOLATION OF RCW 19.86 BASED
ON MISREPRESENTATIONS OF COMPARABLE COSTS**

18 5.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
19 forth fully herein.

20 5.2 Defendants misrepresented the cost of obtaining a copy of a deed or record of
21 title from a county recorder when they solicited Washington consumers with language in their
22 solicitation that includes but is not limited to the representation that the cost in obtaining a deed
23 or record of title from a county recorder is "UP TO \$89.00."

24 5.3 Defendants misrepresent the costs of obtaining a copy of a deed or record of
25 title from a county recorder when they solicit Washington consumers with language in their
26

1 solicitation that includes, but is not limited to, a representation that the cost to obtain a copy of
2 a deed or other record of title “varies depending on each county rate.”

3 5.4 Defendants violated RCW 19.86.020 in the context of conducting their business
4 by misrepresenting the cost a consumer would incur to obtain a copy of their deed or other
5 record of title from a county recorder.

6 5.5 Defendants’ conduct affected the public interest and had the capacity to mislead
7 a substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
8 or commerce, and unfair methods of competition in violation of RCW 19.86.020.

9
10 **VI. SECOND CAUSE OF ACTION—VIOLATION OF RCW 19.86
BY CREATING A FALSE SENSE OF URGENCY**

11 6.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
12 forth fully herein.

13 6.2 Defendants’ solicitation creates a false sense of urgency for consumers.
14 Defendants create this false sense of urgency when they send a solicitation to a consumer that
15 includes, but is not limited to, the following language and information:

- 16 a. “Please Respond By:” followed by an arbitrary response deadline;
- 17 b. Representing that Defendants provide “a copy of the only document that
18 identifies [real property owner] as the property owner of [physical address of real
19 property] by a recently recorded transferred title on the property”;
- 20 c. By sending their solicitation in an envelope that reads, “IMPORTANT
21 PROPERTY INFORMATION RESPOND PROMPTLY”; and
- 22 d. Marketing and selling to Washington consumers a copy of an official
23 document or record Defendants imply the consumer must possess.

24 6.3 Defendants violated RCW 19.86.020 in the context of conducting their business
25 by creating a false sense of urgency for consumers.

1 6.4 Defendants' conduct affects the public interest and has the capacity to mislead a
2 substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
3 or commerce and unfair methods of competition in violation of RCW 19.86.020.

4
5 **VII. THIRD CAUSE OF ACTION—VIOLATION OF RCW 19.86**
6 **BY CREATING NET IMPRESSION THAT SOLICITATION**
7 **COMES FROM A GOVERNMENTAL AGENCY**

8 7.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
9 forth fully herein.

10 7.2 Defendants create a net impression for consumers that the solicitation they send
11 to consumers comes from a governmental agency by engaging in the following, but not limited
12 to, actions:

13 a. Marketing and selling to Washington consumers a copy of a record
14 maintained by a governmental official;

15 b. Marketing and selling to Washington consumers a copy of an official
16 document or record Defendants imply the consumer must possess;

17 c. Formatting their solicitation to mimic a governmental notice or invoice;

18 d. Including legal and official property descriptions in their solicitation that
19 imply governmental oversight or responsibility;

20 e. Including language in their solicitation that Defendants provide "a copy
21 of the only document that identifies [real property owner] as the property owner of [real
22 property physical address] by a recently transferred title on the property";

23 f. Timing the solicitation to arrive shortly after the recording of a new deed
24 identifying the consumer as owner of the real property;

25 g. By sending their solicitation in an envelope that reads, "IMPORTANT
26 PROPERTY INFORMATION RESPOND PROMPTLY";

1 h. Including warning language on the envelope of governmental
2 prosecution for interfering with the delivery of Defendants' solicitation;

3 i. Using a name that can be confused with a governmental agency;

4 j. Using a mail drop located in the state's capitol, Olympia, Washington;

5 and

6 k. Requesting a consumer pay "an \$89 processing fee" or "SERVICE
7 FEE" to obtain a copy of their residential property deed.

8 7.3 Defendants violated RCW 19.86.020 in the context of conducting their business
9 by creating a net impression for consumers that the solicitation they send to consumers comes
10 from a governmental agency.

11 7.4 The net impression created by Defendants' actions and solicitation cause
12 consumers to believe, among other things, that it is necessary for consumers to obtain copies of
13 their real property deeds from Defendants and/or that Defendants' solicitation is something
14 that consumers are obligated to comply with, respond to, or pay.

15 7.5 Defendants' conduct affects the public interest and has the capacity to mislead a
16 substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
17 or commerce and unfair methods of competition in violation of RCW 19.86.020.

18 **VIII. FOURTH CAUSE OF ACTION — VIOLATION OF RCW 19.86 BY**
19 **CREATING NET IMPRESSION THAT DEFENDANTS ARE THE**
20 **EQUIVALENT OF THE CONSUMER'S COUNTY AUDITOR OR**
21 **RECORDING OFFICE**

22 8.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
23 forth fully herein.

24 8.2 Defendants create a net impression for consumers that Defendants are the
25 equivalent of the consumer's county auditor or recording office by engaging in the following,
26 but not limited to, actions:

1 a. Marketing and selling to Washington consumers a copy of a record
2 maintained by a governmental official;

3 b. Marketing and selling to Washington consumers a copy of an official
4 document or record Defendants imply the consumer must possess;

5 c. Formatting their solicitation to mimic a governmental notice or invoice;

6 d. Including legal and official property descriptions in their solicitation that
7 imply governmental oversight or responsibility;

8 e. Including language in their solicitation that Defendants provide “a copy
9 of the only document that identifies [real property owner] as the property owner of
10 [real property physical address] by a recently recorded transferred title on the
11 property”;

12 f. Timing the solicitation to arrive shortly after the recording of a new deed
13 identifying the consumer as owner of the real property;

14 g. By sending their solicitation in an envelope that reads, “IMPORTANT
15 PROPERTY INFORMATION RESPOND PROMPTLY”;

16 h. Including warning language on the envelope of governmental
17 prosecution for interfering with the delivery of Defendants’ solicitation;

18 i. Using a name that can be confused with a governmental agency; and

19 j. Using a mail drop located in the state’s capitol, Olympia, Washington;

20 and

21 k. Requesting a consumer pay “an \$89 processing fee” or “SERVICE
22 FEE” to obtain a copy of their residential property deed.

23 8.3 Defendants violated RCW 19.86.020 in the context of conducting their business
24 by creating a net impression for consumers that Defendants are the equivalent of the
25 consumer’s county auditor or recording office.

1 8.4 The net impression created by Defendants' actions and solicitation causes
2 consumers to believe, among other things, that it is necessary for consumers to obtain copies of
3 their real property deeds from Defendants and/or that Defendants' solicitation is something
4 that consumers are obligated to comply with, respond to, or pay.

5 8.5 Defendants' conduct affects the public interest and has the capacity to mislead a
6 substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
7 or commerce and unfair methods of competition in violation of RCW 19.86.020.

8
9 **IX. FIFTH CAUSE OF ACTION — VIOLATION OF RCW 19.86**
10 **BY CREATING NET IMPRESSION OF APPLICATION**
11 **OF OR COMPLIANCE WITH WASHINGTON LAW**

12 9.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
13 forth fully herein.

14 9.2 Defendants created the net impression of compliance with an applicable law of
15 this state when they represented, among other things, that they operate in accordance with
16 "Business and Professions Code 17533.6" and provide no other identifying geographical
17 representation of their business other than the address of 1001 Cooper Point Road SW, #140
18 #117, Olympia, Washington, 98502.

19 9.3 Defendants violated RCW 19.86.020 in the context of conducting their business
20 by creating the net impression that their actions were in accordance or in compliance with an
21 applicable law of this state.

22 9.4 Defendants' conduct affects the public interest and has the capacity to mislead
23 a substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
24 or commerce and unfair methods of competition in violation of RCW 19.86.020.

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26 ///

1 **X. SIXTH CAUSE OF ACTION—VIOLATION OF RCW 19.86 BY**
2 **CREATING NET IMPRESSION OF A BILL OR INVOICE A**
3 **CONSUMER IS OBLGATED TO COMPLY WITH, RESPOND TO,**
4 **OR PAY**

5 10.1 Plaintiff realleges Paragraphs 1.1 through 4.27 and incorporates them as if set
6 forth fully herein.

7 10.2 Defendants create a net impression that consumers have received a bill or
8 invoice that the consumer believes he or she is obligated to comply with, respond to or pay by
9 engaging in the following, but not limited to, actions:

10 a. Formatting their solicitation to mimic a bill or invoice;

11 b. Marketing and selling to Washington consumers a copy of an official
12 document or record Defendants imply the consumer must possess;

13 c. Including language in their solicitation that Defendants provide “a copy
14 of the only document that identifies [real property owner] as the property owner of
15 [real property physical address] by a recently recorded transferred title on the
16 property”;

17 d. Sending their solicitation in an envelope that reads, “IMPORTANT
18 PROPERTY INFORMATION RESPOND PROMPTLY”;

19 e. Including language in their solicitation that reads “Please Respond By:”
20 in two separate locations followed by a response deadline; and

21 f. Requesting a consumer pay “an \$89 processing fee” or “SERVICE
22 FEE” to obtain a copy of their residential property deed.

23 10.3 Defendants violated RCW 19.86.020 in the context of conducting their business
24 by creating the net impression that consumers have received a bill or invoice that the consumer
25 believes he or she is obligated to comply with, respond to, or pay.

26 ///

1 10.4 Defendants' conduct affects the public interest and has the capacity to mislead
2 a substantial number of consumers and constitutes unfair or deceptive acts or practices in trade
3 or commerce and unfair methods of competition in violation of RCW 19.86.020.
4

5 **XI. PRAYER FOR RELIEF**

6 **WHEREFORE**, Plaintiff, **STATE OF WASHINGTON**, prays for relief as follows:

7 11.1 That the Court adjudge and decree that defendants have engaged in the conduct
8 complained of herein.

9 11.2 That the Court adjudge and decree that the conduct complained of in Paragraphs
10 4.1 through 10.4 constitutes unfair or deceptive acts or practices and unfair methods of
11 competition in violation of the Consumer Protection Act, Chapter 19.86 RCW.

12 11.3 That the Court issue a permanent injunction enjoining and restraining Defendants
13 and their representatives, successors, assigns, officers, agents, servants, employees, and all other
14 persons acting or claiming to act for, on behalf of, or in active concert or participation with
15 Defendants from continuing or engaging in the unlawful conduct complained of herein.

16 11.4 That the Court assess civil penalties, pursuant to RCW 19.86.140, of up to two
17 thousand dollars (\$2,000) per violation against the Defendants for each and every violation of
18 RCW 19.86.020 caused by the conduct complained of herein.

19 11.5 That the Court make such orders pursuant to RCW 19.86.080 as it deems
20 appropriate to provide for restitution to consumers of money or property acquired by Defendants
21 as a result of the conduct complained of herein.

22 11.6 That the Court make such orders pursuant to RCW 19.86.080 to provide that
23 Plaintiff, State of Washington, have and recover from Defendants the costs of this action,
24 including reasonable attorney's fees.

25 ///

EXHIBIT A

LOCAL RECORDS OFFICE
1001 Cooper Pt Rd SW, #140 #117
Olympia, WA 98502

21 1

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
FBPS

IMPORTANT PROPERTY INFORMATION
RESPOND PROMPTLY

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 SEC 1702 U.S. CODE

THIS IS NOT A GOVERNMENT DOCUMENT

23 HEG-CPI 98367

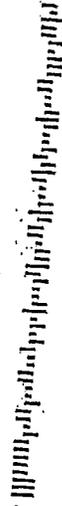


EXHIBIT B

LOCAL RECORDS OFFICE
 1001 Cooper Pt Rd. SW, #140 #117
 Olympia, WA 98502
 Phone: (800) 775-9059

THIS SERVICE TO OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF TITLE IS NOT ASSOCIATED WITH ANY GOVERNMENTAL AGENCY. YOU CAN OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF YOUR TITLE FROM THE COUNTY RECORDER IN THE COUNTY WHERE YOUR PROPERTY IS LOCATED IN FOR UP TO \$89.00

*****LRO NUA94220621 DIGIT
 [Redacted]
 Seattle, WA 98115

Please Respond By:
07/30/2012

LOCAL RECORDS OFFICE

Local Records Office provides a copy of the only document that identifies [Redacted] as the property owner of [Redacted] by a recently recorded transferred title on the property.

Local Records Office provides a property profile where you can find the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information show a deed was recorded in your name [Redacted] on 2012-06-01 which indicates your ownership and interest in the specified property below.

COUNTY PUBLIC INFORMATION

Legal Property Address: [Redacted] Seattle WA 98115

Purchase or Transfer Date:	2012-06-01	Year Built:	1919	Property ID:	[Redacted]
Doc Number:	[Redacted]	Lot Sq Ft:	4480 SF	Improvements:	48.37%
Sale Amount:	\$584,000	Square Feet:	2400 SF	Use Code:	1001
Assessed Value:	\$523,000	Pool:	N/A	Property Zone:	N/A

For a complete property profile and an additional copy the only document that identifies you as a property owner usually called deed, please detach coupon and return with an \$89 processing fee in the envelope provided. You will receive your documents and report within 21 business days.

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

LOCAL RECORDS OFFICE IS NOT AFFILIATED WITH THE COUNTY IN WHICH YOUR DEED IS FILED IN, NOR AFFILIATED WITH ANY GOVERNMENT AGENCIES. THIS OFFER SERVES AS A SOLICITING FOR SERVICES AND NOT TO BE INTERPRETED AS BILL DUE. THIS PRODUCT OR SERVICE HAS NOT BEEN APPROVED OR ENDORSED BY ANY GOVERNMENTAL AGENCY, AND THIS OFFER IS NOT BEING MADE BY AN AGENCY OF 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. LOCAL RECORDS OFFICE OPERATES IN ACCORDANCE TO BOTH BUSINESS AND PROFESSIONS CODE 17533.6.

Please detach coupon and mail with your check

CODE: WUA94220621

PROPERTY ID NO:	SERVICED FEE:	PLEASE RESPOND BY:	CHECK NO:
[Redacted]	\$ 89.00	07/30/2012	

[Redacted]
 Seattle, WA 98115

MAKE CHECK PAYABLE TO:
LOCAL RECORDS OFFICE
 1001 Cooper Pt Rd. SW, #140 #117
 Olympia, WA 98502

Your Phone Number: () _____
 Please write the PROPERTY ID NO. On the lower left corner of your check.

Local Records Office: In the United States anyone can have access to the records of any Real Property. The Real Property is usually recorded in the County records where Local Records Office runs powerful on-line searches to find the Deed of millions of people throughout The United States and gathers at the same time several Characteristics of the property such as: Property Characteristics, Property History, Sale Loan Amount, Assessment and Tax Information, Nearby Neighbors, Comparable Sale Date, Neighborhood Demographics, Private and Public Schools reports, Plat Map, and others. Those are sent to thousands of new property owners.

Real property is property that includes land and buildings, and anything affixed to the land. Real property only includes those structures that are affixed to the land, not those which can be removed, such as equipment.

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 and Property (Tax) Assessor's offices.

Property Title refers to a formal document that serves as evidence of ownership. Conveyance of the document may be required in order to transfer ownership in the property to another person. Title is distinct from possession, a right that often accompanies ownership but is not necessarily sufficient to prove it. In many cases, both possession and title may be transferred independently of each other.

Property deeds are legal instruments that are used to assign ownership of real property, to transfer title to the land and its improvements such as a house. Words used to convey property transfer may be grant, assign, convey or warrant, but they basically all do the same thing, they transfer the interest of the person selling the house to the person buying the house.

Types of property ownership:

a) **Sole Ownership:** The simplest form of property ownership, sole ownership grants one individual complete rights over the property in question.

b) **Tenancy by the Entireties:** When a married couple purchases real estate together, they are granted tenancy by the entireties by many states. This means that each party holds one-half interest in the property, but neither can dispose of or otherwise abridge the right of the other to the property.

c) **Tenancy in Common:** This form of ownership allows multiple people to own a percentage of the same property. While the percentage owned may vary, each person has an equal right to the property during their lifetime. If one of the tenants in common dies, their interest in the property passes to their heirs; it does not devolve to the other tenants in common.

d) **Joint Tenancy:** Joint tenancy agreements require that four conditions be met: ownership must be received at the same time, tenants must hold an equal interest, tenants must each be named on the title, and all must have exactly the same rights of possession. Unlike tenants in common, joint tenants have right of survivorship; the ownership of the property passes to the remaining joint tenants in the event of the death of one of the owners. One joint tenant can buy out another, or legal proceedings can be instituted to dissolve the joint tenancy. If one participant sells his or her interest in the property to another person, the joint tenancy is converted into a tenancy in common, and the right of survivorship is no longer valid; the other tenants have no recourse against this action by one or more of their number.

e) **Community Property:** In some states, real estate purchased by a married couple becomes community property. This form of ownership basically creates a condition where the real estate (and other property, if applicable) is owned by the partnership created by the marriage. If the marriage is dissolved through divorce, the value of the property must be divided between the partners. Community property ownership may give right of survivorship, essentially giving the entirety of the property to the surviving spouse in the event of death; other forms allow the partners to leave their interest in the property to their heirs after they die.

f) **Tenancy in Severalty:** Absolute and sole ownership of property by a legal entity, without cotenants, joint-tenants, or partners.

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This Service to obtain a copy of your Deed or other record of Title is not Associated with any Governmental Agency. You can obtain a Copy of your Deed or other Record of your Title from the County Recorder in the County where your property is Located in the price varies depending on each county rate. This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by agency of 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. Local records office operates in accordance to both business and professions code 17533.6

Mailing Address

Address:

City:

State:

Zip Code:

EXHIBIT C

LOCAL RECORDS OFFICE
 1001 Cooper Pt Rd. SW, #140 #117
 Olympia, WA 98502
 Phone: (800) 775-9059

THIS SERVICE TO OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF TITLE IS NOT ASSOCIATED WITH ANY GOVERNMENTAL AGENCY. YOU CAN OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF YOUR TITLE FROM THE COUNTY RECORDER IN THE COUNTY WHERE YOUR PROPERTY IS LOCATED.



*****LRO WUA27460409 DIGIT-488

[REDACTED]
 Snohomish, WA 98296

Please Respond By:

05/14/2013

LOCAL RECORDS OFFICE

Local Records Office provides a copy of the only document that identifies [REDACTED] as the property owner of [REDACTED] by a recently recorded transferred title on the property.

Local Records Office provides a property profile where you can find the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information show a deed was recorded in your name [REDACTED] on 2013-03-20 which indicates your ownership and interest in the specified property below.

SNOHOMISH COUNTY PUBLIC INFORMATION

Legal Property Address: [REDACTED] Snohomish WA 98296

Purchase or Transfer Date:	2013-03-20	Year Built:	2005	Property ID:	[REDACTED]
Doc Number:	[REDACTED]	Lot Sq Ft:	N/A	Improvements:	\$0
Sale Amount	N/A	Square Feet:	1121 SF	Use Code:	1004
Assessed Value:	N/A	Pool:	N/A	Property Zone	N/A

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Please detach coupon and mail with your check

CODE: WUA27460409

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY	CHECK NO.
929700100200	\$ 89.00	05/14/2013	

[REDACTED]
 Snohomish, WA 98296

MAKE CHECK PAYABLE TO:

LOCAL RECORDS OFFICE
 1001 Cooper Pt Rd. SW, #140 #117
 Olympia, WA 98502

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: () _____
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<i>Mailing Address</i>		
Address:		
City:	State:	Zip Code: