

FILED

SEP 15 2016

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH.

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SNO.

**STATE OF WASHINGTON
SNOHOMISH COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

I.C. CLEAN PEOPLE RECOVERY
HOUSING, a/k/a EVERETT AREA
RECOVERY SERVICES, a/k/a SNOCO
HOMELESS RECOVERY SERVICES;
and TIMOTHY REHBERG,

Defendants.

NO. **16 2 17965 31**

CONSENT DECREE

I. JUDGMENT SUMMARY

- 1.1 Judgment Creditor: State of Washington
- 1.2 Judgment Debtors: Timothy Rehberg, and I.C. Clean People
Recovery Housing
- 1.3 Principal Judgment Amount: \$14,426
- 1.4 Attorney for Judgment Creditor: Sarah Shifley, Assistant Attorney General
- 1.5 Attorney for Judgment Debtors: George T. Freeman, Law Office of George
T. Freeman
- 1.6 Plaintiff, State of Washington, having commenced this action pursuant to the

Consumer Protection Act, RCW 19.86, and Charitable Solicitations Act, RCW 19.09;

1 1.7 Plaintiff appearing by and through its attorneys, Robert W. Ferguson, Attorney
2 General, and Sarah Shifley, Assistant Attorney General; and Defendants appearing by and
3 through their attorney, George T. Freeman;

4 1.8 Plaintiff and Defendants do hereby consent to the entry of this Consent Decree
5 and its provisions (herein referred to as the "Consent Decree");

6 1.9 Plaintiff and Defendants having agreed on a basis for the settlement of the
7 matters alleged in the Complaint, and to the entry of this Consent Decree against Defendants
8 without the need for trial or adjudication of any issue of law or fact;

9 1.10 Defendants having waived service of a Summons and Complaint;

10 1.11 Defendants recognize and state that this Consent Decree is entered into
11 voluntarily and that no promises or threats have been made by the Attorney General's Office or
12 any member, officer, agent or representative thereof to induce them to enter into this Consent
13 Decree, except as provided herein; and enter into this Consent Decree freely and voluntarily
14 and with full knowledge and understanding of the nature of the proceedings and the obligations
15 and duties imposed upon them;

16 1.13 Defendants waive any right they may have to appeal from this Consent Decree;
17 and

18 1.14 Defendants further agree that they will not oppose the entry of this Consent Decree
19 on the grounds the Consent Decree fails to comply with Rule 65(d) of the Rules of Civil
20 Procedure, and hereby waive any objections based thereon;

21 1.15 Defendants further agree that this Court shall retain jurisdiction of this action for
22 the purpose of implementing and enforcing the terms and conditions of the Consent Decree and
23 for all other purposes associated therewith; and,

24 The Court finding no just reason for delay;

25 NOW, THEREFORE, it is hereby ORDERED, ADJUDGED, AND DECREED as
26 follows:

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II. GENERAL

2.1 Jurisdiction. This Court has jurisdiction over the subject matter of this action and over the parties. Plaintiff's Complaint in this matter states claims upon which relief may be granted under the Consumer Protection Act, Chapter 19.86 RCW, and Charitable Solicitations Act, RCW 19.09.

2.2 Defendants. For purposes of this Consent Decree the term "Defendants" where not otherwise specified shall mean Timothy Rehberg, individually and as Founder and Director of I.C. Clean People, and I.C. Clean People.

III. INJUNCTIONS

3.1 Application of Injunctions. The injunctive provisions of this Consent Decree shall apply to Defendants and Defendants' successors, assigns, officers, agents, servants, employees, representatives, and all other persons or entities in active concert or participation with Defendants.

3.2 Notice. Within five (5) business days of entry of this Decree, Defendants shall inform and give actual notice to all successors, assigns, transferees, officers, agents, servants, employees, representatives, attorneys and all other persons or entities in active concert or participation with Defendants, of the terms and conditions of this Consent Decree.

3.3 Injunctions. Defendants and their successors, assigns, transferees, officers, agents, servants, employees, representatives, and all other persons or entities in active concert or participation with Defendants are hereby permanently enjoined and restrained from the following:

- a. Soliciting charitable contributions; and,
- b. Forming or operating any charity or charitable organization.

IV. MONETARY PAYMENT

1 6.4 Representatives of the Attorney General may be permitted to question Defendants,
2 or any officer, director, agent, employee or independent contractor of any corporation affiliated
3 with Defendants, in deposition, pursuant to the provisions and notice requirements of CR 30, in
4 order to monitor compliance with this Consent Decree.

5 6.5 Under no circumstances shall this Consent Decree or the name of the State of
6 Washington, the Office of the Attorney General, Consumer Protection Division, or any of their
7 employees or representatives be used by Defendants in connection with any selling, advertising,
8 or promotion of products or services, or as an endorsement or approval of Defendants' acts,
9 practices or conduct of business.

10 DONE IN OPEN COURT this _____ day ~~_____~~ 2016.

SEP 14 2016

**COMMISSIONER
JACALYN D. BRUDVIK**

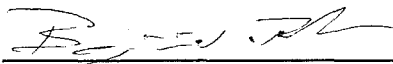
JUDGE

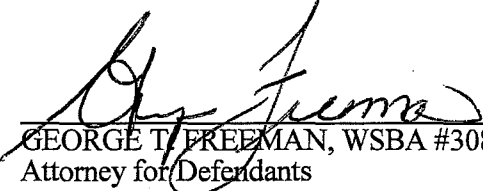
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14 Approved for Entry and Presented by:

Approved for Entry, Notice of Presentation
Waived:

15 ROBERT W. FERGUSON
16 Attorney General

LAW OFFICE OF GEORGE T. FREEMAN

17 
18 SARAH SHIFLEY, WSBA #39394
19 Assistant Attorney General
Attorneys for Plaintiff
State of Washington


GEORGE T. FREEMAN, WSBA #30896
Attorney for Defendants

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21 Benjamin J. Fuesch, WSBA # 39960