

FILED
KING COUNTY WASHINGTON

OCT 03 2025

SUPERIOR COURT CLERK

**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

JOHN ELLIOTT, individually;
SHANELLE SUNDE, individually;
BRADY HOWARD, individually;
GRACE KINNEY, individually; JULIE
ELLIS, individually; PROBATE &
ADMINISTRATION SERVICES LLC,
a Washington limited liability company;
SUNDE CONSULTING &
ACCOUNTING LLC, a Washington
Limited Liability Company; ELLIS
PROBATE SERVICES LLC, a
Washington limited liability company;
AURORA CREEK RANCH LLC, a
Washington limited liability company;
FOUNDATION ESCROW INC, a
Washington corporation; ROBERT
BROUILLARD, ESQ., individually; and
DOUGLAS OWENS, ESQ.,
individually,

Defendants.

NO. 25-2-04480-7 SEA

JUDGMENT FOR PLAINTIFF STATE
OF WASHINGTON AGAINST
DEFENDANTS JOHN ELLIOTT,
PROBATE & ADMINISTRATION
SERVICES LLC, AND AURORA
CREEK RANCH LLC

[CLERK'S ACTION REQUIRED]

I. JUDGMENT SUMMARY

1.1 Judgment Creditor: State of Washington

1.2 Judgment Debtors: John Elliott
Probate & Administration Services LLC
Aurora Creek Ranch LLC

1.3 Principal Judgment

- a) Restitution: \$3,541,025.49
b) Penalties: \$1,050,000.00
c) Costs & Attorney's Fees: \$789,763.51 (subject to any offset, ¶ 2.9)

Total Judgment: **\$5,380,789.00**

1.4 Post Judgment Interest Rate 12% per annum

1.5 Attorneys for Judgment Creditor: Matt Geyman, WSBA #17544
Ben Carr, WSBA #40778
Lauren Holzer, WSBA #59242

1.6 Attorneys for Judgment Debtors: None

II. JUDGMENT

2.1 Based on the Court's Findings of Fact, Conclusions of Law, and Order Granting State's Motion for Default Judgment, entered July 11, 2025, and its Order Granting State's Petition for Fees and Costs Against Defendants John Elliott, Probate & Administration Services LLC, Aurora Creek Ranch LLC, Shanelle Sunde, and Sunde Consulting & Accounting LLC, entered August 26, 2025, the Court hereby enters judgment in favor of the Plaintiff State of Washington against Defendants John Elliott, Probate & Administration Services LLC, and Aurora Creek Ranch LLC (hereafter Judgment Defendants) as follows:

A. Restitution

2.2 Pursuant to RCW 19.86.080(2), Judgment Defendants are liable for and are hereby ordered to pay a total of **\$3,541,025.49** in restitution for the money or property, real or personal, which they unlawfully acquired from the affected estates through their unlawful, unfair, and deceptive acts and practices identified in this litigation.

2.3 To the extent that restitution is available to be paid from the estate trust accounts that Judgment Defendants created for the benefit of specific estates, that portion of the total

1 restitution amount shall be paid from those trust accounts as directed by the Court.

2 2.4 Judgment Defendants shall pay the remaining restitution (i.e., the amount
3 remaining after subtracting the funds paid from specific estate trust accounts as set forth in
4 Paragraph 2.3) to the Attorney General within 30 days of this judgment by valid check or wire
5 transfer as set forth in Paragraph 3.1 below.

6 2.5 The Attorney General will distribute restitution to the affected estates and
7 consumers from these funds in the manner and amounts that will most effectively address the
8 harm, at the sole discretion of the Attorney General.

9 **B. Injunction**

10 2.6 Pursuant to RCW 19.86.080(1), Judgment Defendants are hereby permanently
11 RESTRAINED and ENJOINED as follows:

- 12 a. The Court previously issued a TRO freezing the 75 identified estate accounts
13 controlled by these Judgment Defendants, along with 11 identified non-
14 fiduciary accounts into which they transferred estate funds. Dkt. 26. To
15 permanently protect these funds, the Court subsequently converted the TRO
16 to a permanent injunction which remains in effect. Dkt. 125;
- 17 b. Judgment Defendants are prohibiting from acting as professional
18 administrators or executors in any future probate matters in the State of
19 Washington; and
- 20 c. Judgment Defendants shall not engage in any other conduct that violates the
21 Consumer Protection Act, RCW 19.86, or Washington's probate laws.

22 **C. Civil Penalties**

23 2.7 Pursuant to RCW 19.86.140, Judgment Defendants are liable for and are hereby
24 ordered to pay civil penalties to the Plaintiff State of Washington in the amount of **\$1,050,000.00**
25 as detailed in the Court's Findings of Fact, Conclusions of Law, and Order Granting State's
26 Motion for Default Judgment, entered July 11, 2025. Dkt. 125.

1 **D. Costs and Attorneys' Fees**

2 2.8 Pursuant to RCW 19.86.080(1), Judgment Defendants are liable for and are
3 hereby ordered to pay Plaintiff State of Washington's attorney fees and costs in the amount of
4 **\$789,763.51**, as detailed in the Court's Order Granting State's Petition for Fees and Costs Against
5 Defendants John Elliott, Probate & Administration Services LLC, Aurora Creek Ranch LLC,
6 Shanelle Sunde, and Sunde Consulting & Accounting LLC, entered August 26, 2025. Dkt. 132.

7 2.9 The Court's Order Granting State's Petition for Fees and Costs, Dkt. 132, granted
8 attorney's fees and costs jointly and severally against Defendants John Elliott,
9 Probate & Administration Services LLC, Aurora Creek Ranch LLC, Shanelle Sunde, and Sunde
10 Consulting & Accounting LLC. *Id.* The attorney's fees and costs ordered against these Defendants
11 are, therefore, offset by any amount paid by Defendants Shanelle Sunde and Sunde
12 Consulting & Accounting LLC in satisfaction of the attorney's fees and costs ordered against those
13 Defendants by separate judgment.

14 **III. PAYMENT AND ENFORCEMENT**

15 3.1 All payments made to satisfy this Judgment shall be in the form of a valid check
16 or wire transfer paid to the order of the "Attorney General – State of Washington." Payments
17 shall be sent to the Office of the Attorney General, Attention: Margaret Farmer, Litigation
18 Support Manager, 800 Fifth Avenue, Suite 2000, Seattle, Washington 98104-3188.

19 3.2 Nothing in this Judgment shall be construed as to limit or bar any other
20 government entity or any consumer in pursuit of other remedies against Judgment Defendants.
21 Representatives of the Office of the Attorney General shall be permitted, upon reasonable notice
22 to Judgment Defendants, to access and inspect all business records or documents under the
23 control of Judgment Defendants to monitor compliance with the terms of this Judgment.

24 3.3 Pursuant to RCW 19.86.140, any violation of the terms of this Judgment shall
25 form the basis for further enforcement proceedings, including, but not limited to, contempt of
26

1 Court proceedings and forfeiture of the civil penalty of up to \$125,000 for violations committed
2 after the date of the Judgment.

3 3.4 The violation of any of the injunctive terms of this Judgment shall constitute a
4 violation of RCW 19.86.020.

5 3.5 This Judgment applies only to the Judgment Defendants. The State is entitled to
6 seek entry of a separate judgment against one or all remaining Defendants in this case.

7 3.6 The Court further finds that there is no just reason for delay in entry of judgment
8 against Judgment Defendants.

9 DONE IN OPEN COURT THIS 2nd day of ^{October} September, 2025.

10
11 
12 THE HONORABLE SUZANNE R. PARISIEN
13 King County Superior Court Judge

14 Presented by:

15 NICHOLAS W. BROWN
16 Attorney General

17 s/ Matt Geyman

18 MATT GEYMAN, WSBA #17544
19 BEN CARR, WSBA #40778
20 LAUREN HOLZER, WSBA #59242
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