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

9 In re:

NO. 26-2-05645-34

10 REGISTRAR AGENCY LLC, D/B/A
11 REGISTRAR AGENCY OF
12 CORPORATIONS, REGISTRAR
13 AGENCY CORPORATION, AND
14 REGISTERED AGENCY,

ASSURANCE OF
DISCONTINUANCE

Respondent.

15 The State of Washington (State), by and through its attorneys, Nicholas W. Brown, Attorney
16 General, and Lauren Holzer, Assistant Attorney General, files this Assurance of Discontinuance
17 pursuant to the Consumer Protection Act (CPA), RCW 19.86.100. Registrar Agency LLC,
18 (Respondent) is a limited liability company headquartered in Olympia, Washington that provides
19 services to businesses to complete their required annual report filings. This Assurance of
20 Discontinuance resolves the State's concerns that Respondent engaged in unfair or deceptive acts
21 or practices under RCW 19.86.020 with respect to the dissemination of its solicitations related to
22 its services in Washington.

23 **I. ASSURANCE OF DISCONTINUANCE**

24 1.1 The State deems that the following constitute unfair or deceptive acts or practices
25 in trade or commerce that violate the Washington Consumer Protection Act, RCW 19.86.020:
26

- a. mailing, texting, emailing, or otherwise sending solicitations by any other means that create the deceptive net impression that they are a bill or invoice a consumer must pay;
- b. sending solicitations that create the deceptive net impression that the solicitation originated from a governmental entity;
- c. using a business name that creates the deceptive net impression that it is affiliated with a governmental entity; and
- d. using envelopes or letterheads that create the deceptive net impression that its contents originate from a governmental entity or contain a bill the consumer must pay.

1.2 Respondent does not admit that it has committed acts or practices that constitute unfair or deceptive acts or practices under the Washington Consumer Protection Act., RCW 19.86.020. Nevertheless, Respondent has discontinued soliciting Washington businesses at present and, in addition to refraining from any conduct described above, Respondent agrees it will not engage in the following practice in the future: Soliciting Washington businesses to pay an inflated fee for required business filings with the Secretary of State or any other governmental agency without conspicuously disclosing the fact that (1) they are not a governmental agency, and (2) that the fee is not required to complete the filing. Respondent shall permanently cease its use of the image of Washington's State Capitol building in Olympia on any of its solicitations.

II. RELEASE OF CLAIMS

2.1 By its execution of this Assurance of Discontinuance, the State releases Respondent from all civil claims, causes of action, damages, restitution, fines, costs, and penalties under RCW 19.86, arising from or related to the conduct and/or practices referenced in this Assurance of Discontinuance.

2.2 In the event that Respondent violates this Assurance of Discontinuance, this

1 release of claims becomes void, and nothing shall prevent the State from enforcing RCW 19.86
2 and seeking permanent injunctive relief and recovery of costs, restitution, and civil penalties
3 against Respondent for any conduct covered by this Assurance of Discontinuance prior to and
4 after its execution by the parties

5 2.3 This Assurance of Discontinuance is not, and may not, be considered an
6 admission of violation for any purposes; but proof of failure to comply with this Assurance of
7 Discontinuance shall be *prima facie* evidence of violations of RCW 19.86, thereby placing upon
8 the violator the burden of defending against the Court's imposition of injunctions, restitution,
9 civil penalties, and other relief that the Attorney General may seek.

10 III. PAYMENT TO STATE

11 3.1 Pursuant to RCW 19.86.080 and RCW 19.86.140, Respondent shall pay a total of
12 **\$522,409.00** to the State for distribution to Washington consumers who made payments to
13 Respondent as a result of the solicitations described herein, payment of a claims administrator,
14 costs and reasonable attorneys' fees incurred by the State in pursuing this matter, for monitoring
15 and potential enforcement of this Assurance of Discontinuance, for future enforcement of
16 RCW 19.86, or for any lawful purpose in the discharge of the Attorney General's duties at the
17 sole discretion of the Attorney General.

18 3.2 Within thirty (30) days of entry of this Assurance of Discontinuance, Respondent
19 shall pay \$70,000.00 of the total amount listed in paragraph 3.1 to the State. Respondent's
20 remaining balance of \$452,409.00 shall be paid over the following twenty-one (21) months,
21 with a monthly payment of \$21,543.00 due by the fifth day of each month for the first twenty
22 (20) months and a final payment of \$21,549.00 due by the fifth day of month twenty-one (21).

23 3.3 Respondent shall deliver the payments referenced herein in the form of a check
24 payable to "Attorney General – State of Washington" to the following address: Office of the
25 Attorney General, Attention: Margaret Farmer, Consumer Protection Division, 800 Fifth Avenue,
26 Suite 2000, Seattle, Washington, 98104-3188; or by wire transfer. Respondent's failure to make a

1 timely payment shall be a material breach.

2 3.4 Respondent's owner and governor, Elliott S. Cameron, has executed a
3 Confession of Judgment in the amount of \$522,409.00, a true and correct copy of which is
4 attached hereto as Exhibit 1. The original executed Confession of Judgment shall remain in the
5 possession, custody, and control of the State. The Confession of Judgment shall only be filed
6 with the Court in the event that Respondent fails to fully and timely remit to the State any
7 payment listed in Paragraph 3.2. Should Respondent default on the monetary obligations listed
8 herein, Respondent agrees that the State shall have the right to file the Confession of Judgment
9 with this Court after providing it ten (10) calendar days' notice to cure the default.

10 **IV. BREACH OF AGREEMENT**

11 4.1 If Respondent fails to comply with the terms stated Sections I and III of this
12 Assurance of Discontinuance, and upon ten (10) calendar days' notice to Respondent, the State
13 shall be entitled to move the Court for an Order to Enforce the Assurance of Discontinuance.
14 Respondent shall have an opportunity to cure during the ten (10) calendar days.

15 **V. ADDITIONAL PROVISIONS**

16 5.1 This Assurance of Discontinuance is not an admission or finding that
17 Respondent violated the Washington Consumer Protection Act, ch. 19.86 RCW, or any other
18 law or statute for any purpose.

19 5.2 Under no circumstances shall this Assurance of Discontinuance or the name of
20 the State of Washington or the Office of the Attorney General, or any employees or
21 representatives be used by Respondent or by its officers, employees, representatives, or agents
22 in conjunction with any of its business activities.

23 5.3 This Assurance of Discontinuance is binding on Respondent and its owners,
24 directors, successors, assignees, transferees, officers, agents, partners, servants, employees,
25 representatives, and all other persons acting in concert or participating with Respondent in the
26 context of conducting Respondent's business.

5.4 Nothing in this Assurance of Discontinuance shall be construed as to limit or bar any other person or entity from pursuing available legal claims or remedies against Respondent.

APPROVED on this _____ day of _____, 2026.

JUDGE/COURT COMMISSIONER

Presented by:

Agreed to and approved for entry by:

NICHOLAS W. BROWN
Attorney General


LAUREN HOLZER, WSBA # 59242
Assistant Attorney General
Attorney for State of Washington
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
206-516-2994
Lauren.Holzer@atg.wa.gov


 AARON E. MILLSTEIN, WSBA # 44135
 Attorney for Respondent
 Arnold & Porter Kaye Scholer LLP
 1420 5th Avenue, Suite 1400
 Seattle, WA 98101
 206-288-0117
 Aaron.Millstein@arnoldporter.com

EXHIBIT 1

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**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

In re:

REGISTRAR AGENCY LLC, D/B/A
REGISTRAR AGENCY OF
CORPORATIONS, REGISTRAR
AGENCY CORPORATION, AND
REGISTERED AGENCY,

Respondent.

NO.

CONFESSION OF JUDGMENT

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I. JUDGMENT SUMMARY

1.1	Judgment Creditor	State of Washington
1.2	Judgment Debtor	Elliott S. Cameron, in his individual capacity and in his capacity as owner of Registrar Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation, and Registered Agency
1.3	Judgment Amount	\$522,409.00
1.4	Attorneys for Judgment Creditor	Lauren Holzer Assistant Attorney General
1.5	Attorneys for Judgment Debtor	Aaron E. Millstein Arnold & Porter Kaye Scholer LLP

Pursuant to Chapter 4.60 of the Revised Code of Washington, Judgment by Confession,
Elliott S. Cameron in his individual capacity and in his capacity as owner of Registrar

1 Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation, and
2 Registered Agency, hereby authorized entry of judgment under the following terms:

3 **II. FACTUAL BASIS FOR JUDGMENT**

4 The State of Washington and Elliott S. Cameron have agreed upon a basis for resolution
5 of the State's claims against Mr. Cameron arising from his operation and management of
6 Registrar Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation,
7 and Registered Agency. In the event that Mr. Cameron fails to make any payment required by
8 Paragraph 3.2 of the executed Assurance of Discontinuance on time and in full, including but
9 not limited to circumstances in which Mr. Cameron files for bankruptcy protection, subject to
10 the cure provision in Paragraph 4.1 of the Assurance of Discontinuance, Mr. Cameron shall be
11 immediately liable for the full amount due under the Assurance of Discontinuance, provided that
12 Mr. Cameron shall be entitled to a set-off for any sums toward the \$522,409.00 obligation
13 previously paid to the State of Washington by him.

14 If Mr. Cameron seeks bankruptcy protection or assigns his assets to a receiver for the
15 benefit of his creditors, and the bankruptcy trustee, receiver or creditors seek to recover
16 Mr. Cameron's payments made pursuant to the Assurance of Discontinuance from the State,
17 Mr. Cameron shall be liable for any sums remitted by the State to such parties.

18 **III. AUTHORIZATION FOR ENTRY OF JUDGMENT**

19 I, Elliott S. Cameron, being duly sworn upon oath acknowledge liability of \$522,409.00
20 owed to the State of Washington, and I authorize entry of judgment against me for the amount
21 set forth in the judgment summary above.

22
23 Elliott S. Cameron, in his individual capacity and
24 in his capacity as owner of Registrar Agency LLC
25 d/b/a Registrar Agency of Corporations, Registrar
26 Agency Corporation, and Registered Agency

1 STATE OF _____)
2 COUNTY OF _____)

3 The foregoing instrument was acknowledged and affirmed before me this ____ day of
4 _____, 2026 by _____.

5
6 Notary Public
My Commission Expires: _____

7 **IV. ORDER FOR ENTRY**

8 The above Confession of Judgment having been presented to this Court for entry in
9 accordance with RCW 4.60.070, the Court having found said Confession of Judgment to be
10 sufficient now, therefore, it is hereby

11 ORDERED that the Clerk of this Court shall forthwith enter judgment against Elliott S.
12 Cameron, in his individual capacity in accordance with the terms of the Confession of Judgment.

13
14 DONE IN OPEN COURT this ____ day of _____, 2026.

15
16 JUDGE/COURT COMMISSIONER

17 Presented by:

18 NICHOLAS W. BROWN
19 Attorney General

20 
21 LAUREN HOLZER, WSBA # 59242
22 Assistant Attorney General
23 Attorneys for the State of Washington
24 Office of the Attorney General
25 800 Fifth Avenue, Suite 2000
26 Seattle, WA 98104

Notice of Presentment Waived and
Approved as to Form by:

Arnold & Porter Kaye Scholer LLP


AARON E. MILLSTEIN, WSBA # 44135
Attorney for Respondent
Arnold & Porter Kaye Scholer LLP
1420 5th Avenue, Suite 1400
Seattle, WA 98101

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

9 In re:

10 REGISTRAR AGENCY LLC, D/B/A
11 REGISTRAR AGENCY OF
12 CORPORATIONS, REGISTRAR
13 AGENCY CORPORATION, AND
14 REGISTERED AGENCY,

15 Respondent.

NO.

CONFESSION OF JUDGMENT

16
17 **I. JUDGMENT SUMMARY**

18 1.1	Judgment Creditor	State of Washington
19 1.2	Judgment Debtor	Elliott S. Cameron, in his individual capacity and in his capacity as owner of Registrar Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation, and Registered Agency
20 1.3	Judgment Amount	\$522,409.00
21 1.4	Attorneys for Judgment Creditor	Lauren Holzer Assistant Attorney General
22 1.5	Attorneys for Judgment Debtor	Aaron E. Millstein Arnold & Porter Kaye Scholer LLP

23
24 Pursuant to Chapter 4.60 of the Revised Code of Washington, Judgment by Confession,
25 Elliott S. Cameron in his individual capacity and in his capacity as owner of Registrar
26

Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation, and Registered Agency, hereby authorized entry of judgment under the following terms:

II. FACTUAL BASIS FOR JUDGMENT

The State of Washington and Elliott S. Cameron have agreed upon a basis for resolution of the State's claims against Mr. Cameron arising from his operation and management of Registrar Agency LLC, d/b/a Registrar Agency of Corporations, Registrar Agency Corporation, and Registered Agency. In the event that Mr. Cameron fails to make any payment required by Paragraph 3.2 of the executed Assurance of Discontinuance on time and in full, including but not limited to circumstances in which Mr. Cameron files for bankruptcy protection, subject to the cure provision in Paragraph 4.1 of the Assurance of Discontinuance, Mr. Cameron shall be immediately liable for the full amount due under the Assurance of Discontinuance, provided that Mr. Cameron shall be entitled to a set-off for any sums toward the \$522,409.00 obligation previously paid to the State of Washington by him.

If Mr. Cameron seeks bankruptcy protection or assigns his assets to a receiver for the benefit of his creditors, and the bankruptcy trustee, receiver or creditors seek to recover Mr. Cameron's payments made pursuant to the Assurance of Discontinuance from the State, Mr. Cameron shall be liable for any sums remitted by the State to such parties.

III. AUTHORIZATION FOR ENTRY OF JUDGMENT

I, Elliott S. Cameron, being duly sworn upon oath acknowledge liability of \$522,409.00 owed to the State of Washington, and I authorize entry of judgment against me for the amount set forth in the judgment summary above.


Elliott S. Cameron, in his individual capacity and
in his capacity as owner of Registrar Agency LLC
d/b/a Registrar Agency of Corporations, Registrar
Agency Corporation, and Registered Agency

1 STATE OF _____)
2 COUNTY OF _____)

3 The foregoing instrument was acknowledged and affirmed before me this ____ day of
4 _____, 2026 by _____.

5 Please see attached
6 California
7 Acknowledgement ☒
8 Jurat _____
9 Notary Initials AD

Notary Public
My Commission Expires: _____

10 IV. ORDER FOR ENTRY

11 The above Confession of Judgment having been presented to this Court for entry in
12 accordance with RCW 4.60.070, the Court having found said Confession of Judgment to be
13 sufficient now, therefore, it is hereby

14 ORDERED that the Clerk of this Court shall forthwith enter judgment against Elliott S.
15 Cameron, in his individual capacity in accordance with the terms of the Confession of Judgment.

16 DONE IN OPEN COURT this ____ day of _____, 2026.

17 JUDGE/COURT COMMISSIONER

18 Presented by:

19 NICHOLAS W. BROWN
20 Attorney General

Notice of Presentment Waived and
Approved as to Form by:

Arnold & Porter Kaye Scholer LLP

21 LAUREN HOLZER, WSBA # 59242
22 Assistant Attorney General
23 Attorneys for the State of Washington
24 Office of the Attorney General
25 800 Fifth Avenue, Suite 2000
26 Seattle, WA 98104

AARON E. MILLSTEIN, WSBA # 44135
Attorney for Respondent
Arnold & Porter Kaye Scholer LLP
1420 5th Avenue, Suite 1400
Seattle, WA 98101

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1129

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California }

County of Orange

Ava Diaz, Notary Public

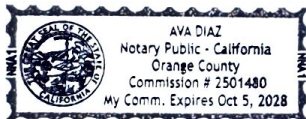
On August 07, 2024 before me, _____
Date Here Insert Name and Title of the Officer

personally appeared Elliott S. Camexon
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Ava Diaz
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____