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

9 In re:

10 CENTRAL WASHINGTON HEALTH  
11 SERVICES ASSOCIATION  
12 d/b/a CONFLUENCE HEALTH,

Respondent.

NO.

ASSURANCE OF DISCONTINUANCE

**[CLERK'S ACTION REQUIRED]**

13 **I. INTRODUCTION**

14 1.1 The State of Washington (State), by and through its attorneys, Nicholas W. Brown,  
15 Attorney General, and Will O'Connor and Robert A. Hyde, Assistant Attorneys General, files this  
16 Assurance of Discontinuance pursuant to the Consumer Protection Act (CPA), RCW 19.86.100.

17 1.2 This Assurance of Discontinuance resolves the State's concerns that  
18 Central Washington Health Services Association d/b/a Confluence Health (hereinafter,  
19 Respondent or Confluence) engaged in unfair or deceptive acts or practices under RCW 19.86.020  
20 with respect to the conduct described herein.

21 **II. ASSURANCE OF DISCONTINUANCE**

22 2.1 The Attorney General deems that the following would constitute an unfair or  
23 deceptive act or practice in trade or commerce that violates the Washington Consumer Protection  
24 Act, RCW 19.86.020: failing to refund patients approved for charity care for all payments made  
25 by the patient during the time period of their demonstrated approval for charity.  
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2.2 Confluence admits that its practices in some instances varied from its charity care policy and therefore it engaged in the practice described above. However, Confluence does not admit that it violated Washington's Consumer Protection Act. Confluence has agreed to enter this Assurance of Discontinuance and settlement of contested matters to avoid further controversy and expense. Confluence agrees not to engage in the practices identified above. Confluence Health also agrees to fully comply with all requirements of RCW 19.86.

### III. RELEASE OF CLAIMS

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

3.2 In the event Confluence violates this Assurance of Discontinuance, this release of claims becomes void, and nothing shall prevent the State from enforcing RCW 19.86 and seeking permanent injunctive relief and recovery of costs, restitution, and civil penalties against Confluence for any conduct covered by this Assurance of Discontinuance prior to and after its execution by the parties.

3.3 This Assurance of Discontinuance is not, and may not, be considered an admission of violation for any purposes; but proof of failure to comply with this Assurance of Discontinuance shall be *prima facie* evidence of violation of RCW 19.86 (and may be enforced by the Washington State Attorney General in the same manner it uses to enforce the violations of Assurance of Discontinuance entered pursuant to RCW 19.86.020), thereby placing upon the violator the burden of defending against the Court's imposition of injunctions, restitution, civil penalties, and other relief the Attorney General may seek.

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4.2 Confluence shall mail or deliver payment in the form of a check to the Office of the Attorney General, Attention: Margaret Farmer, Consumer Protection Division, 800 Fifth Avenue, Suite 2000, Seattle, Washington, 98104-3188.

## V. ADDITIONAL PROVISIONS

5.2 This Assurance of Discontinuance is binding on Confluence and its owners, directors, successors, assigns, transferees, officers, agents, partners, servants, employees, representatives, and all other persons acting in concert or participating with Confluence in the context of conducting Confluence's business.

APPROVED on this                      day of December 2025.

ASSURANCE OF DISCONTINUANCE - 3

ATTORNEY GENERAL OF WASHINGTON  
Consumer Protection Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104-3188  
206-464-7744

1 Presented by:

2 NICHOLAS W. BROWN  
3 Attorney General

4 s/ Will O'Connor

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13 *Attorneys for the State of Washington*

Agreed to and approved for entry by:

CENTRAL WASHINGTON HEALTH  
SERVICES ASSOCIATION  
D/B/A CONFLUENCE HEALTH



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