

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON**

In re

NORTHWEST TERRITORIAL MINT,  
LLC,

Debtor.

NO. 16-11767

STATE OF WASHINGTON JOINDER IN  
THE SHOW CAUSE MOTION AGAINST  
JEFFREY MARK McMEEL FOR  
CONTEMPT.

COMES NOW counsel for the State of Washington and JOINS in the motion of the  
U.S. Trustee upon the following grounds:

1. Impersonating A State Official. The referenced pleading is clearly misleading,  
fraudulent and issues without any authority.

**RCW 9a.60.040**

**Criminal impersonation in the first degree.**

(1) A person is guilty of criminal impersonation in the first degree if the  
person:

(a) Assumes a false identity and does an act in his or her assumed character  
with intent to defraud another or for any other unlawful purpose; or

(b) Pretends to be a representative of some person or organization or a  
public servant and does an act in his or her pretended capacity with intent to  
defraud another or for any other unlawful purpose.

(2) Criminal impersonation in the first degree is a class C felony.

Public servant is defined under RCW 9A.04.110(23).

2. Barratry. While the true or actual intent of McMeel is not known at this time, he is  
strictly liable for his acts. The State of Washington Attorney General has specifically  
appeared in this case to protect both the Department of Revenue, as a creditor, along with

1 consumers protected by a prior Consent Decree entered by the Consumer Protection division  
2 of the Office of the Attorney General. The McMeel pleading as filed creates needless and  
3 unwarranted confusion as to the authority of the Attorney General and the action(s) of the  
4 State herein:

5 **RCW 9.12.010**

6 **Barratry.**

7 Every person who brings on his or her own behalf, or instigates, incites, or  
8 encourages another to bring, any false suit at law or in equity in any court of  
9 this state, with intent thereby to distress or harass a defendant in the suit, or who  
10 serves or sends any paper or document purporting to be or resembling a judicial  
11 process, that is not in fact a judicial process, is guilty of a misdemeanor; and in  
12 case the person offending is an attorney, he or she may, in addition thereto be  
13 disbarred from practicing law within this state.

14 3. Potential Bankruptcy Crime(s). These same actions likely violate 18 U.S.C. §152:

15 **§152. Concealment of assets; false oaths and claims; bribery**

16 A person who-

17 (1) knowingly and fraudulently conceals from a custodian, trustee, marshal,  
18 or other officer of the court charged with the control or custody of property, or,  
19 in connection with a case under title 11, from creditors or the United States  
20 Trustee, any property belonging to the estate of a debtor;

21 (2) knowingly and fraudulently makes a false oath or account in or in relation  
22 to any case under title 11;

23 (3) knowingly and fraudulently makes a false declaration, certificate,  
24 verification, or statement under penalty of perjury as permitted under section  
25 1746 of title 28, in or in relation to any case under title 11;

26 WHEREUPON, having so stated, the State of Washington PRAYS for the relief sought by the  
U.S. Trustee along with referral to the U.S. Attorney for potential investigation of bankruptcy  
crimes.

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DATED this \_\_6th\_\_ day of May, 2016.

ROBERT W. FERGUSON  
Attorney General

*/s/ Zachary Mosner*

ZACHARY MOSNER, WSBA No. 9566  
Assistant Attorney General