

Street, Harrisburg, PA 17110.

- b. Respondent solicits charitable contributions in Pennsylvania through direct mail and through online solicitations.
- c. On or about April 23, 2012, Respondent was ordered to Cease and Desist soliciting in the Commonwealth by the Secretary of the Commonwealth.
- d. On or about May 23, 2012, Respondent solicited contributions on its website, worldsurgicalfoundation.org.
- e. On or about May 26, 2012, Respondent solicited donations via its hosting of a tennis tournament at the Harrisburg Academy Courts.
- f. Respondent has taken remedial measures to ensure future compliance with The Solicitation of Funds for Charitable Purposes Act.

AGREED VIOLATIONS

- 5. Respondent admits and agrees that by engaging in the foregoing activities:
 - a. Respondent admits and agrees that by engaging in the foregoing activities Respondent violated the Act at 10 P.S. § 162.15(a)(1) by violating an Order issued by the Secretary of the Commonwealth.

PROPOSED ORDER

- 6. The participants, intending to be legally bound, consent to issuance of the following Order in settlement of this matter:
 - a. Respondent violated the Act at 10 P.S. § 162.15(a)(1)

ADMINISTRATIVE FINE

- b. An **ADMINISTRATIVE FINE** of two thousand dollars (\$2,000.00) is

EFFECT OF SECRETARY'S REJECTION

10. Should the Secretary not approve this Consent Agreement, presentation to and consideration of this Consent Agreement and other documents and matters by the Secretary shall not prejudice the Secretary from further participation in the adjudication of this matter. This paragraph is binding on the participants even if the Secretary does not approve this Consent Agreement.

ENTIRE AGREEMENT

11. This Agreement contains the whole agreement between the parties; provided, however, that the captions printed in the various provisions of this agreement are for ease of reading only and are not to be interpreted as forming any part of this agreement. There are no other terms, obligations, covenants, representations, statements or conditions, or otherwise, of any kind whatsoever, concerning this Agreement.

AGREEMENT DOES NOT PREVENT REFERRAL TO OTHER AGENCIES

12. The parties acknowledge that other federal, state, and/or local agencies may have jurisdiction over the activities of, or representations made by, Respondent and its officers, directors, agents, employees or independent contractors. Nothing in this Consent Agreement or the Order based upon this Consent Agreement shall preclude representatives of the Bureau from referring any information or data produced as a result of this matter to any federal, state, or local agency or governmental unit having jurisdiction over the activities of Respondent or any officer, director, agent, employee or independent contractor of the Respondent.

VERIFICATION OF FACTS AND STATEMENTS

13. Respondent verifies that the facts and statements set forth in this Agreement are true and correct to the best of Respondent's knowledge, information and belief. Respondent understands

that statements in this Agreement are made subject to the criminal penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

World Surgical Foundation, Inc.

Eric M. Spada
Eric M. Spada, Esquire
Prosecuting Attorney
Department of State

Domingo T. Alvear
By: DOMINGO T. ALVEAR
Title: PRESIDENT
Respondent

DATED: 7/17/12

DATED: 7/9/2012



**IN THE MATTER OF WORLD SURGICAL FOUNDATION, INC.
FILE NO. 12-98-05081**

ORDER

AND NOW, to wit, on this 7th day of August 2012, the terms of paragraph 6 of the foregoing Consent Agreement are hereby adopted and incorporated as the Order of the Secretary of the Commonwealth in resolution of this matter. This Order shall take effect immediately.

BY ORDER

A handwritten signature in cursive script, appearing to read "Carol Aichele".

Carol Aichele
Secretary of the Commonwealth