

- a. Respondent's last known business address, as on file with the Department of State, is 73 Chapel Street, Newton, MA 02458.
- b. People for the Ethical Treatment of Animals, Inc. is a registered charitable organization under certificate number 7556.
- c. Respondent solicited Pennsylvania residents and businesses on behalf of People for the Ethical Treatment of Animals, Inc. between September 11, 2009, 2009 and July 31, 2010.
- d. The Act required Respondent to file a campaign report by October 29, 2010.
- e. Respondent did not file a campaign report for People for the Ethical Treatment of Animals, Inc. by October 29, 2010.
- f. Unitarian Universalist Service Committee, Inc. is a registered charitable organization under certificate number 2141.
- g. Respondent solicited Pennsylvania residents and businesses on behalf of Unitarian Universalist Service Committee, Inc. between November 18, 2009 and June 30, 2010.
- h. The Act required Respondent to file a campaign report by September 28, 2010.
- i. Respondent did not file a campaign report for Unitarian Universalist Service Committee, Inc. by September 28, 2010.
- j. The Fund for Animals, Inc. is a registered charitable organization under certificate number 2121.

k. Respondent solicited Pennsylvania residents and businesses on behalf of The Fund for Animals, Inc. between April 8, 2009 and March 31, 2010.

l. The Act required Respondent to file a campaign report by June 29, 2010.

m. Respondent filed a campaign report for a solicitation campaign on behalf of The Fund for Animals, Inc. on October 1, 2010.

n. The Bureau rejected this report on October 4, 2010 for several reasons.

o. Respondent has not filed a corrected campaign report for The Fund for Animals, Inc.

p. Between January 2010 and November 1, 2010, Respondent submitted sixteen (16) campaign reports late or failed to file campaign reports and was assessed \$2,225.00 in administrative fines.

q. Respondent has failed to pay the \$2,225.00 in administrative fines.

AGREED VIOLATIONS

6. Respondent admits and agrees that by engaging in the foregoing activities:

a. Respondent repeatedly violated the Act at 10 P.S. § 162.9(l), by and through § 162.15(a)(1), by failing to file campaign reports within ninety (90) days after a solicitation campaign or event that was completed or on the anniversary of a campaign or event lasting more than one year; and

b. Respondent repeatedly violated the Act at 10 P.S. § 162.17(b)(3) by and through 10 P.S. § 162.15(a)(1) by failing to pay the administrative fines assessed to the Respondent.

PROPOSED ORDER

7. The participants, intending to be legally bound, consent to the issuance of the following Order in settlement of this matter:

a. Respondent repeatedly violated the Act at 10 P.S. § 162.9(l), by and through §162.15(a)(1); and

b. Respondent repeatedly violated the Act at 10 P.S. § 162.17(b)(3) by and through 10 P.S. § 162.15(a)(1).

ADMINISTRATIVE FINE

c. An **ADMINISTRATIVE FINE** of four thousand dollars (\$4,000.00) is levied upon Respondent. Respondent shall tender the full sum of four thousand dollars (\$4,000.00) with this executed Consent Agreement which shall be paid by **certified check, cashier's check, attorney's check or U.S. Postal money order made payable to the "Commonwealth of Pennsylvania."**

d. Additionally, Respondent shall pay the outstanding administrative fines that were assessed to Respondent between January 2010 and November 1, 2010 in the amount of \$2,225.00

CASE SETTLED AND DISCONTINUED

8. This case shall be deemed settled and discontinued upon the Secretary issuing an Order adopting this Consent Agreement and the Respondent's successful completion of any ordered discipline.

ACKNOWLEDGEMENT OF NOTICE AND WAIVER OF HEARING

9. Respondent waives the filing of an Order to Show Cause in this matter. Respondent knowingly and voluntarily waives the right to an administrative hearing in this matter, and to the

following rights related to that hearing: to be represented by counsel at the hearing; to present witnesses and testimony in defense or in mitigation of any sanction that may be imposed for a violation; to cross-examine witnesses and to challenge evidence presented by the Bureau; to present legal arguments by means of a brief; and to take an appeal from any final adverse decision.

AGREEMENT NOT BINDING ON OTHER PARTIES

10. This Consent Agreement is between the Bureau and Respondent only. It does not bind any other administrative or governmental entity of the Commonwealth of Pennsylvania, including any other bureau within the Department of State. Except as otherwise noted, this Agreement is to have no legal effect if (a) the Office of General Counsel expresses an objection to the Agreement's form or legality and/or (b) unless and until the Secretary issues the stipulated Order.

EFFECT OF SECRETARY'S REJECTION

11. 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

12. 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

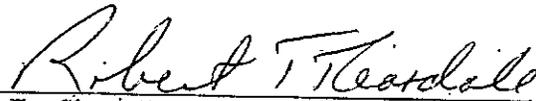
13. The parties acknowledge that other federal, state, and/or local agencies may have jurisdiction over the activities of, or representations made by, Respondent. Nothing in this Consent Agreement or the Order based upon this Consent Agreement shall preclude representatives of the Bureau from referring 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.

VERIFICATION OF FACTS AND STATEMENTS

14. 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.



Jacquelyn E. Pfirsich
Prosecuting Attorney
Department of State



For Share Group, Inc.
Title: *CHIEF FINANCIAL OFFICER*
Respondent

DATED: 12/27/10

DATED: 12/21/10



**IN THE MATTER OF
SHARE GROUP, INC.
FILE NO. 10-98-09458**

ORDER

AND NOW, to wit, on this 8th day of March 2011, the terms of paragraph 7 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
Acting Secretary of the Commonwealth