

COPY

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE SECRETARY OF THE COMMONWEALTH**

**Commonwealth of Pennsylvania
Bureau of Charitable Organizations**

vs.

**Action Donation Services
Respondent**

:
:
:
:
:
:
:

**Docket No. 0007-98-16
File No. 14-98-14325**

RECEIVED
2011 MAR 23 PM 2:06
Department of State

FINAL ADJUDICATION AND ORDER

**Pedro A. Cortés
Secretary of the Commonwealth**

**302 North Office Building
Harrisburg, PA 17120**

HISTORY

This matter comes before the Secretary of the Commonwealth (Secretary) from an order to show cause filed August 4, 2016, alleging that Action Donation Services (Respondent), a professional solicitor not currently registered in the Commonwealth of Pennsylvania, is subject to administrative sanctions under the Solicitation of Funds for Charitable Purposes Act ("Act").¹ The order to show cause alleges that Respondent violated the Act at 10 P.S. §162.15(a)(1), because Respondent violated or acted in violation of an Order of the Secretary. The order to show cause also alleges that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(a), by providing professional solicitor services prior to registration with the Department of State as a professional solicitor. Lastly, the order to show cause alleges that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(e), by failing to file with the Department of State copies of written contracts with charitable organizations prior to providing professional solicitor services to the charities.

On October 5, 2016, the Commonwealth filed a motion to enter default and deem facts admitted in accordance with the General Rules of Administrative Practice and Procedure at 1 Pa. Code § 35.37.

Respondent did not submit a reply to either pleading. The Secretary now issues this adjudication and order in final disposition of this matter.

¹ Act of December 19, 1990, P.L. 1200, No. 202, *as amended*, 10 P.S. § 162.1 *et seq.*

FINDINGS OF FACTS

1. This matter is before the Secretary of the Commonwealth (Secretary) pursuant to the Solicitation of Funds for Charitable Purposes Act, Act of December 19, 1990, P.L. 1200, No. 202, *as amended* (hereinafter referred to as 'Act'), 10 P.S. §§ 162.1-162.24. (Order to Show Cause ¶1).

2. Respondent is located in the area of San Diego, CA and has a mailing address of: P.O. Box 86551, San Diego, CA 92138. (Order to Show Cause ¶2).

3. Respondent is a professional solicitor as defined by the Act. (Order to Show Cause ¶3).

4. Respondent is not registered as a professional solicitor with the Bureau. (Order to Show Cause ¶4).

5. Keystone Paralyzed Veterans of America, Inc. ("KPVA") is a charitable organization registered with the Bureau at certificate number 13538. (Order to Show Cause ¶5).

6. Respondent entered into a contract with KPVA, effective February 1, 2011 (tentatively), in which Respondent was to provide KPVA with professional solicitor services in the Commonwealth for a period of one (1) year, after which the agreement would automatically renew for successive additional terms of one (1) year each, unless either party provided written notification not less than thirty (30) days prior to the expiration of the renewal date of its intent not to renew. (Order to Show Cause ¶6).

7. As of January 30, 2015, KPVA advised that there has been no written notification by either party of an intent not to renew the contract. (Order to Show Cause ¶7).

8. The contract between Respondent and KPVA has been in effect for each annual period from February 1, 2012, through January 31, 2015. (Order to Show Cause ¶8).

9. Respondent provided services to KPVA under the contract from February 1, 2012, through at least January 31, 2015. (Order to Show Cause ¶9).

10. Ronald McDonald House Charities of Central Pennsylvania (“RMHCP”) is a charitable organization registered with the Bureau at certificate number 863. (Order to Show Cause ¶10).

11. Respondent entered into a contract with RMHCP, effective June 12, 2012, in which Respondent was to provide RMHCP with professional solicitor services in the Commonwealth for a period of one (1) year, after which the agreement would automatically renew for successive additional terms of one (1) year each, unless either party provided written notification not less than thirty (30) days prior to the expiration of the renewal date of its intent not to renew. (Order to Show Cause ¶11).

12. On or about December 16, 2014, RMHCP received an email from Ted Cox [ted.cox@actiondonation.org] advising RMHCP that Action Donation Services had “made a decision not to provide property donation services to any charity in the State of Pennsylvania going forward.” Notification was therefore provided to RMHCP that Respondent was terminating their services effective December 16, 2014. (Order to Show Cause ¶12).

13. Respondent provided services to RMHCP under the contract from June 12, 2012 through December 16, 2014. (Order to Show Cause ¶13).

14. Defeat Diabetes Foundation (“DDF”) is a charitable organization that is registered with the Bureau, certificate number 13597. (Order to Show Cause ¶14).

15. Respondent entered into a contract with DDF, effective June 1, 2010, in which Respondent was to provide DDF with professional solicitor services in the Commonwealth for a period of one (1) year, after which the agreement would automatically renew for successive additional terms of one (1) year each, unless either party provided written notification not less than

thirty (30) days prior to the expiration of the renewal date of its intent not to renew. (Order to Show Cause ¶15).

16. DDF listed Respondent as a professional fundraiser on the Unified Registration Statement it filed with the Bureau for fiscal years ending December 31, 2011, 2012, 2013 and 2014. (Order to Show Cause ¶16).

17. DDF has not advised the Bureau of there being written notification by either party to the contract to end the contract. (Order to Show Cause ¶17).

18. Respondent provided services to DDF under the contract from June 1, 2010, through at least December 31, 2014. (Order to Show Cause ¶18).

19. On July 24, 2012, Respondent was charged by the Commonwealth in an administrative action filed before the Secretary of the Commonwealth, at Docket No. 0030-98-12, File 12-98-06325, with providing services as a professional solicitor to four (4) identified charities seeking contributions in the Commonwealth, and with providing those services prior to obtaining the required approval by the Commonwealth of each contract under which the services were provided. (Order to Show Cause ¶19).

20. The four (4) specific identified charities were: Keystone Paralyzed Veterans of America, Inc.; Hope International; Inner-City Movement, Inc.; and, Ronald McDonald House Charities of the Philadelphia Region, Inc. (Order to Show Cause ¶20).

21. In resolution of an administrative action brought against Respondent, on October 1, 2012, the Secretary of the Commonwealth issued an Order adopting and incorporating the terms of paragraph 6 of a Consent Agreement entered into by the Respondent and the Commonwealth. (Order to Show Cause ¶21).

22. Paragraph 6 of the Consent Agreement provided as follows:

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

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

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

ADMINISTRATIVE FINE

c. An **ADMINISTRATIVE FINE** of two thousand dollars (\$2,000.00) is levied upon Respondent. Respondent shall tender the full sum of two thousand dollars (\$2,000.00), with this executed Consent Agreement which shall be paid by **certified check, cashiers check, attorney's check, or U.S. Postal money order made payable to the "Commonwealth of Pennsylvania."** Respondent shall also pay any and all currently outstanding Administrative Fines levied by the Bureau's registration unit.

FILING OF REGISTRATION DOCUMENTS

d. Respondent shall submit to the Bureau all documents required to initially register within fifteen (15) days of the date of the Secretary's Order adopting this Consent Agreement. Respondent is prohibited from providing professional [solicitor] services in Pennsylvania until such time as the Respondent becomes properly registered with the Bureau.

(Order to Show Cause ¶22).

23. As set forth in the Consent Agreement, Respondent was found to have violated the registration provision for professional solicitors [Section 162.9(a) of the Act] and to have violated the requirement to file a copy of the contract Respondent had with each charity prior to providing services under the contract [Section 162.9(e) of the Act]. (Order to Show Cause ¶23)

24. As set forth in the Consent Agreement, Respondent was required to register within fifteen (15) days of the issuance of the Order by the Secretary and was prohibited from providing professional fundraising services until after becoming properly registered. (Order to Show Cause ¶24).

25. Respondent failed to submit all documents required to initially register with the Bureau within fifteen (15) days as required by the Order adopting the Consent Agreement in the administrative action filed at Docket No. 0030-98-12. (Order to Show Cause ¶26)

26. Respondent never became registered with the Bureau. (Bureau records)

27. Respondent provided professional solicitor services to KPVA, RMHCP and DDF after October 1, 2012, the date of the Order issued by the Secretary prohibited Respondent from providing professional solicitor services in Pennsylvania. (Order to Show Cause ¶29)

28. Respondent provided professional solicitor services to KPVA, RMHCP and DDF from October 1, 2012 through December 2014, or thereafter, without being registered as a professional solicitor. (Order to Show Cause ¶32)

29. The services as a professional solicitor provided by Respondent to the charitable organizations were provided in accordance with a written contract executed by the parties. (Order to Show Cause ¶35)

30. Respondent did not provide a copy of the written contract to the Department of State at any time prior to the performance of the services as a professional solicitor set forth in the contract. (Order to Show Cause ¶36)

31. On August 4, 2016, the Commonwealth filed an order to show cause in this matter. (Docket number 0007-98-16)

32. Pursuant to the Certificate of Service attached to the order to show cause, the Commonwealth served the order to show cause upon Respondent by mailing one copy via certified mail, return receipt requested and another copy via first class mail, postage prepaid, on August 4, 2016, to Craig J. Witt, CEO of Respondent at the following address: Action Donation Services, P.O. Box 86551, San Diego, CA 92138. (Motion to enter default and deem facts admitted ¶¶ 3-4; Docket number 0007-98-16)

33. The copy of the order to show cause sent by certified mail remains "available for pickup" at the U.S. Postal Service Office at San Diego, CA, as indicated by USPS.com for tracking item number 9171 9690 0935 0118 2139 17. (Motion to enter default and deem facts admitted ¶ 5, Exhibit B)

34. The order to show cause sent via first class mail, postage prepaid, was not returned to the Commonwealth. (Motion to enter default and deem facts admitted ¶ 7)

35. The order to show cause directed Respondent to file an answer thereto within thirty (30) days of its date. (Motion to enter default and deem facts admitted ¶ 8)

36. Thirty days from the date of the order to show cause expired on September 5, 2016. (Motion to enter default and deem facts admitted ¶ 9)

37. Respondent did not file a response to the Order to Show Cause or the Motion to Enter Default and Deem Facts Admitted. (Docket number 0007-98-16)

38. Respondent was served with all pleadings, orders, and notices filed of record in this matter. (Docket number 0007-98-16)

CONCLUSIONS OF LAW

1. The Secretary has jurisdiction in this matter. (Findings of Fact 1, 3)
2. Respondent has been afforded reasonable notice of the charges against it and an opportunity to be heard in this proceeding in accordance with the Administrative Agency Law, 2 Pa.C.S. §504. (Findings of Fact 2, 31-38)
3. There is good cause to grant the Commonwealth's motion to deem facts admitted because Respondent failed to file a written answer to the order to show cause. (Finding of fact 37-38)
4. Respondent violated the Act at 10 P.S. §162.15(a)(1), in that Respondent violated or operated in violation of an Order issued by the Secretary by not submitting registration materials within 15 days of the Consent Agreement. (Finding of fact 4-30)
5. Respondent violated the Act at 10 P.S. §162.15(a)(1), in that Respondent violated or operated in violation of an Order issued by the Secretary by providing professional solicitor services while prohibited by Order from doing so, with the provision of services to each charity considered to be a separate violation. (Finding of fact 4-30)
6. Respondent violated the Act at 10 P.S. §162.9(a), by providing services as a professional solicitor in the Commonwealth prior to obtaining approval by the Department of State of a registration statement, with the provision of services to each of the three charities considered to be a separate violation. (Finding of fact 4-30)
7. Respondent violated the Act at 10 P.S. §162.9(e), by failing to file with the Department of State each written contract between Respondent and three charitable organizations for professional fundraising services within the Commonwealth and provided those services prior to the approval by the Department of each contract, with the provision of services to each charity under each contract considered to be a separate violation. (Finding of fact 4-30)

DISCUSSION

I. STATUTORY AND REGULATORY PROVISIONS

This matter is before the Secretary of the Commonwealth (Secretary) pursuant to the Solicitation of Funds for Charitable Purposes Act, Act of December 19, 1990, P.L. 1200, No. 202, *as amended* ("Act"), 10 P.S. §§ 162.1, *et seq.* The order to show cause issued in this matter comprises ten counts, alleging that Respondent violated the Act at 10 P.S. §162.9(a) and (e) and 10 P.S. §162.15(a)(1) by and through 10 P.S. §162.17(b)(3), which provide in pertinent part as follows:

§ 162.9. Registration of professional solicitors; contract and disclosure requirements; bonds; records; books

(a) Registration and approval required.—No person shall act as a professional solicitor before obtaining department approval of a registration statement pursuant to subsection (d) or after the expiration, suspension or revocation of such registration. ...

* * *

(e) Contract filing.—No less than ten working days prior to the commencement of each solicitation campaign, event or services, a professional solicitor shall file with the department a copy of the contract described in subsection (f) and a written solicitation notice. No solicitation or services pursuant to the contract shall begin before the department has approved the contract pursuant to subsection (g). The solicitation notice shall be accompanied by a fee of \$ 25 and shall be signed and sworn to by the authorized contracting officer for the professional solicitor. If more than one event or campaign is conducted under a contract, then a solicitation notice addendum must be filed no less than ten working days prior to the commencement of each additional event or campaign. No additional fee is required to file the addendum. The solicitation notice and addendum shall contain all of the following information:

- (1) A description of the solicitation event or campaign.
- (2) Each location and telephone number from which the solicitation is to be conducted.
- (3) The legal name and resident address of each person responsible for directing and supervising the conduct of the campaign and each person who is to solicit during such campaign.
- (4) A statement as to whether the professional solicitor will at any time have custody or control of contributions.
- (5) The account number and location of each bank account where receipts from the campaign are to be deposited.

(6) A full and fair description of the charitable program for which the solicitation campaign is being carried out.

(7) The date the solicitation campaign or event will begin or be held within this Commonwealth and the termination date for each campaign or event.

(8) Any other information required by the regulations of the department.

* * *

§ 162.15. Prohibited Acts

(a) General Rule. – Regardless of a person's intent or the lack of injury, the following acts and practices are prohibited in the planning, conduct or execution of any solicitation or charitable sales promotion:

(1) Operating in violation of, or failing to comply with, any of the requirements of this act, regulations of the department or an order of the secretary, or soliciting contributions after registration with the department has expired or has been suspended or revoked or soliciting contributions prior to the solicitation notice and contract having been approved by the department.

* * *

§ 162.17. Administrative enforcement and penalties

(a) General rule. - The secretary may refuse to register or revoke or suspend the registration of any charitable organization, professional fundraising counsel or professional solicitor whenever he finds that a charitable organization, professional fundraising counsel or professional solicitor, or an agent, servant or employee thereof:

(1) Has violated or is operating in violation of any of the provisions of this act, the regulations of the department, or an order issued by the secretary.

(2) Has refused or failed or any of its principal officers has refused or failed, after notice, to produce any records of such organization or to disclose any information required to be disclosed under this act or the regulations of the department.

(3) Has made a material false statement in an application, statement or report required to be filed under this act.

(b) Additional actions. – When the secretary finds that the registration of any person may be refused, suspended or revoked under the terms of subsection (a), the secretary may:

(1) Revoke a grant of exemption to any of the provisions of this act.

(2) Issue an order directing that the person cease and desist specified fundraising activities.

(3) Impose an administrative fine not to exceed \$1,000 for each act or omission which constitutes a violation of this act and an additional penalty, not to exceed \$100 for each day during which such violation continues. Registration will be automatically suspended upon final affirmation of an administrative fine until the fine is paid or until the normal expiration date of the registration. No registration shall be renewed until the fine is paid.

(4) Place the registrant on probation for such period of time and subject to such conditions as he may decide.

(c) Administrative procedures. —All actions of the secretary shall be taken subject to the right of notice, hearing and adjudication and the right of appeal therefrom in accordance with Title 2 of the Pennsylvania Consolidated Statutes (relating to administrative law and procedure).

The motion to enter default and deem facts admitted is in accordance with the General Rules of Administrative Practice and Procedure. The relevant provision of the General Rules of Administrative Practice and Procedure states as follows:

§ 35.37 Answers to order to show cause

Any person upon whom an order to show cause has been served . . . shall, if directed to do so, respond to the same by filing within the time specified in the order an answer in writing. The answer shall be drawn so as specifically to admit or deny the allegations or charges which may be in order, set forth the facts upon which respondent relies, and state concisely the matters of law relied upon.... A respondent failing to file an answer within the time allowed shall be deemed in default, and relevant facts stated in the Order to show cause may be deemed admitted.

1 Pa. Code § 35.37.

II. DUE PROCESS

“It is well established that the requirements of due process of law apply to administrative proceedings.” First National Bank of Pike County v. Department of Banking and Bank of Matamoras, Intervening, 300 A.2d 823, 824 (Pa. Cmwlth. 1973) (citation omitted). “Due process requires that a person be provided notice and an opportunity to be heard prior to an adjudication, affecting that person’s rights.” Goetz v. Department of Environmental Resources, 613 A.2d 65, 67 (Pa. Cmwlth. 1992) (citation omitted), appeal denied, 625 A.2d 1196 (Pa. 1993). “Notice of administrative action which is mailed to the interested party’s last known address has been found to be reasonable notice.” Kobylski v. Commonwealth of Pennsylvania, Milk Marketing Board, 516 A.2d 75, 77 (Pa. Cmwlth. 1986), citing Yarbrough v. Department of Public Welfare, 478 A.2d 956 (Pa. Cmwlth. 1984).

A copy of the order to show cause was mailed to Respondent at its last known address by certified mail, return receipt requested and by first class mail, postage prepaid. The order to show cause sent via certified mail remains "available for pickup" at the U.S. Postal Service Office at San Diego, CA. The order to show cause sent via first class mail, postage prepaid, has not been returned to the Commonwealth. Therefore, the Secretary finds that Respondent received reasonable notice of the action and allegations against it. The order to show cause clearly and specifically stated the charges against Respondent. The order to show cause directed Respondent to file an answer or risk disciplinary action without a hearing. The order to show cause explained the procedures to request a hearing. Further, the order to show cause warned Respondent that if it failed to request a hearing it would be deemed to have waived its right to a hearing and final judgment might be entered without a hearing. Due process does not confer an absolute right to be heard, but only that a party is provided with an opportunity to be heard. Goetz, 613 A.2d at 67. The Secretary finds that Respondent was given an opportunity to be heard and failed to take advantage of that opportunity. Therefore, the Secretary of the Commonwealth deems the factual allegations contained in the order to show cause admitted, and grants the motion to enter default and deem facts admitted against Respondent.

IV. ANALYSIS AND SANCTION

The ten counts of the order to show cause can be separated into three distinct violations. The Commonwealth first alleges that Respondent violated the Act at 10 P.S. § 162.15(a)(1), which prohibits solicitors from operating in violation of, or failing to comply with, an order of the Secretary.

The consent agreement and order adopted by the Secretary of the Commonwealth on October 1, 2012, required that Respondent submit to the Bureau all documents required to register

as a professional solicitor within fifteen (15) days of the date of the Order and prohibited Respondent from providing professional solicitor services in Pennsylvania until such time as the Respondent becomes properly registered with the Bureau. The facts deemed admitted indicate that Respondent failed to submit any registration to the Bureau and continued to provide professional solicitor services to Keystone Paralyzed Veterans of America, Inc., Ronald McDonald House Charities of the Philadelphia Region, Inc., and Defeat Diabetes Foundation after October 1, 2012. Therefore, the Commonwealth has established that Respondent violated the Act at 10 P.S. §162.15(a)(1) and counts 1 – 4 are sustained.

Counts 5 – 7 of the order to show cause allege that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(a), by providing professional solicitor services to three charitable organizations prior to registration with the Department of State as a professional solicitor. The facts deemed admitted establish that Respondent was never registered as professional solicitor with the Bureau and nonetheless provided professional solicitor services to Keystone Paralyzed Veterans of America, Inc., Ronald McDonald House Charities of the Philadelphia Region, Inc., and Defeat Diabetes Foundation. Therefore, the Commonwealth has established that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(a), and counts 5 – 7 are sustained.

Lastly, counts 8 – 10 of the order to show cause allege that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(e), by failing to file with the Department of State copies of written contracts with charitable organizations prior to providing professional solicitor services to the charities. The facts deemed admitted establish that the services as a professional solicitor provided by Respondent to the charitable organizations were provided in accordance with a written contract executed by the parties, but Respondent did not provide a copy of the written contract to the Department of State at any time prior to the performance of the

services as a professional solicitor set forth in the contracts. Therefore, the Commonwealth has established that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.9(e), and counts 8 – 10 are sustained.

When the Secretary finds that a professional solicitor or an agent, servant or employee thereof has violated any of the provisions of the Act, the Secretary is authorized to enforce the Act against such person or company pursuant to Section 17(a)(1) of the Act, 10 P.S. §162.17(a)(1), and to levy discipline and administrative fines according to Section 17(b) of the Act, 10 P.S. §162.17(b). Under Section 17(b)(3), the Secretary may impose an administrative fine not to exceed \$1,000 for each act or omission which constitutes a violation of the Act.

The Secretary of the Commonwealth finds that Respondent has violated the Act by both violating and operating in violation of an Order issued by the Secretary, by not submitting a registration as required by the Order and by providing professional solicitor services to three charities while prohibited by Order from doing so. Respondent has also violated the Act by providing services as a professional solicitor in the Commonwealth for three charitable organizations prior to obtaining approval by the Department of State of a registration statement. Finally, Respondent violated the Act by failing to file with the Department of State each written contract between Respondent and three charitable organizations for professional fundraising services within the Commonwealth and provided those services prior to the approval by the Department of each contract. The provision of services to each charity under each contract considered to be a separate violation.

Respondent has never been registered with the Bureau. Despite signing a consent agreement in 2012, in which Respondent admitted that it had violated the Act and agreed to register as a professional solicitor, it did not. Respondent nonetheless continued to render professional solicitor services in the Commonwealth for three charitable organizations. To date, Respondent

remains unregistered as a professional solicitor in the Commonwealth of Pennsylvania. The obligations that Respondent failed to perform are critical requirements to which a professional solicitor must adhere under the Act. Based on the foregoing findings of facts, conclusions of law and discussion, and in the absence of mitigation, the following order shall issue:

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE SECRETARY OF THE COMMONWEALTH

Commonwealth of Pennsylvania :
Bureau of Charitable Organizations :
 :
vs. : Docket No. 0007-98-17
 : File No. 14-98-14325
Action Donation Services, :
Respondent :

ORDER

AND NOW, this 23rd day of March, 2017, upon consideration of the foregoing findings of fact, conclusions of law and discussion, it is hereby **ordered** as follows:

1. An **administrative fine** in the amount of **\$10,000.00** shall be imposed upon Action Donation Services in accordance with 10 P.S. § 162.17(b)(3). This amount shall be remitted by certified check or U.S. Postal Service money order made payable to "Commonwealth of Pennsylvania" within thirty days of the effective date of this order and mailed to:

Martha Brown, Assistant Counsel
Pennsylvania Department of State
Office of Chief Counsel
301 North Office Building
Harrisburg, PA 17120

2. Respondent shall be **prohibited from registering** as a professional solicitor in the Commonwealth of Pennsylvania unless and until the above penalty is paid.

3. Action Donation Services, its successors, agents or affiliates, shall **CEASE and DESIST** from all manner of solicitation activities in this Commonwealth in accordance with 10 P.S. § 162.17(b)(2), until such time as all information requested by the Bureau has been provided, all penalties imposed have been paid in full and Action Donation Services comes into full compliance with all provisions of the Act, including proper registration.

Appeal may be taken pursuant to section 17(c) of the Act, 10 P.S. §162.17(c), and 2 Pa. C.S. §702, within 30 days of the date of mailing of this Adjudication and Order as indicated below.

This order shall take effect thirty days from the date it is deposited in the mail.

BY ORDER:



Pedro A. Cortés
Secretary of the Commonwealth

Respondent:

Action Donation Services
P.O. Box 86551
San Diego, CA 92138

For the Commonwealth

Robert Armour, Esquire
Prosecuting Attorney
Commonwealth of Pennsylvania
Department of State
P.O. Box 2649
Harrisburg, PA 17106-9521

Date of Mailing: 3.23.17