



## **STIPULATED FACTS**

4. Respondent admits that the following allegations are true:
  - a. Respondent's last known address on file with the Bureau is 101 Eisele Road, Cheswick, PA 15024.
  - b. Respondent solicits charitable contributions in Pennsylvania through telephone, direct mail and fundraising events.
  - c. Respondent's IRS Form 990 for fiscal year ending December 31, 2007 indicates that Respondent received \$108,278 in general contributions.
  - d. Respondent's IRS Form 990 for fiscal year ending December 31, 2008, indicates that Respondent received \$64,120 in general contributions.
  - e. Respondent's IRS Form 990 for fiscal year ending December 31, 2009 indicates that Respondent received \$114,681 in general contributions.
  - f. Respondent's IRS Form 990 for fiscal year ending December 31, 2010 indicates that Respondent received \$89,380 in general contributions.
  - g. Respondent is required to be registered with the Bureau.
  - h. Between on or about May 14, 2008 and the current date, Respondent has continued to soliciting charitable contributions in the Commonwealth.

## **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 it repeatedly violated the Act at, 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.5, by soliciting charitable contributions in Pennsylvania without being properly registered.

**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) by and through 10 P.S. §162.5.

**ADMINISTRATIVE FINE**

b. 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."**

**FILING OF REGISTRATION DOCUMENTS**

c. To continue operations, Respondent shall submit to the Bureau all documents required to renew its registration within thirty (30) days of the date of the Secretary's Order adopting this Consent Agreement. Respondent is prohibited from soliciting contributions in Pennsylvania until such time as the Respondent becomes registered with the bureau.

**CASE SETTLED AND DISCONTINUED**

7. 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**

8. 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**

9. This Consent Agreement is between the Bureau and Respondent only. It does not bind any other governmental or administrative 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**

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,

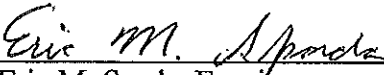
obligations, covenants, representations, statements or conditions, or otherwise, of any kind whatsoever, concerning this Agreement.

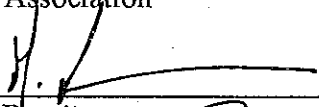
**AGREEMENT DOES NOT PREVENT REFERRAL TO OTHER AGENCIES**

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.

  
Eric M. Spada, Esquire  
Prosecuting Attorney  
Department of State

Pittsburgh Harlequins Rugby Football Association  
  
By: MATTHEW ROSEMEYER  
Title: EXECUTIVE DIRECTOR  
Respondent

DATED: 6/11/12


DATED: 6.7.12



**IN THE MATTER OF THE  
PITTSBURGH HARLEQUINS RUGBY FOOTBALL  
ASSOCIATION  
FILE NO. 12-98-02317  
ORDER**

**AND NOW**, to wit, on this 27<sup>th</sup> day of June, 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

  
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Carol Aichele  
Secretary of the Commonwealth