

or excluded from the requirements of the Act.

STIPULATED FACTS

5. Respondent admits that the following allegations are true:
 - a. Respondent's last known physical address is 770 Emerald Drive, Lancaster, PA 17603.
 - b. Respondent solicits charitable contributions in Pennsylvania through the telephone and special fundraising events.
 - c. Respondent raised over \$42,000 in gross contributions during fiscal years ending December 31, 2008 and December 31, 2009.
 - d. Respondent employed Grandscale Fundraising, Inc., a professional solicitor, to provide professional solicitor services during fiscal years ending December 31, 2008 and December 31, 2009.
 - e. Respondent was not registered as a charitable organization with the Bureau for fiscal years ending December 31, 2008 and December 31, 2009.

AGREED VIOLATIONS

6. Respondent admits and agrees that by engaging in the foregoing activities:
 - a. Respondent repeatedly violated the Act at, 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.5, by soliciting charitable contributions in Pennsylvania without being properly registered.

PROPOSED ORDER

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

a. Respondent repeatedly 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 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, cashier's check, attorney's check, or U.S. Postal money order made payable to the " Commonwealth of Pennsylvania. "

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 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

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

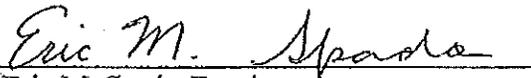
13. The parties acknowledge that other federal, state, and/or local agencies may have jurisdiction over the activities of, or representations made by, Respondent and its officers, directors, agents, employees or independent contractors. Nothing in this Consent Agreement or the Order based upon this Consent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

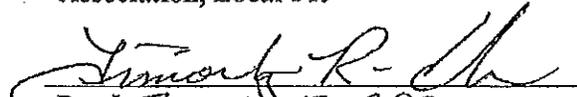
information or data produced as a result of this matter to any federal, state, or local agency or governmental unit having jurisdiction over the activities of Respondent or any officer, director, agent, employee or independent contractor of the Respondent.

VERIFICATION OF FACTS AND STATEMENTS

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.

Lancaster Professional Firefighters
Association, Local 319


Eric M. Spada, Esquire
Prosecuting Attorney
Department of State


By: *TIMOTHY R. ERB*
Title: *President*
Respondent

DATED: 8/6/12

DATED:



IN THE MATTER OF THE
LANCASTER PROFESSIONAL FIREFIGHTERS ASSOCIATION,
LOCAL 319
FILE NO. 11-98-12332

ORDER

AND NOW, to wit, on this 7th day of August 2012, 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", written over a horizontal line.

Carol Aichele
Secretary of the Commonwealth