

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

Commonwealth of Pennsylvania,
Bureau of Charitable Organizations

vs.

Law Enforcement Alliance of America
Respondent

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Docket No. 0021-98-01
File No. 01-98-00838

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Department of State

CONSENT AGREEMENT AND ORDER

The Commonwealth of Pennsylvania, Bureau of Charitable Organizations (“Bureau”) and Law Enforcement Alliance of America (“Respondent”) stipulate as follows in settlement of the above-captioned case:

1. This matter is before the Secretary of the Commonwealth (“Secretary”) pursuant to the Solicitation of Funds for Charitable Purposes Act (“the Act”), Act of December 19, 1990, P.L. 1200, No. 202, *as amended*, 10 P.S. §§162.1-162.24.
2. Respondent’s last known business address, as on file with the Department of State, is 7700 Leesburg Pike, Suite 421, Falls Church, VA 22043.
3. Respondent solicited charitable contributions in Pennsylvania in 1999.
4. Respondent never filed a registration application for the calendar year ending December 31, 1999.
5. Respondent solicited charitable contributions in Pennsylvania in 2000.
6. Respondent never filed a registration application for the calendar year ending December 31, 2000.

AGREED VIOLATIONS

7. Respondent committed multiple violations of the Act at 10 P.S. § 162.15(a)(1) by soliciting contributions in the Commonwealth of Pennsylvania without being registered.

PROPOSED ORDER

8. The Bureau and the Respondent agree to the issuance of the following Order:

a. Respondent committed multiple violations of the Act at 10 P.S. § 162.15(a)(1) by soliciting contributions in the Commonwealth of Pennsylvania without being registered under the Act.

b. Respondent shall register with the Bureau or otherwise come into compliance with the Act prior to soliciting in Pennsylvania.

c. Respondent shall not represent directly or indirectly that by this Consent Agreement the Bureau has sanctioned, condoned, or approved any part or aspect of Respondent's activities.

d. An **ADMINISTRATIVE FINE** of three thousand dollars (\$3,000) is levied upon Respondent. Respondent shall tender the full sum of three thousand dollars (\$3,000) 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."

9. This case shall be deemed settled and discontinued upon the Secretary issuing an Order adopting this Consent Agreement.

ACKNOWLEDGEMENT OF NOTICE AND WAIVER OF HEARING

10. Respondent acknowledges the filing and service 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

11. This Consent Agreement is between the Bureau and Respondent only. It does not bind any other 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

12. 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

13. 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

14. 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.

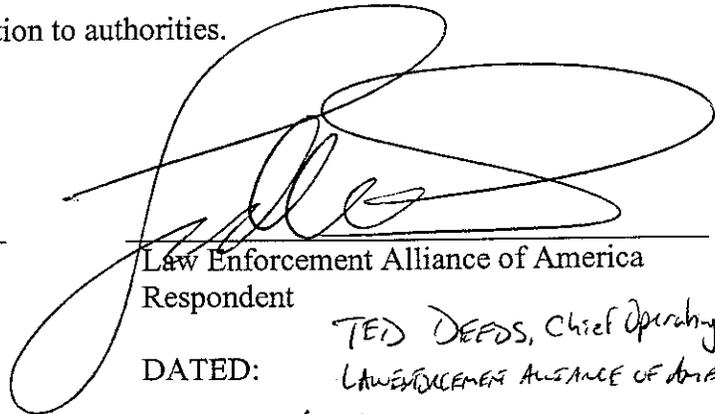
VERIFICATION OF FACTS AND STATEMENTS

15. 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.



Philip Zarone
Prosecuting Attorney
Bureau of Charitable Organizations
DATED:

1/7/02



Law Enforcement Alliance of America
Respondent

TED DEEDS, Chief Operating Officer
LAW ENFORCEMENT ALLIANCE OF AMERICA, INC.

DATED: 12/21/01

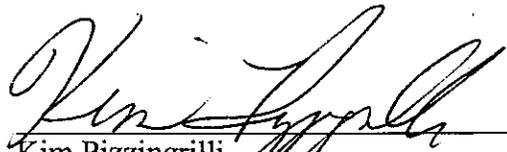


**IN THE MATTER OF THE SOLICITATION OF
FUNDS FOR CHARITABLE PURPOSES BY
LAW ENFORCEMENT ALLIANCE OF AMERICA
FILE NO. 01-98-00838**

ORDER

AND NOW, this 10th day of January 2002, the terms of Paragraph 8 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


Kim Pizzigrilli
Secretary of the Commonwealth