

COPY

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

PROCEEDINGS  
2017 FEB 22 AM 11:18  
Department of State

Commonwealth of Pennsylvania,  
Bureau of Corporations and  
Charitable Organizations

vs.

Lauren Giguere,  
Respondent

Docket No. 000 1-98-  
File No. 16-98-08632

RECEIVED  
JAN 18 2017  
OFFICE OF CHIEF COUNSEL

CONSENT AGREEMENT AND ORDER

The Commonwealth of Pennsylvania, Department of State, Bureau of Corporations and Charitable Organizations ("Bureau") and Lauren Giguere, ("Respondent"), stipulate as follows in settlement of the above-captioned matter:

JURISDICTION

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. At all relevant and material times, Respondent acted as a professional fundraising counsel as defined by the Act.
3. At all relevant and material times, Respondent did not hold a registration to provide professional fundraising counsel services related to solicitation of charitable contributions in the Commonwealth of Pennsylvania.

STIPULATED FACTS

4. Respondent admits that the following allegations are true:
  - a. On or about February 22, 2016, the Bureau's Registration and Compliance Division received registration materials from Alliance for Building

Communities, Inc.(hereafter 'Alliance'), including the Charitable Organization Registration Statement Form BCO-10.

b. A true and correct copy of Form BCO-10 submitted by Alliance is attached and incorporated herein as **Exhibit A**.

c. In response to Question 15 on the form, which requested the name, address and telephone number of all professional solicitors used to provide services with respect to the solicitation of contributions from residents of the Commonwealth, Alliance provided the name of Respondent and the address 5513 Hoffman Road, Schnecksville, PA.<sup>1</sup>

d. A review of records maintained by the Bureau confirmed that the Respondent was not registered with the Bureau as either a professional solicitor or a professional fundraising counsel in the Commonwealth.

e. The Registration and Compliance Division alerted the Bureau's Enforcement and Investigations Division (hereafter referred to as 'BEI') that Respondent was not registered and an investigative file was opened.

f. On or about May 11, 2016, BEI contacted Alliance via telephone to request a copy of the organization's contract for professional solicitation services with Respondent.

g. Alliance informed BEI that as of January 1, 2016, the the organization no longer used Respondent's services.

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<sup>1</sup>The charity incorrectly classified Respondent as a professional solicitor. Based upon the services and activities provided to the charity, Respondent acted as a professional fundraising counsel as defined by the Act. That Respondent was listed in response to question 15 on Form - BCO-10 is irrelevant, as question 16, relating to professional fundraising counsel requests the same information that is requested for professional solicitors in question 15.

h. Following the telephone call, BEI sent Alliance an email memorializing the conversation.

i. A true and correct copy of the email to Alliance is attached and incorporated herein as **Exhibit B**.

j. The same day, BEI sent via First Class and Certified Mail, a letter advising Respondent of the registration requirement under the Act, and further requesting compliance with those requirements.

k. A true and correct copy of BEI's letter to Respondent is attached and incorporated herein as **Exhibit C**.

l. On or about June 8, 2016, Respondent contacted BEI via telephone in response to the May 11, 2018 letter.

m. Respondent advised BEI that she did not have a written contract with Alliance.

n. Respondent explained that in and around 2013, she submitted a proposal to Alliance in which she offered to write unlimited grant proposals for the organization in exchange for payment of \$20,000 per year.

o. Respondent further stated that her services to Alliance were based upon a the organization's verbal agreement to her proposal.

p. Respondent also stated that she has not provided professional fundraising counsel or solicitation services to any charitable organization since 2015.

q. That same day Respondent contacted BEI via email to provide corrected and more detailed information regarding professional fundraising counsel services on behalf of Alliance.

r. A true and correct copy of Respondent's email correspondence to BEI is attached and incorporated herein as **Exhibit D**.

s. Respondent provided grant writing services to Alliance, which included writing grant proposals for the organization and where electronic submission of such grants was available, Respondent submitted grants on the organization's behalf.

t. Respondent acted as a professional fundraising counsel for Alliance for three (3) years and nine (9) months.

u. Respondent did not have a written contract with Alliance, however, Respondent received \$24,000 per year for her services in 2013, 2014 and 2015, based upon a verbal agreement with the organization.

v. Respondent provided Alliance with professional fundraising counsel services for nine (9) months in 2012, for which she received \$18,000 compensation.

#### AGREED VIOLATIONS

5. The parties agree that by engaging in the foregoing activities, Respondent committed multiple violations of Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), as follows:

a. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent provided professional fundraising counsel services regarding the solicitation of contributions in the Commonwealth prior to obtaining approval by the Department of State of a registration statement as required by Section 8(a) of the Act, 10 P.S. § 162.8(a), beginning in 2012 through 2015, with each year of unregistered conduct constituting a separate violation.

b. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent provided professional fundraising counsel services to a

charitable organization in the absence of a written contract as required by Section 8(d) of the Act, 10 P.S. § 162.8(d).

c. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent failed to file with the Department of State a written contract between the organization and a charitable organization for professional fundraising counsel services related to solicitations for charitable contributions within the Commonwealth and provided those services prior to the approval by the Department of each contract as required by Section 8(d) of the Act, 10 P.S. § 162.8(d).

**PROPOSED ORDER**

6. To address concerns raised by the Commonwealth and to resolve this matter on a compromise basis, the Commonwealth and the Respondent, intending to be legally bound, agree to the issuance by the Secretary of the following Order in settlement of this matter:

a. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent provided professional fundraising counsel services regarding the solicitation of contributions in the Commonwealth from 2012 through 2015, prior to obtaining approval by the Department of State of a registration statement as required by Section 8(a) of the Act, 10 P.S. § 162.8(a), with each year of unregistered activity constituting a separate violation.

b. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent provided professional fundraising counsel services to a charitable organization in the absence of a written contract as required by Section 8(d) of the Act, 10 P.S. § 162.8(d), with each change in compensation constituting a contract and therefore separate violation.

c. Respondent violated Section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), in that Respondent failed to file with the Department of State a written contract between the organization and a charitable organization for professional fundraising counsel services related to solicitations for charitable contributions within the Commonwealth and provided those services prior to the approval by the Department of each contract as required by Section 8(d) of the Act, 10 P.S. § 162.8(d).

ADMINISTRATIVE PENALTY

d. For failure to register with the Department in violation of section 8(a) of the Act, 10 P.S. § 162.8(a) Respondent shall be fined five hundred dollars (\$500) per year of unregistered activity (four years total).

e. For failure to execute a written contract as required of section 8(d) of the Act, 10 P.S. § 162.8(d) Respondent shall be fined five hundred dollars (\$500) for each of the two verbal agreement for professional fundraising counsel services.

f. For failure to file with and receive approval of contracts from the Department in violation of 8(d) of the Act, 10 P.s. § 162.8(d), Respondent shall be fined one hundred dollars (\$100) for each of the two contracts not filed.

g. A total ADMINISTRATIVE FINE in the amount of **THREE THOUSAND TWO HUNDRED DOLLARS (\$3,200.00)** is hereby levied upon Respondent.

(1) Respondent shall tender the full sum of the ADMINISTRATIVE FINE with the return of this executed Consent Agreement;

(2) Payment of the ADMINISTRATIVE FINE shall be by certified check, cashier's check, attorney's check, or

money order issued by a usual, customary, and reputable issuer (e.g. U.S. Postal Money Order, Western Union Money Order, etc.).

(3) The instrument of payment shall be payable to the 'Commonwealth of Pennsylvania,' and shall be valid for a period of at least one hundred eighty (180) days.

ADDITIONAL PENALTIES

h. Respondent agrees not to provide professional fundraising counsel services with regard to the solicitation of charitable contributions in the Commonwealth of Pennsylvania without first being properly registered with the Bureau in accordance with Section 162.8 of the Act, 10 P.S. § 162.8.

i. Respondent acknowledges that failure to register with the Bureau when required to do so, may result in an administrative fine of \$1,000.00, and an additional penalty of \$100.00 for each day the violations continue.

j. Respondent acknowledges that failing to register with the Bureau when required to do so may result in a subsequent registrations being automatically suspended until the fine is paid or until the normal expiration date of the registration in accordance with Section 162.17 of the Act, 10 P.S. § 162.17.

k. Respondent acknowledges that no subsequent registration shall be renewed until the fine is paid.

l. Respondent shall not enter into any contract with a charitable organization that is not registered with the Bureau.

m. Respondent shall submit to the Bureau any and all current contracts to provide professional fundraising services within thirty (30) days of the date of the Secretary's Order adopting this Consent Agreement. In the event that the contracts

are not filed within the required time frame, the Respondent shall pay an administrative fine of \$1000.00, and shall pay an additional penalty of \$100.00 for each day during which the violation continues, in accordance with Section 17 of the Act, 10 P.S. § 162.17.

n. Respondent agrees that it will not act as a professional fundraising counsel until it has filed a contract for the services with the Bureau and the contract has been approved pursuant to Section 8(d) of the Act, 10 P.S. § 162.8(d).

#### CASE SETTLED AND DISCONTINUED

o. This case shall be deemed settled and discontinued upon the Secretary issuing an Order approving and adopting this Consent Agreement and upon the Respondent's successful completion of the requirements set forth in this Order.

p. Nothing in this Consent Agreement and Order shall preclude the Prosecuting Attorney for the Bureau from filing charges, or the Secretary from imposing disciplinary or corrective measures, for violations or facts not contained in this Consent Agreement and Order.

#### ADMISSIBILITY OF CONSENT AGREEMENT IN FUTURE PROCEEDINGS

7. Respondent agrees that if Respondent is charged with a violation of the Act in the future, this Consent Agreement and Order shall be admitted into evidence without objection in any proceeding that may be held involving that charge.

#### ACKNOWLEDGMENT OF NOTICE AND WAIVER OF HEARING

8. Respondent acknowledges the receipt of an Order to Show Cause in this matter.

9. Respondent knowingly and voluntarily waives the right to an administrative hearing in this matter, and knowingly and voluntarily waives the following rights related to that hearing: to attend and 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 any witness presented by the Commonwealth and to challenge evidence presented by the Commonwealth; to present legal arguments by means of a brief; and, to take an appeal from any final adverse decision.

**ACKNOWLEDGMENT OF RIGHT TO ATTORNEY**

10. Respondent acknowledges that it is aware that it has the right to consult with, and be represented by, private legal counsel of Respondent's choosing and at Respondent's expense when reviewing, considering and accepting the terms of this Consent Agreement.

11. To the extent that Respondent is not represented by legal counsel, Respondent has knowingly elected to proceed in this matter without the assistance of legal counsel.

**WAIVER OF CLAIM OF COMMINGLING AND OTHER CONSTITUTIONAL CLAIMS**

12. Respondent expressly waives any constitutional rights and issues, such as commingling of prosecutorial and adjudicative functions by the Secretary or the Secretary's counsel, which may arise or have arisen during the negotiation, preparation and/or presentation of this Consent Agreement. This paragraph is binding on the participants even if the Secretary does not approve this Consent Agreement.

**NO MODIFICATION OF ORDER**

13. Respondent agrees, as a condition of entering into this Consent Agreement, not to seek modification at a later date of the Stipulated Order adopting and implementing this Consent Agreement without first obtaining the express written concurrence of the Prosecution Division.

**AGREEMENT NOT BINDING ON OTHER PARTIES**

14. 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.

15. The Office of General Counsel has approved this Consent Agreement as to form and legality; however, this Consent Agreement shall have no legal effect unless and until the Secretary issues an Order approving and adopting this Consent Agreement.

**EFFECT OF SECRETARY'S REJECTION OF CONSENT AGREEMENT**

16. 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.

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

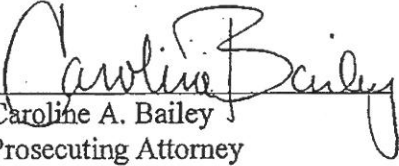
17. The parties acknowledge that other federal, state, and/or local agencies may have jurisdiction over the activities of, or representations made by, Respondent and its officers, directors, agents, employees or independent contractors. Nothing in this Consent Agreement or the Order based upon this Consent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

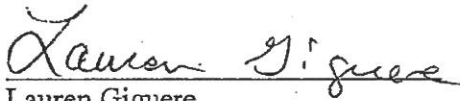
**ENTIRE AGREEMENT**

18. This agreement contains the whole agreement between the participants; 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.

VERIFICATION OF FACTS AND STATEMENTS

19. Respondent verifies that the facts and statements set forth in this Consent Agreement are true and correct to the best of Respondent's knowledge, information and belief. Respondent understands that statements in this Consent Agreement are made subject to the criminal penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

  
Caroline A. Bailey  
Prosecuting Attorney  
Department of State

  
Lauren Giguere  
Respondent

DATED: Jan 18, 2017

DATED: Jan 17, 2017



Lauren Giguere

DOCKET NO. -98-17  
FILE NO. 16-98-08632

**ORDER**

AND NOW, this 21<sup>ST</sup> day of FEBRUARY 2017 the foregoing Consent Agreement is approved and the terms set forth in paragraph 6 are hereby adopted and incorporated herein as the Order of the Secretary of the Commonwealth issued in resolution of this matter.

THIS ORDER shall take effect immediately.

BY ORDER:

A handwritten signature in cursive script that reads "Pedro A. Cortés".

Pedro A. Cortés  
Secretary of the Commonwealth

For the Commonwealth:

Caroline A. Bailey, Esquire  
306 North Office Building  
Harrisburg, PA 17120

Respondent:

Lauren Giguere  
5513 Hoffman Rd  
Schnecksville, PA 18078

Date of mailing: 2.22.17



Commonwealth of Pennsylvania  
Department of State

Bureau of Charitable Organizations  
207 North Office Building  
Harrisburg, Pennsylvania 17120

Telephone: (717) 788-1720  
(800) 792-0999 (within PA only)  
Fax: (717) 783-6014  
Website: www.dos.state.pa.us/charities  
Traoy L. McCurdy, Director

For Official Use Only	
Approved:	_____
RF:	_____
AF:	_____
LF:	_____
Fee Received:	_____

Charitable Organization Registration Statement - Form BCO-10

Check if registering voluntarily  
(See note under "Important Information.")

Certificate Number: 15928  
(Renewals Only)

Fiscal Year Ended: 06 / 30 / 15

Employer Identification Number (EIN): 23-2041406

1. Legal name of organization: ALLIANCE FOR BUILDING COMMUNITIES, INC

Check if name change Previous name: \_\_\_\_\_

2. All other names used to solicit contributions: NONE

PA DEPT. OF STATE

FEB 22 2018

3. Contact person: GERALD ALFANO

Contact's E-mail: Galfano@housing-abo.org

Physical address of organization: (Required) Mailing address: (if different than physical)

801 HAMILTON ST

SUITE 400

City: ALLENTOWN

City: \_\_\_\_\_

State: PA Zip code: 18101

State: \_\_\_\_\_ Zip code: \_\_\_\_\_

County: \_\_\_\_\_

800 number: \_\_\_\_\_

Phone number: 610-439-7007

Fax number: \_\_\_\_\_

E-mail (if different than Contact's E-mail): \_\_\_\_\_

Website: \_\_\_\_\_

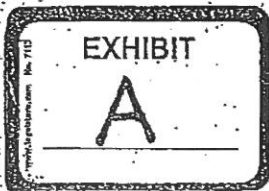
4. Names, addresses, and telephone numbers of all offices, chapters, branches, auxiliaries, affiliates, or other subordinate units located in Pennsylvania: (Attach separate sheet if necessary)

SEE FEDERAL FORM 990 SCHEDULE R

BCO\_10



TT678554



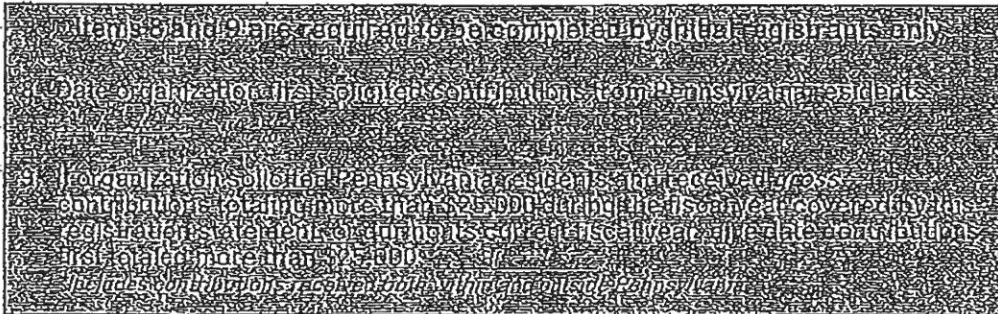
5. For Organizations described in Section 162.7(a) of the Act, check section that describes organization: (See footnote #2 of Instructions. Volunteer registrants do not respond.)

162.7(a)(1)  162.7(a)(2)   
162.7(a)(3)  162.7(a)(4)  Not Applicable

6. List type of organization (e.g. corporation, association, etc.): \_\_\_\_\_  
Where established: PA Date established: \*\* 7/1/78  
*\*\*Initial registrants must submit copies of organizational documents such as charter, articles of incorporation, constitution, or other organizational instrument, and by-laws.*

7. Is any person compensated, or do you intend to compensate any person, for soliciting contributions in Pennsylvania, including employees of the organization and professional solicitors? Yes  No  (Do not check "Yes" if you only use or intend to only use a professional fundraising counsel.)

If "Yes", give date person or entity started or will start soliciting contributions from Pennsylvania residents.     /    /    



10. Has organization been granted IRS tax-exempt status? Yes  No  (If "Yes", please submit copy of IRS exemption letter if not previously submitted.)

A. If "Yes", under which IRS code section: 501(C)(3)

B. Has organization's tax-exempt status ever been denied, revoked, or modified? Yes  No  (If "Yes" attach copy of denial, revocation, or modification.)

11. Was the organization required to file an IRS 990 return and applicable schedules for its most recently completed fiscal year? Yes  No

(If "No", attach explanation of why organization is exempt from filing an IRS 990 return. An organization that is not required to file an IRS 990 return must file a Pennsylvania public disclosure form BCO-23. This includes an organization that files a 990N, 990EZ, or 990PF.)

12. A clear description of the specific programs for which contributions will be used, and a statement whether such programs are planned or in existence:

To provide innovative leadership in developing quality, affordable housing and in creating community  
partnerships that stimulate and sustain healthy neighborhoods where people have the opportunity to invest  
their time, resources & spirit

13. Manner in which contributions are solicited (e.g. direct mail, telephone, internet, etc.):

WRITTEN GRANT PROPOSALS

14. Is organization registered to solicit contributions in any other state or municipality? Yes  No  (If "Yes", list all states and municipalities. Attach separate sheet if necessary.)

15. Names, addresses, and telephone numbers of all professional solicitors you use or intend to use to solicit contributions from Pennsylvania residents. For each entry, include the beginning and ending dates of all contracts, and dates Pennsylvania residents were first solicited, or will be solicited; (Attach separate sheet if necessary)

Lauren Giguere, 5513 Hoffman Dr, Schnecksville, PA

Contract start January 2011 open ended

16. Names, addresses, and telephone numbers of all professional fundraising counsels you use or intend to use to provide services with respect to the solicitation of contributions from Pennsylvania residents. For each entry, include the beginning and ending dates of all contracts, and dates services began, or will begin, with respect to soliciting contributions from Pennsylvania residents; (Attach separate sheet if necessary)

NONE

17. Names, addresses, and telephone numbers of any commercial coventurers under contract with your organization:

NONE



18. If you are a parent organization located in Pennsylvania, do you elect to file a combined registration covering all of your Pennsylvania affiliates?

Yes  No  Not Applicable  (See note under "Important Information")

If "Yes", give all names and certificate numbers of your affiliate organizations:  
(For each affiliate whose parent organization files a Form IRS 990 group return, it must file a form BCO-23, in addition to filing a copy of the organization's Form IRS 990 return.)

19. Are you a Pennsylvania affiliate of a parent organization, which elected to file a combined registration on your behalf? Yes  No  (See note under "Important Information")

If "Yes", provide the name and, if available, certificate # of your parent organization. (For each affiliate whose parent organization files a Form IRS 990 group return, it must file a form BCO-23, in addition to filing a copy of the organization's Form IRS 990 return.)

\_\_\_\_\_  
(Legal name of parent organization)

\_\_\_\_\_  
(Certificate #)

20. Does your organization share contributions or other revenue with any other nonprofit corporation or unincorporated association? Yes  No  (If "Yes", attach an explanation listing name, address, type of organization, and relationship to your organization.)

21. Does your organization share formal governance with any other nonprofit corporation or unincorporated association? Yes  No  (If "Yes", attach an explanation listing name, address, type of organization, and relationship to your organization.)

22. Does any other domestic or foreign organization own a 10% or greater interest in your organization? Yes  No  (If "Yes", attach the following information for each other domestic or foreign organization: name and type of organization, whether organization is for-profit or nonprofit, and relationship of organization to your organization.)

23. Does your organization own a 10% or greater interest in any other domestic or foreign organization? Yes  No  (If "Yes", attach the following information for each other domestic or foreign organization: name and type of organization, whether organization is for-profit or nonprofit, and relationship of organization to your organization.)

24. Provide the names and addresses of all officers, directors, trustees, and principal salaried executive staff officers: (Attach separate sheet if necessary)

\_\_\_\_\_  
See federal form 990 page 7  
\_\_\_\_\_  
\_\_\_\_\_



25. Names and addresses for: (Attach separate sheet if necessary)

A. Individual(s) in charge of solicitation activities:

Gerald Alfano

B. Individual(s) with final responsibility for the custody of contributions:

Gerald Alfano

C. Individual(s) with final responsibility for final distribution of contributions:

Gerald Alfano

D. Individual(s) responsible for custody of financial records:

Gerald Alfano

26. If you answer "Yes" to any of the following, attach a list of related individuals with names, business, and residence addresses of related parties. Are any officers, directors, trustees, or employees related by blood, marriage, or adoption to:

A. Any other officer, director, trustee, or employee? Yes  No

B. Any officer, agent, or employee of any professional fundraising counsel or solicitor under contract with organization? Yes  No

C. Any supplier or vendor providing goods or services? Yes  No

27. If you answer "Yes" to any of the following, attach full written explanations, including reasons for actions, and copies of all relevant documents. Has organization or any of its present officers, directors, executive personnel, trustees, employees, or fundraisers:

A. Been found to have engaged in unlawful practices in the solicitation of contributions or administration of charitable assets or been enjoined from soliciting contributions or are such proceedings pending in this or any other jurisdiction? Yes  No

B. Had its registration or license to solicit contributions denied, suspended, or revoked by any governmental agency? Yes  No

C. Entered into any legally enforceable agreement such as a consent agreement, an assurance of voluntary compliance or discontinuance with any district attorney, Office of Attorney General, or other local or state governmental agency? Yes  No

I certify that the information provided in this registration, including all statements and documentation, is true and correct. I understand that the falsification of any statement or documentation is subject to criminal penalties for unsworn falsifications pursuant to 18 PA. C.S. § 4904.

BLA  
Signature of Chief Fiscal Officer

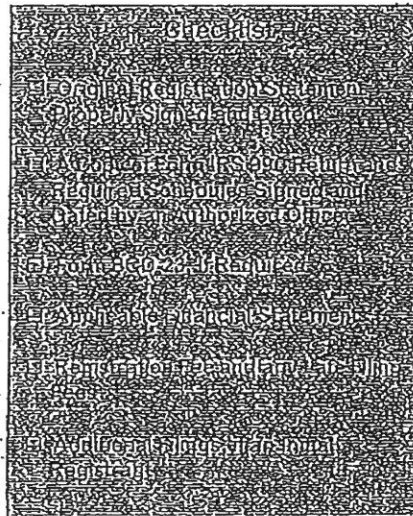
Date 1/29/16

Brad Fattinger  
Type or Print Name and Title of Chief  
Fiscal Officer

[Signature]  
Signature of Another Authorized Officer

Date 09 JAN 2016

GERALD ALFARO  
Type or Print Name and Title of  
Another Authorized Officer



Leyder, Gail

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From: Leyder, Gail  
Sent: Wednesday, May 11, 2016 10:52 AM  
To: 'GAlfano@housing-abc.org'  
Subject: Professional Solicitor contract needed

Mr. Alfano,

Per our conversation this morning, please provide a copy of the open ended contract Alliance Building Communities, Inc had with Professional Solicitor Lauren Giguere which started January 2011. It is my understanding from speaking with you about this, that your company stopped using her services on January 1, 2016.

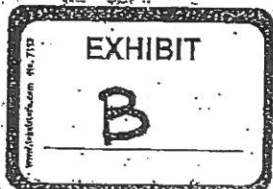
Please note that if you hire another professional solicitor or professional fundraising counsel to solicit for your organization, they must register and file the contract with the Department of State prior to providing any services for you. It is also your responsibility to keep copies of those contracts. You can obtain further information and a registration packet by visiting the Bureau's website at <http://www.dos.state.pa.us/charities>.

If you have any questions, call me at my direct line listed below.

Thank you in advance for your cooperation,

Gail R. Leyder | Special Investigator II  
Department of State | Division of Investigations  
212 North Office Bldg | Harrisburg, PA 17120  
717.787.0701 phone | 717.705.8526 fax  
[www.dos.pa.gov](http://www.dos.pa.gov)

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May 11, 2016

CERTIFIED MAIL

9171 9690 0935 0047 4701 60

Lauren Giguere  
5513 Hoffman Drive  
Schnecksville, PA 18078

16-026  
Re: ~~16-026~~

Dear Ms. Giguere:

The Pennsylvania Bureau of Corporations and Charitable Organizations has received evidence that you may be violating the Solicitation of Funds for Charitable Purposes Act (Act), 10 P.S. §162.1 *et seq.*, by providing professional solicitor services and/or professional fundraising counsel services in Pennsylvania for one or more charitable organizations without being registered.

The Act requires the registration of all professional solicitors who are retained by a charitable organization to solicit charitable contributions in Pennsylvania and all professional fundraising counsels that provide services for charitable organizations which solicit contributions in Pennsylvania to be registered with the Bureau and have copies of all contracts on file.

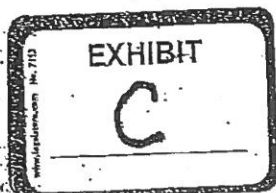
You can obtain further information and a registration packet by visiting the Bureau's website at <http://www.dos.state.pa.us/charities>. If you do not have access to the Internet, you may request a registration packet by calling me directly at (717) 787-0701. Please contact Brian Aumiller of the Bureau at (717) 783-1720 if you need assistance completing the registration materials.

If you do not return a completed registration statement within 30 days or provide evidence that your company is not required to register, a Cease and Desist Order will be issued ordering your company to stop all soliciting and services on behalf of charitable organizations soliciting contributions in Pennsylvania. Section 17 (b)(3) of the Act, 10 P. S. § 162.17 (b)(3), authorizes the Bureau to impose fines of up to \$1,000 per violation and additional penalties of up to \$100 per day. I urge you to give this matter your immediate attention.

If you have any questions, you can contact me directly at 717-787-0701. I look forward to your prompt cooperation and thank you in advance for your time and attention.

Sincerely,

*Gail R. Leyder*  
Gail R. Leyder  
Special Investigator



Leyder, Gail

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From: sav <mgig5050@aol.com>  
Sent: Wednesday, June 08, 2016 5:43 PM.  
To: Leyder, Gail  
Subject: Re: For Lauren - Proposal to Alliance

Ms Leyder:

Thank you for your time today. I just did a search for the proposal I submitted to Alliance for Building Communities. But I can tell you it

was for \$24,000 per year for the last three years and the year before that was for \$18,000 for 9 months. I provided grant writing services and if it was an electronic submission, I actually submitted the grant via the computer. I was paid in equal payments on a monthly basis.

Lauren Giguere

-----Original Message-----

From: Leyder, Gail <gleyder@pa.gov>  
To: 'MGIG5050@aol.com' <MGIG5050@aol.com>  
Sent: Wed, Jun 8, 2016 9:41 am  
Subject: For Lauren - Proposal to Alliance

Ms. Giguere,

Per our phone conversation this morning, please email me a copy of the Proposal you submitted to Alliance For Building Communities. If you can't locate the Proposal, please state in your return email that you never had a contract With ABC and details (date, payment, and services provided) of the proposal.

Thank you in advance for your cooperation,

Gail R. Leyder | Special Investigator II  
Department of State | Division of Investigations  
212 North Office Bldg | Harrisburg, PA 17120  
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