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

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Department of State

Commonwealth of Pennsylvania
Bureau of Charitable Organizations

v.

United States Burn Support Organization,
Respondent

Docket No. 0042-98-10
File No. 10-98-05561

FINAL ADJUDICATION AND ORDER

Basil L. Merenda
Secretary of the Commonwealth

302 North Office Building
Harrisburg, PA 17120
(717)787-7630

HISTORY

This matter comes before the Secretary of the Commonwealth ("Secretary") on an order to show cause filed July 14, 2010, alleging that the United States Burn Support Organization ("Respondent") 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), on two occasions by and through 10 P.S. § 162.12, first by failing to provide certain information requested for inspection by investigative subpoena by the Bureau of Charitable Organizations (Bureau). The order to show cause also alleges that Respondent violated the Act at 10 P.S. §162.15(a)(1), on two occasions by and through 10 P.S. §162.17(a)(2), by failing to provide the Bureau with information requested by investigative subpoena. Further, the order to show cause alleges that Respondent violated the Act at 10 P.S. §162.15(a)(2) by utilizing any unfair or deceptive acts or practices or engaging in any fraudulent conduct which creates a likelihood of confusion or of misunderstanding. Finally, the order to show cause alleges that Respondent violated the Act at 10 P.S. §162.15(a)(6) by misrepresenting or misleading anyone in any manner to believe that any other person sponsors, endorses or approves such solicitation or charitable sales promotion when such other person has not given consent in writing to the use of his name for these purposes.

On October 26, 2010, 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 the order to show cause or the motion to enter default and deem facts admitted. 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 FACT

1. This matter is before the 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.* (Order to show cause ¶ 1).
2. Respondent United States Burn Support Organization's (hereinafter "Respondent" or "USBSO") last known mailing address is P.O. Box 26001, Philadelphia, PA 19128. (Order to show cause ¶ 2).
3. Respondent is not registered as a charitable organization with the Bureau. (Order to show cause ¶ 3).
4. Respondent solicits charitable contributions in Pennsylvania. (Order to Show Cause, Exhibit A).
5. On or about September 8, 2008, the Bureau sent via certified mail, a letter² requesting information including but not limited to the total number of Pennsylvania residents that contributed to Respondent's organization since Respondent first solicited in the Commonwealth, as well as the total amount of contributions received from Pennsylvania residents since Respondent first solicited in the Commonwealth. (Order to show cause ¶ 4, Exhibit A).
6. On or about October 7, 2008, Respondent submitted an incomplete registration packet that did not contain all of the information requested in the Bureau's September 8, 2008 correspondence. (Order to show cause ¶ 6, Exhibit B).

² The Order to Show Cause refers to this correspondence throughout as an "investigative subpoena." However, this document was not a formal investigative subpoena issued under 10 P.S. § 162.16(a)(5). Thus, in the remaining finding of fact and conclusions of law, this document will be referred to as "correspondence."

7. On or about October 22, 2008, the Bureau sent via certified mail, a letter³ requesting information including but not limited to answers to all applicable questions on the Form BCO-10 and Form BCO-23, and copies of Respondent's fiscal records. (Order to show cause ¶ 7, Exhibit B).

8. Respondent has not provided the Bureau with the information requested in the Bureau's October 22, 2008 correspondence. (Order to show cause ¶9).

9. Respondent maintains a website with a web address of: www.usburn.org. (Order to show cause ¶ 21).

10. Respondent's website is interactive and contains a "Donate" button. (Order to show cause ¶ 22).

11. On its website, Respondent lists numerous alleged sponsors, including the Philadelphia Fire Department and the Whitemarsh Township Fire Marshall. (Order to show cause ¶ 23).

12. Respondent was not authorized by either the Philadelphia Fire Department or the Whitemarsh Township Fire Marshall to list the Philadelphia Fire Department or the Whitemarsh Township Fire Marshall as sponsors on Respondent's website. (Order to show cause ¶ 24)

13. On or about September 11, 2008, the Philadelphia Fire Department sent Respondent a letter requesting that Respondent remove the Philadelphia Fire Department's name from the list of sponsors on Respondent's website. (Order to show cause ¶ 25, Exhibit C).

14. As of July 8, 2010, Respondent had not removed the Philadelphia Fire Department's name for the list of sponsors on Respondent's website. (Order to show cause ¶ 27)

³ The Order to Show Cause also refers to this correspondence throughout as an "investigative subpoena." However, this document was not a formal investigative subpoena issued under 10 P.S. § 162.16(a)(5). Thus, in the remaining finding of fact and conclusions of law, this document will be referred to as "correspondence."

15. Pursuant to the Certificate of Service attached to the order to show cause, the Commonwealth mailed one copy of the order to show cause via certified mail, return receipt requested and another copy via first class mail, postage prepaid, to Respondent at the following address: P.O. Box 26001, Philadelphia, PA 19128. (Motion to enter default and deem facts admitted ¶ 2; docket number 0042-98-10).

16. The Order to Show Cause sent to Respondent via certified mail, return receipt requested, was returned to the Bureau and marked "UNC" or unclaimed. (Motion to enter default and deem facts admitted ¶ 3).

17. The order to show cause sent to Respondent via first class mail, postage prepaid, was not returned to the Commonwealth. (Motion to enter default and deem facts admitted ¶ 5).

18. On September 23, 2010, the Commonwealth sent another copy of the Order to Show Cause via certified mail, return receipt requested, and a copy via first class mail, postage prepaid, to Respondent at the following address: 6329 Sherwood Road, Philadelphia, PA 19151. (Motion to enter default and deem facts admitted ¶ 6).

19. Respondent received the Order to Show Cause on September 25, 2010. (Motion to enter default and deem facts admitted ¶ 7).

20. 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 ¶ 8).

21. 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 ¶ 9).

22. Thirty (30) days from the date of the Order to Show Cause expired on August 13, 2010. (Motion to enter default and deem facts admitted ¶ 10).

23. On October 26, 2010, Respondent was served with a copy of the motion to enter default and deem facts admitted at the Sherwood Road address. (Motion to enter default, Certificate of service; docket number 0042-98-10).

24. As of the date of the motion to enter default and deem facts admitted, Respondent had filed no answer to the order to show cause. (Motion to enter default and deem facts admitted ¶ 11; docket number 0042-98-10).

25. Respondent did not file a response to the order to show cause or the motion to enter default and deem facts admitted. (Docket number 0042-98-10).

26. Respondent was served with all pleadings, orders and notices filed of record in this matter. (Docket number 0042-98-10).

CONCLUSIONS OF LAW

1. The Secretary has jurisdiction in this matter. (Findings of Fact 1-4).
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 15-26).
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 25).
4. Respondent is subject to disciplinary action under section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through section 12, for failing to provide the information requested in the Bureau's correspondence of September 8, 2008. (Findings of Fact 2-6).
5. Respondent is subject to disciplinary action under section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through section 17(a)(2), for failing to provide the information requested in the Bureau's correspondence of September 8, 2008. (Findings of Fact 2-6).
6. Respondent is subject to disciplinary action under section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through section 12, for failing to produce the records demanded of it by the Bureau in the Bureau's correspondence of October 22, 2008. (Findings of Fact 2-4, 7-8).
7. Respondent is subject to disciplinary action under section 15(a)(1) of the Act, 10 P.S. § 162.15(a)(1), by and through section 17(a)(2), for failing to provide the information requested in the Bureau's correspondence of October 22, 2008. (Findings of Fact 2-4, 7-8).
8. Respondent is subject to disciplinary action under section 15(a)(2) of the Act, 10 P.S. §162.15(a)(2), by utilizing an unfair or deceptive act or practice or engaging in fraudulent conduct which creates a likelihood of confusion or of misunderstanding. (Findings of Fact 9-14)

9. Respondent is subject to disciplinary action under section 15(a)(6) of the Act, 10 P.S. §162.15(a)(6), by misrepresenting or misleading the public to believe that any other person sponsors, endorses or approves such solicitation or charitable sales promotion when such other person has not given consent in writing to the use of his name for these purposes. (Findings of Fact 9-14)

DISCUSSION

I. STATUTORY AND REGULATORY PROVISIONS

This matter is before the 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 of six counts, alleging that Respondent violated the following provisions of the Act, which provide in pertinent part:

§162.12. Records to be kept by charitable organizations, professional fundraising counsels and professional solicitors; inspection; retention

Every charitable organization, professional fundraising counsel and professional solicitor subject to the provisions of this act shall, in accordance with the rules and regulations prescribed by the department, keep true fiscal records as to its activities in this Commonwealth as may be covered under this act, in such form as will enable them accurately to provide the information required under this act. Such records shall be made available for inspection upon demand by the department or the Office of Attorney General. ... Such records shall be maintained for a period of at least three years after the end of the period of registration to which they relate.

§ 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.

(2) Utilizing any unfair or deceptive acts or practices or engaging in any fraudulent conduct which creates a likelihood of confusion or of misunderstanding

* * *

(6) Misrepresenting or misleading anyone in any manner to believe that any other person sponsors, endorses or approves such solicitation or charitable sales promotion when such other person has not given consent in writing to the use of his name for these purposes.

* * *

§ 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.

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.

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), app. den., 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).

The copy of the order to show cause mailed to Respondent at the Sherwood Road address by certified mail, return receipt requested, was signed for by a Philip Jaswer. Postal Form 3811, Article# 7010 1670 0000 1225 9796 shows that Respondent received the Order on September 25, 2010. Additionally, the order to show cause mailed by first class mail has not been returned to the Commonwealth. Therefore, the Secretary finds that Respondent received actual 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 be 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 admitted the factual allegations contained in the order to show and grants the motion to enter default and deem facts admitted against Respondent.

III. ANALYSIS AND SANCTION

In counts one through four of the order to show cause, the Commonwealth charges that Respondent violated the Act at 10 P.S. §162.15(a)(1), which generally prohibits charitable organizations from operating in violation of, or failing to comply with, any of the requirements of the Act.

In count one, the Commonwealth specifically charges that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.12, "by failing to provide all information requested for inspection by the Bureau in the Bureau's September 8, 2008 investigative subpoena [correspondence]." Section 12 of the Act [10 P.S. §162.12] requires a charitable organization to "keep true fiscal records as to its activities in this Commonwealth" and to make them available for inspection "upon demand" by the Bureau. The Bureau's September 8, 2008 correspondence, which is Exhibit A to the order to show cause, stated that USBSO was soliciting contributions in Pennsylvania and was therefore required to register with the Bureau. The letter also requested the total number of Pennsylvania contributors, the total amount of contributions from Pennsylvania citizens and businesses and copies of all contracts between the charity and any professional fundraising counsel or solicitors in Pennsylvania. The items requested are clearly fiscal records as contemplated by section 12 of the Act. A "demand" by the Bureau to inspect those records may be in the forms of a letter or a formal subpoena. Respondent's failure to provide these

records for inspection establishes a violation of 10 P.S. §162.15(a)(1) by and through 10 P.S. §162.12, and Respondent is thus subject to disciplinary action on count one.

In count two, the Commonwealth charges that Respondent violated the Act at section 17(a)(2), 10 P.S. §162.17(a)(2), by “failing to provide all information requested for inspection by the Bureau in the Bureau’s September 8, 2010 [sic] investigative subpoena [correspondence].”⁴ The Act requires charitable organizations soliciting funds in Pennsylvania to register with the Bureau, and pursuant to that registration, the organizations must provide certain information required by law. 10 P.S. §162.5. If the Bureau gives notice to a charitable organization that the law requires it to register and to provide certain information, and the Bureau requests the organization to provide that information, and if the organization does not provide that information, then the organization has violated 10 P.S. §162.17(a)(2).

Here, the Bureau both provided notice to Respondent, with its September 8, 2008 letter, that USBSO was required to register under the Act. The Act required Respondent to furnish certain information. The Bureau requested this information via the September 8, 2008 correspondence. Respondent has never provided the information. These facts establish a violation of 10 P.S. §162.17(a)(2), by Respondent’s failing to provide the information requested in the Bureau’s September 8, 2008 correspondence.

In count three, the Commonwealth charges that Respondent violated the Act at 10 P.S. §162.15(a)(1), by and through 10 P.S. §162.12, “by failing to provide the information requested for inspection by the Bureau in the Bureau’s October 22, 2008 investigative subpoena

⁴ In counts two and four, the order to show cause misstates the year of the Bureau’s letters to be 2010. These counts should read 2008, the year in which the correspondence was actually sent, as evidenced by Exhibits A and B.

[correspondence].” Again, section 12 of the Act [10 P.S. §162.12] requires a charitable organization such as USBSO to “keep true fiscal records as to its activities in this Commonwealth” and to provide them on demand by the Bureau. The Bureau’s October 22, 2008 correspondence (Exhibit B to the order to show cause) pointed out discrepancies in Respondent’s registration statement and requested sponsor contact information, names and addresses of all contributors, dates and amounts of first year expenditures, bank statements and evidence of the charity’s appointment as the United Nations High Commissioner for Burns. While this list includes more than fiscal records, the vast majority of the information requested by the Bureau was fiscal records of the nature required to be kept by section 12 of the Act. Respondent never provided these records for inspection. Therefore, count three establishes a violation of 10 P.S. §162.15(a)(1) by and through 10 P.S. §162.12, and Respondent is thus subject to disciplinary action on that count.

In count four, the Commonwealth charges that Respondent violated the Act at section 17(a)(2), 10 P.S. §162.17(a)(2), by “failing to provide all information requested for inspection by the Bureau in the Bureau’s October 22, 2010 [sic] investigative subpoena (correspondence).” As discussed in count two, the Act requires charitable organizations soliciting funds in Pennsylvania to register with the Bureau, and pursuant to that registration, the organizations must provide certain information required by law. 10 P.S. §162.5. The Bureau, in its correspondence of October 22, 2010 (Exhibit B to the order to show cause), both provided notice that Respondent was required to provide certain information to the Bureau pursuant to its legal obligation to register and requested that Respondent provide that information. These facts establish a violation

of 10 P.S. §162.15(a)(1), by and through 10 P.S. § 162.17(a)(2), and Respondent is thus subject to disciplinary action on count four.

In count five, the Commonwealth alleges that Respondent violated the Act at 10 P.S. §162.15(a)(2), “by utilizing any unfair or deceptive acts or practices or engaging in any fraudulent conduct which creates a likelihood of confusion or of misunderstanding.” “Deceptive” means “perceptually misleading.”⁵ The order to show cause alleges that Respondent lists the Philadelphia Fire Department among its sponsors on its website; however, Respondent was not authorized by the Fire Department to do so and the Fire Commissioner of the Philadelphia Fire Department expressly disavows any continuing relationship with Respondent and requests Respondent to remove the Philadelphia Fire Department from its list of sponsors (Exhibit C to the Order to Show Cause). Thus, Respondent’s continued listing on its website of the Philadelphia Fire Department as one of its sponsors is a misleading and deceptive act which is likely to cause the public to believe that the Philadelphia Fire Department does sponsor Respondent, when such is in fact not the case. Therefore, Respondent is thus subject to disciplinary action for violation of 10 P.S. §162.15(a)(2).

In count six, the Commonwealth charges that Respondent violated the Act at 10 P.S. §162.15(a)(6), “by misrepresenting or misleading anyone in any manner to believe that any other person⁶ sponsors, endorses or approves such solicitation or charitable sales promotion when such other person has not given consent in writing to the use of his name for these purposes.” Respondent listed the Philadelphia Fire Department on its website as one of its sponsors, when

⁵ Dictionary.com, <http://dictionary.reference.com/browse/deceptive>.

⁶ The Philadelphia Fire Department is a “person” for purposes of the Act. *See* 10 P.S. §162.3.

the Fire Department had not consented and indeed objected in writing to being listed as a sponsor. Also, Respondent solicits contributions on its website by means of the "donate" button, on which users can click in order to make donations to Respondent. These two factors taken together plausibly indicate to a user of Respondent's website that the Philadelphia Fire Department, by way of its alleged sponsorship of Respondent, also "sponsors, endorses, or approves" the solicitation of donations on Respondent's website. Therefore, Respondent subject to disciplinary action for violation of 10 P.S. §162.15(a)(6).

In assigning a sanction, the Secretary weighs the number and seriousness of the violations against any mitigating evidence. Respondent did not offer any mitigating evidence. The Commonwealth requests that the Secretary impose upon Respondent an appropriate penalty for the actions set forth in the order to show cause. Section 17(b)(3) of the Act, 10 P.S. §162.17(b)(3), authorizes the Secretary to "impose an administrative fine not to exceed \$1,000 for each act or omission which constitutes a violation of [the] Act." Respondent on two occasions failed to provide the Bureau with fiscal records as to USBSO's activities in the Commonwealth, after the Bureau sent correspondence requesting specified records and information required to be retained by the charity and to be included with any charity's registration statement. The Bureau's two demands for the specified information were both ignored by Respondent. This was charged as, and may be reasonably found to constitute, four distinct violations of the Act.

Respondent's violations of 10 P.S. §162.15(a)(2) and (6) are also two distinct violations of the Act. United States Burn Support Organization listed numerous alleged sponsors on its website, including the Philadelphia Fire Department and the Whitemarsh Township Fire

Marshall, when it was not authorized to do. This action is deceptive and misleading to the public, representing a sponsorship relationship where none exists. This also thwarts the very intent of the

Act, which is to:

not merely require proper registration of charitable organizations, professional fundraisers and professional solicitors, but shall protect the citizens of this Commonwealth by requiring full public disclosure of the identity of persons who solicit contributions from the public, the purposes for which such contributions are solicited and the manner in which they are actually used, by promoting consumer education about charitable concerns, by providing civil and criminal penalties for deception and dishonest statements and conduct in the solicitation and reporting of contributions for or in the name of charitable purposes and by publicizing matters relating to fraud, deception and misrepresentation perpetrated in the name of charity

Accordingly, based on the foregoing findings of fact, 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.

United States Burn Support Organization,
Respondent

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: Docket No. 0042 -98-10
: File No. 10-98-05561
:
:

ORDER

AND NOW, this 30th day of November, 2010, upon consideration of the foregoing findings of fact, conclusions of law and discussion, it is hereby **ORDERED** that:

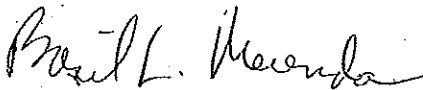
(1) United States Burn Support Organization, its successors, agents or affiliates, shall **CEASE and DESIST** from all manner of fundraising and solicitation activities in this Commonwealth, until such time as all information requested by the Bureau has been provided, all penalties imposed below are paid in full and United States Burn Support Organization comes into full compliance with all provisions of the Act, including proper registration.

(2) An **administrative fine** in the amount of **\$6,000.00** shall be imposed upon United States Burn Support Organization and/or its successors. 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 H. Brown, Assistant Counsel
Pennsylvania Department of State
Office of Chief Counsel
301 North Office Building
Harrisburg, PA 17120

Appeal of this decision to the Commonwealth Court may be taken pursuant to 2 Pa.C.S. §702 within 30 days of the date of mailing shown below.

BY ORDER:



Basil L. Merenda
Secretary of the Commonwealth

Respondent:

United States Burn Support Organization
P.O. Box 26001
Philadelphia, PA 19128

and

United States Burn Support Organization
6329 Sherwood Road
Philadelphia, PA 19151

For the Commonwealth

Jacquelyn E. Pfursich, Prosecuting Attorney
Commonwealth of Pennsylvania
Department of State
212 North Office Building
Harrisburg, PA 17120

Date of Mailing:

November 30, 2010