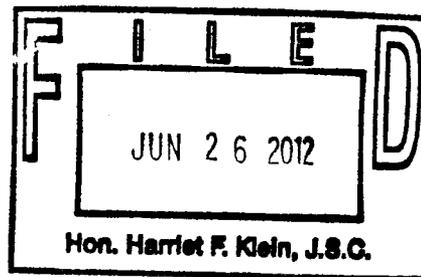


JEFFREY S. CHIESA
ATTORNEY GENERAL OF NEW JERSEY
Division of Law
25 Market Street
POB 112
Trenton, NJ 08625-0112



Anna M. Lascurain
Deputy Attorney General
609-292-0717

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
ESSEX COUNTY
DOCKET NO.: C-77-12

JEFFREY S. CHIESA, Attorney General:
of New Jersey, and ERIC T. KANEFSKY:
Acting Director of the New Jersey :
Division of Consumer Affairs, :
: :
Plaintiffs : **FINAL JUDGMENT**
: :
v. : :
: :
PAUL GROSSI, : :
and PJG ENTERPRISES, LLC. : :
Defendants :

THIS MATTER was presented before the Court by Attorney General Jeffrey S. Chiesa, on behalf of Eric T. Kanefsky, Acting Director of the New Jersey Division of Consumer Affairs (collectively the "Plaintiffs"), (Anna M. Lascurain, Deputy Attorney General appearing), by filing a Verified Complaint and an Order to Show Cause with Temporary Restraints, pursuant to R:4-52-1, against Paul

Grossi and PJG Enterprises, LLC.(collectively "the Defendants") (Geoffrey Evans, Esq, appearing).

On April 18, 2012, the Court entered an Order granting temporary restraints, *inter alia*, and a partial asset freeze against the Defendants for numerous violations of the Charitable Registration and Investigation Act, N.J.S.A.45:17A-18 et seq. ("Charities Act"). After the entry of the Order, the Plaintiffs and the Defendants agreed to resolve any and all issues in controversy in this action on the terms set forth in this Final Judgment.

FACTUAL FINDINGS

1. The Defendants admit to the factual findings set forth herein:
 - a) Defendant, PJG Enterprises, LLC. ("PJG"), a New Jersey limited liability corporation, had a principal place of business located at 387 Passaic Avenue, Fairfield, New Jersey.
 - b) Defendant, Paul Grossi ("Grossi"), is the owner and operator of PJG and has personally controlled, managed, and participated in PJG's business operations including the operations giving rise to the violations alleged in this action.
 - c) PJG was never registered as an Independent Paid Fund Raiser ("IPFR") with the Charities Registration and Investigation Unit ("Charities Unit") as required by

N.J.S.A. 45:17A-27(a). The registration of Grossi's prior company, known as PJG Promotions, LLC ("Promotions, LLC"), expired in 2009. Grossi was last registered as characterized himself as "professional solicitor" (sic) for Promotions, LLC in June 2005.

- d) The Defendants, acting as unregistered IPFRs solicited on behalf of the following charitable organizations: American Breast Cancer Federation; Children's Cancer Assistance Network; American Veteran's Foundation; Operation Lookout for Missing Children; Our American Veterans; Breast Cancer Assistance Network and Association for Police Officers (collectively referred to herein as the "Unregistered Charities").
- e) None of the Unregistered Charities on whose behalf the Defendants solicited contributions were registered as charitable organizations to do business within the New Jersey pursuant to N.J.S.A. 45:17A-23(6)(a).
- f) Grossi operated PJG and solicited contributions on behalf of the Unregistered Charities without having filed a bond with the Charities Unit as required by N.J.S.A. 45:17a-27(g).
- g) In his operation of PJG, Grossi failed to exercise control over fund raising activities in violation of N.J.S.A. 45:17A-31(a) by failing to keep adequate books

and records and failing to comply with the Division of Consumer Affairs' November 10, 2011 subpoenas directing production of those books and records.

- h) Grossi operated PJG and solicited on behalf of the Unregistered Charities using solicitors who were not registered in violation of N.J.S.A. 45:17A-28.
- i) Grossi represented to investigators from the Charities Unit that he was not soliciting in New Jersey when he was, in fact, doing so.
- j) PJG, through Grossi, failed to file an annual registration statement pursuant to N.J.S.A. 45:17A-20.
- k) At this time, there has been no determination that Grossi received money designated for a charitable organization.

PERMANENT INJUNCTIVE RELIEF

- 2. Defendants are found to have engaged in the conduct alleged in the Verified Complaint.
- 3. Defendants, PJG and Grossi, their agents, employees, partners, officers, directors, attorneys, stockholders, successors, and/or any person who is directly or indirectly under their control or direction, are permanently restrained and enjoined from directly or indirectly violating the Charities Act and from directly or indirectly engaging in the following conduct:

- (a) soliciting or promoting any charities to, from, or within the State of New Jersey;
- (b) acting as an unregistered IPFR to, from, or within the State of New Jersey;
- (c) employing unregistered solicitors in the State of New Jersey; and
- (d) conducting any fund raising organization to, from or within the State of New Jersey.

CIVIL MONETARY PENALTY

- 4. Defendants PJG and Grossi shall be jointly and severally liable for the payment of a civil monetary penalty in the amount of \$15,000 pursuant to N.J.S.A. 17A:338(d). This will consist of an immediate lump sum payment of \$5000 on or before 10 days after the entry of the Consent Judgment, and the remainder shall be suspended.
- 5. All payments shall be made by attorney trust account check, bank check or other guaranteed funds and be sent to:
 - Lawrence J. Biondo, Supervising Investigator
 - Office of Consumer Protection
 - Division of Consumer Affairs
 - 124 Halsey Street - 7th Floor
 - P.O. Box 45025
 - Newark, NJ 07101
- 6. In the event that the Defendants default in making a the civil penalty payment on time or in full, or fail to comply with any other provision of this final judgment, the entire unpaid portion of the total civil penalty amount shall be

immediately due and payable along with post judgment interest as set forth in R. 4:42-11.

ASSET FREEZE

7. Paragraph 5 of the April 18, 2012 Order to Show Cause with Temporary Restraints, which provided for an asset freeze limited to assets which did not include PJG's employees located in States other than New Jersey, shall be vacated upon the submission by the Defendants to the Plaintiffs a letter representing the source of his present income, if any. Grossi shall co-sign this letter attesting to the truth of the representation of financial hardship.

FINAL JUDGMENT

8. Final judgment in the amount of \$15,000 is entered against the Defendants. Should defendants fail to make timely payment as described in paragraph 4 of this Final Judgment, Plaintiffs may enforce collection of the judgment in accordance with applicable law.

GENERAL PROVISIONS

9. Defendant Grossi's liability to pay the civil monetary penalty, pursuant to this Final Judgment, and shall be non-dischargeable in bankruptcy.
10. The findings of fact and the terms of this Final Judgment may be disclosed and are admissible as evidence against Defendant

Grossi in any subsequent civil, criminal, administrative or any other action or proceeding against him.

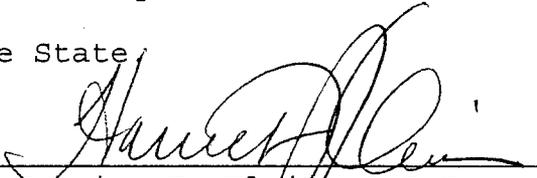
11. This Final Judgment applies to and is binding upon Defendants Grossi and PJG.
12. The parties acknowledge that for the purpose of enforcement of this Final Judgment, New Jersey Law shall govern the terms and provisions herein.
13. The parties represent that an authorized representative of each has signed this Final Judgment with full knowledge, understanding and acceptance of its terms and that this person has done so with authority to legally bind the respective party.
14. This Final Judgment constitutes the entire agreement among the parties with respect to its subject matter. Any addition, deletion or change to this Final Judgment must be in writing and signed by all parties to be bound and approved and signed by the Court.
15. This Final Judgment is entered into by the Parties as their own free and voluntary act and with full knowledge and understanding of the obligations and duties imposed by this Final Judgment.
16. The Parties have negotiated, jointly drafted and fully reviewed the terms of this Final Judgment and the rule that uncertainty or ambiguity is to be construed against the

drafter shall not apply to the construction or interpretation of this Final Judgment.

17. As used in this Final Judgment, the plural shall include the singular and the singular shall include the plural. In addition, "or" and "and" shall be interpreted conjunctively.

18. Except as otherwise explicitly provided in this Final Judgment, nothing herein shall be construed to limit the authority of the Attorney General to protect the interests of the State or the people of the State.

Dated: June 26, 2012



Harriet F. Klein, J.S.C.

We consent to the form and entry of this Final Judgment.

Casha & Casha

Dated: _____

By: _____
Geoffrey C. Evans, Esq.
On behalf of the Defendants

JEFFREY S. CHIESA
ATTORNEY GENERAL OF NEW JERSEY

Dated: 6/12/2012

By: 

Anna M. Lascurain
Deputy Attorney General
On behalf of the Plaintiffs

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Dated: _____

Harriet F. Klein, J.S.C.

We consent to the form and entry of this Final Judgment.

Casha & Casha

Dated: June 8 2012

By: [Signature]
Geoffrey C. Evans, Esq.
On behalf of the Defendants

JEFFREY S. CHIESA
ATTORNEY GENERAL OF NEW JERSEY

Dated: _____

By: _____
Anna M. Lascurain
Deputy Attorney General
On behalf of the Plaintiffs